



UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration

National Marine Fisheries Service

P.O. Box 21668

Juneau, Alaska 99802-1668

February 21, 2006

Mark Hummel
District Ranger
Wrangell Ranger District
P.O. Box 51
Wrangell, AK 99929

RE: Backline Timber Sale
Environmental Assessment

Dear Mr. Hummel:

The National Marine Fisheries Service (NMFS) reviewed the Backline Timber Sale Environmental Assessment (EA). The Backline Project Area is located on Wrangell Island approximately 12 miles south of Wrangell. The project area is within Value Comparison Units 476, 477, 478, and 479 and encompasses approximately 28,443 acres of National Forest System land. Two issues were identified through project scoping: timber economics and cumulative effects to aquatic resources. Concerns were raised about the cumulative impact of introducing additional timber harvest and roads to watersheds that contain extensive harvested areas and high road densities. The action alternatives would harvest approximately 7 to 16 million board feet of timber and build one mile of temporary road. The preferred alternative, Alternative 3, would harvest approximately 15.8 million board feet of timber from 630 acres, and build one mile of temporary road. Alternative 3 includes the following mitigation measures: (1) remove five old drainage structures, (2) restore stream channels to original gradients, and (3) correct 27 erosion problems on an abandoned road.

Section 305(b) of the Magnuson-Stevens Fishery Conservation and Management Act (MSFCMA) requires Federal agencies to consult with NMFS on all actions that may adversely affect EFH. NMFS is required to make conservation recommendations, which may include measures to avoid, minimize, mitigate or otherwise offset adverse effects. We offer the following comments specific to the MSFCMA for your consideration.

For the purposes of this project, EFH includes all segments of streams where salmon reside during any life stage or period of the year, and the marine waters and substrates of Zimovia Strait (in the vicinity of Pats Creek LTF) and Eastern Passage (in the vicinity of Earl West LTF). The streams in the project area provide important habitat for pink, chum, and coho salmon as well as steelhead and cutthroat trout and Dolly Varden char. The marine waters and substrates of Zimovia Strait and Eastern Passage provide important habitat for a number of ground fish species including Pacific cod, arrowtooth flounder, Pacific ocean perch, walleye pollock, dusky rockfish, shortraker and rougheye rockfish, yelloweye rockfish, sablefish, flathead sole, rex sole, sculpin and skate.

NMFS concurs with the Forest Service determination that the Backline project may adversely affect Essential Fish Habitat. Harvest is being proposed in two watersheds that currently have over 20 percent of the watershed harvested (stands less than 30 years old). This 20 percent



harvest is considered a threshold of concern in third order watersheds which triggers a more intensive watershed analysis prior to additional disturbances. The EA identified 16 existing fish passage concerns and proposes to rectify only 7 of these in conjunction with one alternative. The unit cards identify soil and wetland concerns with several units including units: 1, 2, 4, 8, and 10. Fisheries concerns are identified in all units.

The EA could use additional clarity and information in several areas. Maps 1-1, 1-2, AR-1 display all the roads in the project area as existing drivable roads including the road below Unit 1. The narrative, however, describes the road below Unit 1 as abandoned. Table AR-3 lists 2 fish passage concerns in the Basin Creek watershed, however the most recent road condition survey (RCS) indicated that these are no longer a concern. The EA should be updated with the most recent information from the RCS. The discussion of log transfer facilities (LTFs) on pages 3-28 and 3-29 should have more detailed information. The narrative states that Pats Creek LTF and Earl West LTF meet State water quality criteria for LTF permits, but it does not provide the specific details of the existing extent and depth of bark accumulation. The cumulative impact of additional bark debris is not discussed relative to existing wood debris. How much additional bark could accumulate and still meet state standards? The text should summarize results of the dive investigation. Also the EA does not discuss the October 1995 LTF Siting, Construction, Operation, Monitoring and Reporting Guidelines or whether the LTFs meet those guidelines. In addition, for wood not going to the Wrangell mill, the EA does not discuss utilizing a barge facility instead of putting the logs in the water. What is the feasibility of a barge facility and the costs involved? What are the potential benefits to biological resources if a barge facility were used?

A review of the RCS data indicates that there are 14 "red" culverts in the project area. A red culvert is one that does not meet the Q2-2day duration design flow standard and is restricting the movement of fish. Seven of these culverts are in the McCormack Creek watershed and are located on the abandoned road below unit 1. The other seven culverts are in the Lower Salamander Creek watershed. The RCS identifies three crossings in the Lower Salamander Creek watershed with Class I habitat affected. The amount of habitat affected ranges from 100 meters to 1669 meters. The class II habitat affected ranges from 50 to 269 meters. These 14 culverts that do not meet current standards for fish passage should be described in further detail as well as the corresponding habitat that is impacted and not available or only partially available. The potential for correcting some or all of these culverts should be investigated. What opportunities are being foregone by not replacing or improving fish passage in these culverts in conjunction with this proposed timber sale and road maintenance and construction activities? What are the cumulative impacts on fish passage from previous road construction and proposed construction?

