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VIA ELECTRONIC MAIL

David Schmid, Regional Forester
Alaska Region
USDA Forest Service
709 W. 9th Street
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Juneau, AK 99802-1628
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Re: Objection to the Prince of Wales Landscape Level Analysis Project

Dear Regional Forester Schmid:

Pursuant to 36 C.F.R. Part 218, Defenders of Wildlife (Defenders) hereby objects to the Final Environmental Impact Statement and Draft Record of Decision for the Prince of Wales Landscape Level Analysis Project (the Project). Defenders has also joined the objection submitted on its behalf by Earthjustice, and submits this objection in order to raise two additional points.

I. The FEIS Must Include an Alternative that Implements the Biologically-Preferred Old Growth Reserves Identified by the Interdisciplinary Team.

As explained in our comments on the Draft Environmental Impact Statement for the Project, Appendix K of the 2008 Forest Plan Amendment FEIS addresses the process for modifying Old Growth Reserve (OGR) boundaries to conform to Forest Plan criteria as part of project-level reviews such as this Project:

Project-level reviews will ensure that OGRs meet Forest Plan OGR criteria while addressing forest-wide multiple use goals and objectives. There are two levels of review included in the project-level review: 1) the interagency review, and 2) the decision process.

> Step 1, Interagency Review Process—The purpose of an interagency review is to identify the biologically preferred location for the OGR. An interagency team of USDA Forest Service, USFWS, and ADF&G biologists will jointly evaluate the location and habitat composition of the OGR by reviewing all the large productive old growth blocks within a Value Comparison Unit (VCU). The interagency review

team will develop a proposal for the OGR that meets the criteria of this appendix and document why other proposals were not recommended. The review will include the following steps:

A. Review the purpose and rationale for current location of the Forest Plan OGR as documented in the current Tongass Old Growth database.

B. Assess whether the purpose and rationale for the location of the OGR has changed.

C. Use the design criteria to define the biologically preferred location for the OGR.

D. Document this proposal as the interagency proposed OGR in the Tongass Old Growth database and in an Interagency OGR Review report.

Step 2, Decision Process—Line officers will incorporate the interagency review team OGR recommendation in the NEPA process, considering the best biological location for the OGR while balancing other considerations. The interagency team will work with the decision maker to develop alternate proposals, if necessary to meet other Forest Plan objectives. The implemented OGR must meet the minimum criteria as described below. The Decision process will include the following steps:

A. Attempt to develop a viable project that avoids conflicts with the biologically preferred OGR. At a minimum, the biologically preferred OGR will be considered in an alternative in the NEPA document.

B. Where modifications to the biologically preferred OGR are required to meet Forest-wide multiple use goals and objectives:

1. Follow the management prescriptions as defined for the Old-growth Habitat LUD; and

2. Document the rationale for modifications to the biologically preferred OGR.[1]

We further explained that

> Incorporating the project-level review and adjusting OGR boundaries is especially important to undertake as part of this project, because Prince of Wales Island includes many areas specifically identified in Appendix K as needing a project-level review to ascertain the appropriate OGR boundaries. This is because "critical site-specific information was not available" for these OGRs when the 2008 Forest Plan Amendment was completed.[2] The POWLLA project includes eleven Value Comparison Units (VCUs) listed in Appendix K as needing a project-level review.[3] Given the size, scope and intended duration of the POWLLA project, it is difficult

[1] 2008 Tongass Forest Plan Amendment FEIS, Appendix K at p.K-2 (emphasis added).
[2] 2008 Forest Plan, Appendix K at K-1.
[3] Interagency Review Team OGR Review (2018 IRT) at 1; Appendix K at K-1.

