



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

*National Marine Fisheries Service*

*P.O. Box 21668*

*Juneau, Alaska 99802-1668*

July 16, 2003

Monique Wheeler  
Community Development Department  
City and Borough of Juneau  
155 S. Seward Street  
Juneau, Alaska 99801

Re: USE2003-00030 Conditional Use Permit for Horse Stabling

Dear Ms. Wheeler:

The National Marine Fisheries Service's Habitat Conservation Division staff conducted a site visit on the morning of Thursday, July 10 to the proposed site for housing the Montana Creek horses and inspected it for fish and wetland resources of concern.

The site is approximately 4.5 acres and transected by an intermittent stream channel that is a tributary of Montana Creek. This stream channel is likely to provide overwinter rearing habitat for coho salmon. There are extensive wetlands on the property including forested palustrine wetlands, scrub-shrub wetlands, and a freshwater fen. Water hemlock, a poisonous plant, was found growing in the intermittent streambed and fen habitat.

Two ponds at the site were inspected, one was dry and the other pond contained shallow standing water. The banks of this pond are steep and would be eroded significantly if horses were allowed to freely drink from this water source. This water would not be a suitable water source for horses - the pond is small, stagnant, steep sided, and contains water hemlock. The other pond area appeared to have intermittent flow and was dry although the soils were saturated and the vegetation indicates that it usually contains standing water. If city water is available to the property, we suggest that standard water troughs would be better for both the horses and the wetlands.

The proposed use for this property - seasonal stabling of up to 40 horses, would result in degradation of stream channels, wetlands, and ponds if the horses were allowed free rein on this small parcel. Housing a large number of horses at this site would result in excessive sedimentation of the stream channel and downstream fish habitat harming rearing fish and degrading spawning gravels. The considerable accumulation of junk cars and other debris on-site would need an extensive cleanup - including soil removal - to alleviate hazards from spilled hydrocarbons (oil) and debris including crushed glass and metal fragments.



In summary - this site does not appear to be of adequate size or habitat type to house 35 to 40 free reining horses without harming both the land, the on-site and downstream aquatic resources, and the horses themselves. We hope this information is useful for you in evaluating this conditional use permit application. Please contact Sue Walker (586-7646, [susan.walker@noaa.gov](mailto:susan.walker@noaa.gov)) regarding this project.

Sincerely,



Jonathan M. Kurland  
Assistant Regional Administrator,  
for Habitat Conservation

cc: ADNR Permitting, Attn: Carl Schrader