



January 19, 2023

Jolie Harrison, Division Chief
Permits and Conservation Division
National Marine Fisheries Service
Office of Protected Resources
1315 East-West Highway, Room 13635
Silver Spring, MD 20910

RE: Tongass Narrows Project – Incidental Harassment Authorization Renewal Request

Dear Ms. Harrison,

The Alaska Department of Transportation and Public Facilities (DOT&PF) was issued an Incidental Harassment Authorization (IHA) for the Tongass Narrows Project on March 5, 2022. The IHA is valid March 5, 2022 through March 4, 2023. Work has not finished and DOT&PF is requesting a one-year extension under a renewal of the IHA through March 4, 2024. The renewal is necessary to complete the in-water construction activities authorized under Phase 1 of the Tongass Narrows Project: Revilla New Ferry Berth and Upland Improvements, Gravina Island Shuttle Ferry Berth/Related Terminal Improvements, Gravina Airport Ferry Layup Facility, and Gravina Freight Facility.

We believe this request qualifies for a renewal because:

- DOT&PF is transmitting this request for an IHA renewal prior to March 5, 2023 (60 days prior to the effective date of the IHA);
- Except for the authorized work that has been completed, this renewal request is for identical activities, the same locations, equipment, methods, and amount of in-water work as specified in the IHA application submitted to NMFS. Specifically, this renewal request removes the following:
 - **Work completed March 5, 2022 through December 9, 2022:**
 - Revilla New Ferry Berth and Upland Improvements: All in-water activities have been completed.

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- Gravina Island Shuttle Ferry Berth/Related Terminal Improvements: installation and removal of twelve (12) 20-inch temporary piles; installation of ten (10) rock sockets; installation of twelve (12) 24-inch permanent piles.
- Gravina Airport Ferry Layup Facility: All in-water activities have been completed.

Since work began on March 21, 2022, a total of 61 days of in-water construction have occurred. Although the IHA was valid starting March 5, 2022, the construction crews did not begin until March 21. Currently, they are taking a holiday break and will return to work in early to mid-January 2023.

- **Work expected to be completed before the IHA expires on March 4, 2023:** Between January 5 and March 4, 2023, DOT&PF anticipates that the contractor would drive piles for 17 to 20 days at the Gravina Island Shuttle Ferry Berth/Related Terminal Improvements and the Gravina Freight Facility.
- Therefore, the **IHA renewal would authorize the remaining estimated 10-13 days of pile installation** (91 pile driving days - 61 pile driving days in 2022 – 17 to 20 days of work expected before March 4, 2023) to complete remaining work at the Gravina Island Shuttle Ferry Berth/Related Terminal Improvements and Freight Facility, including:
 - Installation of twenty-eight (28) tension anchors and twenty-three (23) 24-inch Piles with 11 Sockets for the Gravina Island Shuttle Ferry Berth/Related Terminal Improvements.
 - All pile driving activities for the Freight Facility: installation of six (6) 20-inch steel piles; installation of three (3) 24-inch steel piles; installation of four (4) 30-inch steels piles; and installation and removal of 12 24-inch temporary piles. This includes five (5) rock sockets and thirteen (13) tension anchors;
- Based on the preliminary marine mammal monitoring report summarizing observation data collected during 61 days of pile driving between March 21 and December 9, 2022 (when construction ended for the year), marine mammal takes are not expected to exceed the level authorized under the IHA. One Level A take of harbor seals occurred and, as shown in the table below, minimal Level B take of any species occurred. A preliminary monitoring report showing the results of the required monitoring data is attached. DOT&PF is not requesting any changes to the authorized take numbers because the results to date align with the nature/scale of impacts previously analyzed or authorized.

Species	Level B		
	Actual	Allowed	Remain
Steller sea lion	31	2,169	2,138
Harbor seal	26	1,014	988
Harbor porpoise	0	27	27
Dall's porpoise	0	207	207
Pacific white-sided dolphin	0	92	92
Killer whale	24	72	48
Humpback whale (Hawaii DPS)*	16	288	210
Humpback whale (Mexico DPS)	2		
Minke whale	0	2	2

Elephant Seal**	1	37	37
TOTAL	100	3,848	3,748

**15 collective Level B Takes of humpback whales occurred under the initial (6) and renewed Phase 1 IHA(9). The Level B takes under the new IHA on April 6 and November 18, 2022, are considered to be the 16th collective Level B takes and are considered to be from the Mexico DPS (2 level B Takes to date).*

***Elephant seals were not authorized for take when take the potential take occurred. NMFS was informed of the potential unauthorized Level B take, and on July 1, 2022, NMFS authorized 37 Level B takes of elephant seals.*

- DOT&PF would not change any mitigation or monitoring measures under the requested renewal.

If you need any additional information or have any questions or concerns, please do not hesitate to contact me at (907) 465-4509 or via email at benjamin.storey@alaska.gov. You may also contact our environmental analyst for the project, Christy Gentemann, at 465-4524, or via email at christy.gentemann@alaska.gov.

Sincerely,



Ben Storey
Southcoast Regional Environmental Manager

Cc:

Leah Davis, Office of Protected Resources, NMFS
Julie Scheurer, Protected Resources Division, NMFS
Christina Mounce, DOT&PF NEPA Program Manager

Table 1 - Pile Details for each Project Component

Project Component	Piles Proposed for Initial IHA	Piles Completed	Piles Remaining for Renewal	Rock Sockets Proposed for Initial IHA	Rock Sockets Completed	Rock Sockets Remaining for Renewal	Tension Anchors Proposed for Initial IHA	Tension Anchors Completed	Tension Anchors Remaining for Renewal
Gravina Airport Layup Facility									
24" Pile Diameter	8 (8 temporary via DTH)	8 (temporary via DTH)	0	0	0	0	0	0	0
30" Pile Diameter	14 (6 battered)	14 (6 battered)	0	8	8	0	12	12	0
Gravina Freight Facility									
20" Pile Diameter	6 (battered)	0	6	0	0	0	6	0	6
24" Pile Diameter	15 (12 temporary via DTH)	0	15 (12 temporary via DTH)	3	0	3	3	0	3
30" Pile Diameter	4 (2 battered)	0	4 (2 battered)	2	0	2	4	0	4
Revilla New Ferry Berth									
20" Pile Diameter	8 (8 temporary)	8	0	0	0	0	0	0	0
24" Pile Diameter	N/A	N/A	N/A	N/A	N/A	N/A	5	5	0
New Gravina Island Shuttle Ferry Berth/Related Terminal Improvements									
20" Pile Diameter	12 (12 temporary)	12 (temporary)	0	0	0	0	0		
24" Pile Diameter	35 (18 battered)	12	23 (19 proposed)	21	10	11 (11 proposed)	28	0	28 (28 proposed)
Total	102	57	45	34	17	17	58	45	13