



UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration

National Marine Fisheries Service
P.O. Box 21668
Juneau, Alaska 99802-1668

November 19, 2004

MEMORANDUM FOR: Susan Kennedy
NEPA Coordinator, NOAA Office of Strategic Planning

FROM:  James W. Balsiger
Administrator, Alaska Region

SUBJECT: Emerald Bay Draft EIS

Attached for your signature are comments by the National Marine Fisheries Alaska Region on the draft supplemental Environmental Impact Statement (EIS) for the Emerald Bay Timber Sale. The comment period for this EIS closes November 29, 2004. Please fax the comments to John Natvig, US Forest Service, (605) 720-7712 and mail a signed copy to our office for our records.

Please contact Katharine Miller at (907) 586-7643 if you have any questions.

Attachment



John Natvig
USDA Forest Service; TEAMS Enterprise
Attn: Emerald Bay
P.O. Box 241
Fort Meade, SD 57741

Dear Mr. Natvig;

The National Oceanic and Atmospheric Administration's National Marine Fisheries Service (NMFS) has reviewed the Draft Supplemental Environmental Impact Statement (DSEIS) for the Emerald Bay Timber Sale. The Forest Service's preferred alternative would harvest approximately 32,749 CCF of timber from approximately 601 acres of National Forest System land in a single timber sale.

Section 305(b) of the Magnuson-Stevens Fishery Conservation and Management Act 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. 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 Emerald Bay. The streams in the project area provide important habitat for pink, chum and coho salmon. The marine waters and substrates of Emerald Bay provide important habitat for a number of species including Pacific cod, arrowtooth flounder, Pacific ocean perch, walleye pollock, dusky rockfish, shortraker and roughey rockfish, yelloweye rockfish, rock sole, sculpin, skate, and spiny scallop. Chinook salmon are present in the marine waters adjacent to the project site, but do not spawn in the streams in the project area.

The SDEIS has several inconsistencies that make it difficult to assess how the proposed action may affect EFH. For example, the Proposed Action section of the Executive Summary (page S-1) states:

“The Forest Service proposes to harvest approximately 24,359 CCF of timber from approximately 620 acres of National Forest System land through one timber sale.” “Logs would be helicopter yarded from the cutting units to a barge in Emerald Bay.” “No road or log transfer facilities would be constructed.”

These descriptions correspond to Alternative C (Table S-1 and Table 2-5). The last page of the Executive Summary states that the preferred alternative for the SDEIS is Alternative B, and page S-4 of the SDEIS describes Alternative B as having “6.2 miles of road construction and conventional harvest” and further states “Alternatives B and D reduce helicopter yarding distance through road construction and Alternative B proposes conventional yarding methods (shovel and cable).” Page 1-2 of the main document also states “The preferred alternative, Alternative B ... would require 6.2 miles of new road construction and a log transfer facility.” If Alternative B is the preferred alternative the description of the proposed action should correspond to the description of Alternative B.

Also, page 1-2 in the Proposed Action section of Chapter 1, Purpose and Need, states that the Forest Service plans to harvest approximately 24,359 CCF of timber from approximately 620 acres of land, whereas the preferred alternative apparently involves 32,749 CCF and 601 acres. Again, the description of the proposed action should correspond to the description of the preferred alternative. We recommend that you clarify these inconsistencies.

The text has some inconsistencies regarding the use of log stringer bridges and culverts to cross streams/drainages. The description of the alternative design in Chapter 2 on pages 2-1 and 2-2 states “Log-stringer bridges would be used to cross drainages, and culverts would only be used for crossdrain areas.” Do drainages include Class I, II, III, and IV streams or just Class I and Class II streams? Are “crossdrain areas” culverts that will transport water running along ditch lines under the road through a culvert, or are Class III or Class IV streams included? Clear definitions and consistent use of terminology would be helpful. For example, page 2-16 states “Road construction includes log stringer bridges for all crossings of Class I or II streams.” Page 3-16 states: “All crossings would be log-stringer bridges which would be removed at the end of the sale.” Page 3-17 states: “All required crossings would utilize log-stringer bridges.” Table Fisheries – 2, titled Emerald Bay Stream Crossings by Alternative, does not define crossings nor break out crossings by stream class or by anadromous, resident or water quality streams. Such clarification would be useful. Also, for any of the alternatives, NMFS supports the use of log stringer bridges and closure of the road with restoration of stream crossings after timber management operations are completed.

