



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

*National Marine Fisheries Service*

*P.O. Box 21668*

*Juneau, Alaska 99802-1668*

January 26, 2006

Greystone Environmental Consultants, Inc.  
Wrangell Ranger District Analysis Team  
5231 South Quebec Street  
Greenwood Village, CO 80111

RE: WRD Roads Analysis

Dear Analysis Team:

The National Marine Fisheries Service (NMFS) reviewed the information provided on the Wrangell Ranger District (WRD) Roads Analysis and Access and Travel Management Project. The project background information stated that the main objective of the analysis is to provide information on all of the roads on the WRD excluding Zarembo Island. The analysis includes roads on: Rynda, Sokolof, Woronkofski, Bushy, Shrubby, Etolin, and Wrangell Islands, and on the mainland near Frosty Bay. The analysis will use a science-based approach to document the current condition of the existing transportation system and address existing and future road management options. The analysis will provide information to Forest Service personnel to aid in decision-making or to focus transportation planning efforts. The next phase of transportation planning on the Wrangell Ranger District will be an Access and Travel Management Plan that will include a decision process for road management. NMFS offers these comments for your consideration.

#### Federally Managed Species

For information on federally managed species and essential fish habitat (EFH), NMFS directs you to the following web site: <http://www.fakr.noaa.gov/habitat/efh.htm>.

#### Anadromous Fish

The planning area contains numerous anadromous fish streams. The Forest Service maintains a channel type data base with some anadromous fish distribution data and the State of Alaska maintains a Catalog of Waters Important for the Spawning, Rearing or Migration of Anadromous Fishes and an associated atlas (Anadromous Waters Catalogue/AWC). The AWC is located electronically at: [http://www.sf.adfg.state.ak.us/SARR/FishDistrib/FDD\\_catalogs.cfm](http://www.sf.adfg.state.ak.us/SARR/FishDistrib/FDD_catalogs.cfm).

Anadromous fish distribution maps can be found at:

[http://www.sf.adfg.state.ak.us/SARR/FishDistrib/FDD\\_catalogs.cfm](http://www.sf.adfg.state.ak.us/SARR/FishDistrib/FDD_catalogs.cfm).

#### Red Culverts

The Forest Service investigated the culverts across the Tongass National Forest as part of a survey to determine in which streams with resident or anadromous fish the culverts are working properly and passing fish to state standards. Culverts were classified as red, green, or gray. Red culverts have complete or partial blockage of fish (juvenile and/or adult) at some or all flows. Green culverts pass fish to state standards. Culverts classified as gray need further analysis to



determine if they meet state standards. A database with this information is available from John McDonell, Assistant Forest Fish Biologist, Tongass National Forest. He can be contacted at: P.O. Box 309, Petersburg, AK 99833-0309, [jmcdonell@fs.fed.us](mailto:jmcdonell@fs.fed.us), (907) 772-5862, FAX (907) 772-5896. This information should be included in the WRD Roads Analysis.

The data in this database is critical part of a science-based approach to road management. For example, the number of red culverts in a section of road and the cost of replacement is valuable information in determining whether a road should be closed or left open. The Forest Service is in the process of prioritizing which of these red culverts to replace, retrofit, or repair to provide for fish passage. Strong consideration should be given to decommissioning roads or putting roads in storage where there are a significant number of red culverts and low projected use either for timber management, recreation, or subsistence. Negative road effects on stream channel stability, water quality, and fish passage can be minimized by closing low use roads and directing limited road maintenance dollars to roads that must remain open for timber management and connectivity purposes.

If you have any questions regarding our comments please contact Cindy Hartmann at (907) 586-7585 or at [cindy.hartmann@noaa.gov](mailto:cindy.hartmann@noaa.gov).

Sincerely,



Robert D. Mecum  
Acting Administrator, Alaska Region

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