



UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration

National Marine Fisheries Service

P.O. Box 21668

Juneau, Alaska 99802-1668

February 2, 2009

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

RE: Central Kupreanof Timber Harvest
Draft Environmental Impact Statement

Dear Mr. Savage:

The National Marine Fisheries Service (NMFS) reviewed the Draft Environmental Impact Statement (DEIS) for the Central Kupreanof Timber Harvest. The project area begins approximately nine miles southeast of the community of Kake. The project will utilize the Kake road system. The action alternatives would make between 28.1 and 70.2 million board feet (MMBF) of timber available for harvest within the project area, and require 2.2 to 6.1 miles of temporary road and up to 25.1 miles of system roads. Up to 3.9 miles of new temporary road and up to 7.3 miles of new system roads would be constructed. Construction of these roads would require 8 to 139 stream crossings, depending on the alternative selected. This project would update the Road Analysis Process (RAP) which recommends road management objectives for the Kake Road System. Implementation of the recommended road management objectives would result in the removal of 19 culverts that do not meet fish passage standards. The Hamilton Bay log transfer facility (LTF) would be used to transport logs by saltwater to a processing facility. The operator has the option to barge or to raft the logs.

The DEIS identifies Alternative 2 as the Proposed Action and Alternative 3 as a Preferred Alternative. Alternative 2 would require four new Class I road crossings. Alternative 3 would require five new Class I road crossings. Alternative 4 would not require any new Class I road crossings. All proposed Class I and Class II road crossings on temporary roads would be log stringer bridges. Temporary roads would be decommissioned after timber harvest is complete.

The EFH assessment describes the potential impacts of the Proposed Action to EFH in fresh and marine waters. 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 Hamilton Bay. Freshwater fish habitat in the Central Kupreanof Timber Harvest area supports populations of pink, chum, sockeye, and coho salmon. Potential adverse effects to freshwater EFH include increased stream-flows, increased sediment delivery, altered riparian vegetation, disturbed channel integrity, potential blockage of upstream movement of fish at road crossings, increased wind throw, and potential loss of large woody debris. Potential adverse effects to marine EFH include the addition of wood debris from the transfer of logs which could smother marine organisms and natural habitat, the addition of hydrocarbon chemicals from boat motors or oil/gas spillage, loss



of habitat from the construction of structures in the intertidal zone, and reduced water quality.

NMFS concurs with the U.S. Forest Service (USFS) determination in the EFH assessment that the Central Kupreanof Timber Harvest may adversely affect EFH.

There are currently 61 red fish crossings in the project area. A red crossing is one that cannot pass juvenile fish at some or all flows and does not meet Forest Standards for passing fish in Class I or II streams. Blockage of fish passage is inconsistent with the best management practices under section 404(f) of the Clean Water Act. The 61 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 all of these culverts should be investigated as part of this timber sale. Removal of 19 culverts which are red fish crossings on roads proposed for closure through the RAP was identified in the DEIS as a stewardship opportunity.

The DEIS identifies some harvest in very high risk hazard soils (MMI-4). There is an increased risk of sediment delivery to streams when timber is harvested on high hazard soils or on over steepened slopes.

The project will utilize an existing LTF in Hamilton Bay, which is a steel piling and concrete dock facility. The USFS is proposing to give the operator the option to place the log bundles on a barge or in the water. Hamilton Bay was placed on the list of impaired waterbodies in 1996 because of bark accumulation that exceeded water quality standards. It was removed from the list in 2002 after a September 2000 dive survey report found that the bark accumulation was less than 1 acre. Given the location of the LTF in the inner portion of Hamilton Bay and the limited flushing capability of the inner portion of the Bay, the in-water transfer of up to 70 MMBF of timber has the potential to create bark deposition in the Bay that will again exceed water quality standards.

Section 305(b) of the Magnuson-Stevens Fishery Conservation and Management Act (MSA) requires Federal agencies to consult with NMFS on all actions that may adversely affect Essential Fish Habitat (EFH). NMFS is required to make EFH Conservation Recommendations, which may include measures to avoid, minimize, mitigate or otherwise offset adverse effects.

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

1. Provide for adequate upstream fish passage at all road crossings on Class I and Class II streams.
2. Repair the 61 red culverts in the project area to meet Forest Standards as part of the timber sale.
3. Eliminate the acres of planned harvest on soils classified as MMI-4.

4. Require the direct transfer of logs to barges as a condition of the timber sale contract to avoid the deposition of additional bark and woody debris in Hamilton Bay.

Thank you for the opportunity to provide comments. If you have any questions regarding our comments, please contact Cindy Hartmann at 907-586-7585.

Sincerely,



Robert D. Mecum
Acting Administrator, Alaska Region

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Cindy Hartmann Moore

January 30, 2009