



THE STATE
of **ALASKA**
GOVERNOR BILL WALKER

Department of Fish and Game

DIVISION OF HABITAT
Southeast Region Office

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September 20, 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 scoping information you provided for the US Forest Service's (USFS) Central Tongass Landscape Level Analysis (LLA) and coordinated our comments with the Alaska Department of Fish and Game (ADF&G) Sport Fish and Wildlife Conservation Divisions in Petersburg, and our Division of Wildlife Conservation Access and Defense staff in Anchorage.

We appreciate clarification of the LLA process in the scoping document, which outlines development of a Draft Environmental Impact Statement (EIS) and Implementation Guide (IG), which will be available for public review then finalized, followed by Annual Plan of Work meetings where the USFS will solicit comments and input on the work proposed for the following year, to be considered by the Interdisciplinary Team.

We recommend considering the following during EIS and IG development:

Fish

The Central Tongass Scoping Report and Draft Activity Cards state the proposed action includes addressing up to 150 red pipes and does not mention grey pipes. Grey pipes should be included in the analysis, especially when they are on road segments where red pipe replacements are occurring. Also, the EIS and IG should be clear that a Title 16 Fish Habitat Concurrence to authorize red pipes "as is", when upstream fish habitat does not warrant replacement, may be pursued.

The Scoping Report mentions fish stocking and lake fertilization, both of which need to be conducted in consultation with ADF&G. Fish stocking needs to comply with ADF&G's genetic stock policy and Fish Transport permitting, and fertilization should only be considered after a

review of site-specific conditions shows lake fertilization would provide a positive benefit to salmon and outweigh impacts to other species. A monitoring plan and Title 16 Fish Habitat Concurrence would be required.

Wildlife

The Timber Analysis Areas (TAA) encompass land used by local residents for deer and moose hunting due to access created by logging roads and increased visibility of game in young clearcuts. New clearcuts and roads will increase hunting opportunity but will result in a long-term decline of ungulates due to reduced carrying capacity as stands mature to second growth forest. The Mitkof, Tonka, and Portage TAAs overlap with Division of Wildlife Conservation's Unit 3 Intensive Management Project for deer, where the goal is to grow the deer population to support higher levels of harvest in the future.

To help the public in the region make informed decisions and comments, please provide the following in the LLA EIS:

- Statements regarding how the USFS and IDT will or will not consider ADF&Gs intensive management goals and supporting data when developing harvest plans in the Mitkof, Tonka, and Portage TAAs.
- Visual and numerical representations of the proportion of clearcut-harvested productive old-growth forest (POG), clearcut-harvested high POG, remaining deer winter habitat (POG below 800' elevation with some southerly aspect), and proposed harvest area.
- An assessment of short and long-term consequences for deer and moose hunting and harvest opportunity, based on published research.
- A clear description of proposed wildlife habitat improvement projects including techniques, cost/acre, and schedule. The anticipated benefits for deer, moose, and Management Indicator Species should be supported by published research in similar habitat. When no such research exists, it should be clearly stated that it is uncertain whether any benefits for wildlife will result from those projects. If those projects have documented benefits for other management goals like timber production, that should also be clearly stated.
- An assessment of the direct economic benefits of the proposed action for residents of the plan area including a timeline for those benefits.

ANILCA

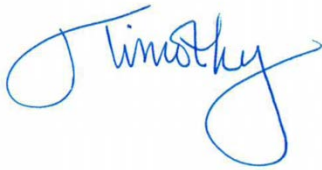
The Central Tongass Project Scoping Report states the only activity allowed in wilderness is invasive plant treatment, which is incorrect. The following activities listed in the Activity Cards are specifically allowed in national forest wilderness under ANILCA and the direction in the Alaska Region Supplement to Forest Service Manual 2320:

- Activity 02: Fisheries Improvements. ANILCA Section 1315(b) allows for fishery research, management, enhancement, and rehabilitation activities in national forest wilderness.
- Activity 04: Recreation Facility Construction, Reconstruction, Improvement, Decommissioning, and Maintenance. ANILCA Section 1315(c) and (d) allow for maintenance of existing cabins and construction of new cabins in wilderness.
- Activity 05: Trail Construction, Reconstruction, Improvement, Decommissioning and Maintenance. Trails are an acceptable improvement in wilderness per FSM 2323.13f.

Please correct the EIS and consider activities in wilderness according to the allowances in ANILCA.

Thank you for the opportunity to comment. Please contact Habitat Biologist Greg Albrecht at greg.albrecht@alaska.gov or 465-6384 with questions.

Sincerely,



Jackie Timothy
Southeast Regional Supervisor

Email cc:

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