



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

*National Marine Fisheries Service*

*P.O. Box 21668*

*Juneau, Alaska 99802-1668*

December 14, 2006

Linda Christian  
IDT Leader  
Wrangell Ranger District  
Tongass National Forest  
P.O. Box 51  
Wrangell, AK 99929

RE: Baht Timber Sale  
Draft Environmental Impact Statement

Dear Ms. Christian:

The National Marine Fisheries Service (NMFS) has reviewed the Draft Environmental Impact Statement (DEIS) for the Baht Timber Sale on Zarembo Island, Wrangell Ranger District, Tongass National Forest. Zarembo Island is situated between Clarence, Sumner, and Stikine Straits, approximately 17 air miles west of Wrangell, Alaska. The Baht Timber Sale area is located on the northern half of Zarembo Island in Value Comparison Units 456, 457, 458, and 459. The sale area is approximately 57,600 acres in size, of which approximately 18,000 acres are considered suitable for timber management. The sale could utilize existing log transfer facilities (LTFs) located at St. John Harbor, Roosevelt Harbor, and Deep Bay. The DEIS describes four action alternatives and a No-action Alternative. These five alternatives are described in the DEIS as follows:

“1) No Action, proposing no harvest or road construction in the project area at this time; 2) the preferred Alternative, designed to provide the most economically efficient harvest of timber, harvesting about 27.7 million board feet (MMBF) and building about 7.8 miles of new road and constructing 3.1 miles on unauthorized roadbed; 3) the Proposed Action, designed to attain the maximum timber volume allowed under the Forest Plan Standards and Guidelines, harvesting about 42.2 MMBF and building about 15.2 miles of new road and constructing 5.3 miles on unauthorized road bed; 4) designed to reduce watershed impacts, harvesting about 23.2 MMBF and building about 5.4 miles of new road and constructing 1.9 miles on unauthorized roadbed; 5) address wildlife habitat impacts, harvesting about 16.7 MMBF and building about 9.4 miles of new road and construction 3.2 miles on unauthorized roadbed.”

Section 305(b) of the Magnuson-Stevens Fishery Conservation and Management Act (MSA) requires Federal agencies to consult with NMFS on all actions that may adversely affect Essential Fish Habitat (EFH). NMFS is required to make EFH Conservation Recommendations, which may include measures to avoid, minimize, mitigate or otherwise offset adverse effects. EFH in the Baht project area includes all segments of streams where salmon reside during any life stage or period of the year, and the marine waters and substrates of St. John Harbor, Deep Bay, Roosevelt Harbor, and Sumner Strait. 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 largest watershed in the project area, St. John Creek, is one of the most productive anadromous streams on Zarembo Island. The marine waters near the project area provide important habitat for a number of groundfish and other species including Pacific cod, arrowtooth flounder, Pacific Ocean perch, walleye pollock, dusky rockfish, shorttraker rockfish, rougheye rockfish, yelloweye rockfish, sablefish, flathead sole, rex sole, sculpin, skate and various forage fish species.

NMFS concurs with the Forest Service determination that the Baht Timber Sale may adversely affect EFH. According to the DEIS this determination was based on the significance of cumulative watershed effects on Class I fish streams in proposed watersheds. NMFS is similarly concerned about the cumulative effects of proposed timber harvest and road construction on freshwater EFH in watersheds that have been impacted by past forest management activities. The DEIS states (pg 3-18): “Past harvest and roads within the watersheds of the Baht project area may have changed streamflow, sediment transport and storage processes. These changes may alter habitat features such as pools in sensitive stream channels, which may result in impacts on fisheries resources.”

Considering the threat of adverse impacts to EFH from proposed timber harvest and road construction in the Baht project area, NMFS appreciates the Forest Service’s effort to conduct a landscape-level sediment risk assessment as part of the DEIS. That assessment identified six watersheds in the project area that may have inherent higher risk for mass movement, sediment transport, and sediment storage due to past and proposed timber harvest and road construction (pg. 3-27). The sensitive watersheds in the Baht Timber Sale area include Beach Creek, Big Island Creek, St. John Creek, 52012 Creek, and Frenchy Creek watersheds. Several of these watersheds contain important Class I and II fish streams.

