



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

National Marine Fisheries Service

P.O. Box 21668

Juneau, Alaska 99802-1668

December 29, 2005

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

RE: Navy Timber Sale -- Scoping Comments

Dear Mr. Hummel:

The National Marine Fisheries Service (NMFS) reviewed the USDA Forest Service Wrangell Ranger District (WRD), request for scoping comments on the proposed Navy Timber Sale. The Proposed Action for this project is to harvest up to 50 million board feet from approximately 2,070 acres. Logging would be accomplished using ground based and/or helicopter logging systems. The Proposed Action would construct approximately thirty-five miles of new temporary and classified road. Timber would be hauled to the existing Anita Bay South Log Transfer Facility (LTF) and a new LTF planned near Navy Creek. We offer these scoping comments specific to the EFH provisions of the Magnuson-Stevens Fishery Conservation and Management Act (MSFCMA), the Marine Mammal Protection Act (MMPA) and the Endangered Species Act (ESA).

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. 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 Navy project area contains many large and small stream systems with anadromous and resident fish. Coho, sockeye, pink and chum salmon utilize these streams as well as steelhead and cutthroat trout and Dolly Varden char. Coho, sockeye, pink and chum salmon are species with designated essential fish habitat. 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.

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 southeast Alaska including sampling in or near the project area in Anita Bay and Steamer Bay. Nearshore beach seining done by NMFS scientists in Anita Bay and Steamer Bay sampled the following species: shiner perch, Pacific sandlance, threespine stickleback, crescent gunnel, bay pipefish, coho salmon, tubesnout, northern sculpin, Pacific staghorn sculpin, great sculpin, surf smelt, buffalo sculpin, Pacific sanddab, cutthroat trout, copper rockfish, Dolly Varden char, blackeye goby, snake prickleback, silverspotted sculpin, and starry flounder (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 investigation for the proposed new LTF.

Recommendations

NMFS offers the following Scoping comments and recommendations:

LTFs

LTFs have the potential to adversely affect EFH. Log storage and handling in marine waters often results in accumulation of woody debris. These woody debris frequently impact site productivity for many years. The EFH Assessment should contain detailed information on LTFs, such as the results of dive surveys on existing LTFs or proposed LTF sites, identification of construction or reconstruction needs prior to LTF operation, or other site-specific information that is necessary for assessing the potential impacts of the LTF on EFH. The effects analysis should evaluate the

current conditions at the existing LTF (Anita Bay South) and proposed LTF as well as the potential impact of proposed sales on these LTFs.

NMFS recommends that the analysis consider the option of using small barge facilities to store logs. We recommend that LTFs be included in your list of preliminary issues to be addressed in the environmental impact statement (EIS).

Fish Passage through Culverts

The Proposed Action would construct approximately thirty-five miles of new temporary and classified 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. Red culverts do not meet the Federal Clean Water Act requirements for fish passage. The proposed action may add to the current fish passage problem on the Tongass. Therefore, we recommend that fish passage be included in your list of preliminary issues to be addressed in the EIS.

Wetlands

Wetlands are defined as areas that are inundated or saturated by surface or groundwater at a frequency and duration sufficient to support, and that under normal circumstances do support, a prevalence of vegetation typically adapted for life in saturated soil conditions. Wetlands include “muskegs”, forested swamps, marshes, bogs, and similar areas. Wetlands provide functions such as groundwater recharge; water detention; sediment/toxicant retention; stream bank stabilization; nutrient removal and transport; detritus production; etc. The Clean Water Act 404(B)(1) guidelines direct agencies first to avoid impacting wetlands, second to minimize any impacts to wetlands and last to compensate for unavoidable adverse impacts. 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 preliminary 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. Contact Aleria Jensen at (907) 586-7248 to determine whether consultation under section 7 of the ESA is 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,



Robert D. Mecum
Acting Administrator, Alaska Region

Enclosures (2)

cc: ADNR, Petersburg, Jim Cariello, jim_cariello@dnr.state.ak.us
USFWS, Juneau, Steve Brochmann, steve_brockmann@fws.gov
EPA, Juneau, Chris Meade, meade.chris@epa.gov
ADF&G, Juneau, Tom Schumacher, tom_schumacher@fishgame.state.ak.us
COE, Lloyd Fanter, Lloyd.h.fanter@poa02.usace.army.mil
NMFS, PR, Kaja Brix, Kaja.Brix@noaa.gov
NMFS, PR, Aleria Jensen, Aleria.Jensen@noaa.gov
NMFS, HCD, Cindy Hartmann, Cindy.Hartmann@noaa.gov
comments-alaska-tongass-wrangell@fs.fed.us

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.