



UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration

National Marine Fisheries Service

P.O. Box 21668

Juneau, Alaska 99802-1668

February 21, 2008

Lynn D. Kolund
District Ranger
Ketchikan/Misty Fjords Ranger District
Tongass National Forest
3031 Tongass Avenue
Ketchikan, Alaska 99901

Re: Public Scoping Letter: Access and Travel Management (ATM) Environmental Assessment

Attn: Linda Pulliam

Dear Mr. Kolund:

The National Marine Fisheries Service (NMFS) has reviewed the scoping letter for the Ketchikan-Misty Fjords Ranger District's need to develop an Access and Travel Management Plan (ATM) to implement the 2005 Travel Management Rule (36 CFR 212) as revised by the Department of Agriculture. The purpose of this action is to designate existing Forest Service (FS) roads that will be available to motor vehicle travel and to what level open and closed roads will be maintained.

Your letter indicates that approximately two thirds, or 200 miles, of current open roads will be closed and the analysis will mainly focus on the first two of five identified maintenance levels (MLs) of which ML 1 and ML 2 roads are defined as:

- ML 1: Assigned to intermittent service roads during the time they are closed to vehicular traffic. Emphasis is normally given to maintaining drainage facilities and runoff patterns. Roads receiving level 1 maintenance may be of any type, class, or construction standard, and may be managed at any other maintenance level during the time they are open for traffic. While being maintained at level 1, they are closed to vehicular traffic.
- ML 2: Assigned to roads open for use by high clearance vehicles. Passenger car traffic is not a consideration. Traffic is normally minor, usually consisting of one or a combination of administrative, permitted, dispersed recreation, or other specialized uses. Log haul may occur at this level.

Total ML 1 road closures will occur at Marine Access Facility (MAF) landing sites Hassler, Bluff, Klu, SW Neets, Upper Carroll, Vallenar Bay, and Elf Point. Partial closures will occur on ML 1 and ML 2 mixed use roads accessed at MAF landing sites Shrimp, Fire Cove, Margarite,



Shelter, and Shoal Cove. Your letter states that this ATM will close many roads that are currently closed due to landslides and brush. You further state that closing roads, or putting them into storage for later use, may involve such actions as water bar installation, ditch cleaning, the removal of bridges and/or culverts, and storm proofing, depending on the condition of the road and to the level of maintenance required.

ML 1 or ML 2 definitions do not mention maintaining fish passage. All of the total and partial road closure sites have many identified anadromous streams listed in the Alaska Department of Fish and Game (ADF&G) Anadromous Stream Catalog that support Pacific salmon (please refer to Ketchikan Quadrangles B4, B5, C4, C5, C6, D4, and D5 and Special Publication No. 07-06, Catalog of Waters Important for Spawning, Rearing, or Migration of Anadromous Fishes- Southeastern Region, Effective June 1, 2007). This document can also be accessed at (http://www.sf.adfg.state.ak.us/SARR/FishDistrib/FDD_catalogs.cfm).

The environmental analysis for the project should address the Essential Fish Habitat (EFH) provisions of the Magnuson-Stevens Fishery Conservation and Management Act. Section 305 (b) of the Magnuson-Stevens Act requires federal agencies to consult with NMFS on all actions that may adversely affect EFH. Adverse effect means any impact that reduces the quality and/or quantity of EFH. Adverse effects may include direct or indirect physical, chemical, or biological alterations of the waters or substrate and loss of, or injury to, benthic organisms, prey species and their habitat, and other ecosystem components, if such modifications reduce the quality and/or quantity of EFH. Adverse effect to EFH may result from actions occurring within EFH or outside of EFH and may include site-specific or habitat-wide impacts, including individual, cumulative, or synergistic consequences of actions. 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; and
4. Proposed mitigation, if applicable.

NMFS supports closing and decommissioning the roads proposed and displayed in red on the map that accompanied your letter. However, NMFS is concerned with those roads that are now considered impassable to motorized vehicles and have been subsequently closed. Have these roads already been put into storage? Impassable closed roads have the potential to adversely affect EFH by not having fish passage addressed prior to closure status, and may impact spawning adult salmon as well as out-migrating juvenile salmon by not receiving the defined maintenance closure procedures necessary to ensure effective fish passage. NMFS recommends that prior to any road closure or road storage activity all anadromous stream crossings be fully evaluated for acceptable upstream and downstream access by both adult and juvenile salmonids.

In a report by ADF&G, a study jointly conducted by ADF&G and the USFS found 66% of culverts on salmon streams and 85% of culverts on resident trout streams did not fully meet the criteria for passing fish on 60% of the Tongass National Forest's permanent road system (Flanders and Cariello, 2000). A color code was established that identified a "red" culvert as one

that did not meet the Q2-2day duration design flow standard and impeded fish passage. The effects analysis should include information from the Forest Service road condition survey for all the roads in the Project Area and specifically identify all red culverts. The potential for correcting some or all of these culverts should be analyzed. All red culverts in streams identified as anadromous on totally closed roads should be removed or corrected to ensure adequate fish passage. NMFS recommends that the Forest Service utilize the Road Condition Survey Database (available from John McDonnell, Assistant Forest Fish Biologist, Tongass National Forest, jmcdonell@fs.fed.us, (907) 772-5862) to help determine whether a road should be closed or left open.

All 5 species of Pacific salmon are identified within the road system network so the Environmental Assessment should identify in-stream work windows to best fit each individual salmon population to protect adult and juvenile salmon. Coordination with area fish biologists will help in developing specific timing windows for each particular road maintenance protocol. The Environmental Assessment should also specify the Best Management Practices to be used during road storage activities to protect essential fish habitat.

Thank you for the opportunity to provide comments for developing your Environmental Assessment concerning ATM road use. If you have any questions regarding this letter, please contact Tim Wilkins at 907-586-7643 or Timothy.Wilkins@noaa.gov.

Sincerely,



Robert D. Mecum
Acting Administrator, Alaska Region

Applicant

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Literature Cited

Flanders, L. S., and J. Cariello, 2000. Tongass Road Condition Survey Report. Alaska Department of Fish and Game, Habitat and Restoration Division. Technical Report No. 00-7, Southeast Regional Office, Douglas, AK. 48 pps.