NMFS is concerned that additional timber harvest and road construction in the upper Frenchy Creek watershed pose a risk to overall watershed health and EFH. The Frenchy Creek watershed contains both Class I and II fish streams and drains into Class I fish habitat in lower St. John Creek. Both creeks support pink, chum, and coho salmon and steelhead trout. Channel Condition Assessments indicate the channels of both creeks are properly functioning. However, the Frenchy Creek watershed has experienced high levels of timber harvest and road construction within the past 30 years. Currently 27% of the Frenchy Creek watershed has been harvested; a 20% harvest level is considered a threshold of concern when considering additional timber harvest and road building in a watershed. The DEIS states that (pg 3-30 and 31) “...active roads and problematic closed roads [in the watershed] still remain on the landscape to alter natural hydrologic pathways, concentrate surface flows, and transport sediment.” According to the DEIS (pg 3-35), “...the proposed roads in Alternative 3 would increase the road density in the Frenchy Creek watershed to 2.27 mi/mi<sup>2</sup>. A road density over 2 mi/mi<sup>2</sup> would contribute significant amounts of sediment to the watershed as well as increase the probability of a catastrophic failure.” Of the four economically viable action alternatives, NMFS concludes that Alternatives 2 and 3 would adversely affect EFH in the Frenchy Creek watershed and lower St. John Creek. Our determination is due, in part, to the considerable timber harvest and road construction that would occur in the headwaters of Frenchy Creek under both alternatives. Alternatives 2 and 3 would also harvest timber in the headwaters of other sensitive watersheds (i.e. Units 7, 8, 10, and 29).

The DEIS identified 21 red culverts in the Baht project area. A red crossing is one that cannot pass juvenile fish at some or all flows and does not meet Forest Standards for passing fish in Class I or II streams. Blockage of fish passage is inconsistent with the best management practices under section 404(f) of the Clean Water Act. The DEIS indicates that these culverts will be replaced as funds become available.

The Baht Timber Sale would utilize existing LTFs at Deep Bay and Roosevelt Harbor on the northeast side of Zarembo Island, and at St. John Harbor on the northwestern side of the island. Deep Bay and Roosevelt Harbor are deep coves with steep, rocky shorelines and limited estuarine habitat. By comparison, St. John Harbor is a relatively large bay with extensive tidal flats and a gently sloping shoreline. The transfer of logs to marine waters can impact the marine environment by smothering organisms and natural habitat, and reducing water quality. Bark deposition surveys at the Deep Bay (1994) and St. John Harbor (1997) LTFs found that both sites have not exceeded permitted limits for bark deposition coverage and depth. All three LTFs mentioned above are equipped with bulkheads suitable for the direct transfer of logs to a barge.

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

- 1) The Forest Service should not select Alternative 2 or 3 due to their high potential for contributing to and exacerbating existing cumulative watershed impacts, including adverse impacts to EFH.
- 2) Alternative 4 was designed to spread harvest over a large area to reduce cumulative impacts on sensitive watersheds. NMFS recommends a modified version of Alternative 4 as the preferred alternative. Unit 12 should be substituted for Unit 19 to minimize timber harvest and road construction in steep headwater areas.
- 3) The 21 red culverts in the project area should be replaced to the Forest Standard as part of the timber sale. Ensure adequate fish passage is provided at all project road crossings in conjunction with the timber sale.
- 5) Direct transfer of logs to barges (a recognized timber industry practice) should be a required condition of the timber sale contract. If barging is not used to transfer logs, EFH consultation should be re-initiated to determine the extent of impact by outlining the log transfer, rafting and storage areas in relation to the known extent of past bark deposition and sensitive resources in the area (including eelgrass).
- 6) The FEIS should include a table similar to Table 3-8 in the DEIS that gives the harvest acreage, road mileage, percent area harvested, and road density in each watershed for each of the proposed alternatives. This table would help readers to better understand the cumulative impacts of the action alternatives on each watershed. Figure 3-2 should be modified to show proposed harvest units.

If you have questions regarding our comments contact John Hudson at (907) 586-7639 or [john.hudson@noaa.gov](mailto:john.hudson@noaa.gov).

Sincerely,



Robert D. Mecum  
Acting Administrator, Alaska Region

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