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

April 18, 2005

Mark Anderson, Environmental Coordinator
Alaska Department of Transportation and Public Facilities
6860 Glacier Highway
Juneau, Alaska 99801-7999

RE: Petersburg – South Mitkof Highway Upgrade,
Crystal Lake Hatchery Road to Banana Point
State Project 64846

Dear Mr. Anderson:

The National Marine Fisheries Service (NMFS) reviewed the Alaska Department of Transportation and Public Facilities (DOT&PF) March 17, 2005, request for agency scoping comments on the proposed upgrade of South Mitkof Highway. Upgrades would be made to the highway from the Crystal Lake Hatchery Road to the Banana Point launch ramp. The project would make minor roadway improvements, guardrail repair, replace or repair culverts, and pave 11 miles of gravel highway. The proposed pavement would be 24 feet wide. The project would replace Ohmer Creek Bridge and about 60 culverts along the project. The purposes of the project are to provide a smooth all-season driving surface, reduce maintenance costs, and correct deficiencies in a number of culverts. The project may also pave the parking lot of the proposed South Mitkof Ferry Terminal and a quarter mile of access road to this facility.

We offer the following comments specific to the essential fish habitat (EFH) provisions of the Magnuson-Stevens Fishery Conservation and Management Act (MSFCMA).

Essential Fish Habitat Consultation Process

The environmental analysis for the project must address the EFH requirements of the MSFCMA. Section 305 (b) of the MSFCMA requires Federal agencies to consult with NMFS on all actions that may adversely affect EFH. For such actions, a written EFH Assessment must contain:

1. A description of the proposed action.
2. An analysis of the potential adverse effects of the action on EFH and the managed species.
3. The Federal agency's conclusions regarding the effects of the action on EFH.
4. Proposed mitigation, if applicable.

If appropriate the assessment should also include:

a) The results of an on-site inspection to evaluate the habitat and the site-specific effects of the project.
b) The views of recognized experts on the habitat or species that may be affected.
c) A review of pertinent literature and related information.

d) An analysis of alternatives to the action, including alternatives that could avoid or minimize adverse effects on EFH.
e) Other relevant information.

For information on federally managed species and EFH, NMFS directs you to the following web sites:
http://www.fakr.noaa.gov/habitat/efh.htm , http://www.fakr.noaa.gov/maps/default.htm , and
http://www.fakr.noaa.gov/efh/download/efhshp.htm .

Anadromous Fish
Several proposed culvert replacements would occur in streams that provide anadromous fish habitat and are designated as EFH under the MSFCMA. These streams provide habitat primarily for coho salmon, according to the information provided in your letter. An exception is Ohmer Creek, Alaska Department of Fish and Game stream catalogue number 108-40-1050, which supports runs of pink, chum, coho, and sockeye salmon and steelhead trout.

Recommendations
NMFS offers the following scoping comments and recommendations:

1. Coho Stranding - Ditch Blocks
Some ditch lines along the highway have been identified as problem areas where coho fry and parr are attracted into the ditches at high flows and become stranded when the ditches dewater (personal communication with Jim Cariello, ADNR). NMFS recommends installing permanent ditch blocks on the perennial stream ditch lines that have been identified as problem areas for coho stranding. Installation of ditch blocks should prevent coho fry and parr from moving into these ditches and then becoming stranded. NMFS would also consider other feasible solutions to this problem.

2. Pile Driving in Ohmer Creek
Temporary piles need to be installed in Ohmer Creek for the construction of the bridge. Use a vibratory hammer for pile driving.

Fish are sensitive to underwater sound pressure waves. Pressure waves have been shown to injure and kill fish. Rupture of the swim bladder is the most common type of injury. Smaller fish (i.e., juveniles and smolts) are more susceptible to injuries than large fish. Impact hammers create larger pressure waves than vibratory hammers. Therefore, using a vibratory hammer can minimize pressure wave impacts. We understand that limited use of an impact hammer to "proof" the pile for seismic stability may be necessary to ensure that it meets the designed bearing capacity.

During pile driving, ADOT&PF should monitor for fish kills. If stunned or dead fish are observed, pile driving should cease and appropriate mitigative measures should be initiated.

3. Timing Windows for Anadromous Fish Streams

NMFS recommends the following work construction windows:

Instream work in coho salmon streams should only be conducted from June 1 to September 15.

Instream work in Ohmer Creek and other streams that have pink or chum salmon should only be conducted from June 1 to August 1.

No in-water work should be permitted outside of these timing windows to protect rearing and spawning salmon.

NMFS may offer additional recommendations as more detailed project information becomes available. If you have any questions regarding our general comments and conservation recommendations for this project, please contact Cindy Hartmann at 907-586-7585.

Sincerely,

For James W. Balsiger
Administrator, Alaska Region

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