



THE STATE
of **ALASKA**

GOVERNOR MICHAEL J. DUNLEAVY

Department of Fish and Game

HABITAT Section
Southeast Region Office

802 3rd Street
Douglas, Alaska
P.O. Box 110024
Juneau, Alaska 99811-0024
Main: 907.465.4105
Fax: 907.465.4759

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

RE: Central Tongass Project

Dear Ms. Case:

We, in coordination with biologists in the Alaska Department of Fish and Game (ADF&G) Divisions of Sport Fish, Wildlife Conservation, and Subsistence Divisions, reviewed the Draft Environmental Impact Statement (DEIS) for the Central Tongass Project. We appreciate the opportunity to review the proposed action and offer these comments for Final Environmental Impact Statement (FEIS) development.

Subsistence Resources

Please consider the following corrections and recommendations regarding subsistence resources in Chapter 3 of the DEIS:

- Page 302, paragraph 1; the Community Subsistence Information System citation (ADF&G 1996) does not contain information about the sale of personal use-caught fish. Please either remove the last sentence of this paragraph or provide the correct citation.
- Tables 89 and 91; *crabs* include king and Dungeness crab, which are double counted in the subsistence harvest tables. Please correct the tables and accompanying text.
- Page 320, paragraph 4; The statement "*Deer comprise only eight percent of subsistence harvest for Petersburg, therefore risks to deer populations this community relies upon may result in a minor increase in risk to subsistence incomes*" represents a single year of harvest; subsistence harvest values have ranged up to 22%, and we recommend updating the statement to reflect harvest variability. Furthermore, low deer harvest for Petersburg residents is a result of decreased deer abundance on Mitkof and Kupreanof Islands beginning in 2007 (Lowell 2015), as opposed to a decreased need for the resource.
- Page 337, last paragraph; we recommend including "by weight" after "...deer make up the largest single component of subsistence harvest in the project area...." for clarification.

- Page 338, paragraph 3; Please consider revising the paragraph including the statement “*Moose are primarily harvested under State sport regulations in the project area.*” While true, meat harvested under sport regulations fulfills the role of a “subsistence resource” and has resulted in an average annual harvest of 93 moose from units 1B and 3 since 2010 (Lowell 2018a, 2018b).

Wildlife

As described in Chapter 3, substantial proportions of Productive Old-Growth (POG) forests have been harvested in areas where additional POG harvest is planned, and the near and long-term value of second-growth treatments for individual species remains unverified. Consequently, our comments focus on the likely effects of additional POG harvest on species of greatest interest to ADF&G and users residing in communities within the project area.

Deer

Deer are an important food resource for residents of Game Management Units (GMU) 1B and 3. While we recognize the 2016 Tongass Land and Resource Management Plan (Forest Plan) conservation strategy and its various elements, such as the interagency deer habitat capability and Forest Resource Evaluation System for Habitat models, have been crafted and implemented to provide sufficient deer habitat on the Tongass, deer harvest and populations remain low in GMUs 1B and 3. The Alaska Board of Game set an annual deer harvest objective of 900 deer for GMU 3, based on harvest data from 1994–1998, and created an intensive management program for GMU 1B and 3 to increase deer abundance. The harvest objective has not been met in over 20 years. While hunter effort and regulations influence harvest, POG plays a crucial role in deer resiliency through harsh winters. Therefore, we recommend conservative design and implementation of timber harvest plans under the Central Tongass Project that will achieve the goal of “*maintaining habitat capability sufficient to produce wildlife populations that support the use of wildlife resources for sport, subsistence, and recreational activities*” as stated in Forest Plan Chapter 2 Goals and Objectives.

While both action alternatives will reduce deer habitat capability, Alternative 3 includes measures to enable deer to make seasonal elevational movements through harvested landscapes with the benefit of facilitating hunter access. We agree with this approach and recommend corridors be windfirm and remain navigable if thinned.

Moose

Moose have colonized most of GMU 3 and increased in abundance over the last 30 years. Harvest of this important food source in GMUs 1B and 3 has exceeded 100 bulls annually despite an antler-restricted hunt. Because these moose occupy forested habitat, it is difficult for ADF&G to monitor abundance or population trends and little is known about the ecology and food habits of moose in these areas. Winter diets for moose and deer may overlap and cause competition for winter resources between these species. Therefore, as requested in our scoping comments,^a please provide an assessment of short and long-term consequences for moose hunting and harvest opportunity, based on published research.

^a Jackie Timothy, Southeast Regional Supervisor, ADF&G Division of Habitat, to Carey Case, Project Leader, USFS Petersburg Ranger District. Letter: Central Tongass landscape level analysis comments; dated 9/20/18.

Elk

Elk were introduced to Etolin Island in 1987 and by 1991 a small population was established on neighboring Zarembo Island, currently estimated at 30–50 animals. Elk on Etolin Island primarily occur within the South Etolin Wilderness Area and will not be affected by this project. However, the small population of elk on Zarembo Island, which has been closed to harvest since 2009, are commonly seen on the northern and western portions of the island where timber harvest is planned. The DEIS and the Forest Plan do not mention elk; we recommend the FEIS includes an analysis of the potential effects of both action alternatives on this small, insular population and measures to reduce those effects.

