



**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

Kathryne E. Rodriguez  
Monument Ranger  
Admiralty National Monument  
Tongass National Forest  
USDA Forest Service  
8510 Mendenhall Loop  
Juneau, Alaska 99801

RE: 2008 Surface Exploration Annual Work  
Plan for Kennecott Greens Creek Mining  
Company

Dear Ms. Rodriguez:

The National Marine Fisheries Service (NMFS) reviewed the USDA Forest Service Admiralty National Monument's request for written comments on the 2008 Surface Exploration Annual Work Plan (AWP) from Kennecott Greens Creek Mining Company. The AWP states that the planned exploration activities for the 2008 season include reconnaissance and detailed geologic mapping, ground surveying, geochemical sampling, ground geophysical surveying, and 30,000 to 50,000 feet of core drilling (18 sites maximum). Water for the drilling operations will be sourced from nearby streams. 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 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 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 AWP states that water from the drilling operations will be sourced from nearby streams under permits from the Alaska Department of Natural Resources. Individual streams are not identified in the AWP. The figure accompanying the AWP shows that the proposed drill sites are mostly in the vicinity of three stream systems. These stream systems are: Fowler Creek, Alaska Department of Fish and Game (ADF&G) anadromous waters catalogue number 111-41-10180; Greens Creek, stream number 112-65-10240; and stream number 112-65-10230. All three streams have pink, chum, and coho salmon. Pink, chum, and coho salmon are species that utilize designated essential fish habitat in Admiralty Island streams and lakes. The proposed drill sites are located near the upper reaches of these streams and in tributaries. Anadromous fish are likely not present at the water removal location. However, drilling operations could potentially impact anadromous fish.

### Recommendations

NMFS offers the following scoping comments and recommendations:

#### In-Stream Work and Potential Impacts to Fish

NMFS recommends that Forest Service fish biologists evaluate 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. Precautions should be taken to avoid intake of rearing fish into the drill water. Protection measures should be written into the AWP or other appropriate document.

The AWP 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 at that location. 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 to August 1 (no in-water work August 2 to May 31);  
Chum Salmon: June 1 to August 1 (no in-water work August 2 to May 31);  
Coho salmon: June 1 to September 15 (no in-water work September 16 to May 31).


### Water Quality

The AWP included a *Surface Drilling Pre-Shift Environmental Checklist* which should be a useful tool to protect water quality. The checklist covers operation procedures for the water pump, the drill site, and the drill discharge water. The checklist requires that boom and absorbent mats be present and dry at the water pump and at the drill site. Requiring an oil spill kit on-site is a good precautionary measure. The AWP identifies other precautionary measures that include having 55-gallon diesel fuel drums placed within a secondary containment or within specially constructed double-walled aluminum tanks; using non-treated lumber for construction; permanently mounting the water supply pump within a covered secondary containment system; inspecting the water supply pump during and between shifts; and keeping used drill water out of streams. NMFS has no additional precautionary measures to suggest.

In summary, NMFS recommends that potential effects to fish be further investigated and documented in an EFH Assessment. Minimization measures should be incorporated into the AWP as necessary.

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

cc: ADNR, Craig, Jackie Timothy, [jackie.timothy@alaska.gov](mailto:jackie.timothy@alaska.gov)  
USFWS, Juneau, Richard Enriquez, [richard\\_enriquez@fws.gov](mailto:richard_enriquez@fws.gov)  
EPA, Juneau, Chris Meade, [meade.chris@epa.gov](mailto:meade.chris@epa.gov)  
ADF&G, Juneau, Tom Schumacher, [tom.schumacher@alaska.gov](mailto:tom.schumacher@alaska.gov)  
USFS, Admiralty NM, Steve Hohensee, [shohensee@fs.fed.us](mailto:shohensee@fs.fed.us)  
USFS, Admiralty NM, Sarah Shoemaker, [sshoemaker@fs.fed.us](mailto:sshoemaker@fs.fed.us)  
NMFS, HCD, Cindy Hartmann, [cindy.hartmann@noaa.gov](mailto:cindy.hartmann@noaa.gov)