



UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration

National Marine Fisheries Service

P.O. Box 21668

Juneau, Alaska 99802-1668

December 7, 2005

Kris Benson
Project Environmental Coordinator
Alaska Dept of Transportation & Public Facilities
6860 Glacier Highway
Juneau, Alaska 99801-7999

Re: Project #68606, Haines Highway milepost 3.5-25.3
Scoping Letter

Dear Ms. Benson:

The National Marine Fisheries Service (NMFS) has reviewed your request for scoping comments for the referenced project. Proposed work includes realignment and lane expansion of 22 miles of the Haines Highway, including the possible relocation of a bridge, and associated debris flow maintenance. Thank you for hosting the December 5 scoping meeting to provide review agencies with information on this project. NMFS staff found the stream and habitat inventory document particularly helpful.

The Magnuson-Stevens Fishery Conservation and Management Act (Magnuson-Stevens Act) requires Federal action agencies to consult with NMFS on all actions, or proposed actions, authorized, funded, or undertaken by the agency, that may adversely affect essential fish habitat (EFH). All five species of Pacific salmon utilize the Chilkat River adjacent to this project for various life functions, including migration, spawning and rearing, and its tributaries to varying degrees. The stream and habitat inventory describes these areas in detail. These species and areas constitute EFH and an EFH Assessment should be included in the final environmental document for the project.

Impacts of concern to NMFS will include.

- 1) Adequate fish passage to fish bearing tributaries through culverts and bridges
- 2) Road corridor encroachment and fill into the Chilkat River floodplain, and adjacent wetlands.
- 3) Conveyance of toxic substances such as hydrocarbons, sediments and chemicals used for winter maintenance of the road to adjacent streams by virtue of increased impervious surfaces and loss of areas for infiltration of road runoff.
- 4) Impacts of any gravel mining in the Chilkat River or its tributaries for road fill.
- 5) Devegetation of the banks of the Chilkat River or its tributaries that may lead to more highly hardened and armored conditions resulting in loss of fish habitat values.
- 6) The potential for introduction of aquatic invasive plant species from road bank re-stabilization efforts.
- 7) Adequate avoidance, minimization and mitigation of these impacts.



We recommend that you re-convene the Haines Highway "IDT" interagency team used in previous Haines Highway projects to examine the specifics of habitat impacts for this project, including any recommended mitigation that may be appropriate. We also recommend that an IDT conduct at least one site visit to the project area to gain in the field understanding of potential impacts and solutions. Thank you for the opportunity to comment. If you have any further questions, please contact Linda Shaw at 907-586-7643.

Sincerely,



Robert D. Mecum
Acting Administrator, Alaska Region

cc: Applicant
*EPA Juneau, Chris Meade
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