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

February 6, 2009

Amanda Luecker
Project Environmental Coordinator
Alaska Department of Transportation & Public Facilities
6860 Glacier Highway
P.O. Box 112506
Juneau, Alaska 99811-2506

RE: Scoping comments: Hyder Salmon River Road,
Rehabilitation Project STP-0003(86), 68602

Dear Ms. Luecker,

The National Marine Fisheries Service (NMFS) has reviewed your letter requesting scoping comments on proposed improvements to the Salmon River Road in Hyder, Alaska. The purpose of the project is to provide smoother and safer driving conditions for motorists by paving and upgrading a 4.6 mile section of road between the United States/Canada border and a bear viewing area at Fish Creek, a tributary of the Salmon River. The project has the potential to adversely impact Essential Fish Habitat (EFH) in Hyder, Marx, and Fish creeks and the Salmon River. Specific aspects of the project that may impact EFH include: 1) relocating a 100 foot reach of Hyder Creek to accommodate road widening, 2) ditching, clearing, or grubbing activities near streams, 3) placing fill in or near streams, 4) widening 1,100 feet of the existing roadway near Fish Creek to accommodate parking, and 5) reconstructing/repairing the Fish Creek Bridge abutments.

The streams mentioned above are listed in the Alaska Department of Fish and Game (ADF&G) Anadromous Waters Catalog. Salmon River and Fish and Marx creeks support runs of chum, coho, and pink salmon. Hyder Creek supports coho salmon. Chum salmon stocks near Hyder, Alaska, are of particular interest to both the United States and Canadian governments and are designated as stocks of special concern by the United States/Canada Pacific Salmon Treaty (Halupka et. al. 2000). Fish Creek chum salmon are a unique genetic strain with the largest body size for the species in North America and are listed as a sensitive species by the U.S. Forest Service (USDA Forest Service R10, 2003). Chum salmon fry outmigration occurs from late February through May in Fish and Marx creeks. Pink and chum salmon spawners are present in Fish and Marx creeks from early July into September. Spawning salmon in Fish Creek provide an important food resource for bears and birds and, in turn, benefit the local economy through bear viewing related tourism.

Hyder Creek Relocation

The relocation of Hyder Creek would temporarily adversely impact rearing habitat for juvenile coho salmon. NMFS requests more detailed plans for this project component in order to make recommendations to minimize impacts to EFH. Some measures that would help to avoid impacts to EFH include trapping and relocating fish prior to instream work, installing barriers to prevent fish from entering the project area during construction, and containing sediment during excavation activities. Channel relocation should take place in June or July to avoid impacts to outmigrating and spawning coho salmon.

Ditching, Grubbing, and Clearing

Ditching, grubbing, and clearing, including the cleaning of existing ditches, near streams can adversely impact EFH. Ditches that are in close proximity to streams and that carry sufficient water are often utilized by fishes, especially juvenile coho salmon. Work in and near ditches may also impact EFH indirectly because ditches convey sediment and other pollutants from road surfaces to nearby streams. It is important to recognize the potential for adverse impacts to EFH when engaged in ditching, grubbing, and clearing activities near streams. These types of impacts are especially important in the numerous areas where the road is directly adjacent to Fish and Marx creeks.

The construction of new ditches and cleaning of existing ditches can result in both short term and chronic transport of sediment to nearby fish habitat. Ditch cleaning exposes soil by removing live vegetation from the ditch. Non-woody vegetation in ditches helps to prevent erosion by trapping sediment and pollutants before they can reach fish habitat. 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.

To ensure ditch cleaning is not conducted unnecessarily, with negative consequences to fish and their habitat, all ditches proposed for cleaning should be assessed to determine whether they are functioning properly. To minimize sediment transport to fish habitat, cleaning should occur only where it is clearly needed to improve ditch function. 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, increase the use of sediment traps (e.g. straw bales, check dams) should be increased as needed to prevent sediment transport to streams.

Fill & Construction Activities

The project plans indicate that shot rock and riprap will be placed into a 250 foot reach of Fish Creek, from station 192+00 to 194+50, to construct a road embankment. Placement of fill into this important salmon stream could be avoided by moving the road corridor away from the

stream or replacing the embankment with a vertical wall. To minimize impacts to adult and juvenile salmon during bridge repair work, we recommend repairs should take place in June.

Widening the road to enhance parking availability near the bear viewing area would impact Marx Creek, an anadromous stream recently enhanced to increase spawning habitat for chum salmon. The narrow riparian corridor between the road and Marx Creek provides an important buffer between the road and fish habitat. The road should not be widened in this area.

NMFS appreciates the opportunity to provide scoping comments for this project. Please contact John Hudson at (907) 586-7643 or john.hudson@noaa.gov if you have any questions regarding these comments.

Sincerely,

for Robert D. Mecum
Acting Administrator, Alaska Region

cc: EPA Juneau, Chris Meade*
ADNR, Mark Minnillo*
USFWS Juneau, Richard Enriquez*
ADEC Juneau, Brenda Krauss*
OHMP, Erin Allee*
ADNR, Sadie Wright*
ADNR, Joe Donahue*
ADF&G, Kelly Piazza*
USF&WS, Steve Brockman*
ADEC, Brenda Krause*
EPA, Jennifer Curtis*
Hyder Community Association, Carol Denton*
USACE, Glen Justice*
USFS, Lynn Kolund *
ADNR, Ed Collazzi*

* e-mail PDF

Literature Cited:

Halupka, K.C., et. al., 2000. Biological Characteristics and Population Status of Anadromous Salmon in Southeast Alaska. U.S.D.A. Forest Service Pacific Northwest Research Station, General Technical Report PNW-GTR-468. January, 2000. pps. 260.

U.S.D.A. Forest Service, R10. 2003. Final Supplemental Environmental Impact Statement, Roadless Area Evaluation for Wilderness Recommendations. Vol. III, Appendix C-Part 2. Forest Service R10-MB-481c, United States Department of Agriculture. February, 2003.