



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

*National Marine Fisheries Service*

*P.O. Box 21668*

*Juneau, Alaska 99802-1668*

May 1, 2007

Jane Gendron  
Environmental Impact Analyst  
Alaska Dept. of Trans. and Public Facilities  
6860 Glacier Highway  
PO Box 112506  
Juneau, Alaska 99811-2506

Re: Craig to Klawock Highway  
Maintenance

Dear Ms. Gendron:

The National Marine Fisheries Service (NMFS) has reviewed the EFH (Essential Fish Habitat) Assessment for the Craig to Klawock Highway Maintenance Project. The project will involve ditch and culvert maintenance from milepost one to milepost nine for the purpose of improving the highway drainage system. Maintenance will consist of removing debris from and cutting brush in ditches along both sides of the highway, removing debris and sediment from culverts, repairing damaged culvert inlets, and stabilizing several embankments. An excavator with a ditching bucket will be used to clean the ditches and a small backhoe and hand shovels will be used to clean culvert inlets and outlets. Culvert repair will consist of lifting inlets/outlets into their proper position and removing jagged edges. Four sections of embankment will be stabilized with rip-rap. The project will take place in the spring and summer of 2007. Seven anadromous fish streams included in the Alaska Department of Fish & Game Anadromous Waters Catalog and one un-catalogued anadromous fish stream would be impacted by the project. Anadromous fish species inhabiting these streams include pink, coho, sockeye, and chum salmon; cutthroat and steelhead trout; and Dolly Varden char. The anticipated impacts to EFH include short-term and minor increased turbidity from suspended sediment in the water column. An Erosion and Sediment Control Plan will be prepared and implemented that describes Best Management Practices to control sediment runoff from construction activities and minimizes impacts to water quality.

NMFS agrees that increases in suspended sediment levels following ditch cleaning will be temporary in nature and have minor impacts on EFH; however, we are concerned that ditch cleaning can result in chronic soil erosion in ditches and increased sedimentation in nearby fish streams. Ditch cleaning exposes soil by removing live vegetation from ditches. Non-woody vegetation in ditches provides a critical role in preventing erosion, and traps sediment and pollutants before they can reach fish streams. While NMFS recognizes the need for periodic maintenance of roadside ditches to ensure proper drainage, removing vegetation from ditches exposes sediment to the erosive forces of flowing water. In ditches with high water velocities and/or discharge rates, coarse sediment transport (i.e. bedload) may exceed the capacity or functional life of sediment traps resulting in sediment transport to fish streams. Excess sediment



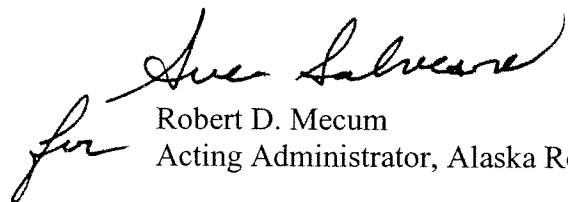
loading in streams can have long-term adverse impacts on EFH and aquatic invertebrate prey species.

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. 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. All ditches proposed for cleaning should be assessed to determine whether they are currently functioning properly. To minimize sediment transport to fish streams, cleaning should occur only where it is clearly needed to improve drainage.
2. If cleaning is necessary in ditches within 150 feet of an anadromous stream, the vegetative mat should be retained and replaced after cleaning the ditch. In areas where a vegetative mat does not exist or does not remain intact during removal/replacement, install sediment traps (e.g. straw bales, check dams) at more frequent intervals than normal to prevent sediment transport to anadromous streams.
3. NMFS would like to review and comment on the Erosion and Sediment Control Plan before the project is initiated.

If you have any questions regarding our recommendations for this project, please contact John Hudson at 907-586-7639 or [john.hudson@noaa.gov](mailto:john.hudson@noaa.gov).

Sincerely,

  
Robert D. Mecum  
Acting Administrator, Alaska Region

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

\* e-mail PDF