



Response to Comment (By Author)

Project: Prince of Wales Landscape Level Analysis Project (50337)
Comment Period: Scoping - NOI Scoping
Period Dates: 11/30/2016 - 12/30/2016 **Generated:** 7/3/2017 4:57 PM

Author(s)	Comment	Response
Anon, Anon	Maintenance and upkeep of the Eagles Nest/Balls Lake picnic/campsite is desperately needed, as well as the boardwalk and lake trail. Its discouraging that the USFS completes such developments then does little to keep them maintained! The boardwalk is deteriorating and sinking into the lake. The trail that encompasses the lake it not maintained, with trees fallen on stairways and sinking walkways. This recreation area is in a central location and a great afternoon outing for both locals and visitors but without up-keep it will not be usable for much longer. Why would the USFS implement new projects on POW when the existing ones are in need of repair???	Improving recreation facilities including Eagles Nest/Balls Lakes Trail will be given full consideration as part of the proposed action and alternatives. Construction of the boardwalk on the backside of the lake is part of the Big Thorne Stewardship Contract and will be implemented by the end of the contract period. The bridge over Cutthroat Creek was completed in 2016 by a partnership between the USFS and OVK utilizing RAC funds.

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Anon, Anon	<p>Rio Roberts Trail. Since the paving of the main highway, Rio Roberts Trail (and fish pass viewing area) have been closed. The closure was due to new road and the lack of parking near the trail-head. This trail was a hot-spot for both locals and tourists to view the fish pass, walk through the muskeg on a beautiful boardwalk, read interpretive signs, etc. I propose that there is a new trail-head built and trail is resurrected. . There are multiple nearby possibilities for parking and the new trail-head, one would be about an eighth of a mile past the Rio Robert Bridge (On the Craig side), there's an old pull-out that could easily be turned to a parking area with the trail starting there. The trail could also start on the gravel road on the Thorne Bay side of the bridge. There would need to be a small bridge to cross Rio Roberts (maybe something like the one at Harris River). Once again, why would the USFS implement new projects on POW when the existing ones are in need of repair???</p>	<p>Developing and improving existing recreation facilities such as Rio Roberts Trail and trail head will be given full consideration may be included in the proposed action or an alternative.</p>
Anon, Anon	<p>Recently I traveled north on POW to Memorial Beach. The trail, campsite and road were all in beautiful shape! What a beautiful spot at the end of the roadBUT, there was NO SIGNAGE WHATSOEVER pointing to "Memorial Beach" or showing the mileage to Memorial Beach. When I neared what I thought to be the spot there was one little picnic sign but nothing more! Why would you develop an area and then not even mark it for guests to find and use???. Not only that, it's a two hour drive to get there, dont you think it would help if people knew how much further and which direction they should go?</p>	<p>Developing and improving recreation facilities including improved signage will be given full consideration and may be part of the Project's proposed action or an alternative.</p>

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Anon, Anon	Please DO NOT open more trails to fishing sights. The USFS has successfully opened trails to viable fish runs then in turn closed or tightly limited the river to fishing!! The Islanders that want to subsistence fish dont need trails to reach these areas. Leave them alone.	We will consider your suggestion of no new trail construction into fishing sites as a design criteria for the Project's Proposed Action or an alternative.
Anon, Anon	Salt Chuck Mine Site- The new interpretive signs are beautiful and informative and give such great history of the area. Why, once again, are there no signs leading people to the area? The road (Lake Ellen Rd?) is nearly overgrown by alders making it nearly impassable. The mine machinery display is also becoming engulfed in alders and by next summer will be completely overtaken. This is one of the main historic sights near Thorne Bay and should be maintained. Once again, why would the USFS implement new projects on POW when the existing ones are in need of repair???	We will considered the installation of signage leading to/from the Salt Chuck Mine, as well as maintenance (brushing) of the area's access road and historic site as a design criteria for the Project's proposed action or an alternative. The maintenance of existing recreation sites is recognized as an Recreation and Tourism Objective in the Tongass National Forest Land and Resource Management Plan (Forest Plan).
Anon, Anon	Citizen requested that the FS install a toilet facility at the Naukati Harbor, possibly in the bottom right corner where the X is below.	Request for a toilet facility at the Naukati dock is noted. It may be considered as a design component in an alternative, although the location may or may not be able to be at the site located on the commenter's map. Land ownership and environmental requirements may dictate potentially feasible sites for such a facility.

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Baker, Bruce	<p>The name of the project states that the endeavor is an “landscape ... analysis project.” This strongly implies that the purpose and need for the project should concern analysis – and only analysis – such as the Forest Service has done in the past on the Tongass with “landscape assessment” processes. Those landscape level documents in turn influenced later NEPA documents that led to decisions implementing the Forest Plan. That is, broad landscape analysis has heretofore been a non-decisionmaking part of a step-by-step process, and a later step was the discrete Forest Plan implementation projects that such assessments helped inform.</p> <p>Here however, the text of the scoping notice indicates that POWLLA is instead a Forest Plan implementation project that will manipulate the forest, communities and economy, and that it is a very broad and long-term (10-15 years). Is this a project for analysis, or for implementation? It can only be one or the other, and consequently this scoping notice can only serve to confuse the public. The title of the scoping notice and name of the project make the project seem relatively innocuous, when in fact it is not.[...]The problem with the POWLLA proposal is that it seeks to accomplish essentially all the management of widespread and diverse sorts during an overly-long time period, all in one project. We believe multiple, discrete projects – each with its own NEPA process – are needed.</p>	<p>The Prince of Wales Landscape Level Analysis (POW LLA) Project was so named because it is a landscape level implementation project being analyzed for effects to the human environment through the National Environmental Policy Act (NEPA) process. We are seeking broad public input into the design of the project. The November/December 2016 comment period was the start of the public input process into the project design. The public will have more opportunities to comment as we refine the proposed action in the spring and again on a finalized version in the early summer of 2017.</p>

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Baker, Bruce	<p>he scope of the project as presented in the scoping notice is so broad and vague in character that it leaves the public – and also the Forest Service itself – at a complete loss of what to suggest for alternatives for the project, except for the No Action alternative. Also, without at least a modicum of specificity on exactly what actions are being proposed, where they would occur within the vast geographic scale, and what the scales of these actions would be, it is at best difficult for the public or the agency to identify significant issues for the purposes of NEPA, and likely impossible to reasonably or accurately do so.</p> <p>Therefore, we ask that this project be summarily cancelled. What is needed instead is a true “landscape assessment” that can inform discrete projects that would follow.</p>	<p>The Prince of Wales Landscape Level Analysis (POW LLA) Project was so named because it is a landscape level implementation project being analyzed for effects to the human environment through the National Environmental Policy Act (NEPA) process. We are seeking broad public input into the design of the project. The November/December 2016 comment period was the start of the public input process into the project design. The public will have more opportunities to comment as we refine the proposed action in the spring and again on a finalized version in the early summer of 2017.</p>

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Baker, Bruce	<p>II. A level playing field for public participation needs to be established The Forest Service has created a highly-biased public engagement process for this project, and that must be remedied immediately. The agency orchestrated creation of the POW Landscape Assessment Team (POWLAT) as a collaborative group to advise this project. POWLAT is open only to island residents, is funded through the federal government’s National Forest Foundation, and is managed by The Nature Conservancy (an organization that has particular biases that we believe are often adverse). We believe that the Forest Service’s role in creating POWLAT and its reliance upon POWLAT violate FACA (the Federal Advisory Committee Act).</p> <p>Public participation for this project needs to be reconstructed on a playing field that is level for all Alaskan and other US citizens and organizations that have interests in the Prince of Wales Island area. This of high concern because while the island is the third-largest in the 50 states, the environment of the island and nearby islands has been very heavily impacted since the mid-20th Century, and is the most heavily impacted area of the region. It is essential that all information and points of view be considered on an equal footing, and the special advantages being afforded to those in the locale through this “collaborative” group are absolutely contrary to that principle. To level the field, traditional NEPA process should be followed (including a new detailed scoping letter), government support for POWLAT should be withdrawn, and favor should cease.</p>	<p>The POW LLA Project is being analyzed under the requirements of the National Environmental Policy Act of 1969 (NEPA), which requires citizen involvement to make better informed decisions. We are conducting abroad public participation effort and there will be several more official public comment periods, not just the scoping period that followed the publication of the Notice of Intent to Prepare an EIS in the Federal Register on November 30, 2016.</p> <p>A collaborative group, calling themselves the Prince of Wales Landscape Assessment Team, has independently formed to provide information to the Forest Service regarding the POW LLA project. This group was not formed by the Forest Service and the Forest Service does not manage or control the group. All members of the public as well as any other group who would like to provide input to the POW LLA Project are encouraged and welcomed to do so.</p>

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Baker, Bruce	<p>The purpose and need statement biases the eventual outcome. The purpose and need statement in the scoping letter is biased toward causing further damages to the Prince of Wales ecosystem. The first need listed is "provid[ing] a sustainable level of forest products"; however, no definition of sustainable is defined, and the statement is not counterbalanced by any statement of the need to protect (e.g.) the abundances and sustainability of wildlife populations across the area and (with the Alexander Archipelago wolves as an example) aid their recovery. The second listed need is to provide old-growth timber, but the scoping letter gives no inkling of how many acres or how much volume that may entail and over what period of time, or of the need to somehow induce the industry to cut its reliance on old-growth. There is no counterbalance to this statement either, concerning the above needs for wildlife.</p> <p>Further, the implication of the timber-related need statements is that timber for the industry on POW must be sourced entirely from federal lands in the POW area. And this raises the point we made in our objection to the 2016 TLMP Amendment that the current timber industry is not sustainable at either the POW or regional scale.</p>	<p>Suggestions for refining the purpose and need statements for the POW LLA have been reviewed and will be considered. The overarching purpose for the project will remain to improve forest ecosystem health on Craig and Thorne Bay Ranger Districts, help support community resiliency, and provide economic development through an integrated approach to meet multiple resource objectives.</p>

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Baker, Bruce	<p>The need statement concerning commercial and precommercial "treatments" of second growth suggests that the treatments can "produce ... forest health conditions that sustain the diversity and productivity of forested ecosystems." At best however, on the timescale of the next several years or decades, these treatments are mere Band-Aids and also their effectiveness depends on what "desired resource values, products and services" will be favored in the actual treatment methods selected. The practice that is most needed is the avoidance of further habitat loss or degradation in the Prince of Wales area (whether in second growth or old-growth), but that need is sorely missing in the purpose and need statement.</p>	<p>Precommercial thinning is a proven treatment we use to adjust stand stocking in young growth to better meet future objectives. Un-thinned stands have limited management options once they begin to mature. Thinning expands these options by promoting a number of favorable tree and overall stand characteristics. Precommercial thinning is also a proven tool we use to enhance understory vegetation in stands that would otherwise provide very limited forage for deer. The effects analysis done for the project will fully disclose the costs and benefits of precommercial thinning if it is included as part of an alternative.</p> <p>We will include a No Action Alternative in the project that addresses your concerns. The effects of this alternative will be weighed against any other action alternatives that are developed. Young-growth treatments that may be considered under the action alternatives will be designed to meet both long- and short-term objectives of those alternatives in accordance with the Forest Plan Land Use Designations where they occur. Any suggestions you might have for the management of young growth under an action alternative where multiple resource objectives might be met is welcomed.</p>
Baker, Bruce	<p>Fish habitat protection needs an explicit "need" statement. The only related need that was stated is for the restoration of fish habitat. With salmon runs in northern Southeast having poor escapement recently, the productivity of streams of all sizes in southern Southeast has become especially important both economically and ecologically. No risks of impairment to any streams in the POW area are acceptable.</p>	<p>Thank you for your comment. A specific "needs" statement was not included because all applicable laws and Forest Plan Standards and Guidelines regarding the protection of fish habitat and water quality will be followed for any project on the Tongass National Forest. The Forest Plan requires specific protections for fish habitat and water quality during different land management activities like road work and timber harvest. These protections are in addition to those mandated by the Clean Water Act, Tongass Timber Reform Act, Regional Best Management Practices, and National Core Best Management Practices.</p>

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Baker, Bruce	<p>Finally, there should be a need statement that, to the maximum extent possible, other economic endeavors on POW need to substitute for timber production, at least for the next few decades. This is the other side of the overall sustainability issue, in the senses of multiple use, ecological integrity and the local economy.</p>	<p>Suggestions for refining the purpose and need statements for the POW LLA have been reviewed and will be considered. The overarching purpose for the project will remain to improve forest ecosystem health on Craig and Thorne Bay Ranger Districts, help support community resiliency, and provide economic development through an integrated approach to meet multiple resource objectives.</p>
Baker, Bruce	<p>The many substantial problems with continued old-growth logging in the POW area has been well argued in comments and appeals of other projects, and need not be repeated here. The transition from using the POW area's federal old-growth should be considered to expire when the existing timber contracts on the island are concluded. The proposed project should not provide additional old-growth. At least half of the alternatives considered in detail should be constructed around this prospect, and should examine all potential economic avenues for the affected communities, not just timber.</p>	<p>Thank you for your comment. The purpose and need for the project states that, through an integrated approach, we will consider multiple uses including but not limited to providing a sustainable level of forest products and providing opportunities for growth in the recreation and tourism sector. The purpose and need encompasses multiple uses across the landscape including, but not limited to, timber, recreation, wildlife habitat, watershed improvement, and supporting transportation infrastructure.</p> <p>Providing old-growth timber is just one possible method of achieving the stated Purpose and Need. A certain level of old-growth logging is consistent with the Amended Tongass National Forest Land and Resource Management Plan.</p> <p>Even though the Forest Plan allows for old growth harvest, the POW LLA may elect to develop alternatives that limit or avoid it. Your concerns for old growth conservation will be considered during alternative development. Economic alternatives to specific actions are considered in the analysis phase of the NEPA process.</p>

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Baker, Bruce	Although the TLMP Amendment contemplates second growth timber removal from riparian management areas, old-growth reserves and the beach fringe, we urge that this not be implemented in the POW area because of the high level of impacts the area has already suffered from logging.	<p data-bbox="1245 326 1976 440">Thank you for your comment. The current 2016 Forest Plan Amendment recognizes the importance of the beach and estuary fringe, riparian management areas, and old-growth reserves.</p> <p data-bbox="1245 480 1976 724">Management of old-growth forests for timber production is generally prohibited in these zones. Young-growth timber may however be managed via commercial harvests and non-commercial treatments under certain limitations and circumstances. The Record of Decision for the 2016 Forest Plan Amendment, pages 6 and 7, describes the limitations to commercial harvest of young growth in the beach and estuary fringe, old-growth reserves, and riparian management areas.</p> <p data-bbox="1245 760 1976 1003">Additionally, there are scenery Standards and Guidelines in the Forest Plan that define the allowable levels of old-growth harvest that can be seen from visual priority travel routes and use areas like Clarence and Sumner Straits. The Forest Plan does however now make additional allowances for the harvest of young-growth timber in the beach fringe and reduces the scenery Standards there in order to promote the transition to primarily young-growth harvesting.</p> <p data-bbox="1245 1039 1976 1187">Even though the Forest Plan allows certain levels of young-growth harvest in the beach fringe, portions of RMAs and in old-growth reserves, the POW LLA Project may elect to develop alternatives that avoid harvests in those areas. Your comment will be considered when we develop alternatives.</p>

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Baker, Bruce	For reasons stated above concerning fish productivity and to aid recovery of the POW area's Alexander Archipelago wolf population, the project alternatives should preclude the construction of new logging roads. Red pipe fixes and other fish passage remediations should be made on an accelerated schedule, which would be outside of, and also if timely part of, this project.	<p>Thank you for your comment. An alternative may be designed that minimizes impacts to fish and wildlife. This alternative could include no new road building.</p> <p>Additionally, the Proposed Action, which has yet to be fully developed, has identified the "improvement of fish passages at road crossings" as a potential management activity that could meet the needs associated with this project. Your concern about fixing red pipes on a more accelerated schedule will be considered when we develop project alternatives.</p>
Baker, Bruce	The reasonable lifespan of a NEPA document is generally considered to be 5-10 years, as established in case law.[...] For these reasons, designing this project for a lifespan of 10 years or more is contrary to reasoned planning and good government.	<p>The CEQ regulations provide a procedural framework for keeping environmental analyses current. They require agencies to prepare supplements upon determining there is significant new information of relevance to the proposed action or its impacts (CFR 1502.9). The possibility of new information arising after an EA or EIS is completed exists regardless of whether a NEPA review is wholly site-specific and short-term in scope or more programmatic in nature with a potentially longer "life". Implementation of an alternative selected through the POW LLA NEPA process would comply with this regulation.</p>
Baker, Bruce	Included as significant issues should be impacts to: old-growth forest; wildlife (including wolves, goshawks, marbled murrelets, deer, marten, the POW spruce grouse, bear, and endemic small mammals); and salmon.	<p>Thank you for your comment. The analysis process for projects on Prince of Wales already includes impacts on old growth as well as to the species listed in the comment (except for the brown bear which is not known to occur on the island).</p> <p>The function and adequacy of the old growth conservation strategy as implemented to date is described in the current Forest Plan to which the POW LLA Project will be tiered.</p>

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Baker, Bruce	<p>We are dumbstruck that the Forest Service put this momentous project out for scoping comments during the holiday season. Doing so is an extreme disservice to the public, to the natural resources that are at stake, and to the economic considerations. Our comments, for example, are hastily written and insufficient as a consequence of the timing. By the time a DEIS would be issued, much that could otherwise have been worked into its alternatives and considerations will have been irrevocably bypassed. The public deserves a better shot at this.</p> <p>The other problem, already discussed, is that the project is too broad and the scoping letter too vague for the public to have a reasonable basis for input.</p> <p>For both reasons, the project should be re-scoped. And further, we request that it be rescoped as purely an analysis project and not an implementation one.</p>	<p>The Prince of Wales Landscape Level Analysis (POW LLA) Project was so named because it is a landscape level implementation project being analyzed for effects to the human environment through the National Environmental Policy Act (NEPA) process. We are seeking broad public input into the design of the project. The November/December 2016 comment period was the start of the public input process into the project design. The public will have more opportunities to comment as we refine the proposed action in the spring and again on a finalized version in the early summer of 2017.</p>
Baker, Bruce	<p>In our comments we challenged the plain inadequacy of the POWLLA scoping letter. The scoping letter's failure to disclose the timber volumes the agency intends for the project – even though known to the agency – further underscores the abject failure of this scoping process. If in the alternative these volumes were not yet known when the scoping letter was issued barely three weeks before the 5-Year Schedule, then the letter clearly was premature.</p> <p>On these grounds we reiterate our call for the current scoping process to be terminated.</p>	<p>We are required by the National Environmental Policy Act to analyze a reasonable range of alternatives which meets the stated purpose and need, goals and objectives, and responds to issues identified during the scoping process.</p> <p>Requests that no old-growth harvesting or road construction occur as part of this project are noted. This may be considered as a design component of an alternative or multiple alternatives.</p>

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Citizen, Concerned	<p>Maintenance and upkeep of the Eagles Nest/Balls Lake picnic/campsite is desperately needed, as well as the boardwalk and lake trail. Its discouraging that the USFS completes such developments then does little to keep them maintained! The boardwalk is deteriorating and sinking into the lake. The trail that encompasses the lake it not maintained, with trees fallen on stairways and sinking walkways. This recreation area is in a central location and a great afternoon outing for both locals and visitors but without up-keep it will not be usable for much longer. Why would the USFS implement new projects on POW when the existing ones are in need of repair???</p>	<p>Improving recreation facilities including Eagles Nest/Balls Lakes Trail will be given full consideration as part of the proposed action and alternatives. Construction of the boardwalk on the backside of the lake is part of the Big Thorne Stewardship Contract and will be implemented by the end of the contract period. The bridge over Cutthroat Creek was completed in 2016 by a partnership between the USFS and OVK utilizing RAC funds.</p>
Citizen, Concerned	<p>Rio Roberts Trail. Since the paving of the main highway, Rio Roberts Trail (and fish pass viewing area) have been closed. The closure was due to new road and the lack of parking near the trail-head. This trail was a hot-spot for both locals and tourists to view the fish pass, walk through the muskeg on a beautiful boardwalk, read interpretive signs, etc. I propose that there is a new trail-head built and trail is resurrected. . There are multiple nearby possibilities for parking and the new trail-head, one would be about an eighth of a mile past the Rio Robert Bridge (On the Craig side), there's an old pull-out that could easily be turned to a parking area with the trail starting there. The trail could also start on the gravel road on the Thorne Bay side of the bridge. There would need to be a small bridge to cross Rio Roberts (maybe something like the one at Harris River). Once again, why would the USFS implement new projects on POW when the existing ones are in need of repair???</p>	<p>Developing and improving existing recreation facilities such as Rio Roberts Trail and trail head will be given full consideration may be included in the proposed action or an alternative.</p>

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Citizen, Concerned	<p>Recently I traveled north on POW to Memorial Beach. The trail, campsite and road were all in beautiful shape! What a beautiful spot at the end of the roadBUT, there was NO SIGNAGE WHATSOEVER pointing to "Memorial Beach" or showing the mileage to Memorial Beach. When I neared what I thought to be the spot there was one little picnic sign but nothing more! Why would you develop an area and then not even mark it for guests to find and use??? Not only that, it's a two hour drive to get there, dont you think it would help if people knew how much further and which direction they should go?</p>	<p>Developing and improving recreation facilities including improved signage will be given full consideration and may be part of theProject's proposed action or an alternative.</p>
Citizen, Concerned	<p>Please DO NOT open more trails to fishing sights. The USFS has successfully opened trails to viable fish runs then in turn closed or tightly limited the river to fishing!! The Islanders that want to subsistence fish dont need trails to reach these areas. Leave them alone.</p>	<p>We will consider your suggestion of no new trail construction into fishing sites as a design criteria for the Project's Proposed Action or an alternative.</p>
Citizen, Concerned	<p>Salt Chuck Mine Site- The new interpretive signs are beautiful and informative and give such great history of the area. Why, once again, are there no signs leading people to the area? The road (Lake Ellen Rd?) is nearly overgrown by alders making it nearly impassable. The mine machinery display is also becoming engulfed in alders and by next summer will be completely overtaken. This is one of the main historic sights near Thorne Bay and should be maintained. Once again, why would the USFS implement new projects on POW when the existing ones are in need of repair???</p>	<p>We will considered the installation of signage leading to/from the Salt Chuck Mine, as well as maintenance (brushing) of the area's access road and historic site as a design criteria for the Project's proposed action or an alternative.</p> <p>The maintenance of existing recreation sites is recognized as an Recreation and Tourism Objective in the Tongass National Forest Land and Resource Management Plan (Forest Plan).</p>

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Claus, Bob	As planned logging activity increases, or land is transferred to more aggressive managers who do not have to consider other than extractive uses, I see this opportunity to use the Forest decline or disappear. This assessment or plan should take alternative uses into consideration because none of the other land managers on the island will consider them at all.	Laws and regulations such as the Multiple Use Sustained Yield Act of 1960 (16 U.S.C. 528-531) (36 CFR 219.19) require that we consider multiple uses of National Forest System lands. The goal of multiple use management is to achieve products and services from a given area without impairing the productive capacity of the site. The purpose and need for the POW LLA Project encompasses multiple uses across the landscape including, but not limited to, timber, recreation, wildlife habitat, watershed improvement, and supporting transportation infrastructure. The Forest Service will consider the different types of activities that could address this need when we develop project alternatives.
Claus, Bob	As with all recent Forest Service actions, the "purpose and need" drives the analysis, and is based on assumptions and values that I believe are too narrowly focused on timber projects; an economic view of community resilience that is based on nostalgia rather than evidence; a stubborn refusal to consider what managers of adjacent land have done or are planning; and a disregard of the long term effects of physical disruption of the forest in an uncertain climatic future. This is a flaw in the US Forest Service planning process and will not be addressed by this project analysis, leaving the door open to objection and litigation. These critiques have been made in other formats and venues, and I will not repeat the arguments or evidence for them here.	Suggestions for refining the purpose and need statements for the POW LLA have been reviewed and will be considered. The overarching purpose for the project will remain to improve forest ecosystem health on Craig and Thorne Bay Ranger Districts, help support community resiliency, and provide economic development through an integrated approach to meet multiple resource objectives.

