



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

National Marine Fisheries Service

P.O. Box 21668

Juneau, Alaska 99802-1668

July 31, 2006

Jeannie Blackmore
IDT Leader
Ketchikan-Misty Fjords Ranger District
Tongass National Forest
3031 Tongass Avenue
Ketchikan, AK 99901

RE: Traitors Cove Timber Sale, Draft
Environmental Impact Statement

Dear Ms. Blackmore:

The National Marine Fisheries Service (NMFS) reviewed the Traitors Cove Timber Sale Draft Environmental Impact Statement (DEIS). The Traitors Cove Timber Sale Area is located on northwest Revillagigedo Island over twenty miles north of Ketchikan, Alaska. The project area includes all or parts of Value Comparison Units (VCUs) 7360, 7370, 7380, 7390, and 7400. The Forest Service proposes to harvest 18.3 million board feet (MMBF) of timber on 973 acres of National Forest System land. This would require about 8.89 miles of new road construction (7.55 miles National Forest System road and 1.34 miles temporary). Alternative 2 represents the Proposed Action. Other action alternatives would harvest 7.3 to 13.9 MMBF of timber and construct 0 to approximately 6 miles of new road.

Section 305(b) of the Magnuson-Stevens Fishery Conservation and Management Act (MSFCMA) requires Federal agencies to consult with NMFS on all actions that may adversely affect Essential Fish Habitat (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 Traitors Cove, Neets Bay, and West Behm Canal. The streams in the project area provide important habitat for pink, chum, and coho salmon as well as steelhead and cutthroat trout and Dolly Varden char. The marine waters provide important habitat for a number of groundfish species including Pacific cod, arrowtooth flounder, Pacific Ocean perch, walleye pollock, dusky rockfish, shorttraker and roughey rockfish, yelloweye rockfish, sablefish, flathead sole, rex sole, sculpin and skate.

NMFS concurs with the Forest Service determination that the Traitors Cove Timber Sale may adversely affect EFH. Harvest is proposed in nine watersheds with over 20 percent of the watershed harvested within the past 30 years and seven watersheds with 15 to 19 percent of the watershed harvested within the past 30 years. Only two of the watersheds in the project area have less than ten percent of the area harvested. The additional harvesting proposed under the action alternatives would increase the number of watersheds exceeding the 20 percent threshold by three to seven. The 20 percent harvest level is considered a threshold of concern in third order watersheds which triggers a more intensive watershed analysis prior to additional



disturbances. A watershed analysis should be completed for the Traitors Cove aquatic analysis area given the amount of prior harvest and proposed harvest.

The DEIS identifies several causes for concern regarding possible effects to fish habitat. Page 3-17 notes that the analysis area is categorized as not functioning properly, with habitat degradation measured by Tier Three surveys suggesting recovery may take over 100 years. Page 3-22 notes high landslide potential associated with logging in some areas. Page 3-27 refers to past logging activities that caused erosion of key physical stream characteristics, suggesting that more extensively harvested watersheds could be affected even more. Page 3-29 highlights the potential for cumulative effects on water quality and delays in recovery for degraded watersheds. The Final EIS should include a more thorough analysis of such cumulative effects on fish habitat from past and proposed logging throughout the study area.

The DEIS identified 14 red culverts in the project area that have not been contracted for replacement. A red crossing is one that cannot pass juvenile fish at some or all flows and does not meet Forest Standards for passing fish in Class I or II streams. The 14 culverts that do not meet current standards for fish passage should be described in further detail as well as the corresponding habitat that is impacted and not available or only partially available. The potential for correcting some or all of these culverts should be investigated. What opportunities are being foregone by not replacing or improving fish passage in these culverts in conjunction with this proposed timber sale and road maintenance and construction activities?

NMFS supports the proposed use of log barges as opposed to log rafts at marine access facilities.

The Final EIS should provide additional clarity and information in the following areas:

- Identify the number of red culverts in each watershed and by road number.
- Provide a list of abbreviations used in the document.
- For unit cards with deferral adjustments display the unit boundary as the unit exists after the deferrals.

NMFS offers the following EFH Conservation Recommendations pursuant to Section 305(b)(4)(A) of the MSFCMA.

1. Develop an alternative to address more directly the cumulative impacts within a watershed. For example, the alternative could drop all units or portions of units with slopes over 72%; drop all units or portions of units with MMI3 and MMI4 soils; eliminate all roads within MMI4 soils; drop all units or portions of units with McGilvery soils; change silviculture prescriptions from clear-cut to uneven-aged, two-aged, or other prescription that retains a significant portion of the existing stand.
2. Conduct a watershed analysis on all watersheds where harvest currently exceeds the 20 percent threshold and where harvest would exceed the 20 percent threshold under an action alternative. Absent a watershed analysis which demonstrates that cumulative effects will not be significant, any additional harvesting within these watersheds should be limited in scale and should be done using uneven-aged management prescriptions.

3. Evaluate the potential for correcting the 14 red culverts that do not meet the current standards for fish passage. Include this information in the analysis, and evaluate foregone opportunities if fish passage is not corrected as a part of this project.
4. Drop unit S19 from the unit pool. Chapter 3 in the DEIS identifies the likelihood of a small-scale landslide in this unit. Unit S19 borders a Class III stream which is tributary to a catalogued anadromous fish stream #101-90-10160.
5. Change the unit boundaries for Units F15, F34, F35, and F39 to eliminate the extreme hazard soils (MMI4) from the Unit. The Forest Plan prohibits harvesting on such soils and has removed them from the tentatively suitable timber base.
6. NMFS does not support selection of Alternatives 2 and 5 as planned due to their high potential for contributing to and exacerbating existing cumulative watershed impacts.

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

Sincerely,



Robert D. Mecum
Acting Administrator, Alaska Region

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