



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

*National Marine Fisheries Service*

*P.O. Box 21668*

*Juneau, Alaska 99802-1668*

December 21, 2005

Amy McLeod  
Project Environmental Coordinator  
Alaska Dept of Transportation & Public Facilities  
6860 Glacier Highway  
Juneau, Alaska 99801-7999

Re: Project #68688, Klawock-Hollis Highway Pavement Rehabilitation

Dear Ms. McLeod:

The National Marine Fisheries Service (NMFS) has reviewed your request for comments regarding the referenced project. The majority of the project involves paving, rehabilitating and upgrading the Klawock-Hollis Highway to provide a smooth and uniform surface for the traveling public. Proposed work would also include upgrading Maybeso Bridge, the existing guardrail and pedestrian facilities along the road.

The Magnuson-Stevens Fishery Conservation and Management Act (Magnuson-Stevens Act) requires Federal action agencies to consult with NMFS on all actions, or proposed actions, authorized, funded, or undertaken by the agency, that may adversely affect essential fish habitat (EFH). Your letter indicates that the project will impact four catalogued anadromous fish streams considered as EFH and that an EFH assessment will be provided to NMFS for review. Eight existing deficient culverts would be replaced with new structures meeting fish passage requirements. In addition, you have indicated that one acre of palustrine emergent wetlands would be affected by the proposed design at the material waste site.

As mitigation, you are soliciting recommendations, including timing recommendations from resource agencies to minimize impacts to fish passage for anadromous and resident fish. An Erosion and Sediment Control Plan will be developed detailing erosion and sediment control measures to be implemented to minimize offsite impacts, and the contractor will develop a plan to control and monitor water quality during construction.

Impacts of concern to NMFS that we recommend you consider in your EFH assessment include:

- 1) Adequate fish passage to fish bearing tributaries through culverts and bridges;
- 2) Conveyance of toxic substances such as hydrocarbons, sediments and chemicals during repaving and construction;
- 3) The potential for introduction of aquatic invasive plant species from any road bank stabilization efforts; and
- 4) Adequate avoidance, minimization and mitigation of these impacts.



As one possibility for mitigation, NMFS suggest you investigate the option of using the pulled stumps and removed hazardous trees for placement as large woody debris in a project or area stream that may be lacking large wood sources. Finally, NMFS recommends a no in-water work window for project anadromous streams of March 15 to June 15 to protect out-migrating salmonids from disturbance. Thank you for the opportunity to comment. If you have any further questions, please contact Linda Shaw at 907-586-7643.

Sincerely,

A handwritten signature in black ink, appearing to read 'Robert D. Mecum', with a small 'for' written below the signature.

Robert D. Mecum  
Acting Administrator, Alaska Region

cc: \*EPA Juneau, Chris Meade  
\*ADF&G, Tom Schumacher  
ADEC, ADNR, USFWS, Juneau  
\*email