



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

National Marine Fisheries Service

P.O. Box 21668

Juneau, Alaska 99802-1668

February 10, 2009

Ms. Leslie Grey
Federal Aviation Administration
222 West 7th Avenue # 14
Anchorage, Alaska 99513-7587

Re: Angoon Airport Environmental Impact
Statement Scoping Comments

Dear Ms. Grey:

The National Marine Fisheries Service (NMFS) has reviewed the scoping material for the Angoon Airport Environmental Impact Statement (EIS).

Background

The Alaska Department of Transportation and Public Facilities' (ADOT&PF) 2007 Angoon Airport Master Plan analyzed twelve potential runway sites, and identified a site on the east side of Favorite Bay as ADOT&PF's Master Plan Preferred Site. This site was presented to the Federal Aviation Administration (FAA) as the Proposed Action for the EIS process. In 2008, FAA conducted wind data collection and supplemental airport planning to confirm whether this Master Plan Preferred Site would meet project purpose and need while being both reasonable and prudent. This supplemental planning also identified three additional alternative sites that would meet project purpose and need while addressing various human and natural resource concerns. The 15 preliminary alternative sites were presented to the public and agency for consideration during the EIS scoping meetings in October 2008. These sites include three locations across Favorite Bay from Angoon on Admiralty Island National Monument / Kootznoowoo Wilderness lands, and one location near the City of Angoon on Kootznoowoo, Inc. and private land. These sites were identified during scoping as Sites 3, 3a, and 4 (the three sites across Favorite Bay) and 12A (the site near Angoon). Sites located across Favorite Bay would require construction of between four and six miles of new road to access the airport. A new access road would cross either Favorite Bay or Favorite Creek, both of which are important subsistence resources for the residents of Angoon. Because Site 12 is on the peninsula near the existing Angoon road system, it would only require construction of a small spur road.

Essential Fish Habitat (EFH) Consultation Process

Section 305 (b) of the Magnuson-Stevens Fishery Conservation and Management Act (MSFCMA) requires federal agencies to consult with NMFS on all actions that may adversely affect EFH. EFH is defined as those waters and substrate necessary to fish for spawning, breeding, feeding, or growth to maturity (MSA § 3(10)). For any action that may adversely affect EFH, the action agency must provide NMFS with a written assessment of the effects of that action on EFH. The



EFH Assessment can be contained within the EIS; if so it should be clearly identified as a discrete part of the document.

The EFH Assessment must contain:

1. A description of the proposed action.
2. An analysis of the potential adverse effects of the action on EFH and managed species.
3. The federal action agency's conclusions regarding the effects of the action on EFH.
4. Proposed mitigation, if applicable.

If appropriate, the assessment should also include:

1. The results of an on-site inspection to evaluate the habitat and the site-specific effects of the project.
2. The views of recognized experts on the habitat or species that may be affected.
3. A review of pertinent literature and related information.
4. An analysis of alternatives to the action. Such analysis should include alternatives that could avoid or minimize adverse effects on EFH.
5. Other relevant information.

Under Section 305(b)(4) of the MSFCMA, NMFS is required to provide EFH Conservation Recommendations to Federal agencies for actions that would adversely affect EFH. The EFH Conservation Recommendations will be provided as part of the EFH consultation process, following receipt of the EFH Assessment. These recommendations may include measures to avoid, minimize, mitigate or otherwise offset adverse effects. Section 305(b)(4)(B) requires the federal agency to provide a detailed response in writing to NMFS addressing the measures proposed for avoiding, mitigating, or offsetting the impact of the activity on EFH habitat. Please see our website for more information: <http://www.fakr.noaa.gov/habitat/faq.htm#fed>. In the meantime, we offer the following comments for your consideration.

Anadromous Fish

EFH for salmon is present within the project area. Favorite Bay and the adjoining Mitchell Bay marine, estuarine, and freshwater complex is a rich area that supports rearing and spawning habitat for coho, chum, sockeye and pink salmon, and Dolly varden and cutthroat trout (Johnson & Dqaigneault 2008). Sites 3, 3a and 4 may be in wetlands and streams that either support anadromous fish or have a nexus to anadromous waters. There are also uncatalogued anadromous streams in the project area. Several Angoon residents report having seen salmon in the inlet to a lake system that lies within Section 34 in T 50 S., R 68 E., and within Sections 2 and 3 in T 51 S., R 68 E (Frank, pers. comm.; Woodbury pers. comm.). Coho salmon are present in Lighter Creek, Mitchell Bay (Frank pers. comm.), which could be impacted from runoff from Sites 3 and 3a. Land contours also suggest the presence of other unmapped anadromous streams. NMFS recommends that all streams in the project area be surveyed for the presence of anadromous and

other fishes, and that newly documented anadromous habitat be nominated to the anadromous stream catalogue (Johnson & Dqaigneault 2008).

