

Date submitted (UTC-11): 12/30/2016 12:00:00 AM

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Comments:

Delilah Bringham, Project Leader

1312 Federal Way

Thorne Bay, AK 99919

December 30, 2016

Re: Prince of Wales Landscape Level Analysis Project

Dear Delilah,

Defenders of Wildlife appreciates the opportunity to comment on the above-referenced project. Established in 1947, Defenders is a national, science-based non-profit conservation organization with more than one million members and supporters nationwide, including over 3,500 in Alaska, Defenders is focused on conserving and restoring native fish and wildlife species and habitat throughout the country, including our National Forest System lands.

In general, we urge the Forest Service to clearly implement the direction established in the 2016 Forest Plan Amendment to reduce old-growth logging and ensure the continued viability of fish and wildlife populations while pursuing any young-growth logging opportunities. Logging in beach fringe, riparian areas and Old Growth Land Use Designation areas in particular must meet the [ldquo]co-intent[rdquo] objective of both improving wildlife habitat conditions and providing young-growth timber to the industry. Investments of public dollars should reflect the array of project components, including the importance and economic benefits of improving and restoring fish and wildlife habitat and of developing recreation and tourism resources, in addition to timber resources. Public investment has traditionally focused on supporting old-growth timber harvest, but that is the tradition from which we are now transitioning. This project must implement that transition.

Additionally, we offer the following specific comments on the Notice of Intent (NOI):

Purpose and Need

Old-Growth Harvest: The NOI states that there is a [ldquo]need to provide old-growth timber to help maintain the expertise and infrastructure of the existing timber industry so the forest products industry can prepare for an increasing amount of merchantable young-growth offerings.[rdquo] The Draft Environmental Impact Statement (DEIS) or supporting documents should test this statement.

For example, what does that preparation entail? How will logging old-growth pursuant to this project prepare the industry to log more young-growth later? By providing employment opportunities to keep the companies in

business? What other steps or actions are necessary in order for the industry to be prepared? Could the restoration, forest health, and recreation and tourism-driven activities also mentioned in the NOI provide other sources of employment for the industry during the transition period? How much employment? Could continued emphasis on old-growth logging for several more years actually make the eventual transition to young-growth more difficult, as additional time and money is invested in the status quo processing equipment and other infrastructure? If the main goal of the old-growth logging is to keep timber companies in business until there is sufficient young-growth available to do so, then the DEIS should assess alternative means of accomplishing that goal.

Also, the DEIS should assess the relative contribution of this project to the total old-growth expected to be provided over the 15-year planning horizon, at different levels of potential harvest.

Commercial and Pre-Commercial Thinning: The DEIS should assess the wildlife impacts of the proposed thinning activities to ensure that they will produce the desired future forest health conditions that [ldquo]sustain the diversity and productivity of forested ecosystems.[rdquo]

Restoration: Prince of Wales Island is one of the more heavily impacted areas in the entire Tongass National Forest, and thus a great candidate for a project with a primary focus on restoration. The DEIS should explore different relative levels of the anticipated activities, including an alternative that sets restoration as its primary goal. Again, the DEIS should assess the employment implications of shifting focus to some extent from old-growth logging to restoration.

Also, it appears that Luck and Laney Creeks are within the general project area and have been identified as priority watersheds for restoration. We encourage you to prioritize the restoration project component generally, restoring these creeks as well as any others in the project area functioning at-risk or at sub-optimal conditions.

Recreation and Tourism: Similarly, the DEIS should examine what relatively low and relatively high emphases on this project component would look like in terms of outcomes and the extent to which the alternatives both [ldquo]maintain infrastructure to an acceptable level[rdquo] and [ldquo]expand opportunities for growth in the recreation and tourism business sector.[rdquo] There may be employment opportunities that offset any that are foregone by reducing or eliminating the old-growth logging component of the project.

Possible Alternatives

The alternatives should assess the costs and benefits of providing different levels of public investment into the various potential project components. In particular, the DEIS should assess the number of jobs associated with those different levels of investment and the related economic impacts associated with each component. Since timber industry jobs vary substantially based on whether there is local processing of timber, the DEIS should distinguish between estimated timber harvest jobs and timber processing jobs.

Also, we understand that the purpose of combining multiple actions into one landscape level project is to gain efficiencies such as having equipment already on site. Nonetheless, we encourage you to consider an alternative that separates the old-growth harvest project component from the remainder. Given the highly controversial nature of old-growth logging, it may benefit the project as a whole to not be tied to, or have its economics, viability, or practicality dependent on, the old-growth logging component. The substantial potential commercial and pre-commercial thinning project components appear to offer some of the same efficiencies as the old-growth harvest

Nature of Decision

The NOI mentions [ldquo]mitigation measures and monitoring requirements[rdquo] and [ldquo]whether there may be a significant restriction of subsistence uses[rdquo] among the decisions to be made. Regarding monitoring requirements, we anticipate that the Forest Service will prepare a new forest-wide plan monitoring program prior to the decision point on this project; activities established pursuant to that monitoring program will be relevant in developing site-specific monitoring actions for this project. Also, we urge the Forest Service to immediately begin the process of developing a list of Species of Conservation Concern on the Tongass pursuant to the 2012 Forest Planning rule. That list will replace the current Sensitive Species list. In general, we would expect the Forest Service to capitalize on opportunities presented by this project to monitor focal species identified in the new monitoring program and the newly-listed Species of Conservation Concern, as

appropriate.

Wildlife

Wolves and Deer: The 2014 Big Thorne Supplemental Information Report and Interagency Wolf Task Force report at Appendix A provide a helpful discussion of the considerations bearing on the continued viability of wolves on POW, and potential management activities necessary to maintain healthy predator-prey relationships. The Task Force noted elements of uncertainty regarding the threat to continued viability of deer and wolves on POW flowing from the Big Thorne sale considered in addition to previous logging and road building conducted on the island. Work to ascertain that viability is ongoing. Some components of this proposed project would add to the viability challenges facing deer, wolves and other wildlife, so the DEIS should evaluate those impacts in light of the Task Force findings, more recent population estimates, and other work done since 2014.

The DEIS should also closely examine the project impacts on other old-growth dependent species including northern/Queen Charlotte goshawks, northern flying squirrels and marten, as well as brown and black bears, Pacific salmon, and Prince of Wales spruce grouse. Finally, the DEIS should assess the function and adequacy of the old growth conservation strategy as implemented to date on Prince of Wales, and identify any appropriate changes to components of that strategy such as old-growth reserve size, location, and composition as well as connectivity among reserves and the adequacy of standards and guidelines applied within the matrix.

Public Engagement

We applaud the Forest Service's efforts to seek public involvement early and often in this project, including consideration of [quod]widely based proposals[quod] from the [quod]Prince of Wales Landscape Assessment Team[quod] mentioned in the NOI. We understand this Team consists of residents of Prince of Wales island interested in providing project input, and as such is not open to non-resident participation. We support and encourage that local outreach and also trust that the decisionmaking process will account for the broader regional and national contexts in which this project arises. In particular, as noted above this project will help implement the 2016 Forest Plan Amendment and must carry forward the Amendment's commitment to conserving and improving fish and wildlife habitat while transitioning away from old-growth logging on the Tongass.

Thank you for your consideration of our comments.

Sincerely,

Pat Lavin

Alaska Representative