



UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration

National Marine Fisheries Service

P.O. Box 21668

Juneau, Alaska 99802-1668

March 10, 2006

Mark Hummel, District Ranger
Wrangell Ranger District
Tongass National Forest
USDA Forest Service
P.O. Box 51
Wrangell, Alaska 99929

RE: Baht Timber Sale – Scoping Comments

Dear Mr. Hummel:

The National Marine Fisheries Service (NMFS) reviewed the request for scoping comments on the proposed Baht Timber Sale. The project is located in the northern half of Zarembo Island within portions of Value Comparison Units 456, 457, 458, and 459. This area encompasses approximately 57,427 acres of National Forest land. The proposed action for this project is to harvest up to 42 million board feet from approximately 1,410 acres. Logging would be accomplished using cable logging systems. The proposed action would construct or reconstruct up to 20.5 miles of road. Timber would be hauled to the existing St. Johns or Deep Bay Log Transfer Facilities (LTF). We offer these scoping comments specific to the essential fish habitat (EFH) provisions of the Magnuson-Stevens Fishery Conservation and Management Act (MSFCMA), the Marine Mammal Protection Act (MMPA) and the Endangered Species Act (ESA).

EFH 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. 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.
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.
- 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 Baht project area contains at least eleven streams identified in the State of Alaska's Catalog of Waters Important for the Spawning, Rearing or Migration of Anadromous Fishes (http://www.sf.adfg.state.ak.us/SARR/FishDistrib/FDD_catalogs.cfm). Coho, pink and chum salmon utilize these streams as well as steelhead and cutthroat trout and Dolly Varden char. Coho, pink, and chum salmon are species with designated EFH. Salmon utilize both stream and nearshore habitats. Nearshore habitats are particularly important to juvenile salmon migrating from fresh water to salt water in the late spring and early summer.

The two largest stream systems in the project area are St. Johns Creek and Meter Bight Creek. The proposed action identifies proposed harvest units in the St. Johns Creek watershed above and between existing managed stands.

Groundfish

The inshore area of the project location provides important habitat for several marine species. Groundfish species with EFH in the project area include: Pacific cod, Pacific Ocean perch, walleye pollock, dusky rockfish, shortraker/ rougheye rockfish, yelloweye rockfish, sablefish, arrowtooth flounder, sculpin, skate, flathead sole, rex sole and various forage fish. Other rockfish expected to be in the project area include: black rockfish, quillback rockfish, copper rockfish and yellowtail rockfish.

Habitat Investigations

NMFS scientists have conducted fish sampling work in Kah Sheets Bay north of the project area. NMFS collected the following species using beach seines: Pacific sandlance, shiner perch, threespine stickleback, crescent gunnel, bay pipefish, snake prickleback, coho salmon, tubesnout, rock sole, tubenose poacher, surf smelt, kelp greenling, starry flounder, northern sculpin, silverspotted sculpin, Pacific staghorn sculpin, great sculpin, and buffalo sculpin, (Johnson, et al. 2005).

NMFS Habitat Conservation Division has certified divers that may be available to assist with near shore habitat investigations. We are especially interested in assisting with the site investigations for the LTFs.

Recommendations

NMFS offers the following scoping comments and recommendations:

Watershed Assessment

NMFS recommends that a watershed assessment be completed for the St. Johns Creek watershed as part of the analysis. The watershed has an extensive amount of managed stands. It is important to have a baseline assessment upon which to base a cumulative effects analysis. This assessment should assess the inherent production potential in the watershed and analyze the potential impact on that potential from the proposed timber harvest. The assessment would contain data on the total area of the watershed relative to the total area already harvested, the total length of stream by habitat class, the length of roads, the number of culverts, the number of culverts with fish passage problems and amount of habitat blocked, and the amount of slopes greater than 76 percent.

LTFs

LTFs have the potential to adversely affect EFH. Log storage and handling in marine waters often results in accumulation of woody debris. Woody debris frequently impact site productivity for many years. The EFH Assessment should contain detailed information on the St. Johns and Deep Bay LTFs such as: the results of dive surveys including the existing extent and depth of bark accumulation; the expected amount of additional debris from the proposed action; if the LTFs meet the 1995 LTF Siting, Construction, Operation, Monitoring and Reporting Guidelines; construction or reconstruction needs prior to LTF operation; and other site-specific information that is necessary for assessing the potential impacts of the LTF on EFH.

NMFS recommends that the analysis consider the option of barges to transport logs instead of traditional LTF use. We recommend that LTFs be included in your list of issues to be addressed in the environmental impact statement (EIS).

Fish Passage through Culverts

The proposed action would construct up to 15.2 miles of new roads and reconstruct up to 5.3 miles of road. On the Tongass and the Chugach National Forests up to 60% of culverts on salmon streams, and 75% of culverts on resident trout streams, do not fully meet the criteria for passing fish. There are currently approximately 2000 "red" culverts on the Tongass National Forest. A red culvert is one that does not meet the Q2-2day duration design flow standard and is restricting the movement of fish. The proposed action may add to the current fish passage problem on the Tongass. The effects analysis should include information from the Forest Service road condition survey for all the roads in the Project Area and specifically identify all red culverts. The potential for correcting some or all of these culverts should be analyzed. We recommend that red culverts/fish passage be included in your list of issues to be addressed in the EIS.

Wetlands

Compensatory mitigation for unavoidable wetland impacts not covered by the silviculture exemption may be appropriate for this proposed action and should be addressed in the assessment. We recommend that wetlands be included in your list of issues to be addressed in the EIS.

ESA/MMPA

The project is within the range of endangered humpback whales and threatened Steller sea lions, as well as harbor porpoises, harbor seals and killer whales, which are protected under the MMPA. Consultation under section 7 of the ESA would be necessary if the proposed action may affect listed species.

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

Sincerely,



Robert D. Mecum
Acting Administrator, Alaska Region

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References

Johnson, S.W., A. Darcie Neff and John F. Thedinga. 2005. *An atlas of the distribution and habitat of common fishes in shallow nearshore waters of southeastern Alaska*, 89p. U.S. Dep. Commer., NOAA Tech. Memo. NMFS-AFSC-157.