The discussion of the Clean Water Act on page 3-81 states: *A discharge of dredge or fill material from normal silviculture activities such as harvesting for the production of forest products is exempt from Section 404 permitting requirements in waters of the United States, including wetlands (404)(f)(1)(A). Forest roads qualify for this exemption only if they are constructed and maintained in accordance with best management practices to assure the flow and circulation patterns and chemical and biological characteristics of the waters are not impaired (404)(f)(1)(E).* Forest roads are only exempted from Clean Water Act jurisdiction if they are maintained to ensure waters are not impaired. The data provided in the EA and in the

indicates that the existing roads impair biological characteristics of the waters. Perhaps existing best management practices are not sufficient to ensure these roads will not impair waters. NMFS is concerned with construction of an additional mile of road when the existing roads are potentially impairing the chemical and biological characteristics of waters. The project should incorporate measures to remediate for impaired waters from prior road construction. The mitigation proposed in Alternative 3 is necessary remedial action that is appropriate for all alternatives, and should be pursued regardless of the alternative selected.

The EA states that: *The most probably immediate effects of timber harvest activities on streams is sediment and organic debris introduction. Timber harvest can also have an effect on water yield and can lead to mass failures, which are still the greatest concern.* The EA states that the McCormack Creek watershed is the most managed basin within the Backline project area and has extensive amounts of harvested area and roads. On page 3-17 the EA states that *McCormack Creek's health may decrease with the additional harvest proposed in Alternative 3.* The supporting rationale includes:

1. *The visible evidence in McCormack Creek watershed suggests that the area is prone to landslides;*
2. *Scientifically-based and peer reviewed literature states that timber harvest in excess of 20 percent of a watershed's total area can induce events that significantly alter the landscape's hydrology and subsequently damage stream channels; and*
3. *Timber harvest would occur directly above an abandoned road with old and failing drainage features – the increased timber harvest may alter the local hydrology enough to induce a failure at one of the drainage features.*

The Wrangell Island Analysis Report (1998) recommended against additional disturbance in McCormack Creek and recommended watershed restoration opportunities be pursued. The EA proposed to harvest two helicopter units in the McCormack Creek watershed, Unit 1 and Unit 2. The Unit Cards identified slopes up to 90% and openings assumed to be landslide tracts in Unit 1 and slopes greater than 72% in Unit 2. This information suggests that continued logging in this sensitive watershed, may be inappropriate, especially given the fact that helicopter logging would result in a deficit sale.

The EA states that: *Past timber harvest and road construction activities are the most obvious agents affecting Lower Salamander Creek. Lower Salamander Creek is a productive fish system because it has extensive, quality spawning and rearing habitats. Lower Salamander Creek is a popular Wrangell Island sportfishing destination.* Units 8 and 10 in the Salamander Creek watershed are proposed for clearcutting (even-aged management) with helicopter yarding proposed for Unit 8 and cable yarding proposed for Unit 10. The EA states (page 3-25) that *the southern portion of Unit 8 is proposed in a steep area and the eastern boundary of Unit 8 is adjacent to an alluvial fan.* The Unit Card for Unit 10 states: *The hillslope that this unit is located on has a history of slope instability as evidenced by the aerial photo. Instability is attributed to steep slopes (steeper than 65%) and somewhat-poorly to poorly drained soils. The unit includes a landslide that occurred during road construction in 1991. A small landslide occurred in a managed stand downslope within 5 years of harvest. It is likely that some mass wasting will occur after harvest of this unit. Debris could enter the HC5 channel feeding Salamander Creek.* Since Unit 8 will be helicopter yarded, which affords greater flexibility in leaving retention trees, additional protection measures could be implemented to provide slope

stability. The EA should consider uneven aged management for this unit. In addition even-aged management is not appropriate for Unit 10 since it would increase the likelihood of mass wasting after harvest.

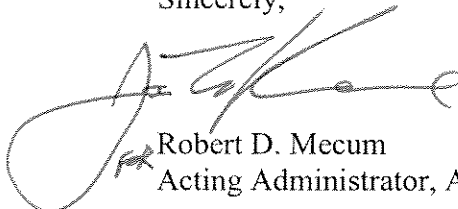
The proposed harvest units include a narrow strip of trees between Units 5 and 6. The Unit cards identify a concern of windthrow post-harvest and state that trees could fall into adjacent HC5 and HC6 stream channels. Section 2.7 states: *District Fisheries and Hydrology staff will monitor the areas between Units 5 and 6 annually after harvest and direct the removal of blowdown material if stream channel debris damming occurs.* If blowdown is expected why leave the narrow strip between these units? The impact of harvesting this strip should be analyzed and included as an alternative. Annual monitoring is labor intensive and costly. Remediation is also costly. Why create a problem now that will take resources to fix later?

NMFS offers the following EFH Conservation Recommendations pursuant to Section 305(b)(4)(A) of the MSFCMA.

1. Evaluate the potential to use a barge in conjunction with the LTFs instead of putting the logs directly in the water.
2. Complete the proposed mitigation and evaluate the potential for correcting the 7 remaining culverts that do not meet the current standards for fish passage. Include this information in the analysis, and evaluate foregone opportunities if fish passage is not corrected as a part of this project.
3. Given the existing level of disturbance in the McCormack Creek watershed and the inherent instability of the steep slopes, drop Unit 1 and Unit 2 from harvest consideration.
4. Change the prescription for Unit 8 from clearcut to partial cut or to one that retains trees of a sufficient diameter to ensure slope stability.
5. NMFS recommends that this Unit 10 be dropped from harvest consideration to avoid probable landslides that could impact an anadromous stream.
6. Analyze the effects of cutting the strip of trees between Units 5 and 6 verses the cost of remediation later.

If you have questions regarding our comments contact Cindy Hartmann at (907) 586-7585.

Sincerely,



Robert D. Mecum
Acting Administrator, Alaska Region

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