Eelgrass Beds

Eelgrass beds are an ecologically important nearshore habitat that is susceptible to degradation and loss due to coastal development and natural environmental changes (Johnson et al. 2003). This habitat can be especially important to many animals, including rearing salmon, flatfish, crab, and others (Johnson et al. 2003). Angoon residents report extensive eelgrass beds at the head of Favorite Bay and also at the mouth of the unnamed stream and lake system that lies within Section 34 in T 50 S., R 68 E., and within Sections 2 and 3 in T 51 S., R 68 E. (Woodbury pers. comm.). NMFS recommends surveying for, verifying anecdotal reports of, and mapping the extent of eelgrass beds in Freshwater Bay, Mitchell Bay, and Kanalku Bay, that could be impacted by runoff from Site 3, 3a and 4, and from any new road. We also suggest that eelgrass surveys be conducted in Killisnoo Harbor, if that EFH could be affected by runoff from Site 12. Please contact NMFS staff for mapping protocol.

Groundfish

EFH for groundfish is present in the project area. Groundfish species present include, but are not limited to: Pacific cod, Pacific Ocean perch, walleye pollock, dusky rockfish, shorttraker and roughey rockfish, yelloweye rockfish, sablefish, sculpin, skate, flathead sole, and rex sole. Other rockfish expected to be in the project area include: black rockfish, quillback rockfish, copper rockfish and yellowtail rockfish.

Timing Restrictions

NMFS recommends that the timing of activities that could adversely impact EFH be restricted to protect EFH and managed species during critical life cycle phases. In general, prohibiting in-water work between March 15 and June 15 could protect spawning herring and migrating juvenile salmon from construction activities. Herring occur in Freshwater Bay and Kanalku Bay, where fecund females have been captured (Frank pers. comm.). Herring spawning activity should be confirmed with Angoon residents, and if possible by actual documentation.

Wetlands Mitigation

The Clean Water Act 404 (B)(1) guidelines direct agencies first to avoid impacting wetlands; second, to minimize any impacts to wetlands; and finally, to compensate for unavoidable adverse impacts. Compensatory mitigation for unavoidable wetland impacts may be required for this action and should be addressed in the EIS. We recommend that you coordinate mitigation plans with NMFS and other resource agencies.

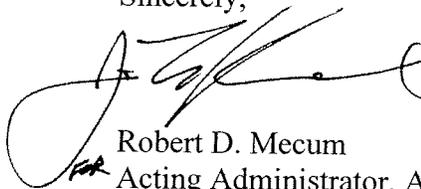
Threatened and Endangered Species / Marine Mammals

Section 9 of the Endangered Species Act (ESA) and federal regulations pursuant to section 4(d) of the ESA prohibit the take of endangered and threatened species, respectively, without special exemption. Take is defined as to harass, harm, pursue, hunt, shoot, wound, kill, trap, capture or collect, or to attempt to engage in any such conduct. In addition, the Marine Mammal Protection Act (MMPA) specifically prohibits the taking of marine mammals, including harassment, unless the activity is exempted by law or permitted under the Act. General information on ESA species and MMPA species under NMFS jurisdiction can be found at:
<http://www.fakr.noaa.gov/protectedresources>.

Endangered humpback whales and threatened Steller sea lions occur within the project area, as do MMPA protected killer whales, porpoises, seals, and sea otters (Frank pers. comm.; Woodbury pers. comm.). Noise from in-water construction activities or from operational procedures can negatively impact marine mammals. This and other potential impacts to marine mammals should be analyzed in the EIS. Precautions may need to be implemented to prevent injury, harm or harassment of marine mammals. Also, under section 7(a)(2) of the ESA, the FAA is required to consult with NMFS to ensure that any action authorized, funded, or carried out by the FAA is not likely to jeopardize the continued existence of threatened or endangered species. For more information on ESA and MMPA requirements, please contact Kate Savage at 907-586-7312 or Katharine.savage@noaa.gov.

Thank you for the opportunity to comment. If you have any questions regarding our scoping comments for this project, please contact Chiska Derr at 907-586-7345 or Chiska.derr@noaa.gov.

Sincerely,



Robert D. Mecum
Acting Administrator, Alaska Region

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