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Claus, Bob	<p>Complete the Sunnahae Trail Restoration: This is an excellent facility easily accessible to the majority of the population of the Island. The restoration or rebuild of the lower section vastly improved the usability and safety of the trail. I have not recently used the lower section of the trail without encountering other hikers, a rarity on most trails on POW. The upper sections are unsafe and impassable for those concerned about falling. The failure to maintain the section of trail between the old logging road and the alpine boardwalk has prevented me and others from accessing the mountaintop. This is embarrassing for the Forest Service, and should be addressed as a high priority.</p>	<p>Developing and improving recreation trails including the Sunnahae Trail will be given full consideration and may be included as part of the Proposed Action or an alternative. A new section of trail from the old logging road to the alpine boardwalk is scheduled to be built the summer of 2017.</p>
Claus, Bob	<p>Connect the Harris River Trails: The Fubar Creek/Harris River Restoration trail and the Harris River Interpretative trail each provide less than an hour of walking time, and terminate within sight of each other across the Harris River. There are other short trails in the Harris River subdivisions closer to Hollis. The Harris River Campground is underutilized. The trails could be connected with a bridge or two and some minor trail building to connect the Hollis Ferry terminal by developed trail to the campground, creating a destination-level facility and attraction. A three-sided shelter along the route could provide a logical stopping place for a long hike. Promote the building of a bike path along the Craig-Klawock-Hollis Highway to provide a non-motorized route from Hollis to Craig that includes the connected trail system</p>	<p>Developing and improving recreation facilities including improvements to Harris River Trail and building new three-sided Shelters will be given full consideration may be included into the Proposed Action or an alternative.</p>

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Claus, Bob	Develop the Control Lake Recreational Complex: Ensure the Ball's Lake trail is completed on schedule, and include a spur from the trail to the Cutthroat road. Improve the bridge over the creek on the Cutthroat road for pedestrian access to the lake. Improve trail access to the Control Lake Cabin. Include a bike path on the Thorne River Road and Big Salt Road to accommodate pedestrian traffic between the cabin, the campground, the picnic area, and the trailhead.	Improving recreation facilities including Eagles Nest/Balls Lakes Trail will be given full consideration as part of the proposed action and alternatives. Construction of the boardwalk on the backside of the lake is part of the Big Thorne Stewardship Contract and will be implemented by the end of the contract period. The bridge over Cutthroat Creek was completed in 2016 by a partnership between the USFS and OVK utilizing RAC funds.
Claus, Bob	Continue Kayak Route Development: Expand the three-sided shelter program to connect kayak destinations for longer range trips. Examples include a three sided shelter between Craig and Canoe Point for a one to two day trip; a three-sided shelter at the Palisades or Fern Point to connect the Point Amargura Cabin to Klawock; and a shelter near Point Gertrudis to connect Craig and Klawock to the Maurelle Islands. Sea Otter Sound is a world-class kayaking destination that could be improved by a shelter at Eagle Island or other scenic spots, connecting Edna Bay to Winter Harbor and Naukati. The islands near Hydaburg and the South POW Wilderness area could be a destination for kayakers with the addition of shelters.	Developing and improving recreation facilities including improvements to Harris River Trail and building new three-sided Shelters will be given full consideration may be included into the Proposed Action or an alternative.
Claus, Bob	Improve Rio Roberts Fish Pass Boardwalk Access: This is a road accessible facility that lost its trailhead in a re-engineering of the Thorne Bay Road. Re-establishing the trailhead and performing basic maintenance on the stairs seems like a low cost way to open a trail back into an interesting section of the forest.	Developing and improving existing recreation facilities such as Rio Roberts Trail and trail head will be given full consideration may be included in the proposed action or an alternative.

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Claus, Bob	Emphasize maintenance of road and easily boat accessible facilities; consider eliminating fly-in facilities from the recreational inventory. These are great assets in theory, but are not used by local people because of the limited recreational aviation community and high cost of air charters	We will consider your suggestion of eliminating fly-in recreation facilities and concentrating on boat and road accessible facilities as a design criteria for the Project's Proposed Action or an alternative.
Claus, Bob	I use the mainline paved or improved road system to access recreational opportunities, and proceed from the main road on foot. A gated road that prohibits motorized access is as good as a trail for my purposes, and an excellent recreational opportunity. I would like to see road closures maintained or increased to include spur roads throughout the area.	<p data-bbox="1245 496 1976 675">Timber sales are designed to be economical; this includes not constructing excessive road segments. Use of existing roads and potential new construction will be thoroughly analyzed. The need for maintenance, reconstruction and new construction will largely be driven by timber harvest and the need to haul harvested timber.</p> <p data-bbox="1245 716 1961 833">Temporary roads are decommissioned when their use period is over. National Forest System roads are analyzed to determine the appropriate long-term use and travel management strategy.</p> <p data-bbox="1245 873 1955 987">We will consider the suggestions of maintaining or increasing road closures, including utilizing gates, and limiting any new road construction as a design criteria for the Project's proposed action or an alternative.</p>

Author(s)	Comment	Response
Claus, Bob	<p>For me, and others who use the Forest as I do, the timber stand establishment and timber stand improvement activities envisioned in the project are irrelevant and unnecessary. Old-growth timber harvest is an anachronism supported by no other Forest in the United States, and condemned worldwide as detrimental to the global environment. Restoration projects are engineering solutions to ecological problems that often cause more problems than they solve. The economic benefits of such activity are an illusion, an attempt at government stimulus that could better be accomplished by direct cash transfer.</p> <p>Time alone, perhaps centuries, is sufficient to restore the forest, and further meddling in natural regeneration and processes degrades my opportunity to enjoy the forest. I personally place a high value on peaceful enjoyment of the Forest, believe others do as well, and think that this value is not captured by current economic analysis.</p>	<p>Thank you for your comment. The purpose and need for the project states that, through an integrated approach, we will consider multiple uses including but not limited to providing a sustainable level of forest products and providing opportunities for growth in the recreation and tourism sector. The purpose and need encompasses multiple uses across the landscape including, but not limited to, timber, recreation, wildlife habitat, watershed improvement, and supporting transportation infrastructure.</p> <p>Providing old-growth timber is just one possible method of achieving the stated Purpose and Need. A certain level of old-growth logging is consistent with the Amended Tongass National Forest Land and Resource Management Plan.</p> <p>Even though the Forest Plan allows for old growth harvest, the POW LLA may elect to develop alternatives that limit or avoid it. Your concerns for old growth conservation will be considered during alternative development. Economic alternatives to specific actions are considered in the analysis phase of the NEPA process.</p>
Culliney, Susan	<p>However, the Needs related to forestry products are overly narrow and favor certain timber operations. The Needs stated in the NOI should instead be decoupled from specific timber methods. Old-growth logging and particular young-growth treatments should not be presented as Needs, but rather should be possible actions used in the future alternatives analysis to meet the more broadly stated Needs.</p> <p>There should be no identified Need to provide old-growth timber. Rather, the stated Need to "provide a sustainable level of forest products to contribute to the economic viability of the region," is more appropriate and accurate. Providing old-</p>	<p>Suggestions for refining the purpose and need statements for the POW LLA have been reviewed and will be considered. The overarching purpose for the project will remain to improve forest ecosystem health on Craig and Thorne Bay Ranger Districts, help support community resiliency, and provide economic development through an integrated approach to meet multiple resource objectives.</p>

Author(s)	Comment	Response
Culliney, Susan	<p>growth timber is just one possible method of achieving the stated Need. A certain level of old-growth logging is consistent with the Amended Forest Plan, and may eventually be included in this Project’s future alternatives analysis. But a broader Need statement would be more accurate, as it leaves room for a variety of ways to meet that Need.[...]The Need statement surrounding the young-growth activities are also too narrowly stated. The broader Need “to produce future desired resource values, products, services, and forest health conditions that sustain the diversity and productivity of forested ecosystems” should be decoupled from the specific “need for commercial and precommercial treatments of young -growth forests.” In fact, the precommercial and commercial treatments are already included in the NOI’s section on “management activities that typically meet the needs associated with this project.” These specific treatments are not appropriate as Need statements, but instead are possible ways to meet the Project’s Needs. The treatments are more appropriately presented later at the DEIS stage, when the USFS is grappling with different actions to meet the identified Purpose and Need.</p> <p>The Purpose and Need statement is the root of the NEPA process, and must be accurate and strong, but not so specific that the alternatives are merely mirrored components of the Purpose and Need. The Need statements for both restoration activities and sustainable recreation opportunities, however, properly refrain from specifics, instead allowing the Proposed Actions and upcoming alternatives analysis to come up with ways to meet those broader needs.</p>	<p>One Need statement also appears out of step with the Forest Plan’s transition away from old-growth clearcut logging.</p>

Author(s)	Comment	Response
	<p>According to the NOI the Project will cover a 10-15 year time period, effectively the same period that the Amended Forest Plan has identified for transitioning away from old-growth clearcut logging. Yet the NOI for this Project identifies the following Need:</p> <p>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.”</p> <p>Maintaining the existing timber industry over a 10-15 year time period, and merely preparing for a transition does not pass muster with the Amended Plan’s transition away from old-growth clearcut logging within 15 years. Instead, the Need statement should clearly identify a Need to move away from old-growth clearcut logging, even if the statement also includes a need to maintain some level of a forest products industry:</p> <p>to help convert the expertise and infrastructure of the timber industry so the forest products industry can transition away from old-growth clearcut logging to an increasing amount of young-growth offerings and other forest products.”[...]We understand the importance of providing some stability to the forest products industry. However, the Service should not simply maintain the status quo. The Amended Forest Plan charts a transition away from old-growth logging in the Tongass. Retaining existing forestry expertise may provide some help transition away from old-growth logging, but the timber industry as it exists today will necessarily need to change, not merely prepare to change.</p>	<p>Suggestions for refining the purpose and need statements for the POW LLA have been reviewed and will be considered. The overarching purpose for the project will remain to improve forest ecosystem health on Craig and Thorne Bay Ranger Districts, help support community resiliency, and provide economic development through an integrated approach to meet multiple resource objectives.</p>

Author(s)	Comment	Response
Culliney, Susan	In contrast, the identified Need to expand recreation opportunities, and not simply maintain existing opportunities, is an exciting signal for the future of this landscape. Wildlife viewing, tourism, and recreation opportunities abound in the Tongass. We suggest the Service pay careful attention to the human capital in the region, and not simply the infrastructure. The communities living on Prince of Wales likely represent a wealth of knowledge about natural history and living in this remote and spectacular landscape. The transition away from old-growth logging, and the turn toward other less tangible “forest products” such as salmon, wildlife tourism, and recreation, depend heavily on engaging and utilizing local communities. It is promising to see such an intent reflected in the Project’s Needs.	<p>The POW LLA Project is being analyzed under the requirements of the National Environmental Policy Act of 1969 (NEPA), which requires citizen involvement to make better informed decisions. We are conducting a broad public participation effort and there will be several more official public comment periods, not just the scoping period that followed the publication of the Notice of Intent to Prepare an EIS in the Federal Register on November 30, 2016.</p> <p>A collaborative group, calling themselves the Prince of Wales Landscape Assessment Team, has independently formed to provide information to the Forest Service regarding the POW LLA project. This group was not formed by the Forest Service and the Forest Service does not manage or control the group. All members of the public as well as any other group who would like to provide input to the POW LLA Project are encouraged and welcome to do so.</p>

Author(s)	Comment	Response
Culliney, Susan	<p>It is encouraging that this analysis will occur at the Prince of Wales landscape level, rather than at a smaller scale such as the timber sale level. (e.g. timber sale like Big Thorne). Many impacts that appear small at the timber sale level in fact aggregate over the island's ecosystem into severely problematic big-scale problems. Road management is a good example of how different scales can be deceiving.</p> <p>The phenomenon of road impacts on wildlife coalesce across the island, but may be lost when analyzed for a single timber sale. For this Landscape Level Analysis Project, the Service should pay close attention to roads. The agency should first accurately track open roads. Second, the agency should consider how the different alternatives will affect both road mileage and access. The alternatives should all achieve an overall net loss in open road access by using closures and decommissioning. Overall, the agency should think strategically about how decreased road access can alleviate poaching pressure on wildlife populations such as wolves.</p>	<p>Thank you for your comment. During the analysis process the impacts of the proposed activities could be analyzed at a variety of scales. Impacts to wildlife are generally analyzed at a VCU, multiple VCUs, WAA, and multiple WAA scale. The POW LLA Project will likely analyze the impacts of roads at a variety of scales, including Prince of Wales Island. At least one alternative could include the option to close roads.</p> <p>In 2009 the Craig and Thorne Bay Rangers signed the Prince of Wales Access and Travel Management Plan. In accordance with 36 CFR 212.5(b) this decision identified the minimum road system for safe and efficient travel and for administration, utilization, and protection of National Forest System lands. This decision also designated the class of vehicle and, if appropriate, time of year for motor vehicle use. The decision is reflected on the Motor Vehicle Use Map and shows where motor vehicle use is allowed and which type of vehicles may be used. The allocated road maintenance budgets are not sufficient to keep all roads open. The process of closing a road to vehicle traffic and placing it in a condition that requires minimum maintenance is done to protect the environment (e.g., protecting aquatic resources from increased sediment delivery to streams) and preserve the facility for future use. There is a range of methods used in closing a road depending on site-specific conditions and appropriate maintenance level; however, the main idea is that the road will be in a mostly self-maintaining physical state. In recent years, the Forest Service has actively engaged the public in providing access on new logging roads for firewood and other subsistence activities before closing the roads. Maps and brochures have been posted in communities and at Forest Service offices. Any changes to the Access and Management Plan as a result of the POW LLA Project will be informed by a travel analysis.</p>

Author(s)	Comment	Response
Culliney, Susan	<p>We are opposed to any logging activities in the beach fringe, riparian management areas, and old-growth reserves, as these areas constitute important wildlife areas set aside as a strategy to ensure the perpetuation of native wildlife species. Given that the Amended Forest Plan will begin to operate on the Tongass, we strongly suggest that the Service use a phased approach to second-growth logging on Prince of Wales.</p> <p>We anticipate that the oldest young-growth areas, like those found in beach fringe, riparian management areas, and old-growth reserves, will appear attractive for creating a young-growth industry. However, an intense focus solely on these areas in the early phase of an establishing second-growth industry would essentially constitute second-growth highgrading. By placing at least some of the conservation areas' young-growth into a phase 2 category, the timber industry will be forced to contract into a more sustainable version of itself. By waiting until later in the transition to harvest the timber in some of these conservation areas, the burgeoning industry will go into these sensitive areas only after having established itself, and only after uncertain methods in young-growth treatments and habitat restoration have been preliminarily tested.</p>	<p>Thank you for your comment. The current 2016 Forest Plan Amendment recognizes the importance of the beach and estuary fringe, riparian management areas, and old-growth reserves.</p> <p>Management of old-growth forests for timber production is generally prohibited in these zones. Young-growth timber may however be managed via commercial harvests and non-commercial treatments under certain limitations and circumstances. The Record of Decision for the 2016 Forest Plan Amendment, pages 6 and 7, describes the limitations to commercial harvest of young growth in the beach and estuary fringe, old-growth reserves, and riparian management areas.</p> <p>Additionally, there are scenery Standards and Guidelines in the Forest Plan that define the allowable levels of old-growth harvest that can be seen from visual priority travel routes and use areas like Clarence and Sumner Straits. The Forest Plan does however now make additional allowances for the harvest of young-growth timber in the beach fringe and reduces the scenery Standards there in order to promote the transition to primarily young-growth harvesting.</p> <p>Even though the Forest Plan allows certain levels of young-growth harvest in the beach fringe, portions of RMAs and in old-growth reserves, the POW LLA Project may elect to develop alternatives that avoid harvests in those areas. Your comment will be considered when we develop alternatives.</p>

Author(s)	Comment	Response
Culliney, Susan	<p>We expect the agency plans to use the young-growth direction outlined in the Amended Forest Plan in the conservation areas of beach fringe, riparian management areas, and old-growth reserves.</p> <p>However, we are still unaware of any evidence showing that these treatments have any benefit to wildlife and may instead act detrimentally. At a minimum, there should be an effort to study the wildlife response to these treatments when the treatments are used in conservation areas. The best way to implement this monitoring may be to incorporate these studies into the Plan’s Monitoring Program. Within the Monitoring Program, the Service could set up an experimental design to capture the wildlife response to various treatments used in the beach fringe, riparian management area, old-growth reserves, as well as forest-wide trends.</p>	<p>Thank you for your comment. A new Forest-wide plan monitoring program to capture wildlife response to various treatments used in the beach fringe, riparian management area, old-growth reserves, as well as forest-wide trends is outside the scope of this project. The POW LLA Project will follow the young-growth direction allowed in the current Forest Plan. An adaptive management monitoring plan may be included in the DEIS to help determine appropriate treatments across the landscape after initial implementation.</p>
Culliney, Susan	<p>Data are urgently needed to understand and track the status of the Alexander Archipelago wolf on Prince of Wales Island. The alternatives for this Project should all consider how each action may affect existing POW wolf populations, as well as how each action could help restore the wolf populations to greater population stability. We also urge the Forest Service to plan out an effective monitoring program, specifically focusing on wolf population numbers and trends, and how the populations respond to various forest activities including roads and timber operations. The Landscape Level Analysis must also include discussion of what the Service will do, should the evidence continue to show that wolf populations are on a steadily declining trend.</p>	<p>Thank you for your comment. The status of the Alexander Archipelago wolf on Prince of Wales Island is currently being studied by both the State of Alaska and the US Forest Service. This project will adhere to all the Standards & Guidelines of the current Forest Plan. The current Forest Plan on page 4-91 directs the Forest Service to:</p> <p>A. Implement a Forest-wide program, in cooperation with ADF&G and USFWS, to assist in maintaining long-term sustainable wolf populations.</p> <ol style="list-style-type: none"> 1. Where wolf mortality concerns have been identified, develop and implement a Wolf Habitat Management Program in conjunction with ADF&G. To assist in managing legal and illegal wolf mortality rates to within sustainable levels, integrate the Wolf Habitat Management Program (including road access management) with season and harvest limit

Author(s)	Comment	Response
Culliney, Susan	Wildlife on Prince of Wales exhibits extraordinary endemism. The Service should include consideration of how each alternative will affect the endemic species on POW, including the Alexander Archipelago wolf, the Prince of Wales Spruce Grouse, and others.	<p>proposals submitted to federal and state boards.</p> <p>a) Participate in interagency monitoring of wolf populations on the Forest.</p> <p>b) Where wolf population data suggest that mortality exceeds sustainable levels, work with ADF&G and USFWS to identify probable sources of mortality. Examine the relationship among wolf mortality, human access, and hunter/trapper harvest. Conduct analyses for smaller islands (e.g., Mitkof Island), portions of larger islands, or among multiple wildlife analysis areas (WAAs).</p> <p>The DEIS will include the analysis required by the current Forest Plan. We will consider the concerns about wolf populations when developing the proposed action and alternatives for this project.</p> <p>Thank you for your comment. The current Forest Plan includes direction on endemic species(p. 4-93). Direction includes (but is not limited to): maintain habitat to support viable populations,improve knowledge of habitat relationships of rare or endemic terrestrial mammals, survey areas for endemics to determine project effects, and analyze the effects of proposed land management activities on their habitat.</p>

Author(s)	Comment	Response
Culliney, Susan	We also strongly suggest the Service include analysis of climate-vulnerable salmon habitat, and how each alternative may exacerbate the existing and future pressures that salmon will experience due to a changing climate.	<p>Climate change will be addressed in the NEPA process, and the CEQ policy will be followed according to the interpretation and direction given by the Forest Service's Washington Office. NEPA requires that we analyze the full range of direct, indirect, and cumulative effects of the alternatives identified in an EIS.</p> <p>The value of carbon stored in forests is recognized as an Ecosystem Services Objective in the Tongass National Forest Land and Resource Management Plan (Forest Plan). This project will be following all Standards & Guidelines in the Forest Plan.</p>

Author(s)	Comment	Response
Curtis, Jennifer	<p>Based on our experience with landscape-level, land management EIS's, we recommend the Draft EIS compare the alternatives in terms of their influence on the following:</p> <ul style="list-style-type: none"> • Impacts on water quality, fish population strongholds, sensitive species and wildlife habitat • Facilitation of natural disturbance and forest development processes at the stand and landscape scales • Retention of large snags, downed logs and large wood in streams • Risk to fragile soils, landslides and erosion from steep slopes • Introduction and spread of invasive species • Impacts to tribal and cultural resources • Enforcement and monitoring of administrative conditions and restrictions • Climate change implications 	<p>NEPA requires that we analyze the full range of direct, indirect, and cumulative effects of the preferred alternative, if any, and of the reasonable alternatives identified in an EIS. We will adhere to all laws and regulations.</p> <p>(CEQ NEPA Regulations, 40 C.F.R. §§ 1508.7, 1508.8)</p>
Curtis, Jennifer	<p>Purpose and Need</p> <p>The Draft EIS should include a clear and concise statement of the underlying purpose and need for the proposed project, consistent with the implementing regulations for NEPA. We recommend that this statement be framed broadly to ensure a robust analysis of alternatives.</p>	<p>Suggestions for refining the purpose and need statements for the POW LLA have been reviewed and will be considered. The overarching purpose for the project will remain to improve forest ecosystem health on Craig and Thorne Bay Ranger Districts, help support community resiliency, and provide economic development through an integrated approach to meet multiple resource objectives.</p>

Author(s)	Comment	Response
Curtis, Jennifer	<p>The Draft EIS should include a range of alternatives which meets the stated purpose and need, goals and objectives, and responds to issues identified during the scoping process. The alternatives analysis should compare alternatives with respect to how well they respond to the stated purpose and need, goals and objectives, and scoping issues. The Council on Environmental Quality recommends that all reasonable alternatives be considered, even if some of them could be outside the capability of the applicant or the jurisdiction of the agency preparing the EIS.</p> <p>Consistent with the purpose of the NEPA, the EPA encourages selection of alternatives that protect, restore and enhance the environment. We strongly support lead agencies' efforts to identify and select alternatives' which maximize environmental benefits, and avoid, minimize, and/or otherwise mitigate environmental impacts.</p>	<p>We are required by the National Environmental Policy Act to analyze a reasonable range of alternatives which meets the stated purpose and need, goals and objectives, and responds to issues identified during the scoping process.</p> <p>Requests that no old-growth harvesting or road construction occur as part of this project are noted. This may be considered as a design component of an alternative or multiple alternatives.</p>
Curtis, Jennifer	<p>We recommend that the Draft EIS discuss how logging will proceed in sensitive areas (i.e., previously burned areas, fragile soils, steep slopes, riparian areas, watersheds with severe sedimentation problems, and fish population strongholds).</p>	<p>The Draft EIS will address sensitive areas (such as steep slopes, sensitive soils, riparian areas, etc.) and consider soil conditions as well as water resources and riparian conditions to minimize environmental impacts as directed by the Forest Plan, Regional and National Best Management Practices, and Region 10 Soil Quality Standards.</p>
Curtis, Jennifer	<p>The Draft EIS should explore how the timing of entry can be adjusted to minimize environmental impacts. This should include a consideration of wildlife use and soil conditions.</p>	<p>The Draft EIS will address sensitive areas (such as steep slopes, sensitive soils, riparian areas, etc.) and consider soil conditions as well as water resources and riparian conditions to minimize environmental impacts as directed by the Forest Plan, Regional and National Best Management Practices, and Region 10 Soil Quality Standards.</p>

Author(s)	Comment	Response
Curtis, Jennifer	The Draft EIS should discuss how proposed prescriptions will promote and restore forest structure, composition, and function, especially in areas near or adjacent to stream corridors.	The Silviculture Resource Report that will be prepared for the Draft EIS will discuss the effects of the various proposed silvicultural prescriptions on forest structure, composition, and function.
Curtis, Jennifer	Invasive Species. We recommend that the Draft EIS include the FOREST SERVICE's direction for noxious weed management, a description of current conditions, and Best Management Practices that will be utilized to reduce the likelihood of introduction and spread of invasive species with the proposed management activities	These recommendations are compatible with USFS guidelines. In recognition that project activities may have an effect on introduction and/or spread of invasive species the Tongass Forest Land and Resource Management Plan includes multiple provisions for analyzing and mitigating any potential effects. A detailed invasive plant risk assessment is completed for every NEPA project that analyzes the current inventory and likelihood of spread of any invasive plants within the project area. Mitigation measures such as project design features and Best Management Practices are included to reduce the risk of introduction and/or spread of invasive species. Further direction for completion of Invasive Risk Assessments and applicable BMPs are provided in the Tongass National Forest Guidance for Invasive Plant Management Program. Future and ongoing invasive weed control projects may be included as proposed actions in an alternative or may be addressed in the cumulative effects sections.
Curtis, Jennifer	We recommend that the Draft EIS include a description of how roads in the project area watersheds currently impact resources and describe the change in road miles and density that will occur as a result of the project.	NEPA requires a "hard look" using the best available science. A thorough analysis of the effects of roads on resources will be part of the NEPA document.

