August 20, 2021

M. Earl Stewart Forest Supervisor, Tongass National Forest Juneau Ranger District 8510 Mendenhall Loop Road Juneau, Alaska 99801

Re: Mendenhall Glacier Mineral Withdrawal AKRO-2021-01966

Dear Mr. Stewart:

The Habitat Conservation Division of NOAA Fisheries has received notice that the Alaska Region, Tongass National Forest, and Bureau of Land Management Alaska State Office are now accepting comments on a proposal to withdrawal federal minerals from mineral exploration and development near the Mendenhall Glacier Recreation Area. The proposed withdrawal is in response to glacial recession and would extend the current withdrawal, issued in 1952, to cover an additional 4,560 acres of National Forest System lands. NOAA Fisheries is providing this comment during the scoping period based on our authorities under the Essential Fish Habitat (EFH) provisions in Section 305(b) of the Magnuson-Stevens Fishery Conservation and Management Act (MSA) and the Fish and Wildlife Coordination Act.

NOAA Fisheries supports the proposed mineral withdrawal, and further encourages a longer timeframe than 20 years for the proposal to support sustainability during continued glacial recession. Adverse impacts of mineral mining activities to fish populations and their habitats are well documented and include disruption of spawning locations, increases in turbidity and sediment suspension, alteration of natural stream flows, destruction of riparian vegetation, and introduction of mining-related pollutants (Limpinsel et al. 2017).

NOAA Fisheries supports protecting this area from potential adverse impacts through mining activities. Mendenhall Lake, Mendenhall River, and its tributaries are important areas for returning and rearing Pacific salmon. Essential fish habitat (EFH) for Pacific salmon covers both their marine and freshwater anadromous lifecycle stages. Freshwater habitat includes all streams, lakes, ponds, wetlands, and other water bodies currently or historically accessible to salmon in



the state (NPFMC 2020). According to the Anadromous Waters Catalog, sockeye salmon (*Oncorhynchus nerka*) and coho salmon (*Oncorhynchus kisutch*) use Mendenhall Lake and its connected streams as spawning and rearing habitats (Giefer and Blossom 2020).

If you have questions regarding our comments for this proposed withdrawal, please contact Molly Zaleski at molly.zaleski@noaa.gov or Linda Shaw at linda.shaw@noaa.gov.

Sincerely,

James W. Balsiger, Ph.D.
Administrator, Alaska Region

Cc:

Forest Service online comment system, https://cara.ecosystem-management.org/Public//CommentInput?Project=60550
Tristan Fluharty, USFS, tristan.fluharty@usda.gov
Matthew Reece, USFS, matthew.a.reece@usda.gov

References

Giefer, J., and B. Blossom. 2020. Catalog of waters important for spawning, rearing, or migration of anadromous fishes – Southeastern Region, effective June 1, 2020. Alaska Department of Fish and Game, Special Publication No. 20-04, Anchorage. Accessed online at: https://www.adfg.alaska.gov/sf/SARR/AWC/index.cfm?ADFG=main.home.

Limpinsel, D. E., M. P. Eagleton, and J. L. Hanson. 2017. Impacts to Essential Fish Habitat from Non-Fishing Activities in Alaska. EFH 5 Year Review: 2010 through 2015. U.S. Department of Commerce, NOAA Tech. Memo. NMFS-F/AKR-14, 229p. doi:10.7289/V5/TM-F/AKR-14. Accessed online at: https://repository.library.noaa.gov/view/noaa/17256

North Pacific Fishery Management Council. 2020. Fishery Management Plan for the Salmon Fisheries in the EEZ off Alaska. NPFMC, Anchorage, AK. Accessed online at: https://www.npfmc.org/wp-content/PDFdocuments/fmp/Salmon/SalmonFMP.pdf.