



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

*National Marine Fisheries Service*

*P.O. Box 21668*

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July 11, 2008

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

RE: Scoping Comments for the Central  
Gravina Island Timber Sale EIS

Dear Mr. Kolund:

The National Marine Fisheries Service (NMFS) reviewed the USDA Forest Service (USFS) Ketchikan-Misty Fjords Ranger District's request for scoping comments on the proposed Central Gravina Island Timber Sale Environmental Impact Statement (EIS). The proposed action would harvest 38 million board feet (MMBF) of timber from 53 harvest units over 1,250 acres. The harvest would require construction of about 14 miles of National Forest System (NFS) roads and two miles of temporary roads. Harvested timber would be hauled to a marine access facility (MAF) at Pacific Log and Lumber on Tongass Narrows. The project would use the mainline state timber sale roads for log haul. Potential logging systems include ground, cable, and helicopter. Another alternative under consideration would harvest 18 MMBF on 28 units and utilize the state road system for log haul to the MAF on Tongass Narrows. The no action alternative will also be analyzed. The land is designated timber production in the Forest Plan. The project area is the Gravina Inventoried Roadless Area. 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 two major stream systems, Vallenar Creek (101-29-10060) and Bostwick Creek (101-27-10360). Both are 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](http://www.sf.adfg.state.ak.us/SARR/FishDistrib/FDD_catalogs.cfm)).

The proposed action identifies proposed harvest units in the Vallenar Creek and Bostwick Creek watersheds. Both streams have coho, pink and chum salmon and steelhead trout. 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 Bostwick Inlet. NMFS collected the following species using beach seines: Pacific sand lance, shiner perch, crescent gunnel, bay pipefish, snake pricklyback, tubesnout, rock sole, English sole, copper rockfish, red Irish lord, tubenose poacher, kelp greenling, Pacific sanddab, kelp perch, cutthroat trout, northern sculpin, Pacific staghorn sculpin, great sculpin, and buffalo sculpin, (Johnson, et al. 2005). This information can be accessed on line using the nearshore fish atlas found at: <http://www.fakr.noaa.gov/habitat/fishatlas/>.

## Recommendations

NMFS offers the following scoping comments and recommendations:

### 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 and relative to the total area proposed for harvest (including harvest on adjoining state land); the length of stream by class, process group, and channel type; the length of roads; the number of culverts; the number of culverts with fish passage problems (if any) and amount of habitat blocked; and the amount of slopes greater than 76 percent with proposed or past timber harvest. Watershed scale impacts are an issue to be addressed in the EIS.

### Fish Passage through Culverts

The proposed action would utilize mainline state timber sale roads and construct 14 miles of new forest system roads and 2 miles of temporary roads. A study jointly conducted by the Alaska Department of Fish and Game and the USFS found 66% of culverts on anadromous fish streams and 85% of culverts on resident fish streams did not fully meet the criteria for passing fish on 60% of the Tongass National Forest's permanent (system) roads (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. There are currently approximately 1200 "red" culverts on the Tongass National Forest (personal communication with John McDonnell on July 10, 2008). The proposed action may add to the current fish passage problem on the Tongass. There is no road condition survey on the existing Gravina Island roads, FS road 8110000 and non-FS roads 8100000-1, 8100000-2, 8100000-3, 8105000 and 8105100 (personal communication with John McDonnell on July 10, 2008). Road condition surveys should be conducted on the existing roads, both FS and non-FS roads. The survey information should be utilized in the analysis. If red culverts are identified the potential for correcting these culverts should be investigated and included in the analysis.

### Log Transfer Facilities (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 planned marine access facility (MAF) at Pacific Log and Lumber is both a barge facility and an in-water LTF. It has a bulkhead for loading logs on a barge or in the water with a crane, and it has a drive-down ramp for placing bundled logs into the water with a front-end loader. This facility is classified as Type V (Transfers less than 15 MMBF within a five-year period. May have 1-2 similar periods of activity during the rotation.). Because of the low permitted discharge bark monitoring surveys are not required by

the Alaska Department of Environmental Conservation and have not been done for this site.

Loading logs directly onto barges significantly minimizes the potential for bark to enter marine waters and is preferable to putting logs into marine waters. NMFS supports use of a barge facility for log transfer. NMFS recommends that a baseline dive monitoring survey be done at the LTF to map and survey the nearshore LTF area including depth contours, the existing extent and depth of bark accumulation, and the flora and fauna present. The EIS should include a discussion of the expected amount of additional debris from the proposed action and from other timber sales that will use the LTF for log transfer; if the LTF meets the 1995 LTF Siting, Construction, Operation, Monitoring and Reporting Guidelines; construction or reconstruction needs; permitting needs; and other site-specific information that is necessary for assessing the potential impacts of the LTF on EFH.

#### Road Closure, Road Decommissioning, and Access Travel Management

Post timber sale 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. An access travel management plan should be included in the timber sale draft 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.

#### Effects Analysis and Cumulative Effects

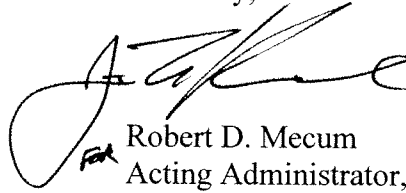
It is important that the effects analysis and the cumulative effects analysis include the current and planned harvest on the adjoining non-National Forest System lands.

#### 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 Aleria Jensen at (907) 586-7248.

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

Enclosure

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## References

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.

Johnson, S.W., A. Darcie Neff and John F. Thedinga. 2005. An atlas on 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.