



UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
National Marine Fisheries Service
P.O. Box 21668
Juneau, Alaska 99802-1668

May 10, 2004

Colonel Timothy J. Gallagher
U.S. Army Corps of Engineers
P.O. Box 898
Anchorage, Alaska 99506-0898

Attn: Ellen Huber

Dear Colonel Gallagher;

The National Marine Fisheries Service (NMFS) has reviewed the Public Notice of Application for Permit by the Alaska Department of Natural Resources, Division of Parks (POA-1997-329-4 Tanana River). The purpose of the project is to protect Rika's Roadhouse, part of the Big Delta State Historical Park, by preventing further bank erosion along the Tanana River. The applicant proposes to install 4 rock barbs into the Tanana River to reduce the potential for bank erosion by redirecting the stream flow away from the bank and reducing the velocity of flowing water against the bank. The applicant also proposes to place a drainage structure in the bank to reduce bank saturation and re-establish riparian vegetation. Fall chum salmon spawning grounds are found within the proposed project area.

The U.S. Army Corps of Engineers (Corps) has determined that the proposed work will not adversely affect Essential Fish Habitat (EFH), including anadromous fish and federally managed fishery resources. NMFS disagrees with this determination. The Tanana River at this location is a late chum salmon spawning area. Aerial surveys by the Alaska Department of Fish and Game have documented as many as 20,000 late chum salmon spawning in this area. Installation of the 4 stream barbs may change the stream dynamics at this location and negatively impact the fall chum salmon spawning area. Fall chum salmon are important to the Yukon River commercial fishery and are heavily utilized for subsistence purposes for the entire length of their migration upriver. Fall chum salmon spawning in the Tanana River appears to be restricted to a limited number of upwelling areas. The project site is one of the few spawning areas that are known to the Alaska Department of Fish Game (Fred Bue, personal communication) and as such is considered to be extremely important for the continued existence of this stock of fish.

The Magnuson-Stevens Fishery Conservation and Management Act requires NMFS to make conservation recommendations regarding any federal action that would adversely affect EFH. The adverse effects of the proposed project can be reduced by incorporating the proposed conservation measures into the project permit. NMFS offers the following recommendations pursuant to section 305(b)(4)(A) of the Magnuson-Stevens Act to minimize project impacts.

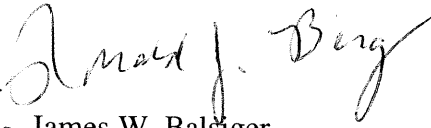


EFH Conservation Recommendations

- 1) Stream barbs should not be permitted at this location. Any instream work at this location could change the existing upwelling pattern and impact fall chum salmon spawning.
- 2) The upland drainage work and vegetation of the stream bank should be permitted. This work could help slow the rate of erosion.

Please note that under section 305(b)(4) of the Magnuson-Stevens Act, the Corps is required to respond in writing within 30 days to NMFS recommendations. If the Corps does not make a decision within 30 days of receiving NMFS Conservation Recommendations, the Corps should provide NMFS with a letter to that effect, and indicate when a full response will be provided. Larry Peltz is the NMFS contact for this project, and can be reached at (907) 271-1332.

Sincerely,


For James W. Balsiger
Administrator, Alaska Region