



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

National Marine Fisheries Service

P.O. Box 21668

Juneau, Alaska 99802-1668

February 13, 2008

Gregory M. Killinger
District Ranger
Craig Ranger District
Tongass National Forest
USDA Forest Service
P.O. Box 500
Craig, Alaska 99921

RE: 2008 Plan of Operations from Full
Metal Minerals Limited

Dear Mr. Killinger:

The National Marine Fisheries Service (NMFS) reviewed the USDA Forest Service Craig Ranger District's (CRD's), request for written comments on the Plan of Operations (POO) from Full Metal Minerals Limited. The PPO states that the planned activities for the 2008 season will consist of geologic mapping, geochemical sampling and diamond drilling of up to NQ2-size (2-7/8") core holes from up to 11 drill pads. The drill will be moved to the site and between sites by helicopter. Site preparation includes clearing a minimum area of 30 feet by 30 feet to allow for safe helicopter access. The total disturbance is estimated to be 0.25 acres. Water for drilling will be obtained from tributaries of Crackerjack Creek (Maybeso Creek) and the Harris River. No fish protection measures are identified in the POO. We offer these scoping comments specific to the EFH provisions of the Magnuson-Stevens Fishery Conservation and Management Act (MSFCMA).

Essential Fish Habitat Consultation Process

The environmental analysis for the project must address the EFH requirements of the MSFCMA. Section 305 (b) of the MSFCMA requires Federal agencies to consult with NMFS on all actions that may adversely affect EFH. Adverse effect means any impact that reduces the quality and/or quantity of EFH. Adverse effects may include direct or indirect physical, chemical, or biological alterations of the waters or substrate and loss of, or injury to, benthic organisms, prey species and their habitat, and other ecosystem components, if such modifications reduce the quality and/or quantity of EFH. Adverse effect to EFH may result from actions occurring within EFH or outside of EFH and may include site-specific or habitat-wide impacts, including individual, cumulative, or synergistic consequences of actions. For such actions, a written EFH Assessment must contain:

1. A description of the proposed action;
2. An analysis of the potential adverse effects of the action on EFH and the managed species;



3. The Federal agency's conclusions regarding the effects of the action on EFH; and
4. Proposed mitigation, if applicable.

If appropriate the assessment should also include:

- a) The results of an on-site inspection to evaluate the habitat and the site-specific effects of the project;
- b) The views of recognized experts on the habitat or species that may be affected;
- c) A review of pertinent literature and related information;
- d) An analysis of alternatives to the action, including alternatives that could avoid or minimize adverse effects on EFH; and
- e) Other relevant information.

For information on federally managed species and EFH in Alaska, NMFS directs you to the following web site: <http://www.fakr.noaa.gov/habitat/efh.htm>.

Anadromous Fish

The POO identifies two stream systems as a proposed drilling water source. One stream is identified as Cracker Jack Creek which is a tributary of Maybeso Creek. The other potential water source is a small tributary of the Harris River. Both Maybeso Creek and the Harris River are catalogued anadromous fish streams with substantial fishery resources. Maybeso Creek, stream number 102-60-10840, has coho, pink, and chum salmon and steelhead trout. Cracker Jack Creek, stream number 102-60-10840-2017, is catalogued as coho salmon rearing. The Harris River, stream number 102-60-10800 has coho, pink, and chum salmon, and steelhead trout. Coho, pink and chum salmon are species with designated essential fish habitat.

Recommendations

NMFS offers the following Scoping comments and recommendations:

In-stream Work and Potential Impacts to Fish

NMFS recommends that CRD fish biologists survey the stream sections proposed for drilling water removal. If rearing coho or resident fish are present then precautions should be taken to protect these rearing fish. Protection measures should be written into the POO.

The POO does not indicate how much water will be taken from the streams and how the removal of water from the streams will impact in-stream flow. Sufficient flow must be left in the stream to support any rearing fish. Water removal should also not impact rearing fish or eggs downstream of the removal site. If necessary, water removal could be confined to work windows when fish eggs are not expected to be in the gravels. The recommended in-water work windows are as follows:

Pink Salmon – June 1 – August 1 (no in-water August 2 – May 31);

Chum Salmon – June 1 to August 1 (no in-water August 2 – May 31);

Coho salmon – June 1 to September 15 (no in-water September 16 – May 31); and

Steelhead Trout – July 18 – August 15 (no in-water August 16 – July 17)

Water Quality

The POO states that all drilling fluids will be contained at the drill pad in sumps and no discharge of drill fluids into surface waters is anticipated. The CRD should ensure that the sumps are sufficient to contain the drilling fluids and drill water is not allowed to flow into streams. If gasoline powered pumps are operated near the streams precautions should be made to ensure that oil and gas does not enter the stream. Requiring a oil spill kit on-site is a good precautionary measure.

In summary, NMFS recommends that potential effects to fish and water quality be further investigated and appropriate minimization measures be incorporated into the POO.

NMFS may offer additional recommendations as more detailed project information becomes available. If you have any questions regarding our general comments and conservation recommendations for this project, please contact Cindy Hartmann at (907) 586-7585.

Sincerely,



for

James W. Balsiger
Administrator, Alaska Region

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