

# STATE OF ALASKA

**DEPARTMENT OF NATURAL RESOURCES  
OFFICE OF HABITAT MANAGEMENT AND PERMITTING  
JUNEAU AREA OFFICE**

**FRANK H. MURKOWSKI, GOVERNOR**

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April 8, 2005

ATTN: CEPOA-CO-R-E

John Klutz

Regulatory Branch

U. S. Army Engineering District, Alaska

P.O. Box 6898

Elmendorf AFB, Alaska 99506-6898

RE: Skagway River Flood Control Project (Skagway River 10), POA-1991-677

Dear Mr. Klutz:

The Office of Habitat Management and Permitting (OHMP) has reviewed the proposed modifications to the City of Skagway application to construct a flood control project on the Skagway River as described in the Corps of Engineers (COE) public notice issued March 24, 2005. The project modifications were submitted to the COE following a determination of consistency with the Alaska Coastal Management Plan (ACMP) issued December 3, 2004. The project modifications incorporate requirements for consistency with the ACMP. We agree with the Corps of Engineers determination that the modifications as proposed are not significant enough to warrant another full public interest review. We offer the following additional information related primarily to the habitat improvements and protections that were included as mitigation in the ACMP consistency determination.

### Dairy Creek Habitat Improvements

Enclosed are design typical drawings and material specifications that should be used in constructing the riffle-pool sequence for instream habitat improvements in Dairy Creek. This design was developed for a similar habitat improvement project on Sawmill Creek in Haines. The cascade feature will not be required for the Dairy Creek improvements. This design includes a repeating sequence of 10' of spawning gravel followed by 20' of riffle gravel immediately downstream, followed by a 30' pool. The first riffle structure should be constructed at the existing culvert scheduled for removal from a location near the downstream end of the dikes. This sequence should be repeated upstream for the length of the dikes along Dairy Creek. We request that OHMP staff or our designee be given the opportunity to be on site during construction.

There currently is adequate riparian vegetation along most of Dairy Creek in the project area. To preserve this vegetation, any disturbed area between the toe of the dike and Dairy Creek should be revegetated with willow live stakes and native grass seed.

The proposal includes a bottomless structure for an access road to cross Dairy Creek. In the State authorizations we have provided the option of using oval CMP set at least 2' below grade, which we believe would be just as effective as a bottomless structure in this location.

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Naturally changing stream conditions at the confluence of Dairy Creek and the Skagway River should be periodically monitored to maximize opportunity for fish to move between Dairy Creek and the Skagway River. Access to this location needs to be provided so that minor work can be done if needed to improve fish passage. There will be times when fish passage will not be possible due to natural migration of the Skagway River active channel.

### East Side Island Bank Protection

The proposed hard points and cottonwood/willow post planting should protect the bank of this island and promote riparian vegetation in an area that currently has none. Less than 80% survival rate of the pole plantings would compromise the benefits of this project, replacement should be required if the survival is less than 80%.

### West Side Dike Alignment

The described mitigation #2 should be reworded to clarify the ordinary high water mark as follows:

2. Moving the alignment of the West dike back to the ordinary high water line as surveyed by the City of Skagway in 2001 (between Stations 8+00 to 22+00) allowing more area in the floodplain for fisheries.

### Monitoring

Monitoring should be required to assess the effectiveness of the habitat improvement projects. We recommend establishing photo points to document the effectiveness of the habitat improvements over time. As-built surveys should be completed when the Dairy Creek and vegetated island habitat improvement projects have been completed. A thalweg survey of Dairy Creek should be conducted to monitor the pool/riffle sequence for change over time. Vegetation surveys to document success of willow/cottonwood plantings and grass seed survival should also be included.

The ADF&G Watershed and Restoration program has offered to establish these photo points and conduct an initial thalweg survey. An initial thalweg survey should be completed prior to construction. The Taiya Inlet Watershed Council has expressed interest in conducting follow up surveys.

### Clarifications on Drawings

The drawings appear to incorrectly show the centerline of the proposed dike overlying the 2001 ordinary high water line. Since the dike is 40' to 50' wide at the base in some places, this would encroach significantly below ordinary high water. The drawings should be clarified to reflect requirements of the DNR easement authorization which will require that:

The outer toe of the slope (not the centerline) of the west side dike, from approximately Station 0+00 to Station 22+00 must be along the ordinary high water line as surveyed in 2001 (EPF 2001-0003). All other dikes and revetments will be located such that the new revetments and dikes overlay existing slopes and curtail

any extension further into the active floodplain. This restriction does not apply to the launchable toe as described on sheet 5 nor to the new section of dike on the east bank between Station 0+00 to Station 9+80.

We appreciate the opportunity to comment on this project. If you have any questions or need further information, please contact Carl Schrader at (907) 465-4287 or [carl\\_schrader@dnr.state.ak.us](mailto:carl_schrader@dnr.state.ak.us).

Sincerely,

Jackie Timothy  
Habitat Biologist  
Office of Habitat Management and Permitting

Enclosures: Typical drawings and materials specifications for Dairy Creek habitat mitigation

Email cc:

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Carl Schrader, DNR/OHMP, Juneau  
Joe Donohue, DNR/OPMP, Juneau  
Ed Colazzi, DNR/MLW, Juneau  
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