



THE STATE
of **ALASKA**
GOVERNOR BILL WALKER

Department of Fish and Game

DIVISION OF HABITAT
Southeast Region Office

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February 26, 2018

Ms. Carey Case, Project Leader
Petersburg Ranger District
PO Box 1328
Petersburg, AK 99833

RE: Central Tongass Landscape Level Analysis

Dear Ms. Case:

Habitat Biologist Greg Albrecht and I reviewed the information you provided for the US Forest Service's (USFS) Central Tongass Landscape Level Analysis (LLA) and coordinated our comments with Alaska Department of Fish and Game (ADF&G) Sport Fish and Wildlife Conservation Divisions staff in Petersburg.

We are confused about post-LLA mechanics and request process clarification. Our understanding is the LLA is a National Environmental Policy Act review that identifies and analyzes the environmental effects of a variety of unspecified generic activities that may or may not be implemented over the long-term on the Petersburg and Wrangell Ranger Districts. These generic activities might include roads, timber harvests, habitat restorations, or new infrastructure, among others. At some point after the LLA analysis is complete, however, folks will submit specific proposals. It would be helpful if you could produce a fact sheet detailing the process the USFS will use to determine if a proposed project falls within LLA sideboards, is compliant with the Forest Plan and other applicable laws and regulations, addresses legacy environmental issues, and includes appropriate oversight and monitoring. The fact sheet should specify who will be participating in the reviews at each juncture, who will be responsible for decision-making, and how disagreements will be resolved.

We provide the following recommendations in response to your survey:

- We recommend proposed timber harvest activities do not occur near completed or proposed habitat restoration and enhancement projects;
- We recommend all proposed projects include the replacement, or authorized and permitted block, of red pipes in the project area;
- We recommend all proposed projects include a fish passage evaluation of all gray pipes in the project area;

- We recommend the LLA include a maintenance schedule for existing and new trails, cabins, and boat launches;
- While we understand the USFS roads providing access to forest resources are managed under an Access and Travel Management Plan, we recommend using the LLA to close roads when ADF&G data and field observations demonstrate an urgent need to protect vulnerable game populations;
- We recommend timber projects developed within the LLA focus on young-growth harvest, limit old-growth harvest, and avoid low elevation and south facing stands to provide habitat for overwintering deer. In addition, these projects should maintain or improve deer habitat by thinning young-growth timber, incorporating skips and gaps, and managing slash to allow free movement.¹ Furthermore, projects developed within the LLA should address and resolve long standing issues on the forest, including old-growth reserve size, high road densities, and insufficient deer habitat capability in compliance with the Forest Plan, the Conservation Strategy, and Appendix K criteria, and;
- We recommend all proposed projects include monitoring commitments, such as an analysis of the efficacy of goshawk nest buffers through study of re-occupancy rates at known nest sites following timber harvest,² or assessing young-growth management effects on wildlife.

We appreciate being invited to participate early in the LLA review and look forward to better understanding the process and outcomes.

Sincerely,



Jackie Timothy
Southeast Regional Supervisor

Flatten, C., K. Titus, and R. Lowell. 2001. Northern Goshawk monitoring, population ecology and diet on the Tongass National Forest. Research final performance report, SE-4-2-6. Alaska Department of Fish and Game, Juneau, Alaska.

¹ Chapter 2, Goals and Objectives, Forest-wide Multiple-use Goals and Objectives, Timber, Wildlife; Chapter 4, Wildlife, Forest-wide Standards and Guidelines, Wildlife Habitat Improvement: WILD2; and Chapter 5, Young Growth Direction, Desired Conditions.

² Flatten et al. (2001), a cooperative goshawk study funded by ADF&G and the USFS, includes study recommendations.

Email cc:

Al Ott, ADF&G Habitat, Fairbanks
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