



UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration

National Marine Fisheries Service
P.O. Box 21668
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November 29, 2007

Amanda Luecker
Project Environmental Coordinator
Alaska Department of Transportation & Public Facilities
6860 Glacier Highway, P.O. Box 112506
Juneau, Alaska 99811-2506

RE: Hyder Causeway Reconstruction & Extension Project MGS-0003(113), 69070, Scoping Request

Dear Ms. Luecker,

The National Marine Fisheries Service (NMFS) has reviewed the scoping letter for the above referenced project that requests comments for a planned Environmental Assessment (EA) that will help to avoid or minimize project impacts from the four proposed alternatives. The project is located at the head of Portland Canal near the United States and Canadian border and lies between the Salmon River, listed in the Alaska Department of Fish and Game (ADF&G) Anadromous Waters Catalog as, 101-15-10500, and Hyder Creek, listed as 101-15-10520. Salmon River has eleven listed anadromous fish upper tributaries, including Fish Creek, 2028, and Texas Creek, 2061, that support runs of chum, coho and pink Pacific salmon. Hyder Creek supports the same salmon species. An existing causeway/trestle separates the estuarine systems of Salmon River and Hyder Creek that provides habitat for juvenile salmon, Dolly Varden trout, Pacific herring, starry flounder, sculpins, and sticklebacks. Dungeness crab and other important benthic marine organisms that provide food for salmon also utilize this area. (Hoffman and Koerner, 1987).

Chum salmon stocks in the Portland Canal are of particular interest to both the United States and Canadian governments and have been "designated as stocks of special concern by the U.S./Canada Pacific Salmon Treaty" (Halupka et. al. 2000). Furthermore, the chum salmon in Fish Creek "has the largest recorded genetic strain...in North America...and are listed as [a] Regional Forester Sensitive Species." (USDA Forest Service R10, 2003). Pink and chum salmon spawning in Fish Creek occurs from late June through early August and supplies an extensive food source to both mammal and avian species as well as providing a unique tourist attraction when bears are feeding. Juvenile chum salmon start migration from Fish Creek as early as mid-February to July (J. H. Helle, pers. comm.).

Juvenile chum and coho salmon utilize the entire estuarine intertidal habitat from the Salmon River north to the head of Portland Canal into Canada's Bear River drainage system prior to migration down Portland Canal (J. H. Helle, pers. comm.). A 1987 study report at Portland Canal conducted by both American and Canadian scientists "indicate[d] that a very high



utilization of tidal flat areas on both the Bear and Salmon Rivers in areas typified by emergent vegetation and meandering stream channels [and] side sloughs and pot holes caused by receding tides were also found to be of prime importance to juvenile chum and coho fry." They further stated that these areas "should be protected from development activities [including] log dumps, gravel and sand removal [and] that additional research be conducted to identify critical areas and rearing time periods." (Hoffman and Koerner, 1987).

All of the four proposed trestle replacement alternatives will adversely affect Essential Fish Habitat (EFH), some to a greater degree than others. NMFS prefers Alternative 4A, a trestle from the end of the existing causeway to the foot of Harbor Island that would have the least adverse effect on EFH and the estuarine system. Alternative 1A, a solid fill structure, although the least costly, would have the greatest adverse effect on EFH by permanently removing the greatest amount of intertidal habitat necessary for juvenile salmon and completely bisecting the Salmon River/Hyder Creek estuarine system. (NMFS responded to the U.S. Army Corps of Engineers on April 25, 2005, concerning a similar filled causeway proposal that would have removed approximately 3.5 acres of intertidal land. We recommended denial of that project and instead using a pile-supported steel-grated causeway to minimize adverse effects.) Alternative 2A, three bridge spans and supporting islands, would have less impact than 1A yet would still remove a very large area of intertidal habitat. Alternative 3A, a short extension of the causeway and island, may be a reasonable compromise but would necessitate mitigation for the anticipated permanent intertidal habitat loss of 1.37 acres.

Habitat loss due to the widening of the causeway to accommodate more and larger vehicular traffic could be minimized by enlarging the turnouts on the north side of the causeway. If necessary, one or two additional turnouts could be constructed on the south side to provide extra passing room. Providing lighted traffic signals at each end of the causeway during peak hours of operation would also avoid the need for enlarging the width of the causeway.

During the pre-application meeting held on September 24, 2007, the agencies discussed that no mitigation had been proposed for the project. One possible avenue for mitigation of intertidal loss might be the relocation of the dump site on the south side of the causeway adjacent to the barge unloading area. Other mitigation opportunities are also available such as habitat enhancement projects in the Fish Creek area. We recommend that you evaluate potential mitigation options in your Environmental Assessment, and we are available to discuss such options with you.

Please contact Tim Wilkins at (907) 586-7643, or Timothy.Wilkins@noaa.gov, if you have any questions regarding these comments.

Sincerely,



for James W. Balsiger
Administrator, Alaska Region

cc: EPA Juneau, Chris Meade*
ADNR, Mark Minnillo*
USFWS Juneau, Richard Enriquez*
ADEC Juneau, Brenda Krauss*
OHMP, Erin Allee*
ADNR, Sadie Wright*
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Literature Cited:

Hoffman, S.H., and J.F. Koerner. 1987. Summary Report on Portland Canal Juvenile Chum Salmon Out-Migrant Survey Trip, May17-23, 1987. Regional Information Report No. 1J87-05. Alaska Department of Fish and Game, Division of Commercial Fisheries, Ketchikan, AK, October, 1987. pps.16

Halupka, K.C., et. al., 2000. Biological Characteristics and Population Status of Anadromous Salmon in Southeast Alaska. U.S.D.A. Forest Service Pacific Northwest Research Station, General Technical Report PNW-GTR-468. January, 2000. pps. 260.

U.S.D.A. Forest Service, R10. 2003. Final Supplemental Environmental Impact Statement, Roadless Area Evaluation for Wilderness Recommendations. Vol. III, Appendix C-Part 2. Forest Service R10-MB-481c, United States Department of Agriculture. February, 2003.