MEMORANDUM

State of Alaska
Department of Transportation & Public Facilities
Southcoast Region

TO: Rob Pauline Permits and Conservation Division Office of Protected Resources National Marine Fisheries Service

DATE: November 20, 2019
FILE NO.: Z681280000

FROM: Benjamin Storey Regional Environmental Manager

SUBJECT: Revisions to Work Schedule

The Alaska Department of Transportation and Public Facilities (DOT&PF) is requesting a revised Incidental Harassment Authorization (IHA) for the AMHS Gustavus Ferry Terminal Improvements Project.

The estimates of pile driving time to conduct the work and the project footprint are the same as the previously approved IHA. The only revision is to supplement the spring work window by two weeks to begin on February 15, 2020 instead of March 1, 2020.

We evaluated the impact that this supplementary two-week work window would have on the estimated incidental take calculations in the IHA and found that no change to take estimates would occur for the following reasons:

- Estimated number, sizes, and pile driving time of 50 days has not changed; and
- The project footprint has not changed

In fact the actual number of takes could go down for most species if pile driving started two weeks earlier and finished before the May 31 end date. Marine mammal occurrences are more frequent in the late spring near the Gustavus ferry terminal. However, at this time we do not propose to reduce any of the take estimates in the original IHA to be conservative and allow for unexpected construction delays due to weather conditions or other issues.

In addition no changes to the mitigation and monitoring plan are proposed. Monitoring would still need to be conducted per the monitoring plan on any day there is pile driving.

In summary we request a revision to the IHA to the spring work window to begin in February 15, 2020 rather than March 1, 2020. No change to marine mammal take estimates would occur from this work window revision because total pile driving duration and location has not changed. No other modifications to the IHA are requested at this time.