Author(s)	Comment	Response
Curtis, Jennifer	As alternatives are developed, we recommend that the Forest Service look for opportunities to reduce the number of roads needed to conduct any proposed timber harvests.	<p>Timber sales are designed to be economical; this includes not constructing excessive road segments. Use of existing roads and potential new construction will be thoroughly analyzed. The need for maintenance, reconstruction and new construction will largely be driven by timber harvest and the need to haul harvested timber.</p> <p>Temporary roads are decommissioned when their use period is over. National Forest System roads are analyzed to determine the appropriate long-term use and travel management strategy.</p>
Curtis, Jennifer	The Draft EIS should provide site specific rationale for treatment based on the need to protect or restore the riparian ecosystem.	<p>We will consider the suggestions of maintaining or increasing road closures, including utilizing gates, and limiting any new road construction as a design criteria for the Project's proposed action or an alternative.</p> <p>Thank you for your comment. The need for restoration activities to improve watershed function and fish and wildlife habitat has been identified for the project area. The Draft EIS will analyze the effects of restoration activities in the different alternatives, and the effects of doing no restoration will be analyzed in a No-Action alternative, and the decision maker will provide rationale for the alternative that he selects.</p>

Author(s)	Comment	Response
Curtis, Jennifer	<p>Silvicultural treatments should be designed to achieve or accelerate system potential riparian conditions.</p> <ul style="list-style-type: none"> • Where fuel loadings allow and ecological benefit can be established we support the directional felling (and leaving) of trees within the riparian area. • The fire effects analysis should include a discussion of Fire Regime Condition Class. • The fire effects analysis should describe how the proposed action - and subsequent actions if necessary - will decrease the risk of undesirable wildfire in the short, medium and long-term. • The fire effects analysis should address the potential impacts of all alternatives (including no-action) for all resources in a consistent and systematic manner. • The risks of uncharacteristic disturbances, such as catastrophic wildfire, should be evaluated against the effects of active restoration designed to reduce those risks (e.g., water quality, fisheries and wildlife effects). 	<p>Your comment is noted. Our analysis typically does not include a fire effects analysis since fire is not historically part of the disturbance regime here. The risk of an uncharacteristic disturbance like fire will be considered when we analyze the effects of the project.</p>
Curtis, Jennifer	<p>The CEQ's August 1, 2016, Final Guidance for Federal Departments and Agencies on Consideration of Greenhouse Gas Emissions and the Effects of Climate Change in National Environmental Policy Act Reviews outlines a reasonable approach.</p> <p>We agree with CEQ that identifying important interactions between a changing climate and the environmental impacts from a proposed action can help Federal agencies and other</p>	<p>All CEQ regulations and Forest Service policies and direction pertaining to climate change will be adhered to. An effects analysis on climate change will be included in the DEIS.</p>

Author(s)	Comment	Response
	<p>decision makers identify practicable opportunities to reduce GHG emissions, improve environmental outcomes, and contribute to safeguarding communities and their infrastructure against the effects of extreme weather events and other climate-related impacts.</p> <p>When addressing climate change agencies should consider: (1) the potential effects of a proposed action on climate change, as indicated by assessing GHG emissions; and (2) the effects of climate change on a proposed action and its environmental impacts. To adequately consider GHG emissions and the effects of climate change on a proposed action and its environmental impacts we emphasize the following recommendations from CEQ:</p>	
		<ul style="list-style-type: none">• Quantify projected direct and indirect GHG emissions, or include a qualitative analysis and explain the basis for determining that quantification is not reasonably available.• Use projected GHG emissions as a proxy for climate change effects.[...]• Provide a recognizable frame of reference for comparing alternatives and mitigation measures' GHG emissions.• Discuss methods to appropriately analyze reasonably foreseeable direct, indirect, and cumulative GHG emissions and climate effects.• Consider short- and long-term effects and benefits in the alternatives and mitigation analysis.• Use available information when assessing potential future state of the affected environment and consider actions in the

Author(s)	Comment	Response
	<p>context of the future state of the environment.</p> <ul style="list-style-type: none">• Use information developed during the NEPA review to consider alternatives that would make the actions and affected communities more resilient to the effects of a changing climate.• Set forth a reasoned explanation for the agency's approach to assessing the broad-scale effects of GHG emissions and climate change.• Account for activities that have a reasonably close causal relationship to the Federal action, such as those that may occur as a predicate for the proposed agency action, or as a consequence of the proposed agency action.• Explain the parameters of the analysis using basic NEPA principles.• If some impacts are monetized but not all, explain the rationale for doing so.	

Author(s)	Comment	Response
Curtis, Jennifer	<p>Weeds</p> <p>Vegetation removal and soil disturbance enable invasive weeds to become established. The Draft EIS should identify management actions that would be taken to comply with Executive Order 13112 on Invasive Species. We recommend including the Forest Service's direction for invasive weed management, a description of current conditions, and best management practices that would be used to reduce the likelihood of introduction and spread of invasive species. Describe any invasive weed control projects planned in the action area, and future/ongoing weed monitoring and control activities.</p>	<p>These recommendations are compatible with USFS guidelines. In recognition that project activities may have an effect on introduction and/or spread of invasive species the Tongass Forest Land and Resource Management Plan includes multiple provisions for analyzing and mitigating any potential effects. A detailed invasive plant risk assessment is completed for every NEPA project that analyzes the current inventory and likelihood of spread of any invasive plants within the project area. Mitigation measures such as project design features and Best Management Practices are included to reduce the risk of introduction and/or spread of invasive species. Further direction for completion of Invasive Risk Assessments and applicable BMPs are provided in the Tongass National Forest Guidance for Invasive Plant Management Program. Future and ongoing invasive weed control projects may be included as proposed actions in an alternative or may be addressed in the cumulative effects sections.</p>
Curtis, Jennifer	<p>Rare Plants</p> <p>The EIS should identify whether there are any threatened, endangered candidates, sensitive, or other plant species of concern within or near the project area which could be affected by proposed actions. The EIS should include general locations of rare or special status plants, and how these sites would be managed to avoid impacts on the plants.</p>	<p>Currently there are no threatened and endangered plants on the Tongass National Forest. Standards and Guidelines for the Tongass National Forest encourage the protection of sensitive and rare plants so as to preclude the need for listing species as threatened or endangered. Provisions for protecting viable plant populations and habitat from project activities are included in the Tongass Forest Land and Resource Management Plan Standards and Guidelines. A Biological Evaluation (BE) that examines the known occurrences and potential habitat of plants on the Region 10 Sensitive Species List is completed for every NEPA project. Detailed mitigation measures and project design features are included in the BE to protect sensitive plant species that are known or suspected to occur in the project area. A botany resource report is also prepared to document the findings of rare plants (S1 and S2 on the Alaska Natural Heritage List).</p>

Author(s)	Comment	Response
Curtis, Jennifer	<p>Describe the current quality of habitat on and near the proposed project area;[...]Identify known fish and wildlife corridors, migration routes, and areas of seasonal fish and wildlife congregation;</p> <ul style="list-style-type: none"> • Evaluate the cumulative alteration and fragmentation of aquatic and terrestrial habitat caused by roads, land use, management activities and human activity; • Evaluate effects on plants, fish and wildlife from habitat removal and alteration, aquatic and terrestrial habitat fragmentation caused by roads, land use, management activities and human activity; • Discuss how the proposed activities would support the retention of large snags, downed logs and large wood in streams, and 	<p>We appreciate your input. The analysis you request is commonly provided in the DEIS and FEIS we prepare.</p>
Curtis, Jennifer	<p>Incorporate the range of firewood gatherers from roads into the snag retention guidelines.</p>	<p>Thank you for your comment. Firewood gathering is a subsistence activity and will be analyzed in the subsistence section of the EIS.</p>

Author(s)	Comment	Response
Curtis, Jennifer	<p>The guidance states that in order to assess the adequacy of the cumulative impacts assessment, five key areas should be considered. The EPA tries to assess whether the cumulative effects analysis:</p> <ul style="list-style-type: none">• Identifies resources, if any, that are being cumulatively impacted.• Determines the appropriate geographic area (within natural ecological boundaries) and the time period over which the effects have occurred and would occur.• Describes a benchmark or baseline.• Looks at all past, present, and reasonably foreseeable future actions that have affected, are affecting, or would affect resources of concern.• Includes scientifically defensible threshold levels. <p>The EIS should take these above steps to analyze and disclose cumulative impacts to identified resources of concern.</p>	<p>NEPA requires that we analyze the full range of direct, indirect, and cumulative effects of the preferred alternative, if any, and of the reasonable alternatives identified in an EIS. We will adhere to all laws and regulations.</p> <p>(CEQ NEPA Regulations, 40 C.F.R. §§ 1508.7, 1508.8)</p>

Author(s)	Comment	Response
Curtis, Jennifer	<p>We recommend that these services be acknowledged, accounted for using quantitative (where feasible) or qualitative means, and fully considered in decision making.</p> <p>The Memo directs the assessment and integration of ecosystem services into agency decision making include the following elements, which are basic tenets of the NEPA process:</p> <ul style="list-style-type: none"> • Describe the Federal action. • Identify and classify key ecosystem services in the location of interest, i.e., the affected environment; • Assess the impact of the Federal action on ecosystem services relative to baseline; • Assess the effect of the changes in ecosystem services associated with the Federal action; and • Integrate ecosystem services analyses into decision making. 	<p>The POW LLA Project is a relatively large-scale NEPA analysis project with an overarching purpose to improve forest ecosystem health, support community resiliency, and provide economic development through an integrated approach to meet multiple resource objectives. The POW LLA Project will be refined over the next year with extensive public input. The Forest Service looks forward to engaging in meaningful dialogue with the public regarding the most relevant and valued ecosystem services, readily-available data, and appropriate qualitative and quantitative methods for assessing contributions to social and economic sustainability.</p>
Curtis, Jennifer	<p>Development of the EIS should be conducted in consultation with all affected tribal governments, consistent with Executive Order (EO) 13175 (Consultation and Coordination with Indian Tribal Governments). The EIS should discuss whether or not the proposed project would affect tribal natural and/or cultural resources and address any concerns of the tribes in accordance with Federal tribal trust responsibilities.</p>	<p>Federal and State laws and regulations require the Forest Service to consult with Federally-recognized tribes and tribal corporations prior to all Federal undertakings. As early as possible in the planning process the Forest Service will consult with Indian tribes to determine if any natural and/or historic resources of traditional cultural significance are present within an undertaking's area of potential effect (APE). Tribal concerns and recommendations derived from the consultation process will be documented and addressed in the inventory report and NEPA project file.</p>

Author(s)	Comment	Response
Curtis, Jennifer	We recommend that the project include a monitoring program designed to assess impacts from the project, and the implementation and effectiveness of measures taken to mitigate impacts. We support the use of multi-party monitoring and encourage the Forest Service, in concert with the Prince of Wales Landscape Assessment Team or another independent stakeholder entity, to develop a multi-party monitoring protocol. We believe the projects undertaken by the collaborative present an opportunity to evaluate the effectiveness of various restoration prescriptions in mixed severity fire regimes, as well as watershed restoration treatments. The EIS should describe the monitoring program, how it would be used in present and future resources management, and the likely extent to which it would be adequately implemented and funded.	<p>The Tongass National Forest conducts implementation and effectiveness monitoring Forest-wide on a random sample basis as part of Forest Plan monitoring. Management activities in the POW LLA Project area are likely to be selected for monitoring as part of this Forest-wide program.</p> <p>Individual resources may have a monitoring component for specific species or habitat included in the DEIS. In addition, an adaptive management monitoring plan may be included in the DEIS to help determine appropriate treatments across the landscape after initial implementation.</p> <p>Multiparty monitoring has occurred in the past on the Districts, but not on a consistent basis due to availability of entities to participate. We agree that the POW LLA Project may provide excellent opportunities for multiparty monitoring and would welcome the opportunity to work with interested individuals or groups to accomplish mutual goals.</p>

Author(s)	Comment	Response
Egelston, David	<p>One of the things that seems to be increasing is tourism. It brings new dollars to the island, and those dollars are turned over a number of times, to benefit many individuals and communities. It would seem logical to support the tourism at a level that is compatible with the unique character of the island. That would mean trying to strike a balance between too many visitors, and not enough. Different people will argue for different levels of course.</p> <p>I am suggesting that there be recreational enhancements. Giving people who live on the island and those who are visiting better access would help bring more people and increase the geographical dispersal of users. Spreading the user population out geographically and over time would minimize the impact on island residents. The communities that support the needs of visitors would still benefit from those sales.</p>	<p>Laws and regulations require the Forest Service to look at multiple uses of forest resources. The purpose and need for the POW LLA Project states that through an integrated approach we will consider multiple uses, including but not limited to providing a sustainable level of forest products and providing sustainable recreation opportunities. A range of alternatives will be considered which analyzes multiple uses across the landscape and also includes a thorough analysis of the economic and social environment.</p>
Egelston, David	<p>There is an existing boat launch at El Capitan that could use updating. The area lends itself to the creation of a better launch facility and parking. Updating this facility would increase usage, offering boaters a safer and shorter run into Sumner Strait, as well as increase occupation for Shipley Bay cabin.</p>	<p>Developing and improving recreation facilities including boat launches will be given full consideration and may be part of the Proposed Action or other alternatives.</p>
Egelston, David	<p>Secondly, there is an opportunity to create a rental cabin on the "loop" that exists there. The cabin would be on the road system and would be available to more people than just those with the ability to own or rent larger boats, or charter aircraft. It would also be a perfect location to make handicapped accessible lodging, so those who are confined to wheelchairs or other adaptive devices could have access.</p>	<p>Developing new recreation facilities including a campground at El Cap will be given full consideration and may be included in the Proposed Action or an alternative.</p>

Author(s)	Comment	Response
Egelston, David	This area would benefit from a boat launch site. Trailerable boats could find access to parts of the island and waters in the northern part of POW and Sumner Strait that presently most boaters cannot access from safe water. Again, it would allow many more people to recreate in the northern part of the island and encourage dispersal of the population, whether visitors or residents.	Developing and improving recreation facilities including boat launches will be given full consideration and may be part of the Proposed Action or other alternatives.
Egelston, David	There is a ramp of sorts at Ratz Harbor presently. It is marginally usable for small skiffs to launch and retrieve. If there was a ramp constructed at that location, small skiff users could utilize that area of Clarence Strait, and have a protected bay to retreat to in the event of fast storms.	Developing and improving recreation facilities including boat launches will be given full consideration and may be part of the Proposed Action or other alternatives.

Author(s)	Comment	Response
Egelston, David	<p>It has been the general practice to close logging roads immediately after logging is done. The result has been that a tremendous amount of usable firewood has been left to rot. Rotting wood has benefits, so it is not a total loss, but it would seem that the cull logs should have a higher use. Many otherwise usable miles of road have been closed to vehicular access. Some of the road cuts are so severe it is difficult for some hikers to traverse. Leaving logging roads open for use, without unnecessary road cuts is desirable to users. Even if the roads are left unmaintained and they are overtaken by new growth, it would be much better than just digging them out and abruptly stopping use.</p>	<p>In 2009 the Craig and Thorne Bay Rangers signed the Prince of Wales Access and Travel Management Plan. In accordance with 36 CFR 212.5(b) this decision identified the minimum road system for safe and efficient travel and for administration, utilization, and protection of National Forest System lands. This decision also designated the class of vehicle and, if appropriate, time of year for motor vehicle use. The decision is reflected on the Motor Vehicle Use Map and shows where motor vehicle use is allowed and which type of vehicles may be used. The allocated road maintenance budgets are not sufficient to keep all roads open. The process of closing a road to vehicle traffic and placing it in a condition that requires minimum maintenance is done to protect the environment (e.g. aquatic resources from increased sediment delivery to streams) and preserve the facility for future use. There is a range of methods used in closing a road depending on site specific conditions and appropriate maintenance level; however, the main idea is that the road will be in a mostly self-maintaining physical state. In recent years the Forest Service has actively engaged the public in providing access on new logging roads for firewood and other subsistence activities before closing the roads. Maps and brochures have been posted in communities and at Forest Service offices. Any changes to the Access and Management Plan as a result of the POW LLA will be informed by a travel analysis.</p> <p>Thank you for your comment. A variety of access options could be considered at the alternative design phase of analysis. Alternatives may include the option of potentially opening closed roads and maintaining currently open roads.</p>

Author(s)	Comment	Response
Egelston, David	Prince of Wales Island has many different parts to it. The habitat diversity found on the island would seem to allow for the introduction of other species that are already found, and prosper, in SE Alaska. Elk and moose are two of the big game species that come to mind. Populations of either or both of those animals would encourage more use of the Tongass National Forest by hunters or those just wishing to view or photograph them, and would also add new food sources for predators, such as wolves.	<p data-bbox="1245 326 1877 380">Thank you for your comment. The current Forest Plan includes direction on the introduction of species.</p> <p data-bbox="1245 418 1976 626">Elk were introduced intentionally as part of a collaborative effort between ADF&G and the USDA Forest Service and are a desired non-native in some areas. As recently as 1987, ADF&G introduced elk on Etolin Island. Since then, elk have spread to other islands and areas in the Southeast. There have been reports of elk and sightings of moose on Prince of Wales Island.</p> <p data-bbox="1245 665 1961 1089">The ADF&G Division of Wildlife Conservation has prepared a draft elk management plan for Southeast Alaska to manage and better understand the elk population and its potential effect on native plants and animals (ADF&G 1999). The main concern is competition with native Sitka black-tailed deer due to the high degree of dietary overlap of the two species (ADF&G 1999). The degree of dietary overlap between the species is the highest reported in the literature, indicating a high potential for direct competition (Kirchhoff and Larsen 1998). Pellet-count surveys on Etolin Island between 1991 and 1998 documented a doubling of the elk population while deer population declined by 56 percent (ADF&G 1999). An associated issue is that a decline in deer numbers could lead to fewer deer hunting opportunities.</p> <p data-bbox="1245 1128 1919 1187">The introduction of either moose or elk to Prince of Wales Island is beyond the scope of this project.</p>

Author(s)	Comment	Response
Gefre, Nick	<p>I would appreciate If some consideration would be given to leaving our roads open after the timber is harvested. The key phrase used to be "multiple use land" and I think we've strayed away from that concept.</p> <p>Since the Timber industry's decline simple things like easy access to fire wood helps the local economy on an individual basis.</p> <p>If a culvert washes out or the Alders get to thick most of us have enough common sense to deal with that situation.</p> <p>I consider it a personal insult that I can't use the roads my tax dollars helped to construct.</p>	<p>In 2009 the Craig and Thorne Bay Rangers signed the Prince of Wales Access and Travel Management Plan. In accordance with 36 CFR 212.5(b) this decision identified the minimum road system for safe and efficient travel and for administration, utilization, and protection of National Forest System lands. This decision also designated the class of vehicle and, if appropriate, time of year for motor vehicle use. The decision is reflected on the Motor Vehicle Use Map and shows where motor vehicle use is allowed and which type of vehicles may be used. The allocated road maintenance budgets are not sufficient to keep all roads open. The process of closing a road to vehicle traffic and placing it in a condition that requires minimum maintenance is done to protect the environment (e.g. aquatic resources from increased sediment delivery to streams) and preserve the facility for future use. There is a range of methods used in closing a road depending on site specific conditions and appropriate maintenance level; however, the main idea is that the road will be in a mostly self-maintaining physical state. In recent years the Forest Service has actively engaged the public in providing access on new logging roads for firewood and other subsistence activities before closing the roads. Maps and brochures have been posted in communities and at Forest Service offices. Any changes to the Access and Management Plan as a result of the POW LLA will be informed by a travel analysis.</p> <p>Thank you for your comment. A variety of access options could be considered at the alternative design phase of analysis. Alternatives may include the option of potentially opening closed roads and maintaining currently open roads.</p>

Author(s)	Comment	Response
Gefre, Nick	I also appreciate the fact that some of the old roads have been developed for ATV use. I think this is a great idea and a step in the right direction.	<p>In 2009 the Craig and Thorne Bay Rangers signed the Prince of Wales Access and Travel Management Plan. In accordance with 36 CFR 212.5(b) this decision identified the minimum road system for safe and efficient travel and for administration, utilization, and protection of National Forest System lands. This decision also designated the class of vehicle and, if appropriate, time of year for motor vehicle use. The decision is reflected on the Motor Vehicle Use Map and shows where motor vehicle use is allowed and which type of vehicles may be used. The allocated road maintenance budgets are not sufficient to keep all roads open. The process of closing a road to vehicle traffic and placing it in a condition that requires minimum maintenance is done to protect the environment (e.g. aquatic resources from increased sediment delivery to streams) and preserve the facility for future use. There is a range of methods used in closing a road depending on site specific conditions and appropriate maintenance level; however, the main idea is that the road will be in a mostly self-maintaining physical state. In recent years the Forest Service has actively engaged the public in providing access on new logging roads for firewood and other subsistence activities before closing the roads. Maps and brochures have been posted in communities and at Forest Service offices. Any changes to the Access and Management Plan as a result of the POW LLA will be informed by a travel analysis.</p> <p>Thank you for your comment. A variety of access options could be considered at the alternative design phase of analysis. Alternatives may include the option of potentially opening closed roads and maintaining currently open roads.</p>

Author(s)	Comment	Response
Goldstein, Gretchen	<p>I respectfully request an extension on the comment deadline, so that other Port Protection residents can be alerted and have comment time,</p> <p>In case no extension is granted, I make the following comments re the POW master plan effort.</p>	<p>The request for an extension was mailed hard copy and did not reach the District until after the end of the comment period. After a comment period has closed, it cannot be extended. However, the comments that were submitted with the extension request were received and are being considered, as they were post-marked within the comment period timeline. Also, there will be another public comment period with an opportunity to provide input on a more refined proposed action in 2017.</p>
Goldstein, Gretchen	No further old growth harvest anywhere on POW	<p>Thank you for your comment. The purpose and need for the project states that, through an integrated approach, we will consider multiple uses including but not limited to providing a sustainable level of forest products and providing opportunities for growth in the recreation and tourism sector. The purpose and need encompasses multiple uses across the landscape including, but not limited to, timber, recreation, wildlife habitat, watershed improvement, and supporting transportation infrastructure.</p> <p>Providing old-growth timber is just one possible method of achieving the stated Purpose and Need. A certain level of old-growth logging is consistent with the Amended Tongass National Forest Land and Resource Management Plan.</p> <p>Even though the Forest Plan allows for old growth harvest, the POW LLA may elect to develop alternatives that limit or avoid it. Your concerns for old growth conservation will be considered during alternative development. Economic alternatives to specific actions are considered in the analysis phase of the NEPA process.</p>

Author(s)	Comment	Response
Goldstein, Gretchen	A green belt protecting Port Protection and Point Baker, line to be determined by the communities working with the USFS,	<p>Your desire for a green belt in the Port Protection and Point Baker areas determined by the communities and the Forest Service has been noted. The development of the POW LLA is meant to be collaborative process with ample public opportunities for involvement throughout the planning process. Habitat restoration is a key component of the purpose and need for the POW LLA Project and will be analyzed.</p> <p>We will consider your suggestion of a green belt and habitat restoration as a design criteria for the Project's Proposed Action or an alternative. All alternatives developed and analyzed for the POW LLA Project will adhere to the current Forest Plan.</p>
Goldstein, Gretchen	No further timber harvest north of the green belted area. Forest planning aimed at habitat restoration, including streams, beach [ldquo]fringe[rdquo] and upland areas.	<p>Your desire for a green belt in the Port Protection and Point Baker areas determined by the communities and the Forest Service has been noted. The development of the POW LLA is meant to be collaborative process with ample public opportunities for involvement throughout the planning process. Habitat restoration is a key component of the purpose and need for the POW LLA Project and will be analyzed.</p> <p>We will consider your suggestion of a green belt and habitat restoration as a design criteria for the Project's Proposed Action or an alternative. All alternatives developed and analyzed for the POW LLA Project will adhere to the current Forest Plan.</p>

Author(s)	Comment	Response
Goldstein, Gretchen	Special case taken of the Port Protection watershed whose parameters are on record with the USFS.	The Port Protection drinking water protection area was delineated based on the study done by Ozark Underground Laboratory, Inc. in December of 1998 and is accepted by the Alaska Department of Environmental Conservation. The Forest Service must adhere to the parameters outlined in the Tongass Land and Resource Management Plan, Organic Administration Act of 1897, Alaska Water Quality Standards, and Alaska Drinking Water Regulations that give directions for management within source watersheds for public water systems. This includes consultation with Alaska Department of Environmental Conservation and the owner/operator of Port Protection water delivery system.

