



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

National Marine Fisheries Service

P.O. Box 21668

Juneau, Alaska 99802-1668

February 19, 2008

Christopher Savage
District Ranger
Petersburg Ranger District
Tongass National Forest
USDA Forest Service
P.O. Box 1328
Petersburg, Alaska 99833

RE: Scoping Comments for the Central
Kupreanof Timber Harvest

Dear Mr. Savage:

The National Marine Fisheries Service (NMFS) reviewed the USDA Forest Service Petersburg Ranger District's request for scoping comments on the proposed Central Kupreanof Timber Harvest project. The proposed action could provide for multiple timber sale opportunities and may result in the production of up to 40 million board feet (mmbf) of timber from approximately 2,025 acres of forested land. Up to approximately 11.1 miles of new forest system road and up to 7 miles of temporary road may be necessary for timber harvest. The existing log transfer facility (LTF) at Little Hamilton in Hamilton Bay would be used. In addition, this planning effort will also look at road management objectives for the Kake Road System. The Kupreanof Timber Harvest project will propose and analyze recommendations for roads to remain open, to be closed, and to be designated for off-highway vehicle use. We offer these scoping comments specific to the Essential Fish Habitat (EFH) provisions of the Magnuson-Stevens Fishery Conservation and Management Act (MSFCMA), the Marine Mammal Protection Act (MMPA), and the Endangered Species Act (ESA).

EFH 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. 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.

In June, 2007, NMFS and the Forest Service agreed to consultation procedures that will be used for EFH consultations. The document with that process is enclosed for your reference. 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 project area contains a number of streams identified in the State of Alaska's Catalog of Waters Important for the Spawning, Rearing or Migration of Anadromous Fishes. (http://www.sf.adfg.state.ak.us/SARR/FishDistrib/FDD_catalogs.cfm).

The proposed action identifies proposed harvest units above and between existing managed stands in watersheds with anadromous fish streams. Coho, pink and chum salmon utilize these streams as well as steelhead and cutthroat trout and Dolly Varden char. Coho, pink, and chum salmon are species with designated EFH. Salmon utilize both stream and nearshore marine 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 Kah Sheets Bay south east of the project area. NMFS collected the following species using beach seines: Pacific sandlance, shiner perch, threespine stickleback, crescent gunnel, bay pipefish, snake prickleback, coho salmon, tubesnout, rock sole, tubenose poacher, surf smelt, kelp greenling, starry flounder, northern sculpin, silverspotted sculpin, Pacific staghorn sculpin, great sculpin, and buffalo sculpin, (Johnson, et al. 2005). Fish collected at a sampling site in Port Camden, east of the project area, include: walleye pollock, Pacific sand lance, Pacific herring, chum salmon, shiner perch, crescent gunnel, snake prickleback, tubesnout, northern sculpin, Pacific staghorn sculpin, great sculpin, surf smelt, rock sole, Dolly Varden, buffalo sculpin, whitespotted greenling, and arctic shanny (Johnson, et al. 2005).

Recommendations

NMFS offers the following scoping comments and recommendations:

Fish Passage through Culverts

The proposed action would construct up to 11.1 miles of new forest system roads and up to 7 miles of temporary roads. 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. A red culvert is one that does not meet the Q2-2day duration design flow standard and is restricting the movement of fish. The proposed action may add to the current fish passage problem on the Tongass. 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. Red culverts and fish passage through culverts are issues to be evaluated in the EIS and Access Travel Management Plan.

LTFs

LTFs have the potential to adversely affect EFH. Log storage and log handling in marine waters often results in accumulation of woody debris. Woody debris frequently impact site productivity for many years. The EFH Assessment should contain detailed information on the Little Hamilton LTF such as: the results of recent dive monitoring surveys including the existing extent and depth of bark accumulation; the expected amount of additional debris from the proposed action; if the LTF meets the 1995 LTF Siting, Construction, Operation, Monitoring and Reporting Guidelines; construction or reconstruction needs prior to LTF operation; and other site-specific information that is necessary for assessing the potential impacts of the LTF on EFH. NMFS recommends that the analysis consider the option of using barges to transport logs instead of traditional LTF use.

Road Closure, Road Decommissioning, and Access Travel Management

NMFS supports closing and decommissioning the roads proposed as displayed in orange and in purple on the map. NMFS recommends that the Forest Service utilize the Road Condition Survey Database (available from John McDonell, 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. Strong consideration should be given to decommissioning roads or putting roads in storage which have a significant number of red culverts and low projected use. 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.

Watershed Assessment

NMFS recommends that a watershed assessment be completed for the watersheds that have proposed harvest if a current assessment is not available. It is important to have baseline assessments upon which to base an effects analysis. The watershed

assessment should assess the inherent production potential in the watershed and analyze the potential impact on that potential from the proposed timber harvest. The assessment should contain data on the total area of the watershed relative to the total area already harvested, the total length of stream by habitat class, the length of roads, the number of culverts, the number of culverts with fish passage problems and amount of habitat blocked, and the amount of slopes greater than 76 percent. Watershed scale impacts are an issue to be addressed in the EIS.

Wetlands

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 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. Consultation under section 7 of the ESA is necessary if the Forest Service determines that the proposed action may affect listed species. For additional information on protected species, contact Erika Phillips at (907) 586-7312.

NMFS may offer additional recommendations as more detailed project information becomes available. If you have any questions regarding our comments for this project, please contact Cindy Hartmann at (907) 586-7585.

Sincerely,



Robert D. Mecum
Acting Administrator, Alaska Region

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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.