

RE: Central Tongass Project, Draft Environmental Impact Statement, July 2019

Comments Submitted To: Petersburg Ranger District ATTN: Carey Case: Project Leader Central Tongass Project DEIS

By: Karin McCullough, [REDACTED]

On: September 15, 2019

I urge the NO ACTION ALTERNATIVE

Using the words in the document: "The Central Tongass Project Analysis is a large landscape-scale NEPA analysis that will result in a decision whether to authorize a variety of integrated resource management activities on the Petersburg and Wrangell Ranger Districts, based on public input received during project scoping and other collaborative efforts, to be implemented over a 15 year period."

Understanding the layers of processes and the rules and regulations that need to be adhered to I suggest moving slower not faster – and planning projects (in all arenas) "as discreet entities with opportunities for public comments Not the current proposal which is a global Central Southeast Sweep. The Process is flawed and needs to be different.

Please note the available maps in the paper copies of the DEIS and online are not adequate. They are not specific enough and are very difficult to read.

If we as the public are being told we need to be very specific in our comments, why is it that the information presented to us is not specific? This document does not analyze the site-specific impacts to the Central Tongass Project.

OLD GROWTH:

First and Foremost, there is no alternative offered other than the NO ACTION alternative that allows no Old Growth Harvest or Old Growth Harvest only in small select micro sales. Not offering these as alternative options is a grave omission. Therefore, I must be a voice for the NO ACTION ALTERNATIVE>

Prime Habitat Areas have already been severely impacted by Forest Service activities. Habitat fragmentation has occurred. This is another reason for Forest Service planning to occur in ways that allow for the public to comment on the specific planning for any proposed actions. A broad sweep approach does not meet the intent of NEPA therefore no action should be taken at this time.

Deer Habitat: Subsistence

Impacts to Deer Habitat would directly impact my family's subsistence use of this resource. The areas my family uses are Mitkof Island and Kupreanof Island. The importance of Old Growth Habitat for deer is well documented. No alternative other than the NO ACTION alternative would assure our continued access to this subsistence food.

Goshawk Habitat: This bird relies on unfragmented old growth habitat. Although Goshawks will nest almost anywhere raising the young to the point of successful fledging takes a very specific habitat. Continuous Old Growth that is below 1,300 feet in elevation and is not on steep terrain (30% and lower)

is needed. South Facing slopes meeting these characteristics offer the greatest chance for successful raising of young goshawks. Only the NO ACTION ALTERNATIVE protects the habitat that meets these needs.

Freshwater streams and lakes:

Sports fishing for Salmon, trout and Steelhead is an important recreational activity to my family.as it is to many other residents. It is also a significant tourist attraction. How any action on the forest would affect these uses is not adequately presented.

Some but not all favorite use areas are: Petersburg Creek (Kupreanof), Coho Creek (Kupreanof), Sumner Creek (Mitkof), Falls Creek (Mitkof), Big Creek also known as Bear Creek (Mitkof),

Marine Resources (Subsistence, Sports, Commercial):

The Tongass is an integral part of the Southeast Alaska Archipelago eco-system. All of the inside waters of the Tongass should be considered part of a large fresh and saltwater mixing zone that provides for productive estuarine areas. Science shows how interconnected the land habitat (forests, muskegs, glaciers, rivers) of the Tongass National Forest is with the Marine eco-system surrounding it. Any EIS should consider this as well as impacts on clean water, clean air and global weather change. Any action to the forest affects the marine habitat. (marine life in its entirety, animal and vegetable)

SIO's "As part of this analysis, the Forest Service is analyzing a project-specific Forest Plan Amendment¹ that responds to issue 1. The amendment would lower adopted Scenic Integrity Objectives (SIOs) (USDA Forest Service 2016a, p. 4-54) to allow more efficient even-aged management on a greater number of acres within selected portions of Timber Analysis Areas (see Figure 2). The amendment would apply only to this project, and may be applied to either action alternatives"

Tourism is currently economically very important (and is growing annually) in the Central Southeast portion of the Tongass. The Scenic Integrity Objectives should not be lowered. Lowering the the SIO would impact important view sheds which are important part of the Tongass experience for mutlt day trip tourist vessels, the whale watching day boats, the kayakers, the owner operated motor vessels, and recreational skiff folk.

Need to address before any further actions:

Repair blocked fish passages. Acknowledge and act on he 2016 Forest Service Report that reviewed the timber sale and administration process for two Viking Lumber contracts. Until findings are resolved we should Slow Down.

Overlook and Scott Peak: Clearly these two areas should not even be in consideration taking into consideration the lawsuit relating to deer and to wolves, the models used to calculate density and the need for habitat.

I urge the NO ACTION ALTERNATIVE be the chosen alternative

Sincerely,

Karin McCullough [REDACTED] [REDACTED] [REDACTED]

