



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

National Marine Fisheries Service

P.O. Box 21668

Juneau, Alaska 99802-1668

July 22, 2005

Forest Cole
Forest Supervisor
Tongass National Forest
648 Misson Street
Ketchikan, AK 99901

RE: Overlook Project Area
Environmental Assessment

Dear Mr. Cole:

The National Marine Fisheries Service (NMFS) has reviewed the Overlook Project Area Environmental Assessment (EA). The Overlook Project Area is located in the central part of Mitkof Island about 15 miles south of Petersburg. The proposed action would harvest approximately 5.1 million board feet of timber from approximately 257 acres. A total of 1.2 miles of nearby classified road and about 0.4 miles of temporary road would be built to access the harvest units. Approximately 2.2 miles of existing classified roads that are currently closed to motorized traffic would be reconstructed to provide access. All of the new and reconstructed roads would be closed after timber harvest is complete.

We offer the following comments specific to the Magnuson-Stevens Fishery Conservation (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 Blind Slough, where the log transfer facility (LTF) is located. The streams in the project area provide important habitat for pink, chum, and coho salmon. The marine waters and substrates of Blind Slough provide important habitat for a number of 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.

Best Management Practices and Forest Plan Standards and Guidelines are the measures relied on to minimize impacts to fisheries. In the Standards and Guidelines minimization measures are tied to stream class, channel types and process groups. There are no maps in the EA that show the channel type/process group. We recommend that the channel type/stream process group be identified in Figure 3-7 and on the unit card maps.

The Unit Cards identify resource concerns and responses. For fisheries the concern section lists the streams that are in the unit by Class (I, II, III or IV) and by channel type. The response states the standard and guideline for each Class and channel type or process group but doesn't state what is actually going to be laid out on the ground. For example Unit # 21:

Concern: A Class II HC3 stream flows just outside the western boundary of the unit.



Response: No programmed commercial timber harvest within the RMA, which is defined as within 100 feet of the stream or to the top of the V-notch, whichever is greater. Provide reasonable assurance of windfirmness of the Riparian Management Area.

How is reasonable assurance of windfirmness being implemented? Is the buffer greater than 100 feet? It would be helpful to have the specific implementation narrative to accompany what is depicted on the unit cards.

Page 88 states: "Where windthrow concerns have been identified, RMAs would be further protected by retaining additional trees within 100 feet of the edge of the RMA to provide reasonable assurance of windfirmness." Windthrow concerns need to be clearly identified and the specifics discussed in the EA. We suggest the EA list which units have windthrow concerns and what is specifically prescribed for each unit to minimize these concerns.

Page 90 states: "Managed stands greater than 30 years of age were excluded from the cumulative effects analysis because stands of this class have typically regrown sufficiently that processes affecting the water balance, such as canopy interception and evapotranspiration, have recovered to pre-harvest rates." Were the stands greater than 30 years of age evaluated to determine if they were "typical" and had sufficient growth?

Page 91 states: "Fish passage through road crossings in the project area watersheds is expected to be restored to natural conditions after road maintenance associated with this and other projects." This statement needs further explanation. What are the plans to restore fish passage to natural conditions? Page 87 states that three fish stream crossings in the project area have culverts that are coded "red" in the Tongass National Forest Road Condition Survey database. A red culvert is one that cannot pass juvenile fish at some or all flows and does not meet current fish passage standards. These red culverts are located on Road 6235. The travel management strategy for road 6235 is to encourage all licensed motor vehicles. Therefore this road would not be closed after the sale.

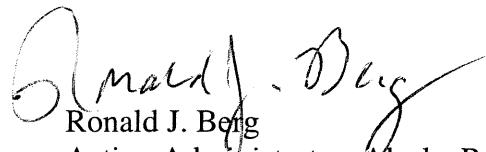
Section 305(b) of the MSFMCA requires Federal agencies to consult with NMFS on all actions that may adversely affect EFH. NMFS is required to make conservation recommendations, which may include measures to avoid, minimize, mitigate or otherwise offset adverse effects.

Accordingly, we offer the following EFH Conservation Recommendations pursuant to Section 305(b)(4)(A) of the Magnuson-Stevens Act.

1. NMFS recommends that the three red culverts on Road 6235 be repaired or replaced so that they can pass juvenile fish at all flows up to the Q2 2-day flow (a two day delay from the mean annual flood). Improving fish passage through these culverts could be considered compensatory mitigation for any unavoidable fishery impacts from the proposed timber sale.

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

Sincerely,


Ronald J. Berg
Acting Administrator, Alaska Region

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