



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

National Marine Fisheries Service

P.O. Box 21668

Juneau, Alaska 99802-1668

September 8, 2006

Jerry O. Ruehle
Preliminary Design and
Environmental Section
Alaska Department of Transportation
and Public Facilities
P.O. Box 196900
Anchorage, Alaska 99519-6900

Re: New Seward Highway
Rabbit Creek to 36th Avenue
Environmental Assessment (EA)

Dear Mr. Ruehle:

The National Marine Fisheries Service (NMFS) has reviewed the above referenced EA by the Alaska Department of Transportation and Public Facilities (ADOT&PF) that proposes improvements to the New Seward Highway (NSH) from Rabbit Creek to 36th Avenue. Two alternatives are being carried forward in the EA, one build alternative and the no-build alternative. The proposed project (build alternative) expands the existing divided four-lanes to six lanes from O'Malley Road to 36th Avenue and provides pedestrian amenities, fencing and illumination the full length of the corridor, noise barriers as warranted, and grade separations at 92nd, 76th, and 68th Avenues and International Airport Road.

Essential Fish Habitat Consultation

Section 305(b) of the Magnuson-Stevens Fishery Conservation and Management Act (Magnuson-Stevens Act) requires federal agencies to consult with NMFS on all actions that may adversely affect Essential Fish Habitat (EFH). Likewise, NMFS is required to make conservation recommendations on all actions that would adversely affect EFH. These may include measures to avoid, minimize, mitigate or otherwise offset adverse effects.

The description of the build alternative in the EA does not describe the proposed design. Until the design is identified NMFS can not evaluate potential effects or provide detailed conservation recommendations. Therefore, we are not able to complete the EFH consultation. However, we offer the following preliminary comments.

Potential Impacts

As described the proposed action has the potential to adversely affect EFH on three anadromous fish streams; Campbell Creek, and the North and South Forks of Little Campbell Creek. These streams are listed as anadromous streams (Alaska Department of Fish and Game Anadromous



Stream Catalog) and collectively provide for the migration, spawning, rearing, and/or overwintering of Chinook, sockeye, pink and coho salmon.

The most prominent impact to EFH for all the streams in the project area is a degradation of water quality. Over the past few years fish kills have occurred in Little Campbell Creek (LCC). This is usually associated with high runoff events and subsequent low water quality suggesting that the current buffering capacity of the Campbell Creek/LCC watershed is inadequate, as a result of increased storm-water runoff from impervious surface area (pavement), via storm-water outfalls flowing into the streams.

Preliminary Comments

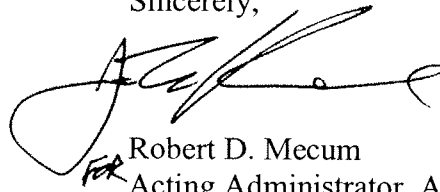
NMFS applauds the proposal to lengthen the bridges over Campbell Creek. This will allow the stream to connect with more of the floodplain with positive effects on EFH. This type of construction design avoids and minimizes adverse effects to EFH. We offer the following suggestions for your planning and design efforts.

1. The EFH assessment suggests that the vegetated ditches along the NSH and grassy swales to be constructed would take up most of the additional water with no substantial effects on EFH. We suggest that ADOT&PF demonstrate this claim by modeling runoff discharge, vegetated ditch, and swale capacity for Campbell Creek and LCC watersheds, including identification past failures in controlling storm-water runoff (peak events). An important component to this model will be the current baseline conditions for water quality in Campbell Creek/LCC. Possible sources of information on LCC water conditions are: USGS, ENRI and the Anchorage Waterways Council. The aforementioned activities should be coordinated with #2 below.
2. Consult and coordinate with LCC Rescue, the watershed restoration subgroup of the Municipality of Anchorage (MOA) Watershed Task Force. This group is investigating the fish kills and overall ecology of Campbell Creek/LCC, as well as setting restoration and monitoring priorities. The main contact for this group with the MOA is David Wigglesworth, Creeks Community Development Manager, Office of Economic and Community Development. He can be reached at 907-343-7116, or WigglesworthDT@ci.anchorage.ak.us
3. Any stream realignment should be designed and constructed by personnel with expertise in stream design and fish passage. Prior to permitting, the stream realignment design should be reviewed and agreed upon by resource agency personnel.

This project is still in the early design phase, and as the proposed action has not been identified, this letter does not fulfill the coordination and consultation requirements of the Magnuson-Stevens Act per 50 CFR 600.905-930. We wish to continue to coordinate with you on this project as you move through the planning and design phases, so as to avoid and minimize impacts to living marine resources and perhaps avoid the necessity for consultation on your

Corps of Engineers Permit Application. Thank you for the opportunity to comment. If you have any questions regarding our comments and conservation recommendations for this project, please contact Brian Lance (907) 271-1301.

Sincerely,

A handwritten signature in black ink, appearing to read 'R. Mecum', with a stylized flourish at the end.

Robert D. Mecum
Acting Administrator, Alaska Region

cc:

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