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

January 11, 2008

Frank Roberts
Planning Staff
Wrangell Ranger District
Tongass National Forest
P.O. Box 51
Wrangell, Alaska 99929

RE: Navy Timber Sale, Draft Environmental Impact Statement

Dear Mr. Roberts:

The National Marine Fisheries Service (NMFS) has reviewed the Navy Timber Sale Draft Environmental Impact Statement (DEIS) and Essential Fish Habitat (EFH) assessment. The project is located on central Etolin Island approximately 22 air miles south of Wrangell, Alaska.

The Navy Timber Sale would harvest between 1,322 to 7,800 acres of Forest Service (FS) land, remove between 18.7 and 97.9 million board feet of timber and construct up to 19.9 miles of new FS roads. The FS preferred alternative, Alternative D, would harvest 2,514 acres, remove 36 million board feet of timber and construct 5.0 miles of new FS roads, 5.3 miles of temporary roads and reconstruct 0.7 miles of existing road. Under alternatives B and C, new log transfer facilities (LTF) would be constructed at Burnett Inlet near Navy Creek and Mosman Inlet at Cooney Cove, respectively.

The EFH assessment describes potential impacts to EFH in fresh and marine waters. Freshwater fish habitat in the Navy Project area supports populations of pink salmon, chum salmon, coho salmon, steelhead trout, and Dolly Varden char. Potential adverse effects to freshwater EFH include direct effects associated with fish stream drainage structure installation and removal, short-term sediment increases, incidental wind throw associated with some stream buffers, and loss of large wood regardless of which alternative is selected. Impacts would occur by entering Navy Lake Creek watershed, which supports one of the highest fish producing streams on Etolin Island, despite limited but critical rearing habitat (located in the depositional stream segments present in the lower portions of the watershed). Navy Lake watershed would be clearcut and modified with 2.7 miles of road construction under Alternative B. In addition, Pump Creek, which has the most anadromous fish habitat of any watershed in the project area (8.1 miles), and is one of the top fish producing streams on Etolin Island has existing impacts by the presence of "red" pipes (culverts). "Red" pipes are those that are restricting fish passage, and these five are the most of any watershed on Etolin Island. Finally, Alternatives B and C would include significant harvest and road construction on unstable slopes, ranging from 420 (B) to 589 (C) acres of harvest on slopes greater than 72%.

To address the potential adverse effects of this project to freshwater EFH, the FS has proposed that the following measures be taken.

- The majority of the proposed roads will be stored following timber sale activities.

- All class I and II streams in the Navy Project area would be protected by a minimum 100' no-harvest buffer with more area protected for different process groups, sensitive riparian soils, elevated windthrow concern, and other relevant resource concerns.

- Maintenance will be built into road construction contracts that will correct existing erosion features.

- Site specific data was collected on all fish streams in the project area to ensure proper windfirmness buffers, proper channel classification, and the size of riparian management areas.

- BMPs would be implemented to protect water quality and aquatic habitats for all freshwater streams in the project area.

- Windfirmness has been incorporated into buffer design to protect all stream and lake buffers.

The marine waters of East Port Frederick are identified as EFH for a number of federally managed species, and species of concern to EFH, including the following: arrowtooth flounder, Atka mackerel, capelin, Chinook salmon, pink salmon, sockeye salmon, chum salmon, coho salmon, eulachon, Greenland turbot, octopus, Pacific cod, Pacific ocean perch, rex sole, rock sole, flathead sole, Dover sole, yellowfin sole, sablefish, sand lance, sculpin, shark, shortraker, rougheye and yelloweye rockfish, skate, squid, walleye pollock and weathervane scallops. Potential adverse effects to marine EFH would be associated with use of the existing or newly constructed LTFs.

The Navy Timber Sale may include direct barging of logs or floating of logs if the sale operator will "apply for additional permits to water logs". Therefore, bark deposition at the existing Anita Bay LTF, or the newly constructed LTFs at Burnett Inlet and Mosman Inlet may impact marine EFH by bark, sediment and debris deposition on the seafloor that diminishes habitat value for managed species and their prey due to additional bark accumulation that smothers subtidal habitat or creates unfavorable chemical conditions. Both new LTFs would be a "low angle rock ramp" design that would extend into the lower intertidal zone. Low angle ramps may be used for either barging or direct floating of logs into the water. Construction of either new LTF would further directly impact marine EFH by modifying the geophysical and biological characteristics of the intertidal zone and could indirectly impact marine EFH from incidental spillage of fuel or other hazardous materials associated with the facility.

The FS has proposed the following measures to minimize negative effects to marine EFH.

- LTF footprint will be minimized to reduce sediment production and land disturbance.

• LTF locations are located in areas where bark and fine sediments will be dispersed by strong tidal currents.

• Habitat surveys have been completed to determine marine habitat and potential impact areas. Locations of new LTFs considered siting guidelines as described in the Forest Plan (Appendix G). None of the LTFs are within 300 feet of an anadromous fish stream, in sensitive areas and are in areas described as typical for marine habitat of the region.

• Cumulative bark deposition is expected to remain within permit thresholds.

• There are no effects expected to affect marine-based aquaculture in Anita Bay or near Cooney Cove.

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. As you have acknowledged in your EFH assessment, the Navy Timber Sale would adversely affect both freshwater and marine EFH. Consequently, NMFS offers the following EFH Conservation Recommendation pursuant to Section 305(b)(4)(A) of the MSFCMA.

For freshwater EFH:

1) No harvest or road construction should occur in the Navy Lake Creek watershed. This watershed should be fully protected for its preeminent value as a high producing and pristine watershed in this area. Rearing habitat in this watershed is limited and located in the lower reaches where cumulative upstream effects of logging activities could concentrate and place the salmon productivity of the watershed at risk.
2) All "red" culverts in the Pump Creek watershed should be replaced to provide adequate fish passage. This watershed has the most fish habitat of the project area, which should be made fully accessible.
3) No harvest should occur on steep slopes (e.g.,>67%) and road construction should be minimized in fish bearing watersheds and streams.

For marine EFH:

4) Only barging of logs should be allowed to minimize the deposition of bark at either the existing or new LTF sites.
5) If new LTFs are constructed, they should be of the deep water barge facility type rather than low angle ramps. Low angle ramps impact lower intertidal habitat by requiring rock fill. A barge facility would have less impact on the subtidal marine environment due to less bark deposition.

Upon receipt of these EFH Conservation Recommendations, the MSFCMA requires federal

agencies to respond to NMFS within 30 days informing us of the agency's decision regarding these recommendations.

Thank you for the opportunity to comment. If you have questions regarding our comments contact Linda Shaw at (907) 586-7585.

Sincerely,

Robert D. Mecum Acting

for James W. Balsiger
Administrator, Alaska Region

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