UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
National Marine Fisheries Service
P.O. Box 21668
Juneau, Alaska 99802-1668

March 20, 2006

Patricia Grantham
District Ranger
Petersburg Ranger District
P.O. Box 1328
Petersburg, AK 99833

RE: Kuiu Timber Sale, Draft
Environmental Impact Statement

Dear Ms. Grantham:

The National Marine Fisheries Service (NMFS) reviewed the Kuiu Timber Sale Area Draft Environmental Impact Statement (DEIS). The Kuiu Timber Sale Area is located on north Kuiu Island approximately 12 miles southwest of Kake and 35 miles northwest of Petersburg. The project area is within Value Comparison Units 399, 400, 402, and 421 and encompasses approximately 46,102 acres of National Forest System land. Four issues were identified through project scoping: roadless areas; wildlife habitat and subsistence; timber harvest economics; and cumulative watershed effects. Concerns were raised about the cumulative impact of introducing additional timber harvest and roads to watersheds that contain extensive harvested areas and high road densities. The DEIS stated "The cumulative effects of harvest and road building within Kuiu Timber Sale Area may affect the condition of stream channels draining these watersheds."

The action alternatives would harvest approximately 14.6 to 42.6 million board feet of timber; build 2.9 to 19 miles of temporary road; and reopen between 3.2 and 6.9 miles of existing closed classified roads. The preferred alternative, Alternative 4, would harvest approximately 42.6 million board feet of timber from approximately 1,425 acres, build 19 miles of new temporary roads and reconstruct 6.1 miles of closed classified road. As mitigation between 8.2 and 11 miles of currently open classified roads will be closed following harvest. In addition, structures on Road 6413 and excess fill in a stream crossing on Road 6417 will be removed (page 2.21).

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 EFH. NMFS is required to make conservation recommendations, which may include measures to avoid, minimize, mitigate or otherwise offset adverse effects. We offer the following comments specific to the 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 Rowan and Saginaw Bays. 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 and substrates of Rowan and Saginaw Bays provide important habitat for a number of ground fish 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.

NMFS concurs with the Forest Service determination that the Kuiu Timber Sale may adversely affect Essential Fish Habitat. Harvest is proposed in two watersheds that currently have over 20 percent of the watershed harvested within the past 30 years and one watershed with 19.8 percent of the watershed with recent harvest. This 20 percent harvest is considered a threshold of concern in third order watersheds which triggers a more intensive watershed analysis prior to additional disturbances. Since harvest began 8 to 59 percent of the project area watersheds have been harvested. Only watershed 109-44-10370 has less than a 19% harvest since harvest began. Of the seven watersheds in the project area three have a very high sediment risk index (SRI), two have a high SRI, and 2 have a moderate SRI. The unit cards identify fish habitat/watershed concerns in all units.

The DEIS identified 6 grey culverts and 44 red culverts in the project area. A red crossing is one that cannot pass juvenile fish at some or all flows, a green fish crossing is one that can pass juvenile fish at all flows up to the Q2-2day flow (a two day delay from the mean annual flood), and a gray fish crossing needs additional analysis to determine if it is red or green. Of the 44 red culverts, 11 are on Class I streams (page 3-180). Those culverts that have had upstream habitat analysis block or partially block approximately 2.4 miles of Class I habitat and 5.2 miles of Class II stream habitat. The 44 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? What are the cumulative impacts on fish passage from previous road construction and proposed construction?

Forest roads are only exempted from Clean Water Act jurisdiction if they are maintained to ensure waters are not impaired ((404) (f) (1) (E)). The DEIS identified that road maintenance needs are increasing as the road system and drainage structures age. Data provided in the DEIS and in the road condition survey indicates that the existing roads impair biological characteristics of the waters. Perhaps existing best management practices are not sufficient to ensure these roads will not impair waters. NMFS is concerned with construction of additional miles of road when the existing roads are potentially impairing the chemical and biological characteristics of waters. The project should incorporate measures to remediate for impaired waters from prior road construction. The mitigation proposed seems minimal relative to the number of red culverts in the project area.

The unit cards identify several units with high hazard soils mass movement index, MMI-3 or extreme hazard soils MMI-4. These units are: 101, 207, 209, 303, 305, and 417. The portion of the unit with MMI-3 and MMI-4 soils has been removed in some instances but not all. In some instances logging is being allowed and full suspension is not required, while in other cases full suspension is required. Logging on soils with a high mass movement index increases the chance of a landslide which increases the potential for sediment delivery to streams. Minimizing the risk of sediment inputs to streams from landslides and roads provides a strategy for avoiding undesirable channel changes (page 3-114).

