



UNITED STATES DEPARTMENT OF COMMERCE  
National Oceanic and Atmospheric Administration

National Marine Fisheries Service

P.O. Box 21668

Juneau, Alaska 99802-1668

October 14, 2003

Jerry O. Ruehle  
Environmental Coordinator  
Alaska Department of Transportation  
and Public Facilities  
4111 Aviation Avenue  
PO Box 196900  
Anchorage, Alaska 99519-6900

Re: Abbott Loop Extension  
Project No. 56559  
Scoping comment

Attention: Jim Childers

Dear Mr. Ruehle:

The National Marine Fisheries Service (NMFS) has reviewed the above referenced agency scoping letter by the Alaska Department of Transportation and Public Facilities (ADOT & PF). The proposed project would extend and improve Abbott Loop Road from Abbott Road to East 48<sup>th</sup> Avenue. ADOT & PF has developed four initial design scenarios, all which generally include construction of a road extension between 64<sup>th</sup> and 48<sup>th</sup> Avenue, bridges over the North and South Forks of Campbell Creek and the Dowling Tributary of South Fork of Campbell Creek, trail crossings, intersection improvements, signals and lighting, bus stops, drainage facilities, and separated pathways.

The scoping letter lists information on threatened and endangered species and specifically requests any additional information NOAA Fisheries may be able to provide. NOAA Fisheries has no additional information on threatened and endangered species. NOAA Fisheries offers the following information on Essential Fish Habitat (EFH).

The North and South Forks of Campbell Creek and the Dowling Tributary of South Fork of Campbell Creek are listed as anadromous streams (Alaska Department of Fish and Game Anadromous Stream Catalog) and have been designated as EFH. Collectively, these streams provide for the migration, spawning, rearing, and/or over-wintering of chinook salmon (*Onchorynchus tshawytscha*), sockeye salmon (*Onchorynchus nerka*), and coho salmon (*Onchorynchus kisutch*). In addition, the streams and associated wetlands within the project area represent the best remaining anadromous fish habitat in the Municipality of Anchorage.



The primary concern of NOAA Fisheries is that this project may adversely affect EFH and anadromous fish resources. The Magnuson-Stevens Fishery Conservation and Management Act (Magnuson-Stevens Act) requires NOAA Fisheries 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. The scoping letter states that an EFH Assessment will be prepared as part of the environmental document for this project. NOAA Fisheries applauds ADOT&PF for their 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. This project is still in the early scoping phase and this letter does not fulfill the coordination and consultation requirements of the EFH provisions as per 50 CFR 600.905-930. NOAA Fisheries encourages ADOT & PF 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) Bridge design should provide as much length as possible (clarify why - is it so they don't wash out, or less impacts to resources? How many support piers in the channel?). Follow bridge length and location recommendations of resource agencies provided in Technical Advisory Group (TAG) meetings. Resource agency recommendations called for a total of 1,450 feet of bridging for crossings of the North and South Forks of Campbell Creek, and the Dowling Tributary of South Fork of Campbell Creek. Scenarios 1A and 2 provide 1000 feet of bridging, scenario 3 provides 1300 feet, and scenario 1B provides only 750 feet. While providing less bridging than requested by resource agencies, Scenarios 1A and 2 are adequate to protect aquatic resources and EFH; as is scenario 3. Scenario 1B is inadequate and unacceptable.

*Rationale: The project area is high quality fish and wildlife habitat. The three streams in this area, as well as associated wetlands, are spawning and/or rearing habitat for coho, sockeye, and chinook salmon. Bridges are ideal for fish passage as well as maintaining the natural hydrology of a stream by allowing the stream to meander and preventing channelization. Attention should be given to bridge length. Bridges are often built too short to encompass the*

floodplain which can cause increased sinuosity upstream and aggradation downstream, with subsequent loss of fish migratory channels and spawning and rearing habitat.

- (2) Install flood relief culverts within the floodplain, on either side of both the South and North Fork Campbell Creek bridges, as well as along the length of impacted wetlands. Maintenance of culverts should be incorporated into the long range project plans.

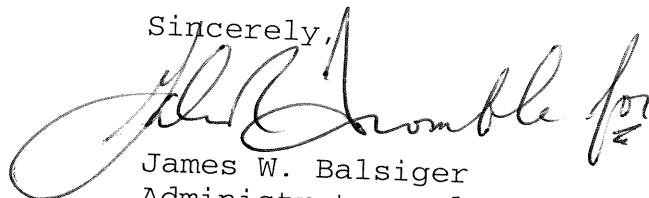
*Rationale: The land east of the proposed road is an extensive wetland complex. The road will essentially function as a dike. The two bridges, while extensive, will not be adequate to convey water downslope (i.e. to the west). This would result in water pooling along the east roadside ditch and wetlands on the downslope side of the road (i.e. west) being deprived of water.*

- (3) 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 and trap sediments before reaching the main stream channel.*

NOAA Fisheries hopes 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 (907) 271-1301 and Larry Peltz (907) 271-1332 are the NOAA Fisheries contacts for this project. Thank you for the opportunity to comment.

Sincerely,



James W. Balsiger  
Administrator, Alaska Region

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

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