



UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration

National Marine Fisheries Service

P.O. Box 21668

Juneau, Alaska 99802-1668

March 19, 2003

Mr. Tim Price
Craig Ranger District
U.S. Forest Service
P.O. Box 500
Craig, Alaska 99921

RE: Proposed Modification of Sunny Creek Fish Pass

Dear Mr. Ingersoll:

The National Marine Fisheries Service (NMFS) has reviewed the referenced proposed action as outlined in your letter of March 7, 2003. The U.S. Forest Service (USFS) is proposing to build a structure upstream of the Sunny Creek fish pass to redirect bedload and floating debris, which has been periodically blocking the fish pass, during high flows. The diverting structure is to be temporarily built of adjustable gabions (rock-filled wire baskets), and would be replaced with a permanent structure after the desired height and location are determined. The USFS is considering whether this project may be categorically excluded from review under the National Environmental Policy Act (NEPA).

Sunny Creek is found in a remote area of the Craig Ranger District, on the east side of Prince of Wales Island. The stream currently supports healthy runs of pink, chum, coho and sockeye salmon, and steelhead trout. The fish pass was built on the stream in 1994.

NMFS advises the USFS to consider the potential impact of the proposed structure to geomorphologic processes. The diversion of bedload and floating debris could have unintended consequences to downstream channel morphology and possibly degrade fish habitat characteristics of Sunny Creek. For example, large woody debris affects the creation of resting pools for use by salmonids in streams. A system deprived of large woody debris sources over time may degrade as older wood is eventually decomposed or washed out. Woody debris also provides nutrient input that supports food chains for fish. Natural bedload transport downstream may be determining fish habitat characteristics to which the Sunny Creek runs have become adapted.

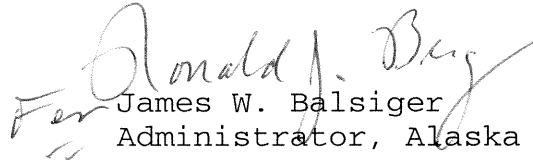
The USFS should investigate the effects of this action, and if your analyses indicate that downstream adverse effects to fish habitat may occur, then you should re-consider the use of the



NEPA categorical exclusion and re-consult NMFS regarding impacts of the proposed action to essential fish habitat, pursuant to the Magnuson-Stevens Fishery Conservation and Management Act.

Please direct any questions you may have regarding these comments to Linda Shaw at (907) 586-7510.

Sincerely,


James W. Balsiger
Administrator, Alaska Region

cc: EPA, Juneau
ADEC, AADGC, ADNR, ADF&G, USFWS, Juneau
ADF&G, Craig