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Comments: The Mule Deer Foundation (MDF) appreciates the opportunity to comment on the Thorne Bay Basin Integrated Management Project Scoping Document.

Sitka Black-tailed deer numbers in Unit 2 are declining. We believe that the aging young-growth stands in stem exclusion constitutes a loss of habitat and are at the root of this decline in deer numbers. At the 2022 Deer Summit in Craig, Alaska from October 13-15, 2022, we heard from Prince of Wales Island (POW) residents, Alaska Department of Fish and Game Staff, and University researchers. All were in agreement that the Unit 2 deer herd population was substantially down from historic levels and all scenarios predict a continued decline in deer populations for the foreseeable future (Gilbert et al. (Final Report to USFWS 2015). Sitka Black-tailed deer populations will continue to decline under even the best scenarios. Based on the importance of deer on POW, we propose and recommend that the "Purpose and Need" for this Project should include, as a primary reason for taking place, the enhancement and restoration of deer habitat to improve deer forage, improve winter range within each watershed, enhance or preserve vertical movement corridors for deer, and restore riparian habitat by careful prescriptions which will provide timber volume and biomass opportunities.

Under the heading of Subsistence-Goals and Objectives you state that the goal is to "Provide for the continuation of subsistence uses and resources by rural Alaskan residents." The consensus at the 2022 Deer Summit and data provided by ADFG/USFS was that residents are struggling to harvest the deer they need to feed their families and the communities. We request that you acknowledge this in your Objectives for the project. We suggest you look at scale and increase the potential acreage proposed to be treated to a "landscape-level" You state that you intend to harvest up to 5,800 acres of young-growth over the next 10-15 years. We assume that these acres are all in stem exclusion. There would be approximately 9.6 square miles of total harvest. With deer density predictions of 12 to 20 deer per square mile, if your prescriptions enhanced deer habitat across the Project Area you might expect to see 110 to 180 additional deer on the landscape. Given the trajectory, a much larger amount and area need to be treated

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In your scoping document on page 3 you state that you intend "To provide a balance, treatments currently being considered include girdling (to minimize slash), creating small gaps (approximately 80 feet in diameter), thinning, and slash management. The purpose for thinning within wildlife corridors and terrestrial habitat areas is to increase the amount of light that reaches the forest floor to enhance the growth of forage plants to meet wildlife needs. In corridors, a goal is to encourage tree growth that produces branches strong enough to intercept snow, so forage is accessible in the winter months."

We believe that "slash management" should include removal of the slash and non-merchantable logs for biomass utilization. Girdling and pruning are labor intensive and eventually the girdled trees will fall to the forest floor limiting forage availability. There is an abundant amount of pre-commercial harvest which should be made available for biomass production. The Mule Deer foundation is working to ensure that there are biomass utilization opportunities in the area and using by-product from pre-commercial thinning would be ideal for this. The Mule Deer Foundation is working on an agreement with Southeast Conference for utilization of biomass from habitat restoration opportunities.

The wildlife corridors shown on the map provided on page 5 positioned either along a riparian corridor or shown spanning the project area from east to west. The riparian corridors would be preserved regardless. You state that "A goal of treatments within these corridors is to enable wildlife movement from the beach to higher elevation muskegs." The Sitka Black-tailed deer that live in the upper portions of the Falls Creek, Gravelly Creek, and Slide Creek drainages do not know there is a "beach fringe" to go to in the winter. It is true that deer in the watersheds

that boarder the beaches will travel down to the beach when winter snows deepen. A Sitka Black-tailed deer in the middle of the islands do not know there is a beach. They must be able to move on the landscape to quality winter range to survive. They need vertical corridors to move freely from higher elevations to lower elevation winter range within the upper watersheds. As designed, only a small portion of the proposed corridors provide such movement. The beach fringe you show at the end of the corridor is nearly all low volume timber or is older stem exclusion, young-growth. We encourage you to look at opportunities for corridors within each watershed to ensure that deer can move freely vertically within them. Opportunities to improve winter habitat in the valley floors should be a priority, developing prescriptions to enhance forage while keeping thermal cover options. This will increase and redistribute the proposed wildlife treatments within the Project Area. As shown in the provided map, most wildlife treatments exist outside the proposed wildlife corridors further fragmenting the existing and habitat improvements within the Project Area.

To summarize, MDF requests and recommends you look at a larger landscape for proposed treatments, include utilization of pre-commercial thinning slash for potential biomass production, and assess and identify movement corridors in the proposed watersheds beyond just helping deer access the beach fringe.

The Mule Deer Foundation appreciates the opportunity to comment on this project as proposed in the Scoping Document. We believe the Forest should consider a paradigm shift from a purpose and need focusing on timber production to a purpose and need for habitat restoration which will produce saw logs and biomass. This Project goes a long way toward this change. We believe however it needs to be restructured to include deer habitat improvements by watershed focusing on large scale, habitat improvements in the proposed watersheds.