Author(s)	Comment	Response
Herbrandson, Deloris	Beach fringes on the North end of POW should be left as they are for visual beauty and to avoid blow down. There is a lot of water traffic in the summer that view this end of POW.	<p data-bbox="1245 326 1980 440">Thank you for your comment. The current 2016 Forest Plan Amendment recognizes the importance of the beach and estuary fringe, riparian management areas, and old-growth reserves.</p> <p data-bbox="1245 483 1980 721">Management of old-growth forests for timber production is generally prohibited in these zones. Young-growth timber may however be managed via commercial harvests and non-commercial treatments under certain limitations and circumstances. The Record of Decision for the 2016 Forest Plan Amendment, pages 6 and 7, describes the limitations to commercial harvest of young growth in the beach and estuary fringe, old-growth reserves, and riparian management areas.</p> <p data-bbox="1245 764 1980 1002">Additionally, there are scenery Standards and Guidelines in the Forest Plan that define the allowable levels of old-growth harvest that can be seen from visual priority travel routes and use areas like Clarence and Sumner Straits. The Forest Plan does however now make additional allowances for the harvest of young-growth timber in the beach fringe and reduces the scenery Standards there in order to promote the transition to primarily young-growth harvesting.</p> <p data-bbox="1245 1045 1980 1187">Even though the Forest Plan allows certain levels of young-growth harvest in the beach fringe, portions of RMAs and in old-growth reserves, the POW LLA Project may elect to develop alternatives that avoid harvests in those areas. Your comment will be considered when we develop alternatives.</p>

Author(s)	Comment	Response
Herbrandson, Deloris	Inland harvesting, reopening existing roads to second growth would be desirable with least adverse impact. Allow local lumbermen small timber sales for local use. The North end of the island desires sustainability.	<p>Timber sales are designed to be economical; this includes not constructing excessive road segments. Use of existing roads and potential new construction will be thoroughly analyzed. The need for maintenance, reconstruction and new construction will largely be driven by timber harvest and the need to haul harvested timber.</p> <p>Temporary roads are decommissioned when their use period is over. National Forest System roads are analyzed to determine the appropriate long-term use and travel management strategy.</p> <p>We will consider the suggestions of maintaining or increasing road closures, including utilizing gates, and limiting any new road construction as a design criteria for the Project's proposed action or an alternative.</p>
Herbrandson, Deloris	I endorse the Pt. Baker Community resolution concerning POW logging.	Thank you for your comment. We are considering the Community Resolution from Point Baker.
Herbrandson, Gerald and Deloris	<p>Beach Logging</p> <p>It appears that the Forest Service may be considering some form of beach logging. I feel that beach fringes should be provided with wide protected buffers as are streams and rivers.</p> <p>I am apposed to this form of logging for the following reasons:</p> <ol style="list-style-type: none"> 1. The beach fringe is a critical wildlife habitat area providing protection and access to animals who rely upon the forest as well as the ocean and tide flats. 	

Author(s)	Comment	Response
	<ul style="list-style-type: none"> * Mink, marin, land otters, and many squirrels live totally within these fringes. * Deer and bear use these areas for forage, access, and protection. * The beach fringe is the most likely location for bald eagle and osprey nests. * Many ducks and shore birds live within this area. * Many water fowl such as the Marbled Murrelet and Wood Duck rely upon these areas for nesting, * Small migratory birds use these areas for their migratory routes. <p>1. Marine mammals use the beach fringe for much of their life.</p> <ul style="list-style-type: none"> * Sea lions and seals form rookeries in protected beach fringe areas. * Humpback Whales feed and sleep during the nighttime within protected coves.[...]1. Beach fringes are sensitive areas subject to wind-throw when disturbed. <p>2. The beach fringes provide some of SE Alaska’s most valuable resource – landscape viewing.</p> <ul style="list-style-type: none"> * The blending of the forest with the ocean is one of SE Alaska’s most defining features. * This landform is possibly the most treasured resource being viewed by passengers on the AMH ferry system, tour ships, and personal boats. It is also the defining feature most often observed from the air. * Most recreation within SE Alaska takes place within the beach fringes. 	<p>Thank you for your comment. The current 2016 Forest Plan Amendment recognizes the importance of the beach and estuary fringe, riparian management areas, and old-growth reserves.</p> <p>Management of old-growth forests for timber production is generally prohibited in these zones. Young-growth timber may however be managed via commercial harvests and non-commercial treatments under certain limitations and circumstances. The Record of Decision for the 2016 Forest Plan Amendment, pages 6 and 7, describes the limitations to commercial harvest of young growth in the beach and estuary fringe, old-growth reserves, and riparian management areas.</p> <p>Additionally, there are scenery Standards and Guidelines in the Forest Plan that define the allowable levels of old-growth harvest that can be seen from visual priority travel routes and use areas like Clarence and Sumner Straits. The Forest Plan does however now make additional allowances for the harvest of young-growth timber in the beach fringe and reduces the scenery Standards there in order to promote the transition to primarily young-growth harvesting.</p> <p>Even though the Forest Plan allows certain levels of young-growth harvest in the beach fringe, portions of RMAs and in old-growth reserves, the POW LLA Project may elect to develop alternatives that avoid harvests in those areas. Your comment will be considered when we develop alternatives.</p>

Author(s)	Comment	Response
Herbrandson, Gerald and Deloris	It was my understanding that beach logging was banned many years ago, I assume for good reason. I am confused as to why we would want to return to this poor management practice. Typically, timber harvested from the beach fringe, is not necessarily the best grade due to being bound and twist.	<p data-bbox="1245 321 1944 440">Thank you for your comment. The current 2016 Forest Plan Amendment recognizes the importance of the beach and estuary fringe, riparian management areas, and old-growth reserves.</p> <p data-bbox="1245 480 1976 721">Management of old-growth forests for timber production is generally prohibited in these zones. Young-growth timber may however be managed via commercial harvests and non-commercial treatments under certain limitations and circumstances. The Record of Decision for the 2016 Forest Plan Amendment, pages 6 and 7, describes the limitations to commercial harvest of young growth in the beach and estuary fringe, old-growth reserves, and riparian management areas.</p> <p data-bbox="1245 761 1976 1002">Additionally, there are scenery Standards and Guidelines in the Forest Plan that define the allowable levels of old-growth harvest that can be seen from visual priority travel routes and use areas like Clarence and Sumner Straits. The Forest Plan does however now make additional allowances for the harvest of young-growth timber in the beach fringe and reduces the scenery Standards there in order to promote the transition to primarily young-growth harvesting.</p> <p data-bbox="1245 1042 1976 1187">Even though the Forest Plan allows certain levels of young-growth harvest in the beach fringe, portions of RMAs and in old-growth reserves, the POW LLA Project may elect to develop alternatives that avoid harvests in those areas. Your comment will be considered when we develop alternatives.</p>

Author(s)	Comment	Response
Herbrandson, Gerald and Deloris	<p>I am not apposed to the logging of timber in a wise sustainable fashion. Small-dispersed timber sales can be healthy for the forest as well as support a local economy. However, large-scale operations do much more damage to the environment and create a boom/bust economy. This type of logging has short-term benefits. It is much more environmentally sound and economically viable to have a sustained yearly output that can be fully processed locally. This provides the most economic return for our valuable resource. Large-scale logging and the export of unprocessed timber is a waste of our resource.</p>	<p>Thank you for your comment. We will consider your suggestion of emphasizing small timber sales as a design criteria for the Project's proposed action or an alternative.</p> <p>The 2016 Tongass National Forest Land and Resource Management Plan Amendment Record of Decision supports the harvest of old-growth timber while transitioning to a predominately young-growth harvest after about 15 years. After that time frame old-growth timber will continue to be offered at an average rate of 5 MMBF per year to support small operators and specialty products such as wood for musical instruments.</p> <p>Your comments to limit or ban round log export is noted. The Forest Service allows limited exports of unprocessed timber from National Forests in Alaska under general authority of the Organic Administration Act (16 U.S.C. §§ 473-482, 551 (2000)), NFMA (16 U.S.C. §§ 1600, 1611-1614 (2000)) and 36 CFR 223.201. One of the primary goals of the Tongass National Forest timber program is to contribute to the local and regional economies of Southeast Alaska. In keeping with this long-standing goal current law allows timber harvested from Federal lands in Alaska to be shipped out of Alaska only if "the supply of timber for local use will not be endangered" (16 U.S.C. §616). The Limited Export Policy provides flexibility for the Region to balance the economics of timber sales to meet statutory requirements.</p>

Author(s)	Comment	Response
Isabell, James and Shelly	Evidence that this is not the case; would be a written letter responding to our comments explaining why each issue was accepted or rejected. Because you have asked for written comments on this plan, it would be both ethical and professional to respond in kind to those people who have provided to written information you have asked for.	All comments received during the public scoping period for the Prince of Wales Landscape Level Analysis (POW LLA) Project have been carefully reviewed and are being considered as general comments, issues to be tracked through the analysis, and potential project design components. Responses to comments will be provided in the project website, which will be opened to all members of the public to view.
Isabell, James and Shelly	<p>Your letter refers to community resiliency and economic viability, when in fact, because of the multitude of unreasonable restrictions which constrict our ability to conduct business under the microsale program, (the first point on your agenda concerning small sales and small business.) should be to implement changes in policy that would provide sufficient timber to small businesses to help assure their survival. We say this because, so many small business owners who depend on microsales have been forced out of business, in part, because of a lack of timber being made available through the U.S. Forest Service on a continual and timely basis.</p> <p>Once a reasonable level of economic stability is achieved, the economic development and community resiliency would be a more realistic and admirable goal.</p>	<p>The microsale program began nearly 15 years ago and allows individuals interested in obtaining timber products for resale to basically go out into the forest, find the material they are interested in, and have the Forest Service offer it for sale. The harvest of the majority of material sold as microsales has been covered under the Roadside Environmental Assessment (EA). The Roadside EA established certain guidelines where this material could come from tiering to the Forest Plan. When an individual locates material they wished to harvest, the Forest Service has to review the location to determine if it is within the guides set by the Roadside EA and that Forest Plan Standards and Guidelines would be met. Over time, the majority of the better salvage opportunities available within the guidelines set under the Roadside EA have been realized. This is forcing purchasers to spend more time looking for material. The Forest Service is also seeing more requests for material in inappropriate locations that have to be denied. This creates a very inefficient process for both the purchaser and the Forest Service. New opportunities for small sales and microsales may be considered as part of the POW LLA Project with the goal of a more streamlined and efficient process with expanded opportunity.</p>
Isabell, James and Shelly	<p>The Microsale Program:</p> <p>The microsale program as it currently exists is</p>	

Author(s)	Comment	Response
Isabell, James and Shelly	<p>designed for small timber related businesses. It is restricted to 50000 board feet, maximum per sale and is currently confined to the salvage of dead standing trees, or trees which have been blown down.</p> <p>The word salvage is defined by (the new world dictionary of the American language page 1298) as follows: "The saving or rescue of any goods, property etc. from destruction, damage, or waste". The Microsale Program does not currently involve the cutting of green trees, nor severely compromised trees.</p> <p>By definition, the microsale, or small salvage sale, SHOULD fall under a completely different timber sale category than green tree sales, and by right it should be differentiated as such by the U.S.F.S. in policy as well.</p> <p>The U.S.F.S. should seize the opportunity to extract fiber that is by definition going to waste, and at the same time providing economic opportunity for its specific target, small timber businesses in rural communities.</p> <p>The removal of this waste reduces the breeding grounds for insects, thereby helping to reduce destructive insect infestations; reduce the amount of mold present due [**line missing from photocopied letter**] an issue more prevalent due to climate change, and should not be ignored. [...] The Microsale Program is a management tool available to the U.S.F.S. and is eco. friendly: leaving a very small footprint in our forests: as opposed to clearcutting large areas of forestation.</p>	<p>The microsale program began nearly 15 years ago and allows individuals interested in obtaining timber products for resale to basically go out into the forest, find the material they are interested in, and have the Forest Service offer it for sale. The harvest of the majority of material sold as microsals has been covered under the Roadside Environmental Assessment (EA). The Roadside EA established certain guidelines where this material could come from tiering to the Forest Plan. When an individual locates material they wished to harvest, the Forest Service has to review the location to determine if it is within the guides set by the Roadside EA and that Forest Plan Standards and Guidelines would be met. Over time, the majority of the better salvage opportunities available within the guidelines set under the Roadside EA have been realized. This is forcing purchasers to spend more time looking for material. The Forest Service is also seeing more requests for material in inappropriate locations that have to be denied. This creates a very inefficient process for both the purchaser and the Forest Service. New opportunities for small sales and microsals may be considered as part of the POW LLA Project with the goal of a more streamlined and efficient process with expanded opportunity.</p>

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	<p>round, meaning all products from microsalses must be processed in some way before leaving P.O.W. in accordance with U.S.F.S. specifications.</p> <p>Yet currently, the time involved for the U.S.F.S. to process these small salvage sales (often involving no more than 6-8 trees), commonly takes 3 to 4 months to go through numerous departments of specialists for approval. These delays prohibit dependent businesses from maintaining any reliable or realistic production schedule.</p> <p>The management of our forests and the most efficient use of timber should be in the hands of trained foresters familiar with the unique ecosystem of Southeast Alaska's forest; A necessity to maintain a healthy forest while providing economic opportunity for the local population. Responsible management of any renewable crop involves thinning, culling, waste removal, and proper harvesting. Whenever possible, those people responsible for managing a renewable resource, such as our forests, must remove the dead, dying, diseased, injured and insect infested products before such problems compromise the health of the stand; and at the same time salvage the cast-off before its entirely unusable for any economic purpose. Essentially, the microsale program, when operated efficiently, serves as a win, win situation; epitomizing the title "U.S. Forest Service", (emphasis on the word "Service"). [**line missing from photocopied letter**] providing a service to sustain a renewable resource, that if managed efficiently will keep on giving to many generations of Alaskans while providing an environmentally sound ecosystem for the good health of all. [...]Yet currently, salvaged material sold under the microsale program has been subjected to excessive scrutiny, more so</p>	<p>The level of "scrutiny" required for a microsale is no different than that for a large green tree timber sale unit. The harvest of timber regardless of the amount of material must meet Forest Plan Standards and Guidelines.</p> <p>Under the microsale program purchasers are allowed to find the material they wish to buy and request the Forest Service offer it for sale. This creates a situation beneficial to the purchaser since sales are focused only on material they are interested in. The downside is that most potential purchasers are not experts on the Forest Plan or other laws and regulations and may inadvertently locate material that cannot be offered for sale. On large timber sales, the Forest Service designs the areas where timber will be sold to meet all laws and policies and completes an environmental review specific to those areas before any potential purchasers are involved. This might give the impression that less environmental review is involved but that is not the case. Resource specialists review all areas in a large timber sale that may have impacts to their resource to ensure that all Standards and Guidelines are met and prescribe any mitigation that may be required. These surveys are required by the Forest Plan regardless the size of the timber sale.</p>

Author(s)	Comment	Response
Isabell, James and Shelly	<p>than either small or large green sales. Evidence confirming this statement is U.S.F.S. policy requiring each specialist; the Geologist, Archaeologist, Hydrologist, soil conservationist, Silviculturist, and fish and wildlife people to inspect and approve each tree. This scrutiny greatly exceeds the level of inspection required on green tree sales where there are literally thousands of trees that are left unseen by the same specialists. This increased and unrealistic level of scrutiny required by the U.S.F.S. concerning Micro-sales, is the greatest cause of delays suffered in the processing of these same trees. If this policy was amended to allow trained foresters to cruise the timber and evaluate the conditions relative to the sale, and then if needed, request the appropriate specialists to assist in making a decision, this surely would relieve a fair amount of pressure in-house, reduce costs, and increase the efficiency of processing microsals.</p>	
	<p>Another fair amount of time attributed to U.S.F.S. delays can also be traced to the lack of sensitivity to the predicaments U.S.F.S. policies subject these local small businessmen to. Where U.S.F.S. employees receive a guaranteed wage on a monthly basis, the small local business man has no such guarantee. The small business owner receives payment after their product is sold. The processing itself can take a variable amount of time depending on factors like: the amount of workable trees (not all trees purchased are productive, and once paid for there is no refund from the U.S.F.S.), how many employees to process the sale, downtime due to equipment repair or illness ect. And all things applicable to the processing and sale of their product equates to time and money. Add to this the delays of 3-4 months or possibly a year's wait between sales due to the U.S.F.S. delays and the local small</p>	

Author(s)	Comment	Response
	<p>business owner can face a financial quagmire that can spiral into bankruptcy. Here is a scenario to consider when current U.S.F.S. policy is implemented causing long delays for the local small business man to finally attain the raw materials necessary to produce his product:</p> <ol style="list-style-type: none"><li data-bbox="478 516 1213 581">1) A chance that he will lose his employees because he can't guarantee steady work or wages.<li data-bbox="478 613 1213 1243">2) Loss of his buyer because he can't [**]line missing from photocopied letter**] causes the buyer to seek out another supplier to keep his business running and profitable. This renders our local small business man unreliable and limiting his source of buyers considerably, and if his business has a very limiting amount of buyers; this could put him out of business all together.[...]This scenario is not an unrealistic situation facing a small local business man each time he applies for a U.S.F.S. microsale. Unfortunately, due to the monopoly of timber in the hands of the U.S.F.S., the local businessman has only (2) other sources of recourse, 1) the State, and 2) private property; each of these having their own limitations. Add to this: the U.S.F.S. trees selected by the business man are put up for public auction and can be purchased by anyone with the highest bid. (this by the way, is a silent auction where all bids are concealed until the U.S.F.S. announces the winning bid) If the businessman who personally invested time and money to select the trees loses the bid, he is not only financially uncompensated he is also facing another delay to purchase a sale.	<p>The microsale program began nearly 15 years ago and allows individuals interested in obtaining timber products for resale to basically go out into the forest, find the material they are interested in, and have the Forest Service offer it for sale. The harvest of the majority of material sold as microsals has been covered under the Roadside Environmental Assessment (EA). The Roadside EA established certain guidelines where this material could come from tiering to the Forest Plan. When an individual locates material they wished to harvest, the Forest Service has to review the location to determine if it is within the guides set by the Roadside EA and that Forest Plan Standards and Guidelines would be met. Over time, the majority of the better salvage opportunities available within the guidelines set under the Roadside EA have been realized. This is forcing purchasers to spend more time looking for material. The Forest Service is also seeing more requests for material in inappropriate locations that have to be denied. This creates a very inefficient process for both the purchaser and the Forest Service. New opportunities for small sales and microsals may be considered as part of the POW LLA Project with the goal of a more streamlined and efficient process with expanded opportunity.</p>

Author(s)	Comment	Response
Isabell, James and Shelly	<p>Another example is the repeated request by small local business to compensate for the excessive loss of land approved for timber production due to road closures. Reasonable compensation could be achieved by simply extending the 800' barrier that has been in place since the implementation of the microsale program. This barrier was assumed at the time to be sufficient to meet the requirements of small business and assure minimum damage to the environment by logging operations. Yet business requirements have forced operators like myself to become more creative.</p> <p>Our company, as well as others, have been regularly using helicopters to extract both logs and blocks. With [**line missing from photocopied letter**] existing marketable trees, soil, or water. Those trees being salvaged are by definition waste and should be removed not only to create economic opportunity, but to enhance the forest by reducing undesirable factors like habitat for mold and insect infestation, reducing a fire hazard and opening up new areas for new growth.</p> <p>We are not suggesting that the 800' barrier be breached when extraction is by means of conventional logging, but there is no scientific justification to limit by policy the salvage of waste products via helicopter extraction. In the case of helicopter extraction, the ONLY limiting factor should be economic viability.</p>	<p>The Roadside EA may be superseded by the POW LLA EIS. New opportunities for small sales and microsales may be considered as part of the POW LLA Project. When we design alternatives for this project we will consider your suggestions. It would also be helpful for us if you could point out certain areas in the project where the type of material you are interested might be more prevalent and state any economic or physical limitations to your operations that you might have.</p>

Author(s)	Comment	Response
Isabell, James and Shelly	<p>Another point continually made at these meetings is that overripe and compromised trees which are deemed by the forester to be declining and without hope of recovery, be removed and salvaged before they lose marketable value.</p> <p>Other microsale programs in the Tongass National forest have recognized the removal of compromised trees to be an effective management tool, and thereby making such trees available for purchase. This is an example of proactive management. To protect a dying tree until the last green needle falls off, represents a management policy that is antiquated, and not meeting the needs of either our timber crop or our economy.</p> <p>Another problem that does not appear to be considered by the U.S.F.S. that pertains to dead and compromised trees is insect infestation. Such infestation is an indicator of rot. Though this infestation appears in the forest handbook as a reason to harvest, this problem has not been addressed when we have asked to purchase dead or compromised trees.</p> <p>An example is Ambrosia, which does not affect green trees, but does compromise the fiber of dead and compromised trees and will show significant insect infestation. Green [**line missing from photocopied letter**] This alone should be ample reason to extract Ambrosia infected trees from our forest</p>	<p>The current guidelines for what is allowed to be harvested under the microsale program is based on the sideboards set under the Roadside Environmental Assessment. This document did not allow for salvage of anything other than dead and down trees.</p> <p>Your suggestion that overripe and compromised trees be considered for the microsale program will be considered when we develop alternatives for the POW LLA Project.</p>