Division of Wildlife Conservation biologists studied elk on Etolin Island from 2008 to 2014 and developed a resource selection function model for elk habitat selection on Etolin Island and a draft report for the study is available (Gregovich *In prep*). Due to differences in summer alpine habitat between southern Etolin and Zarembo Islands, only the winter habitat model is applicable to Zarembo Island. Please consider including information from this report in the FEIS.

Mountain Goats

While the Forest Plan and DEIS recommend helicopters maintain a buffer of 457 m from goat kidding areas and wintering areas, we recommend helicopters remain at least 1,500 m from goats in wintering and kidding habitat.

Martens

Martens are the most sought-after and valuable furbearer in the region and demonstrate endemism on islands where they are found. Kuiu Island supports American and Pacific clades of martens and was closed to trapping in 2008 due to indications of population decline. The DEIS acknowledges implementation of Alternative 2 will reduce marten habitat in some visual comparison units below the 70% threshold where populations may decline, and that implementation of Alternatives 2 and 3 would have major effects to American marten as a Management Indicator Species. This outcome is undesirable for ADF&G and unacceptable per the Forest Plan. Continued harvest of POG forest on Kuiu Island may result in the marten trapping season remaining closed for the foreseeable future.

We appreciate the specific provisions of Alternative 3 to reduce impacts to marten habitat on Kuiu Island based on ADF&G research (Koch 2016) and again, ask for conservative implementation of timber harvest under the Central Tongass Project to ensure wildlife populations provide for sport and subsistence activities under direction of the Forest Plan.

Wolves

The DEIS describes maintaining deer habitat capability to support wolf populations and references conservation measures in the Interagency Wolf Habitat Management Program (IWHMP). Wolves in neighboring GMU 2 were unsuccessfully petitioned for listing under the Endangered Species Act twice. Although the ecological and management settings differ, we encourage implementation of all recommendations of the IWHMP to ensure sufficient deer habitat is present.

Fish

The DEIS describes risks associated with increased peak flows in streams based on the metric of percentage of drainage area harvested. While the negative consequences of increased peak flow events described in the document are important, the effects of forest removal on low-flow events is only obliquely mentioned. Recent droughts throughout Southeast Alaska have demonstrated the degree to which streams of all sizes and habitat types are impacted by low flow. Therefore, we recommend in addition to the analyses prescribed by the DEIS and activity cards, the FEIS include direction for resources specialists to consider low-flow risks in proposed timber harvest areas.

Alaska National Interest Conservation Act (ANILCA)

The DEIS includes references to ANILCA when describing Tongass National Forest complex land ownerships, subsistence resources, and its five designated wilderness areas (the Petersburg Creek–Duncan Salt Chuck, Stikine–LeConte, Tebenkof Bay, Kuiu, and South Etolin Wilderness Areas). The DEIS states these wilderness areas are managed in concurrence with the provisions of ANILCA; however, neither the Wilderness discussion in Chapter 3, nor the activity cards outlining wilderness management in Appendix A, reference allowing the uses Congress recognized as needed in ANILCA.

Our understanding from discussions with USFS staff is that ANILCA allowances for activities in wilderness areas are not occurring under this project because USFS policy does not allow the Forest Supervisor to sign the Central Tongass Project National Environmental Protection Act document for activities in wilderness areas, rather the Regional Forester would be the signatory. However, we note that in accordance with Forest Service Supplement No. R-10 2300-2008-2, the Forest Supervisor can approve temporary facilities and trails as listed in sections 2323.04d and 2320.04d.

Therefore, we request the following activities be allowed under the FEIS and added to the Wilderness Sections of the following activity cards:

Activity 02: Fisheries Improvements - Temporary facilities needed in connection with fisheries research, management, or enhancement/rehabilitation projects (ANILCA 1315(b)). Please revise the language for Activity 01 in Appendix A, page A-30, and Activity 02 in Appendix A, page A-36.

Activity 04: Recreation - Temporary facilities related to the taking of fish and wildlife (ANILCA 1316) needing prior approval and maintenance of existing cabins (ANILCA 1315(c)). Please revise the language for Activity 04 in Appendix A, page A-52.

Activity 05: Trail Construction - Construction and reconstruction of trails for traditional activities (ANILCA 811 or ANILCA 1110(a)) with treads less than 24 inches in width. Please revise language for Activity 05 in Appendix A, page A-56.

Cabins in Wilderness Areas

The action alternatives propose decommissioning up to 15 cabins in the project area, though the USFS has determined the Forest Plan Standard and Guideline to “*Maintain existing public use cabins and shelters at present or improved condition*” is not being met. We are concerned that cabins located in wilderness areas may be included among those decommissioned. Congress recognized the extreme weather events and resulting safety hazards that people traveling and recreating in Alaska face, and therefore made a specific provision for cabin maintenance and construction in wilderness areas under ANILCA 1315.

