



THE STATE
of **ALASKA**
GOVERNOR MIKE DUNLEAVY

Department of Fish and Game

HABITAT SECTION
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October 21, 2022

Mark Pentecost
Thorne Bay Ranger District
1312 Federal Way
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RE: Scoping Comments
Thorne Bay Basin Integrated Management Project (BIMP) #62854

Mr. Pentecost,

The Alaska Department of Fish & Game (ADF&G) has reviewed the United States Forest Service (USFS) proposed Thorne Bay BIMP request for scoping comments as the first step in preparing an Environmental Assessment (EA). The following comments are being provided to help the USFS in its project development and express any concerns the Department may have.

Project Description

The BIMP proposes to utilize sustainable vegetation management approaches over the course of 10-15 years to provide an annual average of 7-10 million board feet (MMBF) of suitable young growth timber, reconstruct temporary roads, maintain National Forest System (NFS) roads, and implement terrestrial and watershed restoration activities in the Thorne Bay basin. Specifically, the project would:

- Harvest up to 5,800 acres of young growth timber using various sizes of timber sales over 19 to 15 years (the project does not include the harvesting of any old growth timber)
- Complete terrestrial habitat treatments on up to 2,800 acres of young growth
- Construct approximately 6 miles of new temporary road
- Construct approximately 1 mile of new NFS road
- Reconstruct approximately 42 miles of decommissioned temporary road
- Maintain approximately 104 miles of NFS road

The project would also improve hydrologic connectivity within the project area, addressing issues with channels diverted by roads and undersized/misplaced crossing structures. Road networks included for these activities are NFS roads 3000000, 3015000, 3017, 3018, and associated spur roads.

Comments and Recommendations

Wildlife

Deer

To maintain and enhance deer habitat thinning or other young-growth treatments such as gaps, or girdling should occur before 25 years post-harvest. Maintaining forage production in young growth stands likely has little benefit if slash is left in the field and discourages deer from using treated stands. Any treatment of young growth intended to benefit deer should carefully consider slash treatments and the need to facilitate movement of deer within and among favorable patches. ADF&G supports implementing varied wildlife treatments and maintaining wildlife corridors with high canopy cover and minimal slash that connects habitat.

Wolves

Based on the layers for the Thorne Bay BIMP, there are known wolf dens in the proposed project area. Protecting habitat around dens is important for wolf reproduction. Based on the known wolf den locations and available research, ADF&G has created a 'no activity buffer' within a minimum distance of 734m from the known den locations. Specific information on den locations (e.g., maps, coordinates, etc.) can be provided upon request when project specifics are known.

Black Bears

Based on the layers for the Thorne Bay BIMP, there are known black bear dens in the proposed project area. Black bears have specific criteria they need for suitable dens and will reuse den sites. Protecting habitat around dens is important for black bear reproduction. ADF&G recommends a 30.5m buffer around known black bear dens. We advise against clearcut logging within the buffer. Specific information on den locations (e.g., maps, coordinates, etc.) can be provided upon request when project specifics are known.

Fisheries

There are several streams within the project area that are included in the State of Alaska Anadromous Waters Catalog (AWC). Notably these include the drainages of Falls Creek (102-70-10580-2008), Gravelly Creek (102-70-10580-2006), and Slide Creek (102-70-10760). These streams have been found to be important for both anadromous and resident fish species. In addition, there are likely to be tributary streams important for fish that have yet to be included in the AWC. We encourage the USFS to submit nominations for any streams found to contain anadromous fish.

The project proposes road construction and reconstruction within these drainages and will undoubtedly require the crossing of these streams and related tributaries. ADF&G supports the USFS in their efforts to remove/replace old stream crossing structures with properly designed structures that will allow the efficient passage of fish. Any new crossing structures installed should also be designed as such. The ADF&G looks forward to working with the USFS through the concurrence process under the *Memorandum of Understanding Between the USFS and the ADF&G Regarding Fish Habitat and Passage* (No.19-MU-11100100-108).

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The Slide Creek drainage was previously logged prior to any stream protections being required and because of this timber was harvested right up to the stream. There may be opportunities for riparian thinning along sections of stream where alder is the dominant species. Because the riparian corridors are also important migration routes for wildlife, slash treatment according to wildlife thinning protocols should be followed.

Thank you for the opportunity to provide comments on the Thorne Bay BIMP. Please direct any questions you may have to Habitat Biologist Mark Minnillo at (907) 826-2560 or emailed to mark.minnillo@alaska.gov

Sincerely,
Doug Vincent-Lang, Commissioner



By Mark Minnillo
Craig Area Office Manager

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