Author(s)	Comment	Response
Isabell, James and Shelly	<p>For our company to operate efficiently and maintain a full crew of 5 to 6 employees, we require at least: 200,000 board feet of large overripe or dead sitka spruce, 50,000 board feet of red cedar, 50,000 board feet of dead or overripe hemlock and 30,000 board feet of yellow cedar per year.</p> <p>This amount of timber represents less than 1/2 of (1) percent of the wood Viking Lumber can export from their Big Thorne sale. Yet this same amount of wood would support our five to six man crew for one year. By comparison, this represents approx. 10 percent of Viking's crew and would support their crew for approx. three days. By small local business processing timber from microsals, our island increases the number of people employed and decreases the amount of [**line missing from photocopied letter**]</p> <p>If the U.S.F.S. can see these numbers as presenting an advantage in favor of our small businesses and rural communities, then it is only a small step to add selected green trees to the microsals program, enhancing the ability for small local businesses to maintain a continual supply of timber.</p>	<p>Knowing the volume of timber a small business like yours needs per year to keep operating will be an important consideration we may use to help develop alternatives. New opportunities for small sales and microsals may be considered as part of the POW LLA Project. When we design alternatives for this project we will consider your suggestions.</p>

Author(s)	Comment	Response
Isabell, James and Shelly	<p>Good timber management should require areas designated "old growth" protection from the harvesting of healthy green timber, and the ecoproblems associated with conventional logging. Yet good management policies should not restrict, but encourage salvage and the removal of waste from these same areas via helicopter, thus increasing economic opportunity without negatively affecting these forests held in reserve. If culling any forest of waste is not deemed to be justifiable by the U.S.F.S., it could be reasoned they have adopted a management policy which appropriates a very substantial part of P.O.W. to "no management". Such a policy does not appear reasonable or justifiable? Especially when considering that these protected areas, combined with numerous other "no harvest", or limited harvest areas are in direct conflict with the stated goals listed in the letter by the U.S.F.S. and POWLLA and stated as follows: "To help support community resiliency, and provide economic development through an integrated approach to meet multiple resource objectives."</p> <p>Again we ask that our plight is carefully considered and provide relief to our company, as well as others who depend on microsals and that policies be implemented to assure us that the microsals program [**]line missing from photocopied letter**] this by amending U.S.F.S. policies to increase salvage opportunities island wide. Obviously what has been previously discussed is of extreme importance to our company and our employees. Following our brief comments concerning other points of interest asked to be commented on.</p>	<p>The Forest Plan establishes a framework that identifies the location, design, and scheduling of all forest management activities. The POW LLA will follow that framework. Where timber salvage or harvest is allowed under the Forest Plan the POW LLA Project will consider those areas.</p>
Isabell, James and Shelly		<p>Laws and regulations require the Forest Service to manage for multiple use. The POW LLA Project is a relatively large-</p>

Author(s)	Comment	Response
	<p>We believe it's correct to say that public recreation as it relates to the overwhelming majority of people on P.O.W., both locals and tourists is dominated by hunting, fishing, and trapping. If this industry is to be supported by the U.S.F.S., we believe the best investment they could make to enhance tourism and recreation, as well as enhance the quality of life for locals and wildlife, is to reopen roads that have been barricaded with water bars, giving greater access to hunter, fishermen, trappers, hikers, people harvesting berries, mushrooms, and firewood, as well as returning economic opportunity to its previously established level.</p> <p>Boat launches, campgrounds, and toilets greatly support this industry and offers a much needed service. However, tax revenue spent on cabins, shelters, trails, winter recreation facilities, and interpretive sites serves a mere "tens" of people, where money channeled to road maintenance and opening road systems would provide a service benefiting not tens of people but thousands, both locals and tourists.</p>	<p>scaleNEPA analysis project with an overarching purpose to improve forest ecosystem health, support community resiliency, and provide economic development through an integrated approach to meet multiple resource objectives.</p> <p>The POW LLA Project will be refined over the next year with extensive public input. The Forest Service looks forward to engaging in meaningful dialogue with the public regarding current socioeconomic conditions and future opportunities to support the social and economic sustainability of Prince of Wales Island communities. Notably, therecreation and tourism economic sector has grown in importance over recent decades. Developing and improving recreation facilities will be given full consideration as part of the Proposed Action, alternatives, and related analyses. A range of alternatives will be considered which analyzes multiple uses across the landscape and also includes a thorough analysis of the economic and social environment.</p> <p>In 2009 the Craig and Thorne Bay Rangers signed the Prince of Wales Access and Travel Management Plan. In accordance with 36 CFR 212.5(b) this decision identified the minimum road system for safe and efficient travel and for administration, utilization, and protection of National Forest System lands. This decision also designated the class of vehicle and, if appropriate, time of year for motor vehicle use. The decision is reflected on the Motor Vehicle Use Map and shows where motor vehicle use is allowed and which type of vehicles may be used. The allocated road maintenance budgets are not sufficient to keep all roads open. The process of closing a road to vehicle traffic and placing it in a condition that requires minimum maintenance is done to protect the environment (e.g. aquatic resources from increased sediment delivery to streams) and preserve the facility for future use. There is a</p>

Author(s)	Comment	Response
Isabell, James and Shelly	<p>Furthermore, it's our opinion that U.S.F.S. engagement in cabin rentals conflicts with private enterprise, competing [**line missing from photocopied letter**] Realistically, if the demand for cabins, shelters, trails, winter recreation areas and interpretive sites are significant to justify the original capital investment and expense to maintenance these facilities, then these needs could and should be provided by private enterprise. But if the interest is so small that it would not support a small mom and pop business, surely the U.S.F.S. would find it difficult to justify funding such services with tax dollars; especially when roads are being closed and unmaintained due to lack of funding. Add to this the U.S.F.S. claims of short staffing because of a cut back on revenue; this lack of funding has a negative impact on their ability to provide timber sale service; an industry that generates income all year and a source of income and tax revenue that greatly exceeds any income generated by the scant island tourism which is limited to only a few months a year.</p>	<p>range of methods used in closing a road depending on site specific conditions and appropriate maintenance level; however, the main idea is that the road will be in a mostly self-maintaining physical state. In recent years the Forest Service has actively engaged the public in providing access on new logging roads for firewood and other subsistence activities before closing the roads. Maps and brochures have been posted in communities and at Forest Service offices. Any changes to the Access and Management Plan as a result of the POW LLA will be informed by a travel analysis.</p> <p>Recreation and tourism are important parts of the Prince of Wales Island economy. The visitor industry supports numerous small businesses across the island ranging from large fishing lodges to small cabin rental businesses. The Forest Service's recreation program, including Forest Service cabins, complements these businesses by providing additional opportunities that bring visitors to the island. Research and analysis completed for the environmental impact statement will highlight current conditions of multiple economic sectors present in the geographic area.</p>

Author(s)	Comment	Response
Isabell, James and Shelly	<p>From a fish and wildlife point of view, by reducing our islands road system by over 50%; government through legislation and policy have increased hunting, trapping, and fishing pressure in areas where roads remain open. This increase of pressure is in direct proportion to the road closures. (50%) These road closures have also restricted our ability to properly prune and cull our forests. This short sighted legislation will not only have a negative effect on our fish and wildlife populations, but will also negatively impact local residents dependent on fish and game for subsistence.</p>	<p>In 2009 the Craig and Thorne Bay Rangers signed the Prince of Wales Access and Travel Management Plan. In accordance with 36 CFR 212.5(b) this decision identified the minimum road system for safe and efficient travel and for administration, utilization, and protection of National Forest System lands. This decision also designated the class of vehicle and, if appropriate, time of year for motor vehicle use. The decision is reflected on the Motor Vehicle Use Map and shows where motor vehicle use is allowed and which type of vehicles may be used. The allocated road maintenance budgets are not sufficient to keep all roads open. The process of closing a road to vehicle traffic and placing it in a condition that requires minimum maintenance is done to protect the environment (e.g. aquatic resources from increased sediment delivery to streams) and preserve the facility for future use. There is a range of methods used in closing a road depending on site specific conditions and appropriate maintenance level; however, the main idea is that the road will be in a mostly self-maintaining physical state. In recent years the Forest Service has actively engaged the public in providing access on new logging roads for firewood and other subsistence activities before closing the roads. Maps and brochures have been posted in communities and at Forest Service offices. Any changes to the Access and Management Plan as a result of the POW LLA will be informed by a travel analysis.</p> <p>Thank you for your comment. A variety of access options could be considered at the alternative design phase of analysis. Alternatives may include the option of potentially opening closed roads and maintaining currently open roads.</p>
Isabell, James and Shelly	<p>Because of the length of this letter we will end it with a brief summary of changes we believe need to be made and are critical for our company's survival.</p>	

Author(s)	Comment	Response
	<p>1.) We request that the current 800 ` restriction from Roadside remain in place as it relates to conventional logging methods. We also request that when extraction is done by helicopter, that no distance limit be imposed, but allowing economic viability be the determining factor.</p> <p>2.) That green trees considered by U.S.F.S. foresters to be compromised and in decline be offered for sale under the microsale program.</p> <p>3.) That "selected" green trees be made available for purchase.</p> <p>4.) That trees root sprung be offered for sale regardless of degree of incline.</p> <p>5.) That Categorical Exclusions (CE's) be made more readily available.</p> <p>6.) That a firm time limit be allocated to specialists who are required to inspect requested trees.</p> <p>7.) That a firm time limit be established for the processing of microsales.</p> <p>8.) That areas which currently restrict conventional extraction of green trees be approved for salvage of dead trees when extraction is by helicopter. And lift the distance restriction.[...]</p> <p>9.) That riparian areas be approved for salvage of dead trees when extraction is by helicopter, again without distance restrictions.</p> <p>10.) That streams and creeks that are classified fish but</p>	<p>The Roadside EA may be superseded by the POW LLA EIS. New opportunities for small sales and microsales may be considered as part of the POW LLA Project. When we design alternatives for this project we will consider your suggestions. It would also be helpful for us if you could point out certain areas in the project where the type of material you are interested might be more prevalent and state any economic or physical limitations to your operations that you might have.</p>

Author(s)	Comment	Response
	<p>[**line missing from photocopied letter**]</p> <p>11.) That a continual minimum flow of water by volume be established when classifying creeks or streams as fish streams.</p> <p>12.) That the salvage of dead trees be allowed within the restricted boundaries of designated fish streams when extraction is done by helicopter. Again, without roadside restrictions.</p> <p>13.) That trees growing in special interest areas; such as karst, caves, sink holes, ect. Not be automatically dismissed because of a broad classification, but be evaluated on an individual sale basis, to consider if the salvage of trees and the intended method of extraction poses a threat to that area's environment.</p> <p>14.) That trees designated eagle trees have visible proof of occupancy (ie- a nest)</p> <p>15.) That insect infestation, conks and obvious injury be considered sufficient reason to cull green trees.</p> <p>16.) That each person applying for a microsale be given a U.S.F.S. handbook describing the metes and bounds of microsales.[...]17.) That once these programs are finalized (both the microsale and the CE program) no additional restrictions be implemented either by specialists or management of the U.S.F.S.</p> <p>18.) That certain legislated restrictions related to federal legislation that have become antiquated due to the use of</p>	

Author(s)	Comment	Response
Jackson, Matthew	<p>helicopters for a method of extracting wood, be readdressed by upper management within the U.S.F.S. and Congress.</p> <p>Old-Growth logging provides very few jobs and very little economic value to the region, at the expense of fishing, tourism, subsistence and ecosystem health. The practice of using tax-payer dollars to subsidize the hell out of old growth logging, for the sake of a few logging jobs and lining the pockets of logging corporations isn't going to work anymore. The Tongass is an incredibly valuable forest. It is the backbone of Southeast Alaska's commercial fishing and tourism industries. It has never been a profitable timber forest. It has always required massive subsidies in the form of dead-end roads and useless infrastructure. How is POW supposed to realize the actual value of the Tongass if you keep cutting it down? How many decades is it going to take for the Forest Service to wake up from it's delusions of Tongass timber? The time to transition to young growth logging is right now! I sincerely support much of the work the FS accomplishes in the Tongass. Habitat restoration, recreational infrastructure and pre-treatment of young-growth stands are all important services you provide to the Tongass. Do what is valuable. Ditch the old-growth logging.</p>	<p>The 2016 Amendment of the <i>Tongass Land and Resource Management Plans</i> supports the transition away from old-growth harvest towards a forest products industry that uses predominantly second- or young-growth timber with the goal of implementing the transition during the next 10 to 15 years. At the end of the transition period, the vast majority of timber sold by the Tongass National Forest will be young growth. Of noteworthy importance, the Forest Plan Amendment's purpose and need statement also directed that there is an ongoing need to provide old-growth timber to retain the expertise and infrastructure of the existing timber industry while the industry prepares to harvest and process an increasing amount of merchantable young-growth offerings.</p> <p>A diverse range of alternatives will be developed, analyzed, and considered for the POW LLA Project. The development of the project is meant to be a collaborative process with extensive opportunities for meaningful public participation throughout the planning process.</p>

Author(s)	Comment	Response
Kautzer, Joan	.) Huge clearcuts are bad for deer habitat	<p>Thank you for your comment and concern on deer habitat including winter range. The Forest Service agrees that a healthy deer population is very important as is providing quality habitat. Clearcuts in the first several years actually provide forage for deer, but as these areas get older and the canopy closes they generally provide less quality habitat for deer.</p> <p>We will consider your suggestion of protecting important deer habitat as a design criteria for the Project's Proposed Action or an alternative.</p>
Kautzer, Joan	.) Roads have caused an extremely negative impact on wildlife creating a fish and game law enforcement impossibility	<p>Thank you for your comment on the effects of roads to wildlife species and recommending road closures. The potential negative impact of roads on wildlife are considered during the analysis process. This project will adhere to all current Forest Plan Standards and Guidelines including those that pertain to wolf populations and road densities.</p> <p>We will consider your suggestion of road closures as a design criteria for the Project's Proposed Action or an alternative, especially in those VCUs and wildlife corridors identified.</p> <p>The enforcement of laws pertaining to legal and illegal fish and game harvest is beyond the scope of this project.</p>

Author(s)	Comment	Response
Kautzer, Joan	Roads have limited our subsistence lifestyle not enhanced it. Non local road hunters have put too much pressure on a compromised local resource.	<p>Thank you for your comment. The effects of non-rural hunters on deer are analyzed. During the analysis process the effects of closing roads may be considered under an alternative.</p> <p>The USFS will follow Standards & Guidelines for subsistence as outlined in the Tongass Land and Resource Management Plan. Consultation to the Southeast Alaska Regional Subsistence Advisory Council will occur as mandated by Section 805 of the Alaska National Interest Lands Claim Act (ANILCA). Opportunity to provide comments related to subsistence use and activity will occur through the public hearing process as mandated by ANILCA 810.</p>
Kautzer, Joan	Fragmented habitat equates to poor carrying capacity	<p>Thank you for your comment. Fragmentation is considered and analyzed for species for which specific criteria has been identified. Minimal effects to wildlife species due to fragmentation could be included in an alternative.</p>
Kautzer, Joan	The Forest Service has never managed for subsistence needs.	<p>Thank you for your comment.</p> <p>Federal subsistence wildlife regulations only apply to Federal lands. ANILCA does not control or mandate activities on private lands. Cumulative effects from other non-federal land ownerships combined with this project's proposed activities will be analyzed in the DEIS.</p> <p>The provisions in ANILCA established a harvest priority for rural residents in an attempt to protect subsistence resource harvest. Under ANILCA, in times of resource scarcity or when demand exceeds biologically sound harvest levels, subsistence harvests have priority over other consumptive use of resources. In practice, this meant that commercial, sport, or other harvests were to be curtailed by state or federal fish and wildlife management authorities before subsistence harvests were limited.</p>

Author(s)	Comment	Response
		<p>The Alaska legislature subsequently passed a regulation to comply with ANILCA, but in 1989, the Alaska Supreme Court ruled in McDowell v. State of Alaska that a harvest priority for rural residents conflicted with the state constitution, which guarantees all Alaskans equal access to the state's natural resources. This ruling took the state out of compliance with ANILCA and the federal government has managed subsistence resources on federal lands in Alaska since 1990. As a result, federal subsistence harvests of fish and wildlife on the Tongass National Forest are presently managed by the Forest Service (Schroeder and Mazza 2005).</p> <p>ANILCA requires the analysis of the potential effects on subsistence uses of all actions on federal lands in Alaska. This analysis typically focuses on those food-related resources most likely to be affected by habitat degradation associated with land management activities. Three factors related to subsistence uses are specifically identified by ANILCA: 1) resource distribution and abundance, 2) access to resources, and 3) competition for the use of resources.</p> <p>This project will adhere to the current Forest Plan which outlines Standards & Guidelines for subsistence. Consultation to the Southeast Alaska Regional Subsistence Advisory Council will occur as mandated by Section 805 of the Alaska National Interest Lands Claim Act (ANILCA). Opportunity to provide comments related to subsistence use and activity will occur through the public hearing process as mandated by ANILCA 810.</p>

Author(s)	Comment	Response
Kautzer, Joan	Top priority should be given to safeguard deer habitat with permanent (not arbitrary) designations for habitat blocks and wildlife corridors.	<p>Thank you for your comment and concern on deer habitat including winter range. The Forest Service agrees that a healthy deer population is very important as is providing quality habitat. Clearcuts in the first several years actually provide forage for deer, but as these areas get older and the canopy closes they generally provide less quality habitat for deer.</p>
Kautzer, Joan	.) No more roads north of the 20 road.	<p>We will consider your suggestion of protecting important deer habitat as a design criteria for the Project's Proposed Action or an alternative.</p> <p>Timber sales are designed to be economical; this includes not constructing excessive road segments. Use of existing roads and potential new construction will be thoroughly analyzed. The need for maintenance, reconstruction and new construction will largely be driven by timber harvest and the need to haul harvested timber.</p> <p>Temporary roads are decommissioned when their use period is over. National Forest System roads are analyzed to determine the appropriate long-term use and travel management strategy.</p>
Kautzer, Joan	.) No road connection between Calder Bay and Lab Bay	<p>We will consider the suggestions of maintaining or increasing road closures, including utilizing gates, and limiting any new road construction as a design criteria for the Project's proposed action or an alternative.</p> <p>The land that a connector road could be built on falls entirely within Sealaska lands and is not part of this analysis. If Sealaska brings forth a proposal to the Forest Service to allow them to build a connector road it would need to be analyzed under NEPA and the public would need to be solicited for comments.</p>

Author(s)	Comment	Response
Kautzer, Joan	9.) No developments of any kind in Lab Bay	Opposition to any development at Labouchere Bay is noted. This may be considered as a design element in an alternative or multiple alternatives.
Kautzer, Joan	10.) No log dumps/LTF[rsquo]s in Lab Bay	Your opposition to the use of the Lab Bay log transfer facility is noted.
Kautzer, Joan	Close as many spurs on the north end of the island (El Cap North, Sumner Straits to Colpoyse)	<p>Timber sales are designed to be economical; this includes not constructing excessive road segments. Use of existing roads and potential new construction will be thoroughly analyzed. The need for maintenance, reconstruction and new construction will largely be driven by timber harvest and the need to haul harvested timber.</p> <p>Temporary roads are decommissioned when their use period is over. National Forest System roads are analyzed to determine the appropriate long-term use and travel management strategy.</p> <p>We will consider the suggestions of maintaining or increasing road closures, including utilizing gates, and limiting any new road construction as a design criteria for the Project's proposed action or an alternative.</p>
Kautzer, Joan	12.) Only microsales should be sold on federal lands on the north end of the island with an eye to support small (not Alcan or Viking) local mills.	<p>We will consider your suggestion of emphasizing small timber sales and microsales around the Port Protection and Point Baker area as a design criteria for the Project's Proposed Action or an alternative.</p> <p>It would be very helpful if you could be specific about which portions of that area you would like to see have a small sale /microsale and free use emphasis.</p>

Author(s)	Comment	Response
Kautzer, Joan	13.) Fix the [ldquo]red pipe[rdquo] culverts	<p data-bbox="1245 321 1591 354">Thank you for your comment.</p> <p data-bbox="1245 386 1980 816">We are required to follow direction from the Forest Plan for maintaining or improving fish passage. Additionally, direction from the Clean Water Act and the Forest Plan requires that any new crossings over fish streams provide for fish passage. Should any new crossings be needed over fish streams, they will be designed to provide for fish passage. Additionally, we maintain a database of known fish crossings that includes road number and milepost, fish passage category, fish species that have been sampled at each crossing, and the amount of fish habitat above crossings that are impeding fish passage. Cumulative effects for fish and other aquatic resources are generally analyzed at the watershed level, and watersheds can then be prioritized for restoration activities including fish passage improvement.</p> <p data-bbox="1245 849 1980 1031">The need for restoration activities to improve watershed function and fish and wildlife habitat has been identified for the project area. We will consider the different types of restoration activities that could address this need, including the improvement of fish passage at road crossings, when we develop project alternatives.</p>

Author(s)	Comment	Response
Kautzer, Joan	14.) Do projects that enhance stream habitat in degraded areas	<p>The Forest Service prioritizes watersheds for restoration based on a core national protocol by the USDA called the WatershedConditionFramework (WCF). The framework is designed to assess and track changes to watershed condition using aquatic and terrestrial indicators. Evaluation of these indicators classifies a watershed's condition into three classes: <i>Functioning Properly</i>, <i>Functioning at Risk</i>, or <i>Impaired Function</i>. Those with <i>Functioning at Risk</i> or <i>Impaired</i> outcomes can be listed as a priority watershed for restoration work. Priority watersheds are further assessed and a Watershed Restoration Action Plan (WRAP) is developed. The WRAP identifies essential projects that are needed to improve the watershed functionality. These projects include actives such as stream restoration, road maintenance and storage, replacing or removing fish barrier structures, andwildlife thinning treatments.In thepast public involvement, partners, and integrated resource involvement within the Forest Service has helped to develop the essential projects. Once essential projects have been completed the watershed condition is reclassified and removed from the priority watershed list. Additionally, improvements in the watershed are tracked in a national database in the corporate Watershed Classification and Assessment Tracking Tool (WCATT).</p>
Kautzer, Joan	15.) Consider an entire ecosystem (old clearcuts & non federal impacts too) when planning new sales. Cumulative impacts, not bubble studies.	<p>NEPA requires that weanalyze the full range of direct, indirect, and cumulative effects of the preferred alternative, if any, and of the reasonable alternatives identified inan EIS. We will adhere to all laws and regulations.</p> <p>(CEQ NEPA Regulations, 40 C.F.R. §§ 1508.7, 1508.8)</p>

Author(s)	Comment	Response
Kautzer, Joan	16.) Ban round log exports. If they can[rsquo]t mill it here it should be left standing.	<p data-bbox="1245 321 1980 410">Thank you for your comment. We will consider your suggestion of emphasizing small timber sales as a design criteria for the Project's proposed action or an alternative.</p> <p data-bbox="1245 448 1980 691">The 2016 Tongass National Forest Land and Resource Management Plan Amendment Record of Decision supports the harvest of old-growth timber while transitioning to a predominately young-growth harvest after about 15 years. After that time frame old-growth timber will continue to be offered at an average rate of 5 MMBF per year to support small operators and specialty products such as wood for musical instruments.</p> <p data-bbox="1245 729 1980 1153">Your comments to limit or ban round log export is noted. The Forest Service allows limited exports of unprocessed timber from National Forests in Alaska under general authority of the Organic Administration Act (16 U.S.C. §§ 473-482, 551 (2000)), NFMA (16 U.S.C. §§ 1600, 1611-1614 (2000)) and 36 CFR 223.201. One of the primary goals of the Tongass National Forest timber program is to contribute to the local and regional economies of Southeast Alaska. In keeping with this long-standing goal current law allows timber harvested from Federal lands in Alaska to be shipped out of Alaska only if "the supply of timber for local use will not be endangered" (16 U.S.C. §616). The Limited Export Policy provides flexibility for the Region to balance the economics of timber sales to meet statutory requirements.</p>

