



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

*National Marine Fisheries Service  
P.O. Box 21668  
Juneau, Alaska 99802-1668*

November 7, 2005

Larry Lunde  
Planning Staff Officer  
Tongass National Forest  
648 Mission Street  
Ketchikan, AK 99901-6591

RE: Draft Study Plan for the Tongass National Forest

Dear Mr. Lunde:

The National Marine Fisheries Service (NMFS) has reviewed the *Draft Study Plan for Adjustment and Update of the Tongass National Forest Plan* dated October 17, 2005. The forest plan update will focus on the inadequacies identified by the 9<sup>th</sup> Circuit Court of Appeals in its August 5, 2005, decision; items of concern identified during the 5-year review of the Forest Plan conducted in 2004; and items of concern identified in ongoing implementation, maintenance and monitoring of the 1997 Forest Plan. NMFS offers these comments for your consideration.

Cumulative Effects – Non-NFS Lands (page 13 in the document)

The description of the technical assessment focuses on an inventory of the past, present, and reasonably foreseeable future harvest on non-NFS lands primarily as it relates to timber volume. NMFS recommends that you also attempt to inventory the amount of anadromous and resident fish habitat within the harvest area on NFS and non-NFS lands (miles of stream or acres or habitat), the management prescription that was applied to this habitat and the current condition of the habitat.

Invasive Species Emphasis (page 14 in the document)

NMFS supports including standards that will guide the Tongass relative to invasive species. NMFS is willing to assist with this and participate in the planned working session.

Miscellaneous Updates and Adjustments (page 19 in the document)

A number of refinements to the riparian standards and guidelines are listed including: buffers on Class III streams, protection of Class IV streams, riparian thinning, and others. NMFS is interested in these analyses and is willing to provide assistance or review.

Additional Updates and Adjustments Needed

Issues identified in the 2003 monitoring plan:

The 2003 monitoring report identified a significant percentage of culverts installed since 1997 that do not meet fish passage standards. The 2003 monitoring report also identified a number of streams within timber sale units that were not correctly identified as fish streams. These fisheries concerns that were discovered by implementation monitoring and described in the 2003 monitoring report should be evaluated to determine if changes are needed in the standards and



guidelines. What is the cause of these implementation problems? Are the standards unclear? If the guidelines in the forest plan are the cause of or are contributing to the implementation problem, then corrections should be part of this plan adjustment and update.

Fish passage through culverts:

The Forest Plan sets a 4 day delay as the standard for fish passage through culverts. The State of Alaska standard is a 2 day delay. The Forest Plan should be consistent with the State standard.

Monitoring Fish Passage through Culverts:

NMFS recommends adding a specific action item to monitor fish passage through culverts. This should include implementation and effectiveness monitoring of newly installed culverts.

Red, Green, Gray Culverts:

In recent years there has been an extensive inventory of existing culverts on the Tongass including an assessment of fish presence and fish passage through these culverts. The purpose of the inventory was to determine in which streams with resident or anadromous fish the culverts are working properly and passing fish to state standards. Culverts were classified as red, green, or gray. Red culverts have complete or partial blockage of fish (juvenile and/or adult) at some or all flows. Green culverts pass fish to state standards. Culverts classified as gray need further analysis to determine if they meet state standards.

An interagency fish passage working group is developing a process to prioritize or rank culverts needing repair; recommending a decision process; and making recommendations on how to handle mitigation. Products and recommendations are either preliminary or in process and therefore not ready to be incorporated into the Forest Plan. However, the Forest Plan revisions should include provisions for implementing improved processes to address problem culverts.

#### NMFS Rules, Regulations and Guidelines

Since the 1997 Tongass Forest Plan NMFS developed rules in two areas that may impact the management of the Tongass. These two areas are marine mammal viewing guidelines and regulations and essential fish habitat (EFH).

Marine Mammal Viewing Guidelines:

NMFS marine mammal viewing guidelines and regulations can be accessed at the following web site: <http://www.fakr.noaa.gov/protectedresources/mmv/guide.htm>

The guidelines and regulations may be pertinent to the Tongass Plan from the perspective of outfitter and guide management. The Forest Service should evaluate whether these guidelines and regulations need to be addressed in the plan adjustment and update.

Essential Fish Habitat (EFH):

The 1996 amendments of the Magnuson-Stevens Fishery Conservation and Management Act (Magnuson-Stevens Act) required the identification of EFH for all fishery management plan managed species and requires Federal agencies to consult with the Secretary (NMFS) for any action authorized, funded, or undertaken, or proposed to be authorized, funded or undertaken by

such agency that may adversely affect essential fish habitat. A determination should be made on whether an EFH consultation and EFH Assessment is needed for the plan adjustment and update.

Information on EFH in Alaska can be found at the following web site:

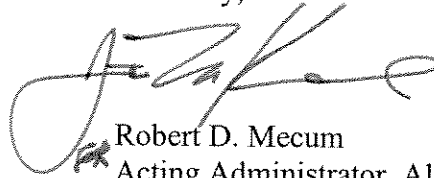
<http://www.fakr.noaa.gov/habitat/efh.htm>

Other Comments/Clarity Comments

It would be helpful for the reader to have acronyms and initialisms defined the first time they are used in the document and included in a table for reference. For example, the first time Logging System and Transportation Analysis (LSTA) is spelled out is on page 2 under the heading Phase 2, however, LSTA was used several times before this in the document.

NMFS appreciates the opportunity to review the draft study plan and provide comments. If you have any questions regarding our comments please contact Cindy Hartmann at (907) 586-7585 or at [cindy.hartmann@noaa.gov](mailto:cindy.hartmann@noaa.gov).

Sincerely,



Robert D. Mecum

Acting Administrator, Alaska Region

cc: \*Chris Meade, EPA Juneau  
\*Tom Schumacher, ADF&G, Juneau  
\*Bill Hanson, USFWS, Juneau  
\*Kim Hastings, USFWS, Juneau  
\*Ron Dunlap, USFS, Juneau  
\*Don Martin, USFS, Juneau  
\*Dick Aho, USFS, Petersburg  
\*Kaja Brix, Juneau  
\*Aleria Jensen, Juneau  
\*Linda, Shaw, Juneau

\*email