



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

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

November 24, 2003

Bob Palmer
Project Administrator
Municipality of Anchorage
Project Management and Engineering
P.O. Box 196650
Anchorage, Alaska 99519-6650

Re: Draft Design Study Report
84th Avenue Upgrades:
Project No. 02-02 and
Spruce Street Upgrades:
Project No. 02-08

Dear Mr. Palmer:

The National Marine Fisheries Service (NMFS) has reviewed the above referenced Draft Design Study Report by the Municipality of Anchorage (MOA). The Draft Design Study Report evaluates the need for improvements along portions of East 84th Avenue and Spruce Street. The report describes and delineates the various alternatives under study, but does not recommend a preferred alternative. Under all build alternatives, construction on East 84th Avenue may impact the South Fork of Little Campbell Creek. Construction on Spruce Street will impact the South Branch of the North Fork of Little Campbell Creek.

The South Fork of Little Campbell Creek, and the South Branch of the North Fork of Little Campbell Creek are listed as anadromous streams (Alaska Department of Fish and Game Anadromous Stream Catalog), and have been designated as essential fish habitat (EFH). These streams collectively provide for the migration, spawning, rearing, and/or overwintering of chinook salmon (*Onchorynchus tshawytscha*) and coho salmon (*Onchorynchus kisutch*).

We are concerned that this project may adversely affect EFH and anadromous fish resources. The Magnuson-Stevens Fishery Conservation and Management Act (Magnuson-Stevens Act) requires NMFS to make conservation recommendations regarding any federal or state agency action that would adversely affect EFH. Federal agencies must prepare an EFH Assessment for any action that may adversely affect EFH. The EFH Assessment may be a separate document or clearly referenced in a support document, such as an Environmental Assessment. NMFS applauds the MOA for its early consultation with resource agencies in the scoping phase of this project.

We offer the following preliminary conservation recommendations in response to your scoping request. The project is still in the early scoping phase, therefore, this letter does not fulfill the coordination and consultation requirements of the EFH provisions as per 50 CFR 600.905-930.



NMFS encourages MOA to review the suggestions presented by the resource agencies during the scoping phase of this project, and incorporate these into your working plan for review.

- (1) As discussed in the September 11, 2003, scoping meeting, MOA should designate an on-site environmental monitor who is responsible for ensuring that the project is in compliance with any special conditions required by the Corps of Engineers (COE) or the Alaska Department of Natural Resources (ADNR), including ensuring fill limits are adequately staked in the field and silt fences are properly installed and maintained.

Rationale: An on-site environmental monitor will ensure compliance with Best Management Practices resulting in greater protection of EFH and anadromous fish resources.

- (2) Shift 84th Avenue to the south to avoid impacts to the South Fork of Little Campbell Creek.

Rationale: The stream channel in this area is already constricted with steep banks. Further encroachment on the stream will result in channel instability and loss of EFH.

- (3) Avoid placing the stream channel along the north side of 84th Avenue (South Fork of Little Campbell Creek) into a culvert.

Rationale: This area is rearing habitat for coho and chinook salmon. Additional culvert length in this area will impede fish movement and result in the loss of EFH.

- (4) Design and construction of the new culvert, and the associated natural stream channel at Spruce Street, should be contracted to a contractor who can demonstrate successful completion of similar projects (i.e. fish passage and natural stream channel design).

Rationale: Fish passage and stream channel stability are key to conservation of EFH. General contractors are not generally experienced in fish passage and stream channel design.

- (5) In-water work should be completed between May 15 and July 15.

Rationale: Work window for southcentral Alaska will reduce impacts to anadromous fish.

- (6) For the Spruce Street crossing, design should include the shortest practicable culvert length. Consider necking down the width of road surface at stream crossing to reduce length of the culvert.

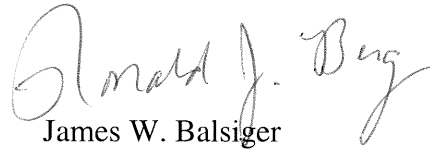
Rationale: Long culverts are a deterrent to fish passage, particularly juveniles. Shortening culvert length will increase the likelihood of efficient fish passage.

- (7) Incorporate measures to provide retention and filtration of stormwater prior to entering the stream. Minimize wetland fill and develop an erosion control plan for anadromous streams and associated wetlands.

Rationale: Sedimentation associated with erosion can smother spawning gravels and destroy rearing habitat for salmonids. Contiguous surrounding wetlands serve to filter runoff, trap sediments before reaching the main stream channel, and buffer stream flows.

NMFS hopes this information is useful to MOA 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 (907) 271-1301 is the NMFS contact for this project.

Sincerely,



James W. Balsiger
Administrator, Alaska Region

For

cc: USFWS, EPA, ADGC, ADFG, ADNOR/OHMP, ADEC, COE - Anchorage

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