Author(s)	Comment	Response
Kautzer, Joan	When doing this assessment the wants of the timber industry should receive consideration proportionate to their role in the region's economy, which is about 1%.	The POW LLA Project is a relatively large-scale NEPA analysis project with an overarching purpose to improve forest ecosystem health, support community resiliency, and provide economic development through an integrated approach to meet multiple resource objectives. The POW LLA Project will be refined over the next year with extensive public input. The Forest Service looks forward to engaging in meaningful dialogue with the public regarding the most relevant and valued ecosystem services, readily-available data, and appropriate qualitative and quantitative methods for assessing contributions to social and economic sustainability.
Kautzer, Joan	Look no further for evidence than the sharp perilous decline in P.O.W. Archipelego wolf populations. An ecosystem wherein a top predator is endangered in a sick ecosystem. Any future sales should be analysed using the wolf as an indicator species. This, the wolf's decline, is not a fish and game fault, but a direct aftermath of retched land management. Cause and effect.	Thank you for your comment. The effects of proposed activities to wolves will be analyzed, including recent findings. Specific direction on the wolf is included in the 2016 Forest Plan on page 4-91.
Kautzer, Joan	Old growth dependent species isolated to small stands of old growth, reducing their original range to mere fractions, are extremely vulnerable to the variables that decimate populations. Roads need to be closed to protect wildlife from the unfair advantage of motorized hunting and trapping.	<p>Thank you for your comment on the effects of roads to wildlife species and recommending road closures. The potential negative impact of roads on wildlife are considered during the analysis process. This project will adhere to all current Forest Plan Standards and Guidelines including those that pertain to wolf populations and road densities.</p> <p>We will consider your suggestion of road closures as a design criteria for the Project's Proposed Action or an alternative, especially in those VCUs and wildlife corridors identified.</p> <p>The enforcement of laws pertaining to legal and illegal fish and game harvest is beyond the scope of this project.</p>

Author(s)	Comment	Response
Kautzer, Joan	<p>Climate change is real, happening and the scary new reality. I fear that I[rsquo]m amongst one of the last generations to have a subsistence lifestyle and to make a living commercial fishing. Intact ecosystems will stand the best chance of surviving extreme climatic events. 2 years ago in the spring of 2015 the Tongass experienced an unprecedented dry spell. When we traveled to our fishing grounds off Noyes and the Maurelle Islands, it was plain to see a die off of old trees on the shallow soiled rocky islands. This was an event caused by one drought, trees that managed to survive for centuries died.</p>	<p>Climate change will be addressed in the NEPA process, and the CEQ policy will be followed according to the interpretation and direction given by the Forest Service's Washington Office. NEPA requires that we analyze the full range of direct, indirect, and cumulative effects of the alternatives identified in an EIS.</p> <p>The value of carbon stored in forests is recognized as an Ecosystem Services Objective in the Tongass National Forest Land and Resource Management Plan (Forest Plan). This project will be following all Standards & Guidelines in the Forest Plan.</p>
Kautzer, Joan	<p>Extreme wind events are also taking tolls with big blow downs. Clearcuts and second growth stands change wind patterns exacerbating blow downs. Anchorages for fishermen & boaters suffer from wind funneling when the old growth is cut, increasing the danger level.</p>	<p>The effects of harvesting on wind patterns will be included as part of our effects analysis. Your concern regarding the effect of harvesting on anchorages will be considered when we design alternatives. It would be helpful if you could work with us to map the important anchorages that you use.</p>
Kautzer, Joan	<p>The commercial fishing industry is already suffering from the consequences of global warming. Ocean acidification and the blob jeopardize the health of the ecosystem on every level; from copepods to crab shells, to sea birds die offs, to red algae blooms killing off whales, to Pinnacleds dying from viruses to salmon runs disappearing or coming back half starved. The Forest Service can not keep behaving like its business as usual. It[rsquo]s way past time that the Forest Service acknowledges that the Tongass is our carbon sink and should not be cut and exported like it doesn[rsquo]t matter. Alcan and Viking should not take precedent over the rest of the Country[rsquo]s & World[rsquo]s needs. The Forest Service must put down the mantle of provider of round log export sales and become the stewards of the carbon sink.</p>	<p>Climate change will be addressed in the NEPA process, and the CEQ policy will be followed according to the interpretation and direction given by the Forest Service's Washington Office. NEPA requires that we analyze the full range of direct, indirect, and cumulative effects of the alternatives identified in an EIS.</p> <p>The value of carbon stored in forests is recognized as an Ecosystem Services Objective in the Tongass National Forest Land and Resource Management Plan (Forest Plan). This project will be following all Standards & Guidelines in the Forest Plan.</p>

Author(s)	Comment	Response
Kautzer, Joan	I have serious doubts any big industrial players are going to tool up and transition to [ldquo]young[rdquo] second growth. This 17 year [ldquo]transition period[rdquo] is just a ploy to cut more old growth before the party is over. This transition should mean serious immediate change, not timber sales as usual until the last day. There should be an immediate cessation of round log exports off federal lands. If companies can[rsquo]t make a living off of milling old growth locally then there is absolutely no chance they will ever make a living off milling young growth. This transition is a myth, and I hate to see more old growth cut in order to perpetuate the myth.	<p>The Tongass Land and Resource Management Plan (Forest Plan) provides overall direction for timber harvest. In general, the 2016 Amendment of the <i>Tongass Land and Resource Management Plan</i> utilized 46 MMBF as the projected timber sale quantity (PTSQ) that informed overall timber objectives. The PTSQ consists of old-growth and young-growth harvest, with old-growth decreasing as a share of total volume (46 MMBF) over time as more young growth becomes economic to harvest. A portion of the PTSQ may originate from the Prince of Wales Island area.</p> <p>While the POW LLA NEPA project may include an alternative that limits old growth harvesting or considers options that require a proportional amount of young growth be included in each large timber sale, managing the Tongass National Forest includes managing the timber resource located on federal lands. The Forest Service remains committed to supporting the economic and social well-being of Prince of Wales Island communities. The agency will continue to explore young-growth forest products and associated potential markets.</p>

Author(s)	Comment	Response
Kirkwood, Dan	<p>In past decades, tourism has become a powerful economic driver in Southeast, joining commercial fishing as leaders of a healthy economy based on renewable resources that come from the Tongass National Forest's unique natural infrastructure. Tourism and related services result in \$1.1 billion in visitor spending annually. The industry employed 10,900 people in 2012-2013, accounting for 20 percent of total employment in Southeast Alaska. Industry employment resulted in \$407 million in labor income.</p>	<p>Laws and regulations require the Forest Service to look at multiple uses of forest resources. The purpose and need for the POW LLA Project states that through an integrated approach we will consider multiple uses, including but not limited to providing a sustainable level of forest products and providing sustainable recreation opportunities. A range of alternatives will be considered which analyzes multiple uses across the landscape and also includes a thorough analysis of the economic and social environment.</p>
Kirkwood, Dan	<p>At the same time, logging has declined after the most accessible trees were harvested. With the industry supporting less than 1% of region jobs, there seems to be little support for the agency's assertion that the remaining timber industry is "fundamental...to the economic vitality of the region."</p> <p>We question the agency's assumption that providing forest products is actually a useful way to improve forest ecosystem health, support community resiliency or provide economic development. We question the agency's prioritization of projects for Prince of Wales Island over the next 10-15 years that leads with logging projects and relegates fisheries restoration and then recreation to the end.</p>	<p>Suggestions for refining the purpose and need statements for the POW LLA have been reviewed and will be considered. The overarching purpose for the project will remain to improve forest ecosystem health on Craig and Thorne Bay Ranger Districts, help support community resiliency, and provide economic development through an integrated approach to meet multiple resource objectives.</p>
Kirkwood, Dan	<p>When the agency speaks to the necessity of management to improve seral characteristics (Timber Stand Improvement, TSI) the Forest Service also asserts the need for Timber Stand Establishment (TSE) without evidence for how TSE will meet any of the goals set out by agency.</p>	<p>Thank you for your comment regarding Timber Stand Establishment meeting agency goals. Currently the only TSE activity occurring on Prince of Wales Island on National Forest System lands is interplanting of yellow cedar to enhance species composition and diversity. Natural regeneration in most stands is generally sufficient; however, stands are assessed after harvest activities to determine the success and viability of natural regeneration and final determination of any necessary additional treatments is made at that time.</p>

Author(s)	Comment	Response
Kirkwood, Dan	<p>While forests do grow back, the qualities of old-growth forest that support so healthy wildlife, wild fish, and draw visitors from around the world are not readily re-established in our generation or the next. Tourism and fishing are based on resources that are currently globally scarce and thus valuable: sustainable wild fish and wild places. The 1 million people who come each year do not come to Alaska to see thick stands of young spruce or to enjoy log dumps and logging roads. Logging may certainly continue to be a part of Southeast's economy, but the agency's continued narrow focus on logging is misplaced and ignores the economic reality of Southeast Alaska.</p>	<p>Laws and regulations require the Forest Service to look at multiple uses of forest resources. The purpose and need for the POW LLA Project states that through an integrated approach we will consider multiple uses, including but not limited to providing a sustainable level of forest products and providing sustainable recreation opportunities. A range of alternatives will be considered which analyzes multiple uses across the landscape and also includes a thorough analysis of the economic and social environment.</p>
Kirkwood, Dan	<p>We look forward to seeing a range of alternatives that reflects the agency's commitment in the 2016 TLMP Amendment to transition to more sustainable forestry and away from old-growth logging. This process is an opportunity to listen to communities and begin to shift away from large-scale clear cuts designed for export</p>	<p>The 2016 Amendment of the <i>Tongass Land and Resource Management Plans</i> supports the transition away from old-growth harvest towards a forest products industry that uses predominantly second- or young-growth timber with the goal of implementing the transition during the next 10 to 15 years. At the end of the transition period, the vast majority of timber sold by the Tongass National Forest will be young growth. Of noteworthy importance, the Forest Plan Amendment's purpose and need statement also directed that there is an ongoing need to provide old-growth timber to retain the expertise and infrastructure of the existing timber industry while the industry prepares to harvest and process an increasing amount of merchantable young-growth offerings.</p> <p>A diverse range of alternatives will be developed, analyzed, and considered for the POW LLA Project. The development of the project is meant to be a collaborative process with extensive opportunities for meaningful public participation throughout the planning process.</p>
Kirkwood, Dan		<p>Laws and regulations require the Forest Service to manage for multiple use. The POW LLA Project is a relatively large-</p>

Author(s)	Comment	Response
	<p>An appropriate range of alternatives will focus on the existing economic opportunities in Southeast Alaska and prioritize analysis of projects that support commercial fishing, recreation and tourism. We look forward to seeing alternatives that analyze how the agency will improve permitting for tour operators, maintain and establish trails and other recreation infrastructure and protect the existing natural and cultural infrastructure of the island.</p>	<p>scaleNEPA analysis project with an overarching purpose to improve forest ecosystem health, support community resiliency, and provide economic development through an integrated approach to meet multiple resource objectives.</p> <p>The POW LLA Project will be refined over the next year with extensive public input. The Forest Service looks forward to engaging in meaningful dialogue with the public regarding current socioeconomic conditions and future opportunities to support the social and economic sustainability of Prince of Wales Island communities. Notably, the recreation and tourism economic sector has grown in importance over recent decades. Developing and improving recreation facilities will be given full consideration as part of the Proposed Action, alternatives, and related analyses. A range of alternatives will be considered which analyzes multiple uses across the landscape and also includes a thorough analysis of the economic and social environment.</p> <p>In 2009 the Craig and Thorne Bay Rangers signed the Prince of Wales Access and Travel Management Plan. In accordance with 36 CFR 212.5(b) this decision identified the minimum road system for safe and efficient travel and for administration, utilization, and protection of National Forest System lands. This decision also designated the class of vehicle and, if appropriate, time of year for motor vehicle use. The decision is reflected on the Motor Vehicle Use Map and shows where motor vehicle use is allowed and which type of vehicles may be used. The allocated road maintenance budgets are not sufficient to keep all roads open. The process of closing a road to vehicle traffic and placing it in a condition that requires minimum maintenance is done to protect the environment (e.g. aquatic resources from increased sediment delivery to streams) and preserve the facility for future use. There is a</p>

Author(s)	Comment	Response
Kirkwood, Dan	Given the importance of hunting and fishing to tourism businesses, we look forward to seeing the agency carefully analyze how they will manage the forest to ensure thriving populations of deer, wolves and bears as well as a high-value salmonid species that draw sportsmen to POW.	<p>range of methods used in closing a road depending on site specific conditions and appropriate maintenance level; however, the main idea is that the road will be in a mostly self-maintaining physical state. In recent years the Forest Service has actively engaged the public in providing access on new logging roads for firewood and other subsistence activities before closing the roads. Maps and brochures have been posted in communities and at Forest Service offices. Any changes to the Access and Management Plan as a result of the POW LLA will be informed by a travel analysis.</p> <p>Thank you for your comment. The analysis you request is commonly provided in the DEIS and FEIS we prepare.</p>
Kirkwood, Dan	When we read the agency's observation that "management activities that have traditionally met the needs associated with this project include [1. timber harvest]," we hope that the agency will use this process as an opportunity to reassess the priority given to this assumption. We are reminded of the observation that "when you are carrying a hammer, every problem looks like a nail." In this case, the agency seems to bring an axe to every problem in the Tongass. This assessment is an opportunity to get some different tools out of the toolbox.	<p>We are required by the National Environmental Policy Act to analyze a reasonable range of alternatives which meets the stated purpose and need, goals and objectives, and responds to issues identified during the scoping process.</p> <p>Requests that no old-growth harvesting or road construction occur as part of this project are noted. This may be considered as a design component of an alternative or multiple alternatives.</p>

Author(s)	Comment	Response
Knight, Rebecca	<p>The Notice of intent for the POWLLA was issued Nov. 29 with a comment deadline of Dec. 30—the height of the busy holiday season. From the get-go, the “extensive public involvement” sought by your agency and cited in your scoping letter is stifled by your choice of comment periods. While your agency has the discretion to set comment periods, it should be extended to after the holidays better include the public involvement your agency touts. I suggest sometime after Jan. 30, 2017 as a new comment deadline and to allow for new public notice with a new and full 30-day comment period.</p>	<p>The POW LLA Project is being analyzed under the requirements of the National Environmental Policy Act of 1969 (NEPA), which requires citizen involvement to make better informed decisions. We are conducting a broad public participation effort and there will be several more official public comment periods, not just the scoping period that followed the publication of the Notice of Intent to Prepare an EIS in the Federal Register on November 30, 2016.</p> <p>A collaborative group, calling themselves the Prince of Wales Landscape Assessment Team, has independently formed to provide information to the Forest Service regarding the POW LLA project. This group was not formed by the Forest Service and the Forest Service does not manage or control the group. All members of the public as well as any other group who would like to provide input to the POW LLA Project are encouraged and welcome to do so.</p>
Knight, Rebecca	<p>Under an analysis that sanctions the status quo, as your purpose and need statement suggests, they will continue to do nothing to prepare for a transition away from OG logging. Instead the industry will manage to liquidate what remains of the OG forest resource on POW Island, and then move on, leaving behind a sea of fragmented and degraded habitat that is useless for subsistence, recreation, and tourism and formerly thriving, local, non-timber economic interests. Your agency’s emphasis on maintaining the status quo enables this inevitability. Please rework your purpose and need statement to give local, subsistence, wildlife, tourism, and recreation primacy over timber extraction.</p>	<p>Suggestions for refining the purpose and need statements for the POW LLA have been reviewed and will be considered. The overarching purpose for the project will remain to improve forest ecosystem health on Craig and Thorne Bay Ranger Districts, help support community resiliency, and provide economic development through an integrated approach to meet multiple resource objectives.</p>

Author(s)	Comment	Response
Knight, Rebecca	Finally, "improvement of forest ecosystem health" does not result from logging more old growth as your P&N statement suggests. Improvement of forest ecosystem health can only begin to happen by standing down from logging entry into these forest stands and allowing them to recover from past destruction.	Suggestions for refining the purpose and need statements for the POW LLA have been reviewed and will be considered. The overarching purpose for the project will remain to improve forest ecosystem health on Craig and Thorne Bay Ranger Districts, help support community resiliency, and provide economic development through an integrated approach to meet multiple resource objectives.
Knight, Rebecca	The industry has had a nearly seven decade free-reign to log the Old Growth (OG) timber component on POW and very few pockets remain of the magnificent forest stands that once predominated on the island. What remains should be off-limits to any further removals	The Record of Decision for the 2016 Forest Plan Amendment outlines the strategy for the transition to a forest products industry based primarily on young growth. This project will follow Forest Plan direction regarding that transition. Even though the Forest Plan allows for old-growth harvest, the POW LLA may elect to develop alternatives that limit or avoid it. Your concerns for old-growth conservation will be considered during alternative development.

Author(s)	Comment	Response
Knight, Rebecca	<p>Instead, the need should be to do no further harm to a POW highly degraded forest ecosystem. Translated, this means an immediate end to logging old growth timber on the island—not yet more of the same.</p> <p>You correctly noted that, “past management activities have affected watershed function and fish and wildlife habitat in the project area”. Indeed, as owner’s of public lands, we cannot choose the forest degradation we inherited but we can chose not to degrade it further. An end to OG logging would go far toward accomplishing that goal.[...]My opposition continues and is consistent with my request that the POW LLA eliminate from consideration any further old-growth logging[...]The Prince of Wales Island cannot sustainably withstand further OG timber removals and its ecosystem is at risk of collapse.</p>	<p>Thank you for your comment. The purpose and need for the project states that, through an integrated approach, we will consider multiple uses including but not limited to providing a sustainable level of forest products and providing opportunities for growth in the recreation and tourism sector. The purpose and needencompasses multiple uses across the landscape including, but not limited to, timber, recreation, wildlife habitat, watershed improvement, and supporting transportation infrastructure.</p> <p>Providing old-growth timber is just one possible method of achieving the stated Purpose and Need. A certain level of old-growth logging is consistent with the Amended Tongass National Forest Land and Resource Management Plan.</p> <p>Even though the Forest Plan allows for old growth harvest, the POW LLA may elect to develop alternatives that limit or avoid it. Your concerns for old growth conservation will be considered during alternative development. Economic alternatives to specific actions are considered in the analysis phase of the NEPA process.</p>
Knight, Rebecca	<p>downscale the level and location of secondgrowth logging on many high productive sites to allow those areas to fully recover</p>	<p>Avoidance of young-growth harvest in certain areas of the project could be considered and developed in one or more alternatives. It would be helpful if you could be specific regarding which areas of the project you consider as highly productive and so we may more closely consider your comment.</p>

Author(s)	Comment	Response
Knight, Rebecca	<p>The scoping letter indicates that a so-called collaborative “Prince of Wales Landscape Assessment Team” was “independently” formed to provide widely based proposals to be considered by the Forest Service in the POWLLA project development and analysis process.</p> <p>As I understand, it was formed at the behest of your agency and consists of hand picked individuals, intended to deliver the predetermined results the FS seeks. Due to its scale and intensity, it is a defacto federal advisory committee and violates one of the most important laws regulating federal agency activities —the Federal Advisory Committee Act (FACA). Congress enacted the FACA in 1972 in part to ensure that the public had information about the existence, activities and costs of federal advisory committees. The creation of the Prince of Wales Landscape Assessment Team circumvents the provisions of the Act. If you continue to insist that the group was independently formed, please disclose how this occurred as well as its makeup.</p> <p>In fact, the existing National Environmental Policy Act (NEPA) process is perfectly adequate for ensuring that all public input is equally considered and disclosed in the POWLLA process and guarantees no one group’s influence skews the outcome. Please, immediately dissolve the Prince of Wales Landscape Assessment Team to avoid this fate and fully incorporate the NEPA process for this planning effort.</p>	<p>The POW LLA Project is being analyzed under the requirements of the National Environmental Policy Act of 1969 (NEPA), which requires citizen involvement to make better informed decisions. We are conducting a broad public participation effort and there will be several more official public comment periods, not just the scoping period that followed the publication of the Notice of Intent to Prepare an EIS in the Federal Register on November 30, 2016.</p> <p>A collaborative group, calling themselves the Prince of Wales Landscape Assessment Team, has independently formed to provide information to the Forest Service regarding the POW LLA project. This group was not formed by the Forest Service and the Forest Service does not manage or control the group. All members of the public as well as any other group who would like to provide input to the POW LLA Project are encouraged and welcome to do so.</p>

Author(s)	Comment	Response
Knight, Rebecca	<p>The scoping letter designated that the proposed action will be developed to meet the project's purpose and need over the course of 10-15 years. This is too long.</p> <p>As your agency well knows, NEPA analysis becomes stale after as little as five years and must be refreshed to incorporate new information and changed conditions. In fact, your identified, up to 15 years time frame to meet the POWLLA purpose and need, even exceeds the life of the Forest Plan. Please adjust the life of the plan to better reflect these realities.</p>	<p>The CEQ regulations provide a procedural framework for keeping environmental analyses current. They require agencies to prepare supplements upon determining there is significant new information of relevance to the proposed action or its impacts (CFR 1502.9).The possibility of new information arising after an EA or EIS is completed exists regardless of whether a NEPA review is wholly site-specific and short-term in scope or more programmatic in nature with a potentially longer "life".Implementation of an alternative selected through the POW LLA NEPA process would comply with this regulation.</p>
Knight, Rebecca	<p>A full range of alternatives must be provided. With this in mind, please include a wildlife/subsistence alternative that prohibits further road construction and no further diminishment of OG forests on POW. It should prohibit any further timber removals in valuable beach fringe habitat and allow second growth on highly productive sites to recover and eventually return to an Old Growth condition. This alternative will directly benefit populations of Alexander Archipelago wolf, Queen Charlotte goshawk, Sitka Blacktailed deer, the Marbled Murrelet, Marten and other OG dependent species.</p>	<p>We are required by the National Environmental Policy Act to analyze a reasonable range of alternatives which meets the stated purpose and need, goals and objectives, and responds to issues identified during the scoping process.</p> <p>Requests that no old-growth harvesting or road construction occur as part of this project are noted.This may be considered as a design component of an alternative or multiple alternatives.</p>

Author(s)	Comment	Response
Knight, Rebecca	However, another source of fish habitat destruction originates from blocked culverts which impede fish passage. I request that you abide by the TLMP requirement to maintain, restore or improve, where feasible, stream conditions that support the migration or other movement of aquatic organisms and further evaluate the cumulative impacts of restricting fish passage at multiple sites in the same watershed, the length of time that structures will restrict movement and factors such as isolated or sensitive populations. With this in mind please identify a current, updated list of impaired culverts by milepost road locations that are in disrepair, the miles of habitat affected by the blocked or partially passages, species affected, and a detailed annual schedule of repairs to be undertaken under the POWLLA. Please do not defer to prospective, unfunded plans for future partial culvert repair rather than disclosing and considering the blocked culverts as part of this analysis.	<p data-bbox="1245 324 1591 354">Thank you for your comment.</p> <p data-bbox="1245 389 1980 815">We are required to follow direction from the Forest Plan for maintaining or improving fish passage. Additionally, direction from the Clean Water Act and the Forest Plan requires that any new crossings over fish streams provide for fish passage. Should any new crossings be needed over fish streams, they will be designed to provide for fish passage. Additionally, we maintain a database of known fish crossings that includes road number and milepost, fish passage category, fish species that have been sampled at each crossing, and the amount of fish habitat above crossings that are impeding fish passage. Cumulative effects for fish and other aquatic resources are generally analyzed at the watershed level, and watersheds can then be prioritized for restoration activities including fish passage improvement.</p> <p data-bbox="1245 850 1980 1031">The need for restoration activities to improve watershed function and fish and wildlife habitat has been identified for the project area. We will consider the different types of restoration activities that could address this need, including the improvement of fish passage at road crossings, when we develop project alternatives.</p>

