



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

*National Marine Fisheries Service
P.O. Box 21668
Juneau, Alaska 99802-1668*

May 12, 2003

Jerry O. Ruehle
Environmental Coordinator
Alaska Department of Transportation
and Public Facilities
4111 Aviation Drive
P. O. Box 196900
Anchorage, Alaska 99519-0473

Re: Seward Highway Safety
Improvements MP 105-MP 115
State Project No. 56631
Federal Project No. NH-0A3-1(25)

Attention: Susan Wick

Dear Mr. Ruehle:

The National Marine Fisheries Service (NMFS) has reviewed the above referenced Essential Fish Habitat (EFH) assessment prepared by the Alaska Department of Transportation and Public Facilities (ADOT&PF). The proposed project involves safety improvements to the New Seward Highway between MP 105 and MP 115 including: incorporation of passing and turning lanes, improved roadway alignment, railroad alignment, and improved recreational access. Proposed highway and/or railroad alignments onto Turnagain Arm will place approximately 4,200,000 cubic yards of fill into approximately 79.5 acres of tidal mudflats.

The ADOT&PF has made a determination that the project may adversely affect EFH. NMFS agrees with this determination. The Magnuson-Stevens Fishery Conservation and Management Act requires NMFS to make conservation recommendations regarding any federal or state agency action that would adversely affect EFH. The construction and operation of the proposed project would adversely affect EFH and anadromous fish if necessary conservation measures are not followed.

Turnagain Arm provides EFH for migrating and/or rearing chinook salmon (*Onchorynchus tshawytscha*), coho salmon (*Onchorynchus kisutch*), pink salmon (*Onchorynchus gorbuscha*), sockeye salmon (*Onchorynchus nerka*), and chum salmon (*Onchorynchus keta*). Potter Creek, located near MP 115 of the project area, is listed as anadromous (ADF&G anadromous catalog, Anchorage A-8). In addition, EFH occurs for several species of groundfish in Knik Arm, and of these, sculpins (Cottidae), Pacific cod (*Gadus macrocephalus*), and walleye pollock (*Theragra chalcogramma*) would be the most likely to utilize the nearshore area of the project.



We offer the following recommendations pursuant to section 305(b)(4)(A) of the Magnuson-Stevens Fishery Conservation and Management Act.

EFH Conservation Recommendations

1. ADOT&PF should provide compensatory mitigation for the permanent loss of EFH in Turnagain Arm (79.5 acres). ADOT&PF should coordinate with NMFS and other applicable agencies to develop its mitigation plans.

Rationale - The footprint of this project is large and NMFS is concerned about the cumulative loss of EFH in the Anchorage area.

2. In-water construction work should be avoided from March 1 through June 30 to avoid disturbance of outmigrating salmonid fry and smolts.

Rationale - Dredging and fill activities can contribute sediment to the marine environment, potentially decreasing fish feeding efficiency and smothering benthic organisms.

3. In-water and intertidal work should be conducted at low tide to the extent possible.

Rationale - Working at low tide will decrease the amount of sediment introduced to the water column.

4. During dredging and fill activities, a silt curtain should be installed and maintained. The curtain should completely enclose the dredge area and remain in place until construction is completed and the side slopes have been stabilized.

Rationale: Dredging and fill activities can contribute sediment to the marine environment, potentially decreasing fish feeding efficiency and smothering benthic organisms. Use of a silt curtain will decrease the size of the affected area.

5. All dredge and/or fill material must be free of contaminants prior to disposal within the proposed fill area or any offsite location.

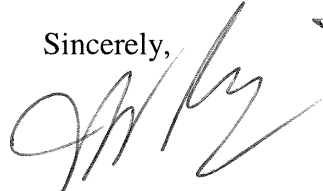
Rationale: Dredging and fill activities have the potential to suspend contaminants, if these are trapped in sand and gravel, into the water column where marine resources could be exposed.

6. Fill below the high tide line should be clean shot rock. Fill should be placed when the site is de-watered by lower tide stages. During construction, the fill site should be graded each work shift to prevent ponding on the fill surface that could trap fishes between high tides.

Rationale: The aforementioned guidelines will minimize disturbance from placement of fill. Fill activities can contribute sediment to the marine environment, potentially decreasing fish feeding efficiency.

We hope that this information is useful to ADOT&PF in fulfilling the coordination and consultation requirements of the Magnuson-Stevens Act and contained in 50 CFR 600.905-930. We are willing to assist you throughout the project with living marine resource issues identified during your public interest review. Brian Lance is the NMFS contact for this project, and can be reached by telephone at (907) 271-1301.

Sincerely,

A handwritten signature in black ink, appearing to read 'J. Balsiger', written over a light blue horizontal line.

James W. Balsiger
Administrator, Alaska Region

cc: USFWS, EPA, ADGC, ADFG, ADEC - Anchorage