> to imagine when the Forest Service will have a better or more appropriate opportunity to establish science-backed OGRs on Prince of Wales Island that comply with Forest Plan OGR criteria via the necessary project level review process.
>
> Accordingly, an interagency review team did indeed review several OGRs on Prince of Wales as part of this project (2018 IRT). This review points out numerous instances where current OGR size and/or composition fail to meet Forest Plan requirements and recommends the biologically preferred OGRs.[4] The stage thus appears to be set for the Forest Service to make the necessary modifications so that OGRs on Prince of Wales Island can finally comply with Forest Plan criteria.[5]

In its response to this comment, the Forest Service states only the following:

> Including the interagency OGR review into an alternative would require a Forest Plan amendment. The Responsible Official decided to not amend the Forest Plan through this process to narrow the scope of analysis for this project. This matches the NOI published in the Federal Register for this project.[6]

This response is inadequate because a decision to not undertake a Forest Plan amendment does not excuse the failure to include the biologically-preferred OGRs in a NEPA alternative. The Forest Service is not required to actually select the alternative that includes the biologically-preferred OGR, and simply developing the alternative does not require a Forest Plan amendment (and is actually required by the Forest Plan). But the agency is required to present that alternative along with an explanation of why it is not feasible to select. The Forest Service has not complied with the Forest Plan on this issue, and its lack of compliance cannot be justified by a desire to not amend the Forest Plan.

We therefore respectfully request that the Forest Service develop an alternative that incorporates the biologically-preferred OGRs in the project area and, if this alternative is not selected for implementation, then explain why doing so is not feasible.

II. The Forest Service Must Implement the Wolf Habitat Management Program.

The Earthjustice objection already raises this argument;[7] we object separately here to raise an additional point about the FEIS discussion of this issue and to add a recently-published study that should factor into the Forest Service's decision on the Objection.

The FEIS discussion of project impacts to wolves related to road density acknowledges that current road densitites in many Wildlife Analysis Areas (WAAs) in the project area exceed the Forest Plan

[4] We won't reprint the 2018 IRT analysis here, but for examples see, e.g., pp. 1 (VCU 5371, El Capitan) (recommending improved connectivity to a large OGR); 2 (VCU 5620, Heceta Island) (recommending relocation of a small OGR to include a contiguous block of POG habitat and making it more circular); 6 (VCU 5570, Alaska Mental Health) (recommending replacing OGR acreage lost due to land ownership transfer with other lands to improve connectivity).

[5] Defenders of Wildlife, comments on DEIS June 18, 2018 at 3.

[6] POWLLA FEIS, Appendix D at D-63.

[7] Earthjustice Objection at 41.

recommended level of 0.7-1.0 miles per square mile.[8] It notes that wolf mortality increases with road density, and states that densities exceeding 1.5 miles per square mile are not believed to continue to result in significant additive mortality.[9]

The Forest Service then appears to use this latter finding as a reason to abandon concern about road density altogether. That is, since road density is fairly high in many WAAs already, "minor increases in road density under any of the alternatives would not be expected to substantially increase harvest risk because of existing road densities in the project area WAAs that are above this number."[10]

The Forest Plan recommends 0.7-1.0 miles per square mile road density in areas of wolf mortality concern, and the Wolf Habitat Management Plan calls for 0.7.[11] The Forest Service cannot simply abandon its own Standards and Guidelines and its own Wolf Habitat Management Program for a new theory of wolf management that allows road densities to approach and exceed 1.5 miles per square mile, because at that point *additive* mortality due to increased density would be minor. At that point, the damage that the road density standard is trying to avoid will have been fully realized. This counsels strongly in favor of considering available options to reduce road density and other causes of wolf mortality; it cannot serve as justification to proceed apace with more road construction and logging.

Finally, we wanted to call your attention to a recently-published study concluding that the existing 600- and 1200-foot buffers around known wolf dens "might be inadequate to promote pup-rearing success" because the home ranges of breeding wolves and wolves belonging to a reproductive pack greatly exceed the buffers.[12] We encourage you to consider this study as you reevaluate the need to fully apply the Wolf Habitat Management Program to site-specific activities when reaching a final decision on this project.

Sincerely,

Pat Lavin

Patrick Lavin
Alaska Senior Representative

[8] FEIS at 235.
[9] Id.
[10] Id.
[11] Interagency Wolf Habitat Management Program (March 2017) at 21.
[12] Roffler and Gregovich, Wolf Space Use During Denning on Prince of Wales Island, Wildlife Biology 2018 (attached).