Author(s)	Comment	Response
Knight, Rebecca	Also, please include an analysis on the effects of blocked culverts on sedimentation – one of the more serious problems associated with blocked culverts. My request is necessary and appropriate and such action is certainly feasible for your agency to undertake for the POWLLA.	<p>Blocked culverts are a concern in many regards. It is understood that roads contribute to stream sedimentation and that culverts that have failed can cause substantially increased sedimentation. An effects analysis on sedimentation will be included in the DEIS.</p> <p>This project will adhere to all Standards and Guidelines outlined in the Forest Plan and both National and Regional Best Management Practices which seek to avoid the adverse impacts to soil and water resources such as the increased sedimentation caused by a blocked culvert.</p>

Author(s)	Comment	Response
Knight, Rebecca	Your agency can get far more bang for the buck to improve fish habitat by fixing the hundreds of red pipes on the POW road system than doing risky Tongass stream restoration which so far has depended on funding from OG logging receipts and which results in yet more fish habitat destruction.	<p>Thank you for your comment.</p> <p>We are required to follow direction from the Forest Plan for maintaining or improving fish passage. Additionally, direction from the Clean Water Act and the Forest Plan requires that any new crossings over fish streams provide for fish passage. Should any new crossings be needed over fish streams, they will be designed to provide for fish passage. Additionally, we maintain a database of known fish crossings that includes road number and milepost, fish passage category, fish species that have been sampled at each crossing, and the amount of fish habitat above crossings that are impeding fish passage. Cumulative effects for fish and other aquatic resources are generally analyzed at the watershed level, and watersheds can then be prioritized for restoration activities including fish passage improvement.</p> <p>The need for restoration activities to improve watershed function and fish and wildlife habitat has been identified for the project area. We will consider the different types of restoration activities that could address this need, including the improvement of fish passage at road crossings, when we develop project alternatives.</p>
Knight, Rebecca	Expert scientific opinion has concluded that globally significant carbon sinks such as the Tongass National Forest are critical to mitigating climate change and should be acknowledged in your analysis. Simply stated, logging results in a net transfer of CO2 to the atmosphere and heightens the impacts of climate change. Protection of forest stands results more carbon storage and mitigates climate change. Adverse impacts of climate change from any POW timber removals are reasonable and foreseeable and therefore must be disclosed and analyzed. Please avoid any suggestion in your analysis	

Author(s)	Comment	Response
	<p>that carbon storage in wood products, thinning, and future forest regeneration alters this balance and lacks any support in credible scientific analyses.</p>	<p>Climate change will be addressed in the NEPA process, and the CEQ policy will be followed according to the interpretation and direction given by the Forest Service's Washington Office. NEPA requires that we analyze the full range of direct, indirect, and cumulative effects of the alternatives identified in an EIS.</p>
	<p>The POWLLA should take a hard look at quantifying the direct and indirect effects of lost carbon storage capacity with preparation of a quantitative analysis. The methods to calculate lost carbon storage and CO2 emissions caused by POW timber sales is available and should not be ignored.</p>	<p>The value of carbon stored in forests is recognized as an Ecosystem Services Objective in the Tongass National Forest Land and Resource Management Plan (Forest Plan). This project will be following all Standards & Guidelines in the Forest Plan.</p>
	<p>Also, please avoid any suggestion that climate change is irrelevant to the range and ultimate choice of alternatives. Nothing could be more relevant. Your analysis should consider, analyze and disclose impacts to climate change from emissions from logging on POW, lost carbon storage in POW old-growth forests, lost carbon storage associated with short-rotations for recovering POW forests and near- and long-term emissions from any proposed woody biomass combustion facilities.</p>	
	<p>Moreover, the impacts of climate change are not "uncertain" and should not be dismissed as such. The Supreme Court and Ninth Circuit have found that the evidence shows that global warming will have an effect on public health and safety and the harms associated with climate change are serious and well recognized.</p>	

Author(s)	Comment	Response
Knight, Rebecca	The establishment of any biomass facility on POW should be prohibited for a variety of reasons especially because it will encourage increased timber removal volumes from which numerous negative impacts flow. Regardless, any proposal to establish a POW biomass industry must be fully analyzed and disclosed. Moreover, logging for biomass increases CO2 emissions, seriously harms public health and diverts resources from zero-emitting renewable energy technologies. Please avoid any assertion that biomass should be treated as a "carbon neutral" fuel. This antiquated conclusion reflects a misinterpretation of outdated accounting mechanisms – an interpretation that is "inconsistent with the best science of forest carbon accounting." . Instead, experts have found that a reliance on forest biomass "makes it likely that greenhouse gas emissions will increase for many years where biomass replaces or displaces fossil fuels."	The construction of a biomass facility is outside the scope of this project. If an interested party brought forth a proposal to the Forest Service to allow them to build a biomass facility on National Forest System land it would need to be analyzed under NEPA and the public would need to be solicited for comments.
Knight, Rebecca	The cost of establishment of any biomass facility on POW should be fully disclosed including all subsidies funded by the American taxpayer.	The construction of a biomass facility is outside the scope of this project. If an interested party brought forth a proposal to the Forest Service to allow them to build a biomass facility on National Forest System land it would need to be analyzed under NEPA and the public would need to be solicited for comments.

Author(s)	Comment	Response
Knight, Rebecca	Prohibit any further diminishment of important deer water range and what remains of the higher value forest stands for deer on the island.	<p>Thank you for your comment and concern on deer habitat including winter range. The Forest Service agrees that a healthy deer population is very important as is providing quality habitat. Clearcuts in the first several years actually provide forage for deer, but as these areas get older and the canopy closes they generally provide less quality habitat for deer.</p> <p>We will consider your suggestion of protecting important deer habitat as a design criteria for the Project's Proposed Action or an alternative.</p>

Author(s)	Comment	Response
Knight, Rebecca	Prohibit logging in beach fringe-the cornerstone of the Tongass Conservation Strategy.	<p data-bbox="1245 321 1980 443">Thank you for your comment. The current 2016 Forest Plan Amendment recognizes the importance of the beach and estuary fringe, riparian management areas, and old-growth reserves.</p> <p data-bbox="1245 483 1980 719">Management of old-growth forests for timber production is generally prohibited in these zones. Young-growth timber may however be managed via commercial harvests and non-commercial treatments under certain limitations and circumstances. The Record of Decision for the 2016 Forest Plan Amendment, pages 6 and 7, describes the limitations to commercial harvest of young growth in the beach and estuary fringe, old-growth reserves, and riparian management areas.</p> <p data-bbox="1245 760 1980 995">Additionally, there are scenery Standards and Guidelines in the Forest Plan that define the allowable levels of old-growth harvest that can be seen from visual priority travel routes and use areas like Clarence and Sumner Straits. The Forest Plan does however now make additional allowances for the harvest of young-growth timber in the beach fringe and reduces the scenery Standards there in order to promote the transition to primarily young-growth harvesting.</p> <p data-bbox="1245 1036 1980 1187">Even though the Forest Plan allows certain levels of young-growth harvest in the beach fringe, portions of RMAs and in old-growth reserves, the POW LLA Project may elect to develop alternatives that avoid harvests in those areas. Your comment will be considered when we develop alternatives.</p>

Author(s)	Comment	Response
Knight, Rebecca	Institute Island-wide road closures and decommissioning to help protect the at-risk Alexander Archipelago wolf from illegal hunting and poaching.	<p>Thank you for your comment on the effects of roads to wildlife species and recommending road closures. The potential negative impact of roads on wildlife are considered during the analysis process. This project will adhere to all current Forest Plan Standards and Guidelines including those that pertain to wolf populations and road densities.</p> <p>We will consider your suggestion of road closures as a design criteria for the Project's Proposed Action or an alternative, especially in those VCUs and wildlife corridors identified.</p> <p>The enforcement of laws pertaining to legal and illegal fish and game harvest is beyond the scope of this project.</p>
Knight, Rebecca	Prohibit any further timber removals from areas that contain Karst soils	<p>Unproductive soils do not support the plant and tree growth that is suitable for timber production. Very shallow soils on karst terrain that are susceptible to removal are located within the high-vulnerability karst areas and have Forest Plan harvest restrictions. All areas proposed to be harvested will adhere to the R10 Soil Quality Standards, Regional and National BMPs, and the 2016 Forest Plan.</p>
Knight, Rebecca	Maintain the wildlife corridor between Port Protection and Calder Bay.	<p>We will consider your suggestion of emphasizing a wildlife corridor between Port Protection and Calder Bay as a design criteria for the Project's Proposed Action or an alternative.</p> <p>The proposal of changing the existing Land Use Designation to Old-growth Habitat LUD would require a Forest Plan amendment. We will consider your suggestion and it may be proposed and analyzed under an alternative.</p>

Author(s)	Comment	Response
Knight, Rebecca	Strongly oppose any further Tongass transfers to the State, Sealaska or other private entities. They would be managed under the State of Alaska Forest Resources and Practices Act (FRPA) which is far weaker than federal regulations.	A concern for the transfer of lands out of the National Forest System (NFS) is noted, specifically as a preference for the environmental protections that are required by the USFS as well as the effect on subsistence uses when they are no longer NFS lands. Land transfer actions are outside of the scope of the POW LLA Project and will not be proposed nor opposed as part of this analysis process. If a land transfer action is being considered outside of this project, it will be analyzed within the cumulative effects of any POW LLA proposed actions or alternatives.
Knight, Rebecca	Prohibit any further industrial scale yellow and red cedar removals. These stands have been formerly high-graded, in particular to improve timber sale profits and are of increasing rarity.	There are no historical records or other evidence of pure stands of yellow or red cedar in the project area. Red and yellow cedar occur in mixed stands of other species like western hemlock and Sitka spruce. Harvest of the cedar species has always occurred along with these other species. Cedar have certainly not been targeted for disproportional harvest at the industrial timber sale scale. Prior to and during the pulp mill era stands with cedar were more often than not avoided where possible. Smaller scale harvests such as for local use and for free use timber tend to place more emphasis on the cedar species.

Author(s)	Comment	Response
Knight, Rebecca	Any proposed "thinning to improve wildlife habitat" should acknowledge that the benefit to wildlife is temporary at best, very expensive and dependent on unsecured funding, and would require continual treatments over time. This practice should not be used as mitigation to provide license for additional logging in important wildlife habitat. Thinning projects should not be funded through additional timber removals or other so-called "stewardship" funding which is just a ruse to promote more logging.	<p>Precommercial thinning is a proven treatment we use to adjust stand stocking in young growth to better meet future objectives. Un-thinned stands have limited management options once they begin to mature. Thinning expands these options by promoting a number of favorable tree and overall stand characteristics. Precommercial thinning is also a proven tool we use to enhance understory vegetation in stands that would otherwise provide very limited forage for deer. The effects analysis done for the project will fully disclose the costs and benefits of precommercial thinning if it is included as part of an alternative.</p> <p>We will include a No Action Alternative in the project that addresses your concerns. The effects of this alternative will be weighed against any other action alternatives that are developed. Young-growth treatments that may be considered under the action alternatives will be designed to meet both long- and short-term objectives of those alternatives in accordance with the Forest Plan Land Use Designations where they occur. Any suggestions you might have for the management of young growth under an action alternative where multiple resource objectives might be met is welcomed.</p>

Author(s)	Comment	Response
Knight, Rebecca	Prohibit any so-called "stewardship" projects which are dependent on logging receipts.	<p>Your opposition to stewardship contracting has been noted.</p> <p>The 2014 Farm Bill included permanent authorization of stewardship contracting for the Forest Service. Stewardship contracting authorities allow the exchange of goods for services. The value of the goods potentially provides a source of funds to accomplish service/restoration activities for which funding may not otherwise be available. The value of those goods, under a stewardship contract scenario, will be exchanged for desired service work within the project area under the same contract.</p> <p>The Forest Service Handbook (FSH) 2409.19, Chapter 60, provides policy and direction for stewardship contracting, and states that the "determination whether or not to use stewardship contracting as a tool ultimately lies with the line officer" (FSH 2409.19, 61.2).</p> <p>The public law and Forest Service policy referenced above established the authorities for the Forest Service to enter into stewardship contracts, and describes how stewardship contracts are intended to be used. Three additional key components provided by policy direction in FSH 2409.19 at 60.2, 60.3, and 61.1, respectively, are: stewardship contracts are an implementation tool; multiple NEPA documents may be used for a single stewardship contracting project; and the Regional Forester must approve the use of stewardship contracting authority to implement projects.</p> <p>While stewardship contracting is one of the tools that may be used to implement POW LLA Project activities, it is important to note that the decision to do so has not yet been made.</p>

Author(s)	Comment	Response
Knight, Rebecca	Prohibit creation of any new Marine Access Facilities on POW and decommission existing MAF's.	Your comment to prohibit the creation of new Marine Access Facilities and decommissioning existing MAFs has been noted.
Knight, Rebecca	Oppose the Tongass "Working Circle" concept on POW as it will only create more pressure to log the remaining Old Growth component and export our OG forest resource. This concept was developed in house with a predetermined group makeup and is not reflective of a public process.	Your opposition to the "working circle" concept has been noted.
Knight, Rebecca	The value of the standing POW Island forest resource for carbon sequestration should be thoroughly considered and quantitatively analyzed.	Climate change will be addressed in the NEPA process, and the CEQ policy will be followed according to the interpretation and direction given by the Forest Service's Washington Office. NEPA requires that we analyze the full range of direct, indirect, and cumulative effects of the alternatives identified in an EIS. The value of carbon stored in forests is recognized as an Ecosystem Services Objective in the Tongass National Forest Land and Resource Management Plan (Forest Plan). This project will be following all Standards & Guidelines in the Forest Plan.

Author(s)	Comment	Response
Knoll, Erin	There is currently little understanding of how the forest will respond to a second harvest; due to the long rotational lengths most of the forest is not mature enough for a second harvest. This landscape level project provides an opportunity for managers to apply adaptive management, using experimental treatments on the forest to aid managers in understanding the ecological processes that may occur following harvest of second growth forests on POW. Some ecological processes that we do not yet understand include: understory response, snow interception over time, wildlife response, and the ground response to a second harvest. The sooner we understand how the forest responds to a second harvest the sooner we can effectively treat and restore forest functions.	The Forest Service in partnership with the Pacific Northwest Research Station is already studying and monitoring these issues that concern you. Although these studies are ongoing,our effects analysis and the management decisions we make are based on what we are learning.

Author(s)	Comment	Response
Knoll, Erin	Beach fringe is one of the most sensitive habitats in the forest. We recommend against creating openings in beach fringe where a corridor of mature or old forest less than 660 feet wide would be left, in order to maintain effective thermal cover (Concannon 1995).	<p>Thank you for your comment. The current 2016 Forest Plan Amendment recognizes the importance of the beach and estuary fringe, riparian management areas, and old-growth reserves.</p> <p>Management of old-growth forests for timber production is generally prohibited in these zones. Young-growth timber may however be managed via commercial harvests and non-commercial treatments under certain limitations and circumstances. The Record of Decision for the 2016 Forest Plan Amendment, pages 6 and 7, describes the limitations to commercial harvest of young growth in the beach and estuary fringe, old-growth reserves, and riparian management areas.</p> <p>Additionally, there are scenery Standards and Guidelines in the Forest Plan that define the allowable levels of old-growth harvest that can be seen from visual priority travel routes and use areas like Clarence and Sumner Straits. The Forest Plan does however now make additional allowances for the harvest of young-growth timber in the beach fringe and reduces the scenery Standards there in order to promote the transition to primarily young-growth harvesting.</p>
Knoll, Erin	We recommend individual tree selection with openings of 2 acres or less to maintain hunting habitat for goshawks and provide thermal cover for deer within beach fringe habitat.	<p>Even though the Forest Plan allows certain levels of young-growth harvest in the beach fringe, portions of RMAs and in old-growth reserves, the POW LLA Project may elect to develop alternatives that avoid harvests in those areas. Your comment will be considered when we develop alternatives.</p> <p>Your suggestions for the maintenance of a minimum 660' beach fringe corridor, a minimum harvest opening size of two acres, and concerns for slash management will be considered when we design alternatives.</p>

Author(s)	Comment	Response
Knoll, Erin	Large forest openings and extensive timber thinning without appropriate slash treatments can interfere with animal movements and increase vulnerability of some species to predation, harvest by humans, and/or exposure to deep snow and severe weather	<p>Your concern is noted. Slash management can be problematic for various reasons. We have a number of methods we use to mitigate the effects of slash on wildlife. These include un-thinned travel corridors, bucking of larger diameter material and adjusting the timing of treatments to occur when slash will be less prevalent. Any suggestions you might have for other ways to address this concern would be helpful.</p> <p>The size of even-aged openings and how they occur across the landscape are also an important consideration for wildlife we are aware of. We welcome any suggestions you may have on how to address this concern. Your suggestions would be particularly helpful if they could be specific to certain watersheds of other defined areas of the project.</p>
Knoll, Erin	This project could be used to develop guidance on treatments that would accelerate succession of retained young-growth toward old-growth conditions.	<p>Your suggestions for the maintenance of a minimum 660' beach fringe corridor, a minimum harvest opening size of two acres, and concerns for slash management will be considered when we design alternatives.</p>

Author(s)	Comment	Response
Lavin, Pat	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 “co-intent” objective of both improving wildlife habitat conditions and providing young-growth timber to the industry.	<p>The Secretary of the US Department of Agriculture issued Memorandum 1044-009, <i>Addressing Sustainable Forestry in Southeast Alaska</i>, on July 2, 2013 which directed management of the Tongass National Forest to expedite the transition away from old-growth timber harvest and towards a forest products industry that uses predominantly second-growth - or young-growth - timber. This transition to predominantly young-growth timber harvest has been thoroughly analyzed at the Forest Plan level and addressed via the 2016 Amendment of the <i>Tongass Land and Resource Management Plan</i>. The Record of Decision for the 2016 Forest Plan Amendment pages 6-8 outlines the direction for the young-growth transition. The POW LLA Project will follow that direction.</p> <p>The POW LLA Project will analyze a range of alternatives with multiple harvest levels for the project planning horizon, with a full economic analysis for each of these alternatives.</p>

Author(s)	Comment	Response
Lavin, Pat	<p>Old-Growth Harvest: The NOI states that there is a “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.” The Draft Environmental Impact Statement (DEIS) or supporting documents should test this statement.</p> <p>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.</p> <p>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.</p>	<p>The Secretary of the US Department of Agriculture issued Memorandum 1044-009, <i>Addressing Sustainable Forestry in Southeast Alaska</i>, on July 2, 2013 which directed management of the Tongass National Forest to expedite the transition away from old-growth timber harvest and towards a forest products industry that uses predominantly second-growth - or young-growth - timber. This transition to predominantly young-growth timber harvest has been thoroughly analyzed at the Forest Plan level and addressed via the 2016 Amendment of the <i>Tongass Land and Resource Management Plan</i>. The Record of Decision for the 2016 Forest Plan Amendment pages 6-8 outlines the direction for the young-growth transition. The POW LLA Project will follow that direction.</p> <p>The POW LLA Project will analyze a range of alternatives with multiple harvest levels for the project planning horizon, with a full economic analysis for each of these alternatives.</p>

Author(s)	Comment	Response
Lavin, Pat	<p>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 "sustain the diversity and productivity of forested ecosystems."</p>	<p>A full effects analysis of all proposed silvicultural treatments will be prepared for the DEIS and Final EIS.</p>
Lavin, Pat	<p>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.</p> <p>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.</p>	<p>The Forest Service prioritizes watersheds for restoration based on a core national protocol by the USDA called the WatershedConditionFramework (WCF). The framework is designed to assess and track changes to watershed condition using aquatic and terrestrial indicators. Evaluation of these indicators classifies a watershed's condition into three classes: <i>Functioning Properly, Functioning at Risk, or Impaired Function</i>. Those with <i>Functioning at Risk or Impaired Function</i> outcomes can be listed as a priority watershed for restoration work. Priority watersheds are further assessed and a Watershed Restoration Action Plan (WRAP) is developed. The WRAP identifies essential projects that are needed to improve the watershed functionality. These projects include activities such as stream restoration, road maintenance and storage, replacing or removing fish barrier structures, and wildlife thinning treatments. In the past public involvement, partners, and integrated resource involvement within the Forest Service has helped to develop the essential projects. Once essential projects have been completed the watershed condition is reclassified and removed from the priority watershed list. Additionally, improvements in the watershed are tracked in a national database in the corporate Watershed Classification and Assessment Tracking Tool (WCATT).</p>
Lavin, Pat		<p>Laws and regulations require the Forest Service to manage for multiple use. The POW LLA Project is a relatively large-scale NEPA analysis project with an overarching purpose to improve forest ecosystem health, support community resiliency, and provide economic development through an</p>

Author(s)	Comment	Response
	<p>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 “maintain infrastructure to an acceptable level” and “expand opportunities for growth in the recreation and tourism business sector.” There may be employment opportunities that offset any that are foregone by reducing or eliminating the old-growth logging component of the project.</p>	<p>integrated approach to meet multiple resource objectives.</p> <p>The POW LLA Project will be refined over the next year with extensive public input. The Forest Service looks forward to engaging in meaningful dialogue with the public regarding current socioeconomic conditions and future opportunities to support the social and economic sustainability of Prince of Wales Island communities. Notably, the recreation and tourism economic sector has grown in importance over recent decades. Developing and improving recreation facilities will be given full consideration as part of the Proposed Action, alternatives, and related analyses. A range of alternatives will be considered which analyzes multiple uses across the landscape and also includes a thorough analysis of the economic and social environment.</p> <p>In 2009 the Craig and Thorne Bay Rangers signed the Prince of Wales Access and Travel Management Plan. In accordance with 36 CFR 212.5(b) this decision identified the minimum road system for safe and efficient travel and for administration, utilization, and protection of National Forest System lands. This decision also designated the class of vehicle and, if appropriate, time of year for motor vehicle use. The decision is reflected on the Motor Vehicle Use Map and shows where motor vehicle use is allowed and which type of vehicles may be used. The allocated road maintenance budgets are not sufficient to keep all roads open. The process of closing a road to vehicle traffic and placing it in a condition that requires minimum maintenance is done to protect the environment (e.g. aquatic resources from increased sediment delivery to streams) and preserve the facility for future use. There is a range of methods used in closing a road depending on site specific conditions and appropriate maintenance level; however, the main idea is that the road will be in a mostly self-</p>

Author(s)	Comment	Response
Lavin, Pat	<p>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.</p>	<p>maintaining physical state. In recent years the Forest Service has actively engaged the public in providing access on new logging roads for firewood and other subsistence activities before closing the roads. Maps and brochures have been posted in communities and at Forest Service offices. Any changes to the Access and Management Plan as a result of the POW LLA will be informed by a travel analysis.</p> <p>Thoughtful consideration of socioeconomic characteristics and conditions will be part of the process to develop alternatives. Jobs across multiple sectors of the forest products industry will be assessed. All research, data, and related analysis will become part of the project record.</p>
Lavin, Pat	<p>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</p>	<p>We are required by the National Environmental Policy Act to analyze a reasonable range of alternatives which meets the stated purpose and need, goals and objectives, and responds to issues identified during the scoping process.</p> <p>Requests that no old-growth harvesting or road construction occur as part of this project are noted. This may be considered as a design component of an alternative or multiple alternatives.</p>

Author(s)	Comment	Response
Lavin, Pat	<p>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.</p>	<p>Thank you for your comment. A new Forest-wide plan monitoring program to capture wildlife response to various treatments used in the beach fringe, riparian management area, old-growth reserves, as well as forest-wide trends is outside the scope of this project. The POW LLA Project will follow the young-growth direction allowed in the current Forest Plan. An adaptive management monitoring plan may be included in the DEIS to help determine appropriate treatments across the landscape after initial implementation.</p>
Lavin, Pat	<p>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.</p>	<p>Thank you for your comment. The effects of proposed activities to wolves will be analyzed, including recent findings. Specific direction on the wolf is included in the 2016 Forest Plan on page 4-91.</p>

