

SAR - DEIS - Chapter 3 - Biological - Aquatic

Comment # Comment

0029063-045

The Draft EIS, on page 3-92, states fish habitat standards and guidelines are based in part on the stream class. There are approximately 3,277 miles of class I streams, 1,435 miles class II, and 4,000 miles of Class III streams. We recommend additional protective measures be required for Class II, Class III, and Class IV streams in order to minimize downstream water quality and aquatic habitat impacts. Headwater areas can greatly influence downstream fish habitat capabilities. The lack of buffers on class II, III, and IV streams, as well as unclassified channels is a significant problem that can adversely affect fish habitat through the loss of a long-term supply of large woody debris, and changes in energy sources and nutrients that can degrade downstream fish habitats. We recommend the Final EIS include adequate buffer measures to protect Class II, Class III, and Class IV streams. In addition, we believe lakes, regardless of their size, deserve full riparian protection to maintain water quality standards.

0034894-011

One of the reasons for establishing National Forests recognized by the Organic Act of 1897, is 'for the purpose of securing favorable conditions of water flows.' The analysis should consider the value of roadless areas to soil and watershed stability. This value includes the role of roadless areas in protecting communities and aquatic habitat from the devastating effects of flooding and landslides, in contrast, failure to protect roadless areas from road construction and logging may exacerbate already dangerous conditions, in recent years, logging of steep slopes and failed roads have resulted in the loss of human life, the destruction of property, and the loss of essential spawning streams for native fish species. The analysis should consider the increased threats of landslides and flooding to local communities and to aquatic habitat caused by road construction, logging, mining, oil and gas development, off-road vehicle use and other harmful activities.

0036574-011

The DEIS and Revised Forest Plan should address, at a minimum, the fish and wildlife resources of Prince William Sound; the most biologically significant areas in the Sound, and associated appropriate management direction for those areas; subsistence areas for hunting and fishing; subsistence, commercial, and sport fishing, impacts on fish and wildlife and wilderness values from motorized vessels such as cruise ships, tour boats, and personal watercraft; impacts on fish and wildlife, and wilderness values from helicopter, and airplane use; the impacts from coastal development on those values; and the value of marine protected areas. The Forest Service should manage the marine environment of Prince William Sound as it does the upland terrestrial environment. In addition, the Forest Service must regulate the activities on Prince William Sound's marine waters to protect designated uplands.

Comment # Comment

0036574-017 The DEIS also fails to consider specific impacts on marine wildlife found within the Chugach National Forest.

Killer Whales

The DEIS does not address killer whales at all within the Forest. There are at least two groups of killer whales regularly found in Prince William Sound, the AT1 transient group, and the AB resident group. The DEIS and Revised Forest Plan must discuss these whales and address any impacts that are reasonably expected to occur within the Forest.

The AT1 group of transient killer whales, also known as the Prince William Sound transients, is in severe decline, with only ten whales remaining. This group of transients (meaning they eat marine mammals as opposed to residents who eat fish) has been documented year round in Prince William Sound. AT1 transients follow convolutions of the shorelines as they hunt, swimming quietly along beaches and close to rocky areas, entering bays and circling small islands, in search of harbor seal, one of their preferred food items. AT1 whales are genetically distinct, and have a unique acoustical dialect. Part of the transients' acoustic behavior does not involve vocalizations at all, but rather, silence. Researchers believe that transients employ a passive listening strategy for finding prey, as opposed to the active searching exemplified by resident echolocation. 'For that reason, a quiet underwater environment is probably important to transient whales searching for food. No doubt they expend much time and energy listening for the telltale sounds of harbor seals and Dall's or harbor porpoises. As a result increased vessel traffic and noise may affect the ability of transients to find their prey. It is no surprise that foraging transients can be very elusive, staying submerged for up to ten minutes, swimming an erratic path and avoiding close approaches by boats. These whales are probably much more susceptible to harassment than residents and their need for quiet should be respected to ensure their long-term survival.' Craig Matkin, et al. Killer Whales of Southern Alaska (1999) at 20. Clearly, the Forest Service must address impacts of increased vessel traffic and any activities that might occur on the tidelands on the AT1 killer whales. This small population is extremely vulnerable to adverse impacts and all efforts must be made to ensure activities within the Forest do not jeopardize the survival of the AT1 transients.

The resident AB pod is made up of 25 whales. These whales eat fish and not marine mammals. They have a complex social structure, traveling in matrilineal groups and using a sophisticated system of echolocation to detect, identify and pursue prey. Generally resident killer whales are loud, boisterous, and active at the surface when socializing or hunting salmon in the middle of passages.

Superpod gatherings that include several pods of resident killer whales, numbering over sixty individuals, have been observed within the Forest waters of Prince William Sound, around Knight Island and Montague Strait. 'Such social gatherings provide mating opportunities.' Killer Whales of Southern Alaska at 60. The Forest Service must consider potential impacts to this area of Prince William Sound.

Critical killer whale habitat includes habitat essential to their prey. Thus, it is essential to protect uplands and watersheds surrounding important marine environments. Healthy salmon stream systems in these uplands directly benefit resident killer whales by insuring a constant supply of salmon. Protecting these lands from development reduces soil erosion and stream sedimentation, which can reduce the productivity of nearshore waters. The nearshore environment is vital not only for salmon - the prey for resident killer whales, but for harbor seals and sea lions - the prey for transient killer whales. Killer Whales of Southern Alaska at 24.

Researchers know little of the winter habits of killer whales but believe that the bays and 'passages of southwestern Prince William Sound are important feeding and socializing areas for killer whales, both historically and at present. ' Killer Whales of Southern Alaska at 24.

The Forest Service must specifically address the impacts of its planning on the killer whale populations in Prince William Sound and ensure adequate protection to minimize adverse impacts to the transient and resident whales.