



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

*National Marine Fisheries Service*

*P.O. Box 21668*

*Juneau, Alaska 99802-1668*

December 16, 2003

Van Sundberg  
Regional Environmental Coordinator  
Alaska Department of Transportation and Public Facilities  
6860 Glacier Highway  
Juneau, AK 99801

Re: Ketchikan South Tongass Highway Pavement Rehabilitation project

Dear Mr. Sundberg:

The National Marine Fisheries Service (NMFS) has reviewed the Essential Fish Habitat (EFH) assessment for the Ketchikan South Tongass Highway Pavement Rehabilitation project. The purpose of the project is to provide a smooth uniform surface on the South Tongass Highway by widening and flattening curves, improving sight distances, paving and extending pedestrian facilities. The project would result in a loss of approximately 1.5 acres of estuarine intertidal wetlands, including 1.2 acres of rocky intertidal shore and 0.3 acres of estuarine intertidal aquatic algae beds. The project would also result in .02 acres of fill being placed in riverine wetlands in connection with installation of wider culverts and improvements to fish passage. The road crosses four anadromous streams.

Section 305(b) of the Magnuson-Stevens Fishery Conservation and Management Act requires Federal agencies to consult with NMFS on all actions that may adversely affect EFH. NMFS is required to make conservation recommendations which may include measures to avoid, minimize, mitigate or otherwise offset adverse effects. For the purposes of this project, EFH includes all segments of streams where salmon reside during any period of the year as well as the marine waters and substrates of Tongass Narrows and George Inlet.

NMFS concurs with the finding that this project may adversely affect EFH. The proposed replacement of culverts that currently serve as barriers to fish migration at three anadromous stream crossings will benefit EFH. Additionally, the Alaska Department of Transportation and Public Facilities (ADOT&PF) proposes to implement Best Management Practices (BMPs) to minimize impacts on water quality. NMFS concurs that reasonable avoidance and minimization measures have been incorporated into the project to reduce impacts to EFH. To compensate for the permanent loss of 1.5 acres of intertidal wetlands and .02 acres of riverine wetlands, ADOT&PF has proposed providing \$39,400.00 of in-lieu fee compensatory mitigation toward the Schoenbar culvert replacement project. NMFS prefers mitigation in which the restored or replaced habitat is of the same kind as the habitat that is lost (e.g. intertidal habitat mitigating for



loss of intertidal habitat). However, given the efforts taken to minimize impact and the benefits of the Schoenbar culvert project, NMFS concurs that the proposed mitigation is sufficient to compensate for unavoidable loss of EFH. Therefore, we offer no further conservation recommendations.

If you have any questions regarding this letter, please contact Katharine Miller at 907-586-7643.

Sincerely,

A handwritten signature in black ink, appearing to read 'J. Balsiger', is written over the printed name.

James W. Balsiger  
Administrator, Alaska Region

cc: Kathryn Erickson ADOT&PF  
ADNR, ADEC, ADF&G, AADGC, USFWS, Juneau