



UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration

National Marine Fisheries Service

P.O. Box 21668

Juneau, Alaska 99802-1668

October 10, 2007

Amanda Luecker
Environmental Analyst
Alaska Dept. of Trans. and Public Facilities (ADOT)
6860 Glacier Highway
PO Box 112506
Juneau, Alaska 99811-2506

Re: Indian River Road Improvements

Dear Ms. Luecker:

The National Marine Fisheries Service (NMFS) has reviewed the EFH (Essential Fish Habitat) Assessment for the Indian River Road Improvement Project. The project is intended to reduce maintenance costs, improve road ride ability, improve storm water drainage and provide pedestrian and bicycle facilities for greater safety. Work will include paving 11-foot wide driving lanes, constructing 8-foot wide multi-use paths, paving streets and driveway approaches, and extending culverts with associated construction of riprap enforced stabilizing earthwalls. Indian River road crosses two streams that are tributaries to the Indian River and are listed in the Alaska Department of Fish & Game Anadromous Waters Catalog for coho salmon rearing habitat (stream #s 113-41-10190-2011 and -2013). ADOT reports that both streams received instream structure mitigation several years ago that appears to be functioning well. Construction related impacts may include siltation, turbidity, habitat destruction, direct mortality and reduced productivity. The following conservation recommendations have been proposed by ADOT to minimize these impacts:

- Instream work would be conducted within the timing windows recommended by resource agencies.
- The project contract specifications will include an Erosion and Sediment Control Plan with special conditions for implementing and maintaining Best Management Practices (BMPs) during construction to minimize project impacts to water quality. BMPs to be used could be check dams, silt fences and wattles.
- The contractor is also required to complete and follow a Hazardous Materials Control Plan for hazardous materials (including petroleum products) detailing cleanup methods, materials and equipment on hand during construction.
- All streambeds inadvertently damaged during construction would be re-established and revegetated.

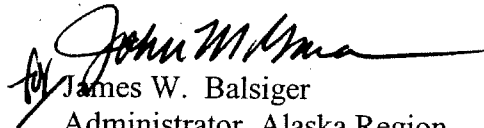


Section 305(b) of the Magnuson-Stevens Fishery Conservation and Management Act requires agencies to consult with NMFS when any activity proposed to be permitted, funded, or undertaken by a federal agency may adversely affect designated EFH. The EFH assessment for this project proposes several conservation measures to minimize impacts to water quality and EFH. NMFS generally concurs with these conservation recommendations and, in addition to those measures, NMFS recommends the following EFH Conservation Recommendations pursuant to Section 305(b)(4)(A) of the Magnuson-Stevens Act:

1. Juvenile coho salmon occupy rearing habitat year round, although they may move during or be displaced by high flow events. Therefore, a construction timing window as proposed by ADOT may not be meaningful for these tributaries. Nevertheless, NMFS does not object if another resource agency wishes to propose a timing window for this project.
2. Streamside vegetation is an important habitat feature for juvenile coho salmon habitat that provides shelter and primary productivity that supports invertebrate prey. NMFS recommends that ADOT consider adding additional streamside vegetation to the project above high water and/or as a bioengineered feature of the riprap armored earthwalls.

If you have any questions regarding our recommendations for this project, please contact Linda Shaw at 907-586-7510 or linda.shaw@noaa.gov.

Sincerely,


James W. Balsiger
Administrator, Alaska Region

cc: EPA Juneau, Chris Meade*
ADNR, Mark Minnillo*
USFWS Juneau, Richard Enriquez*
ADEC, Brenda Kraus*

* e-mail PDF