The narrative on page 3-181 and 3-186 gives the existing continuous bark coverage in Rowan Bay as 0.5 acres and in Saginaw Bay as 1.08 acres. The Alaska Department of Environmental Conservation (ADEC) data base has different amounts of bark debris from the 2002 dive report (personal communication with Chris Foley on March 20, 2006). For the Rowan Bay LTF ADEC lists 0.81 acres of continuous bark debris and 0.64 acres of discontinuous bark debris. For the Saginaw Bay LTF ADEC lists 0.74 acres of continuous bark debris, 0.1 acres of discontinuous bark debris, and 0.86 acres of zero to trace bark coverage. The cumulative impact of additional bark debris is not discussed relative to existing wood debris. The DEIS simply states "Sporadic use of either LTF is not expected to cause additional bark accumulation." However the amount of existing accumulation is close to the threshold (100% bark covering more than 1 acre and deeper than 10 cm at any single point) and which triggers a remediation plan. How much bark is expected to be added from this proposed sale? The EA does not discuss the October 1995 LTF Siting, Construction, Operation, Monitoring and Reporting Guidelines or whether the LTFs meet those guidelines. Both LTFs were constructed prior to these guidelines and were not required to comply with the siting guidelines. Would they comply with these guidelines as presently configured? If not, then barging the logs should be given more consideration. The DEIS does not provide a detailed analysis of the costs of a barge LTF facility verses an in-water LTF or the potential benefits to the biological resources of using a barge facility.

The EA could use additional clarity and information in the following areas:

- It would be most helpful to the reader to have the order of the watersheds the same in all the tables to facilitate comparisons.
- As mentioned above the amount of bark debris accumulation is different than that reported by ADEC.
- The narrative at the top of page 3-114 states "Except for roads and landings, timber harvest occurring more than 20 years ago was not accounted for because harvested slopes are expected to recover rooting strength in the soil and stabilize after a 20 year period." Elsewhere in the document you use a 30 year timeframe (see C-14).
- P 3-117 says 27% of the Saginaw Creek Watershed has been harvested, however Page C-27 says 29% has been harvested.
- It would be useful to have the all the watershed condition information summarized in a table including the percent of the watershed harvested since harvest began; the acres in riparian harvest and percent of the watershed with riparian harvest; number and size of landslides; and the sediment risk index (SRI).
- Include the inherent SRI in Table 3-49.
- Identify the number of red and gray culverts in each watershed and by road number.
- Include data on the existing stream conditions for Rowan Creek watershed and 109-44-1-370 watershed.

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

1. Evaluate the potential for correcting the 44 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.

2. Change the unit boundaries for Units 101, 207, 303, 305 to eliminate the extreme hazard soils (MMI-4) from the Unit. For units where this may not be feasible require full suspension and single tree selection.

3. Change the unit boundary (NE corner of the unit) for Unit 417 to eliminate the high hazard soils (MMI-3) from the Unit.

4. Implement the management recommendations identified in the watershed analysis which includes: strict avoidance of potentially unstable slopes when planning road locations and timber harvest units, diligent maintenance of open roads, and placing roads in storage when not needed for specific planned activities.

5. Consider including some of the management opportunities identified in Table 1-3 (page 1-13) as mitigation for this project.

6. Evaluate the potential to use a barge in conjunction with both LTFs instead of putting the logs directly in the water.

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

Sincerely,

Robert D. Mecum
Acting Administrator, Alaska Region

cc: Kris Rutledge, USDA FS, Petersburg Ranger District
comments-alaska-tongass-petersburg@fs.fed.us
*Chris Meade, EPA Juneau
*Tom Schumacher, ADF&G, Juneau
*Richard Enriquez, USFWS, Juneau
*Bill Hanson, USFWS, Juneau
*Kevin Hanley, ADEC, Juneau
*Jim Cariello, ADNR-OHMP, Petersburg
*Joe Donohue, ADNR-OPMP, Juneau
*Don Martin, USFS, Juneau
*Ron Dunlap, USFS, Juneau
*Dick Aho, USFS, Petersburg
*Cindy Hartmann, NMFS, Juneau

*email