

UNITED STATES DEPARTMENT OF COMMERCE National Oceanic and Atmospheric Administration

National Marine Fisheries Service P.O. Box 21668 Juneau, Alaska 99802-1668

October 31, 2003

Mr. Douglas Van Sundberg Regional Environmental Coordinator Alaska Dept. Transportation and Public Facilities 3132 Channel Drive Juneau, AK 99801-7898

Dear Mr. Van Sundberg:

The National Marine Fisheries Service (NMFS) recently learned that the Alaska Department of Transportation is undertaking ditch clearing activities along the Klawock and Hollis Highway. Apparently the ditch clearing is proceeding without any sediment control measures or best management practices. As a result, sediment is washing from the ditches into nearby Class I and II anadromous streams. The U.S. Forest Service has attempted to rehabilitate several anadromous streams along the Klawock-Hollis Highway. Forest Service biologist are concerned that the ditch clearing activities are jeopardizing these rehabilitation efforts.

Anadromous streams are considered Essential Fish Habitat (EFH) under the Magnuson-Stevens Fishery Conservation and Management Act. Portions of the ditches have been cleared to bare earth, and NMFS is concerned that these areas present a potential continual erosion hazard that could adversely impact spawning and rearing habitat downstream of the clearing activities. While we understand that it is difficult to time ditch clearing activities in Southeast Alaska to avoid potential runoff from rain events, it is important to ensure that best management practices, such as the use of silt fences and straw wattles, are employed to reduce the risk of sediment impacting EFH.

NMFS staff have discussed these issues with Mr. Bill Ballard and Ms. Kris Benson in your agency. Both these individuals were very helpful and agreed to look into NMFS's concerns. NMFS recommends that you immediately implement measures, such as silt fences and straw wattles, to control existing sedimentation. If possible, NMFS also recommends that your agency refrain from additional ditch clearing in this area until next summer when the potential for runoff is reduced and the area where vegetation is removed can be hydroseeded to stabilize the soil. Finally, NMFS recommends that your agency hydroseed the bare sections of the recently cleared ditches in early spring to prevent spring rains from further exacerbating the problem. These measures are necessary to adequately protect the anadromous streams from further damage.



Thank you for your attention to this matter. We would appreciate receiving your response to this letter with your decision regarding actions you will take to address NMFS' concerns. If you have any questions regarding our concerns, please contact Katharine Miller at (907) 586-7643

Sincerely,

James W. Balsiger

Administrator, Alaska Region