We request the USFS focus on renovating cabins rather than decommissioning them, supported by the following statement on page 285 of the DEIS:

“Recreation facility use data for cabins do not show a decrease in use of existing cabins after a cabin is renovated or constructed. New cabin construction appears to attract more use and not displace use from other sites, although the potential for displacement of users is possible.”

Please provide a map in the FEIS showing proposed locations for new structures and identifying the locations of cabins and outhouses proposed for decommissioning or conversion to shelters.

Wilderness Character

In the Environmental Effects section of Chapter 3, Wilderness, there is information on the five qualities of wilderness character under the Regulatory Framework (page 374), though no information on the Alaska-specific ANILCA allowances. The section states:

“Activities prohibited under Section 4(c) of the Wilderness Act must go through a Minimum Requirements Analysis (MRA) before it can be determined whether and how to implement the activity.”

The purpose of additional procedures, such as the MRA, and the activity-specific considerations in the Alaska Region Supplement to Forest Service Manual chapter 2320 (R-10 2300-2008-2), is to protect wilderness character while administering the area and allowing for legislatively authorized uses such as those in ANILCA, not to prevent consideration of activities altogether. We request including the Alaska allowances found in the USFS document *What Can I Do in Wilderness*, as well as recognition in the wilderness sections of the FEIS, that protecting wilderness character is more than protecting opportunities for solitude.

The allowances include the following:

- “...the taking on public lands of fish and wildlife for nonwasteful subsistence uses shall be accorded priority over the taking on such lands of fish and wildlife for other purposes. [ANILCA 804]”;
- “...appropriate use for subsistence purposes of snowmobiles, motorboats, and other means of surface transportation traditionally employed for such purposes by local residents, subject to reasonable regulation. [ANILCA 811]”;

- “...the use of snowmachines (during periods of adequate snow cover, or frozen river conditions in the case of wild and scenic rivers), motorboats, airplanes, and nonmotorized surface transportation methods for traditional activities (where such activities are permitted by this Act or other law) and for travel to and from villages and homesites. [ANILCA 1110(a)]”;
- “...the State or private owner or occupier shall be given by the Secretary such rights as may be necessary to assure adequate and feasible access for economic and other purposes...subject to reasonable regulations... [ANILCA 1110 (b)]”;
- “...Secretary shall authorize and permit temporary access...in order to permit the State or private landowner access to its land for purposes of survey, geophysical, exploratory, or other temporary uses thereof whenever he determines such access will not result in permanent harm to the resources of such unit, area, Reserve or lands. [ANILCA 1111]”;
- “The construction of new cabins is prohibited except as may be authorized pursuant to a nontransferable, five-year special use permit...upon a determination that the proposed use, construction, and maintenance of a cabin is compatible with the purposes for which the unit or area was established... No special use permit shall be issued to authorize the construction of a cabin for private recreational use. [ANILCA 1303(b)(1)]”;
- “Previously existing public use cabins within wilderness designated by this Act, may be permitted to continue and may be maintained or replaced subject to such restrictions as the Secretary deems necessary to preserve the wilderness character of the area. [ANILCA 1315(c)]”;
- “...the Secretary... is authorized to construct and maintain a limited number of new public use cabins and shelters if such cabins and shelters are necessary for the protection of the public health and safety. [ANILCA 1315 (d)]”;
- “Within National Forest wilderness and national forest monuments designated by this Act, the Secretary of Agriculture may permit or otherwise regulate the recovery and salvage of logs from coastlines. [ANILCA 1315(f)]”; and
- “On all public lands where the taking of fish and wildlife is permitted...the Secretary shall permit, subject to reasonable regulation to insure compatibility, the continuance of existing uses, and the future establishment, and use, of temporary campsites, tent platforms, shelters, and other temporary facilities and equipment directly and necessarily related to such activities. [ANILCA 1316].”

Wilderness Buffer

We request removing all language in the DEIS directing the wilderness area manager be consulted for activities adjacent to designated wilderness. While the Wilderness Act does not specifically address the issue of buffer zones around wilderness areas for additional protection, Congress, in Public Law 96-550, section 105 states:

“Congress does not intend that the designation of wilderness areas...lead to the creation of protective perimeters or buffer zones around each wilderness area. The fact that nonwilderness activities or uses can be seen or heard from areas within the wilderness shall not, of itself, preclude such activities or uses up to the boundary of the wilderness area.”

Please contact Habitat Biologist Greg Albrecht at (907) 465-6384 with any questions.

Sincerely,



Kate Kanouse
Regional Supervisor

Email cc:

Ben Mulligan, ADF&G, Anchorage
Al Ott, ADF&G Habitat, Fairbanks
Mark Minnillo, ADF&G Habitat, Craig
ADF&G Habitat Staff, Douglas
Patrick Fowler, ADF&G SF, Petersburg
Troy Thynes, ADF&G CF, Petersburg
Tom Schumacher, ADF&G WC, Douglas
Jen Nolanwing, ADF&G WC, Anchorage
Doug Cooper, USFWS, Anchorage

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