The text does not clearly state how culverts will be handled in terms of road closure. The description of the alternative design in Chapter 2 on page 2-2 states: “Roads in Alternatives B and D would be closed to motorized vehicles when harvest operations are complete.” “Closure would include log-stringer bridge removal and storm proofing (water bar construction).” The description of closure does not specifically mention removing the culverts, and should clearly state that the culverts will be removed, if that is your plan.

On page 3-22, the latitude of the proposed LTF is given as 55.15.02N and the longitude as 132.13.46W, placing the LTF near Sunny Point in Cholmondeley Sound approximately 40 miles from Emerald Bay. NMFS assumes that the actual location of the proposed LTF is the same as shown on the map accompanying the 2001 Record of Decision (ROD) for the Emerald Bay Timber Sale. The Forest Service should provide NMFS with a precise location for the proposed LTF. We note that references to a breakwater associated with the LTF have been removed from the SDEIS and assume that this is in keeping with the information NMFS received during review of the 2001 FEIS and ROD that a breakwater will not be required for this facility. The final supplemental EIS should clarify this point.

The discussion of the environmental consequences of the LTF (pages 3-24 and 3-25) lists four ways that the Alaska Timber Task Force Siting Guidelines attempt to mitigate the potential effects of bark dispersal and toxicity. Page 3-25 states: “Both the helicopter-to-barge LTF proposed for Alternative C and the land-to-barge design proposed for Alternatives B and C

would meet the siting guidelines outlined above.” The land-to-barge design is proposed for Alternatives B and D, not Alternative C.

The United States Fish and Wildlife Service (USFWS) conducted a field investigation at the site of the proposed Emerald Bay LTF in 2000. Its field investigation report, dated June 8, 2000, states: “The proposed Emerald Bay LTF location we investigated does not meet the 1985 Alaska Timber Task Force LTF siting guidelines.” “Specifically, the following siting guidelines will not be met with this project as proposed:”

- 1) “Bark dispersal – LTFs should be sited along or adjacent to straits, channels, or deep bays where currents may be strong enough to disperse wood debris. The proposed Emerald Bay LTF site is relatively shallow and little current was detected along the underwater transects. These factors, in combination, may inhibit bark dispersal.”
- 2) “Site productivity – LTFs should be located in the least productive intertidal and subtidal zones. The proposed Emerald Bay LTF site supports a plant community and animal component that is typical, with a high diversity of species (over four dozen species). The California sea cucumber (*Parastichopus californicus*), a commercially important species, was the most abundant animal observed, and because it was observed in a number of sizes, this suggests that the Emerald Bay site may be a cucumber nursery area. The proposed LTF will likely degrade or possibly eliminate habitat for this and other species observed.”
- 3) “Avoid bald eagle nest trees – LTFs should be sited to avoid bald eagle trees.” ...

NMFS recommends including in the EFH Assessment the results of the 1982, 1998, and 1999 reconnaissance surveys on the proposed LTF site, as well as pertinent information from the USFWS report.

NMFS concurs with the finding that this project may adversely affect EFH. Implementation of the proposed standards and guidelines from the Tongass Forest Plan and applicable best management practices (BMPs) will minimize this impact on anadromous streams. The proposed land-to-barge LTF and inclusion of provisions in the LTF management contract to reduce bark accumulation would reduce impacts to EFH that would occur from a land-to-water LTF. Although NMFS generally concurs with the Forest Service’s conclusion that the potential adverse effects of the project have been minimized to the extent practicable, the lack of a precise location for the LTF, incomplete information in the LTF analysis, and incomplete information on stream crossings and road closure precludes us from providing site-specific EFH recommendations at this time.

Please contact Katharine Miller at (907) 586-7643 or Cindy Hartmann at (907) 586-7585 if you have any questions.

Sincerely,

Susan Kennedy
NEPA Coordinator

cc: USFWS, ADEC, ADNR, EPA, Juneau
ADF&G, Janet Schempf
USDA FS, Don Dunlap, Juneau
USDA FS, Dick Aho, Petersburg

References:

U. S. Fish and Wildlife Service Juneau Field Office (2000). "Report of Field Investigation for the Proposed Emerald Bay Log Transfer Facility on the Cleveland Peninsula near Meyer's Chuck, Alaska." Juneau, AK. 12 pp.