Author(s)	Comment	Response
Lavin, Pat	<p>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.</p>	<p>Thank you for your comment. The analysis process for projects on Prince of Wales already includes impacts on old growth as well as to the species listed in the comment (except for the brown bear which is not known to occur on the island).</p> <p>The function and adequacy of the old growth conservation strategy as implemented to date is described in the current Forest Plan to which the POW LLA Project will be tiered.</p>
Lindekugel, Buck	<p>SEACC supports the Forest Service's stated purpose of "help [ing] support community resiliency" but questions the agency's underlying assumption that the region's economic vitality depends on 10 to 15 more years of old growth logging. This assumption's accuracy is a significant issue for this project and accurate data and analysis is necessary to assess its reliability and enable the agency and public to make informed decisions regarding economic tradeoffs related to proposed resource management choices.[...]This project enables the Forest Service to assess the outdoor recreation and visitor industry's contribution to the economy of Prince of Wales and Southeast Alaska. This analysis is</p> <p>essential for the Forest Service to determine the highest and best use of the land and calculate the tradeoffs associated with the heart of this economic engine on Prince of Wales Island and surrounding islands – roughly 2.5 million acres of Tongass National Forest lands public lands within the POW LLAP project area.</p>	<p>Laws and regulations require the Forest Service to look at multiple uses of forest resources. The purpose and need for the POW LLA Project states that through an integrated approach we will consider multiple uses, including but not limited to providing a sustainable level of forest products and providing sustainable recreation opportunities. A range of alternatives will be considered which analyzes multiple uses across the landscape and also includes a thorough analysis of the economic and social environment.</p>

Author(s)	Comment	Response
Lindekugel, Buck	<p>We question how the agency can rely on a single project decision to provide a 10 to 15 year supply of old-growth forest for logging on Prince of Wales Island. As a rule of thumb, the Forest Service must carefully reexamine the information and analysis in a NEPA document over 5 years old, if substantial changes to the proposed action have occurred, or there are significant new circumstances or information relevant to environmental concerns and bearing on the proposed actions or its impacts. How will the agency conduct monitoring to confirm predictions of impact, ensure the effectiveness of mitigation measures, or change the proposed action to account for unintended consequences? How does the agency intend to coordinate with other landowners to monitor local and cumulative effects under the different standards and practices conducted across the variety of land ownerships on POW?</p>	<p>The CEQ regulations provide a procedural framework for keeping environmental analyses current. They require agencies to prepare supplements upon determining there is significant new information of relevance to the proposed action or its impacts (CFR 1502.9).The possibility of new information arising after an EA or EIS is completed exists regardless of whether a NEPA review is wholly site-specific and short-term in scope or more programmatic in nature with a potentially longer "life".Implementation of an alternative selected through the POW LLA NEPA process would comply with this regulation.</p>
Lindekugel, Buck	<p>By disclosing and analyzing the cumulative effects of these legislative proposals during this Landscape Assessment, the Forest Service would contribute to NEPA’s objective of promoting informed decision-making and citizen involvement. [...]Given the significant scale and scope of these proposed land ownership adjustments, the Forest Service must take a hard look at the environmental and economic effects resulting from substantial differences between federal and state management standards and practices and tradeoffs associated with the devolution of even more federal land on Prince of Wales Island from the Tongass National Forest.</p>	<p>NEPA requires that we analyze the full range of direct, indirect, and cumulative effects of the preferred alternative, if any, and of the reasonable alternatives identified in an EIS. We will adhere to all laws and regulations.</p> <p>(CEQ NEPA Regulations, 40 C.F.R. §§ 1508.7, 1508.8)</p>
Lindekugel, Buck	<p>Inexplicably, the last time the Forest Service calculated an annual market demand forecast was in FY2014.8 Please disclose and analyze both recent real-world cut data and the agency’s own updated market demand projections in this assessment.</p>	<p>The analysis for the POW LLA Project will utilize the most current data available for market conditions and demand which will be included in the public record.</p>

Author(s)	Comment	Response
Lindekugel, Buck	<p>Nor has the agency taken a hard look at the significant effects from implementing the Tongass Limited Export Policy. Has implementation of the export policy increased the appraised value of timber sales offered on the Tongass? Has local access to timber improved? How much yellow cedar has been retained for local manufacture? Has the policy increased the utilization of timber logged on the Tongass? Has providing a market for smaller diameter and low-grade material that local mills cannot process profitably improved sale economics? Has the policy resulted in the significant increase in the likelihood that Tongass timber sales appraise positively? Is export-oriented logging of Tongass old-growth forests critical for the longevity and strength of Southeast Alaska’s primary job producers – the \$2 billion dollar fishing, tourism, and recreation sectors – a worthy trade-off to maintain a relatively few jobs in the timber sector? These questions are not only significant for evaluating the success of this policy but could provide valuable information to Congress and the public regarding the wisdom of designing and appraising sales based on export values.</p>	<p>NEPA analysis of the effects of the Limited Export Policy has been conducted at both at the programmatic and site-specific levels since its adoption. While analysis at the Forest Plan level assists the agency in selecting amongst management alternatives, the Forest Plan itself also does not authorize the harvest of timber without further, site-specific NEPA review. Project-level NEPA analyses evaluate the effects of timber sales in light of the policy including potential effects on in-state employment and the financial efficiency of project alternatives. Project-level NEPA documents also describe how each specific timber sale meets the TTRA requirement to seek to meet market demand for Tongass timber while also providing for the multiple use and sustained yield management of the Forest's renewable resources.</p>
Lindekugel, Buck	<p>Under the GNA, the Forest Service remains responsible for the NEPA portion of the project. We request the Forest Service use this ongoing collaborative NEPA process to disclose and evaluate similarities and differences between state and federal authorities and clarify what state cruise standards and appraisal methods could apply to authorized activities.</p>	<p>Thank you for your comment. Agreements between government parties are handled at the regional level and are beyond the scope of this project.</p>

Author(s)	Comment	Response
Lindekugel, Buck	Develops diverse economic opportunities to support ecological and community health over the long-term. This includes fish and wildlife habitat restoration and improvement, development of recreation facilities, high value-added wood product manufacturing, and renewable energy development.	Laws and regulations such as the Multiple Use Sustained Yield Act of 1960 (16 U.S.C. 528-531) (36 CFR 219.19) require that we consider multiple uses of National Forest System lands. The goal of multiple use management is to achieve products and services from a given area without impairing the productive capacity of the site.
Lindekugel, Buck	Maintains and improves fish and wildlife habitat productivity to support subsistence, sport and commercial harvest of fish and game.	The purpose and need for the POW LLA Project encompasses multiple uses across the landscape including, but not limited to, timber, recreation, wildlife habitat, watershed improvement, and supporting transportation infrastructure. The Forest Service will consider the different types of activities that could address this need when we develop project alternatives.
Lindekugel, Buck	Designs old growth logging to maintain productivity, structural complexity, and understory diversity in high-value winter range.	Thank you for your comment. Wildlife and fish habitat improvement projects may be incorporated into one or more alternatives. The USFS will follow Standards & Guidelines for subsistence, fish habitat, and wildlife habitat as outlined in the Tongass Land and Resource Management Plan. Consultation to the Southeast Alaska Regional Subsistence Advisory Council will occur as mandated by Section 805 of the Alaska National Interest Lands Claim Act (ANILCA). Opportunity to provide comments related to subsistence use and activity will occur through the public hearing process as mandated by ANILCA 810.
Lindekugel, Buck	Designs old growth logging to maintain productivity, structural complexity, and understory diversity in high-value winter range.	Maintaining productivity, structural complexity, and understory diversity in high-value deer winter range will be considered as potential design criteria when alternatives are developed.

Author(s)	Comment	Response
Lindekugel, Buck	Identifies locations where thinning, girdling, pruning, small patch cutting or other treatments to young growth stands could improve fish and wildlife habitat conditions while providing jobs and marketable forest products. This should prioritize young growth management for hunting areas with road access and deer browse so it combines good wildlife habitat with "hunt-ability."	The treatment options and objectives you suggest for young growth will be considered when alternatives are developed for the project area. The young-growth age-class imbalance on the island and the effects of large homogenous young stands on wildlife are important considerations we will address as the project moves forward.
Lindekugel, Buck	Improves wildlife habitat in young-growth stands for deer, bear, marten, wolf, goshawk, murrelets, and flying squirrel by maintaining, prolonging, and/or improving understory forage production and accelerating development of old-growth characteristics in young-growth stands. Schedule these management activities to emphasize management on sites with the highest long-term potential winter habitat value based upon pre-harvest estimated value.	The Forest Service has several different treatment options that may be proposed in the POW LLA Project. The objective of one or more of these treatments would be to improve habitat for a variety of wildlife species by improving forage production and/or trending the stand toward more old-growth-like characteristics. Every effort will be made to try to emphasize the areas that will likely benefit the most from the proposed treatments.
Lindekugel, Buck	Considers tradeoffs between removing or chipping and broadcast thinning.	Thank you for your comment on the Prince of Wales Landscape Level Analysis Project regarding the tradeoffs between removing or chipping and broadcast thinning. These activities will be taken into consideration when developing alternatives for the EIS.

Author(s)	Comment	Response
Lindekugel, Buck	events the loss of understory in young-growth stands that are nearing stem exclusion, with an emphasis on stands that will be most productive for wildlife over the next 10-20 years.	<p>One desired future condition "wildlife objective" in the Tongass National Forest Land and Resource Management Plan is to include a young-growth management program to maintain, prolong, and/or improve understory forage production, and to improve habitat distribution, including future old-growth characteristics in young-growth timber stands for wildlife on lands both suitable and not suitable for timber production.</p> <p>Stem exclusion/light exclusion within an older young-growth stand that precludes understory growth can have a negative affect for wildlife. Earlier timed precommercial thins (PCT) can have a more progressive benefit for deer and other wildlife. In some instances wildlife enhancement projects have been done in youngerstands that havehad PCT treatments;they had variable spacing, andused pruning and girdling. This has been done to accommodate wildlife values.</p> <p>Wildlife habitat improvementthrough precommercial thinning remains an important goal to the wildlife program and the Forest. As the analysis in this project progresses to create alternatives, these comments will be considered.</p>

Author(s)	Comment	Response
Lindekugel, Buck	<p>Minimizes risk of unnatural stream sediment loading and the "unraveling" of stream channels due to landslides and slope instability by avoiding logging on steep, unstable slopes. This alternative would reduce degradation of existing aquatic habitat from choking down-slope stream channels with sediment. Given the high level of landslide activity and slope instability in the project area, the Forest Service should analyze, quantify and disclose the shared characteristics of locations exhibiting past slope instability, such as slope angle, soil and vegetation type, aspect, elevation, distance, proximate cause and impact of accelerated erosion on downslope and downstream fish habitat. A thorough analysis of slope instability and landslide activity and the location in which it occurs should enable the Forest Service to evaluate the effectiveness standards and guidelines regarding the location of cutting units and roads, including the 72% guide. Such an analysis may also evaluate alternative measures to minimize the risk of future slope instability, landslides and stream sediment loading, including selective logging prescriptions and/or avoiding logging on landslide-prone slopes.</p>	<p>Landslide occurrence and mass movement index potential maps will be available for the entire project area. Landslide occurrence maps will be used to calculate landslide frequency and predict future landslide occurrence on the island. On-site slope stability investigations will be conducted for activities proposed on steep slopes in old-growth stands and case-by-case in young-growth stands. The Forest Service will consider site conditions and proposed management actions (logging, road building, or other ground-disturbing activities) when conducting slope stability assessments. The on-site slope stability assessments conducted for the POW LLA harvest units and roads will follow the 2016 Forest Plan direction. All the factors and shared characteristics mentioned are considered in the Region 10 MMI model. This information and/or maps will be located in the POW LLA Soil and Wetland Resource Report.</p>

Author(s)	Comment	Response
Lindekugel, Buck	Improve ecological resiliency, given possible impacts from climate change.	<p>Climate change will be addressed in the NEPA process, and the CEQ policy will be followed according to the interpretation and direction given by the Forest Service's Washington Office. NEPA requires that we analyze the full range of direct, indirect, and cumulative effects of the alternatives identified in an EIS.</p> <p>The value of carbon stored in forests is recognized as an Ecosystem Services Objective in the Tongass National Forest Land and Resource Management Plan (Forest Plan). This project will be following all Standards & Guidelines in the Forest Plan.</p>
Lindekugel, Buck	Minimize road construction in phase II portions of the project area, to improve the economic viability for small sale opportunities (micro sales and sales less than 1.0 mmbf) and maintain high salmon values in this watershed.	<p>Use of existing roads and potential new construction will be thoroughly analyzed. The need for maintenance, reconstruction, and new construction will largely be driven by timber harvest and the need to haul harvested timber. If new roads are needed, then any new crossings over fish streams will be designed to provide for fish passage as directed by the Clean Water Act and the Forest Plan.</p>
Lindekugel, Buck	Maintain the integrity and connectivity of old growth habitat in the project area by exploring partial-cut options for areas with high wildlife and hunting values.	<p>Partial harvest silvicultural prescriptions are a viable option that we have used in the past to mitigate effects to wildlife from old-growth harvesting. We will incorporate your suggestion into the design criteria we use to develop alternatives. Any recommendations you might have regarding where high-value hunting and wildlife areas occur across the island would help inform the POW LLA process.</p>

Author(s)	Comment	Response
Lindekugel, Buck	Reduce logging costs and minimizing impacts by dropping excessive road segments. Decommission temporary roads and place new system roads in storage upon completion of logging activities.	<p>Timber sales are designed to be economical; this includes not constructing excessive road segments. Use of existing roads and potential new construction will be thoroughly analyzed. The need for maintenance, reconstruction and new construction will largely be driven by timber harvest and the need to haul harvested timber.</p> <p>Temporary roads are decommissioned when their use period is over. National Forest System roads are analyzed to determine the appropriate long-term use and travel management strategy.</p> <p>We will consider the suggestions of maintaining or increasing road closures, including utilizing gates, and limiting any new road construction as a design criteria for the Project's proposed action or an alternative.</p>
Lindekugel, Buck	We support management activities that will improve deer habitat across Prince of Wales, particularly by breaking large, single-age second growth stands into smaller treatment to provide an uneven-aged landscape. We encourage experimentation with many fine-scale young-growth treatments, particularly those designed to improve forage production and utilization, snow interception, and wildlife movement.	The treatment options and objectives you suggest for young growth will be considered when alternatives are developed for the project area. The young-growth age-class imbalance on the island and the effects of large homogenous young stands on wildlife are important considerations we will address as the project moves forward.
Lindekugel, Buck	We also support management activities that emphasize forest restoration and enhancement, including repair of culverts, improvements to recreational infrastructure and wildlife and fisheries habitat improvement, especially focused on areas important for traditional uses and subsistence activities.	Thank you for your comment. A variety of restoration and/or enhancement projects may be included in the Proposed Action or an alternative.
Lindekugel, Buck		The difference between planned volume and actual timber volume offered for sale, or "falldown", can vary from project to project. During the development and analysis of project

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	<p>The Forest Service must disclose and analysis falldown experienced on the Logjam, Slate, and Big Thorne offerings and explain the reasons for it. The analysis should also disclose how the falldown affected sale economics for these offerings and the likelihood of similar falldown and effects for this project.</p>	<p>alternatives every effort is made to make the best estimate of potential timber sale harvest volume and acreage. This includes evaluating differences in past projects and utilizing that knowledge to refine future estimates. As with any project, there will be changes that could occur between the planning phase and implementation. Since all alternatives receive equal attention to detail, any changes would be just as likely to occur in one alternative as another. Therefore we do not expect potential change to weight one alternative any differently than another in the decision making process.</p> <p>The majority of the young-growth stands will have a plot survey completed within the stand to determine a more accurate volume to decrease the amount of falldown. The old-growth stands will have plot surveys completed before they are included in a timber sale. A focus area that will represent the variety of old-growth within the project area will have plot surveys completed for the EIS and will be used to calculate the expected falldown throughout the rest of the old-growth stands.</p> <p>Fluctuating timber market conditions and an increase or decrease in harvest costs have a direct effect on stumpage values during the time of timber offer. Because markets fluctuate, volume made available with the POW LLA Project should allow the Forest Service to respond to those fluctuating conditions when packaging timber sales. At the time of actual sale or stewardship offer, a detailed appraisal will be conducted by established regional appraisal methodologies.</p> <p>With regard to timber harvest fitting within stewardship contracting authority, stewardship contracting authorities allow the exchange of goods for services. The timber harvest proposed for the POW LLA Project would be designed to meet</p>

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Lindekugel, Buck	<p>Falldown is a significant issue because the agency's discussion and analysis of environmental consequences in this collaborative NEPA process must inform the public about "the relationship between short-term uses of man's environment and the maintenance and enhancement of long-term productivity."9 The proposed units were bypassed in prior timber sales offerings, presumably because they possess less high-quality timber in them. An economic sale may not be possible in these units, especially if one stated goal for sale of this timber is to fund future restoration and stewardship programs. The agency must disclose and analyze the proposed economic linkage between logging and restoration and stewardship during this collaborative process.</p>	<p>land management objectives identified in the current Forest Plan and will, regardless of the type of contract used to implement the project, generate a value for the goods (timber) sold. The value of the goods potentially provides a source of funds to accomplish service/restoration activities for which funding may not otherwise be available, at least in the short-term. The value of those goods, under a stewardship contract scenario, will be exchanged for desired service work within the project area under the same contract. If the value of goods (timber), determined by Forest Service appraisal and subsequent bids, exceeds the cost of services in the contract, then the excess receipts may be retained on the Forest and used on additional, approved stewardship contracts.</p> <p>The POW LLA Project will include a diverse range of alternatives. The effects analysis will explore social and economic environments and will be presented in both the draft and final environmental impact statement.</p> <p>The difference between planned volume and actual timber volume offered for sale, or "falldown", can vary from project to project. During the development and analysis of project alternatives every effort is made to make the best estimate of potential timber sale harvest volume and acreage. This includes evaluating differences in past projects and utilizing that knowledge to refine future estimates. As with any project, there will be changes that could occur between the planning phase and implementation. Since all alternatives receive equal attention to detail, any changes would be just as likely to occur in one alternative as another. Therefore we do not expect potential change to weight one alternative any differently than another in the decision making process.</p> <p>The majority of the young-growth stands will have a plot survey completed within the stand to determine a more</p>

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		<p>accurate volume to decrease the amount of falldown. The old-growth stands will have plot surveys completed before they are included in a timber sale. A focus area that will represent the variety of old-growth within the project area will have plot surveys completed for the EIS and will be used to calculate the expected falldown throughout the rest of the old-growth stands.</p> <p>Fluctuating timber market conditions and an increase or decrease in harvest costs have a direct effect on stumpage values during the time of timber offer. Because markets fluctuate, volume made available with the POW LLA Project should allow the Forest Service to respond to those fluctuating conditions when packaging timber sales. At the time of actual sale or stewardship offer, a detailed appraisal will be conducted by established regional appraisal methodologies.</p> <p>With regard to timber harvest fitting within stewardship contracting authority, stewardship contracting authorities allow the exchange of goods for services. The timber harvest proposed for the POW LLA Project would be designed to meet land management objectives identified in the current Forest Plan and will, regardless of the type of contract used to implement the project, generate a value for the goods (timber) sold. The value of the goods potentially provides a source of funds to accomplish service/restoration activities for which funding may not otherwise be available, at least in the short-term. The value of those goods, under a stewardship contract scenario, will be exchanged for desired service work within the project area under the same contract. If the value of goods (timber), determined by Forest Service appraisal and subsequent bids, exceeds the cost of services in the contract, then the excess receipts may be retained on the Forest and used on additional, approved stewardship contracts.</p>

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Lindekugel, Buck	<p>In addition, any financial efficiency analysis prepared for this proposal must compare Forest Service actual, direct expenditures with estimated revenues. Since economic development is fundamental to the purpose and need for this project, full disclosure and accurate and detailed analysis of costs and benefits public costs associated with the project is significant for a fair and balanced assessment of whether the jobs created are worth the cost to taxpayers and the environment.</p>	<p>The POW LLA Project will include a diverse range of alternatives. The effects analysis will explore social and economic environments and will be presented in both the draft and final environmental impact statement.</p> <p>The POW LLA Project will follow all current Forest Service policies and regulations. A range of alternatives will be developed for consideration for the project. Each of these alternatives will include a full economic analysis. The POW LLA Project will be refined over the next year with extensive public input. The Forest Service looks forward to engaging in meaningful dialogue with the public regarding the most relevant and valued ecosystem services, readily-available data, and appropriate qualitative and quantitative methods for assessing contributions to social and economic sustainability.</p>
Lindekugel, Buck	<p>To comply with Executive Order 13653, the Forest Service must take a hard look at the effect of proposed management activities on POW's natural infrastructure and what effect of those activities have on improving climate preparedness and resilience and capitalizing on the global significance of the Tongass as a carbon-rich reserve.</p>	<p>NEPA requires that we analyze the full range of direct, indirect, and cumulative effects of the preferred alternative, if any, and of the reasonable alternatives identified in an EIS. We will adhere to all laws and regulations.</p> <p>(CEQ NEPA Regulations, 40 C.F.R. §§ 1508.7, 1508.8)</p>
Link-New, Virgene	<p>Why does the project map for this landscape level analysis not show all the watersheds made off-limits to logging under the soon-to-be-effective Tongass Plan Amendment?</p>	<p>The POW LLA team members are aware of the T77 watersheds and will be adhering to the management stipulations lined out in the Forest Plan.</p>
Link-New, Virgene	<p>What effect will other proposals, like granting the State of Alaska extensive amounts of National Forest lands for a state forest, or the Alaska Mental Health Trust land exchange, or the proposed Sealaska land exchange, or more timber sales on existing POW state forest parcels have on existing subsistence, recreational and commercial uses of forest resources on Prince of Wales Island?</p>	<p>NEPA requires that we analyze the full range of direct, indirect, and cumulative effects of the preferred alternative, if any, and of the reasonable alternatives identified in an EIS. We will adhere to all laws and regulations.</p> <p>(CEQ NEPA Regulations, 40 C.F.R. §§ 1508.7, 1508.8)</p>

Author(s)	Comment	Response
Link-New, Virgene	How can the Forest Service possibly rely on a single project decision to approve a bunch of management activities that will take place over the next 10 to 15 years?	The CEQ regulations provide a procedural framework for keeping environmental analyses current. They require agencies to prepare supplements upon determining there is significant new information of relevance to the proposed action or its impacts (CFR 1502.9).The possibility of new information arising after an EA or EIS is completed exists regardless of whether a NEPA review is wholly site-specific and short-term in scope or more programmatic in nature with a potentially longer "life".Implementation of an alternative selected through the POW LLA NEPA process would comply with this regulation.
Maisch, John "Chris"	The Division of Forestry recommends the POW LLA Project include specific targets for both old and young growth timber sales in order to support community resiliency and as a required component of economic development.	<p>The Tongass Land and Resource Management Plan (Forest Plan) provides overall direction for timber harvest. In general,the 2016 Amendment of the <i>Tongass Land and Resource Management Plan</i>utilized46 MMBF as the projected timber sale quantity (PTSQ) that informed overalltimber objectives.The PTSQ consists of old-growth and young-growth harvest, with old-growth decreasing as a share oftotal volume (46 MMBF) over time as more young growth becomes economic to harvest.A portion of the PTSQ may originate from the Prince of Wales Island area.</p> <p>While the POW LLA NEPA project may include an alternative that limits old growth harvesting or considers options that require a proportional amount of young growth be included in each large timber sale, managing the Tongass National Forest includes managing the timber resource located on federal lands.The Forest Service remains committed to supporting the economic and social well-being of Prince of Wales Island communities. The agency will continue to explore young-growth forest products and associated potential markets.</p>

Author(s)	Comment	Response
Maisch, John "Chris"	Restoration activities for habitat purposes are appropriate actions, but please keep in mind that timber management should be a key focus of your efforts.	Suggestions for refining the purpose and need statements for the POW LLA have been reviewed and will be considered. The overarching purpose for the project will remain to improve forest ecosystem health on Craig and Thorne Bay Ranger Districts, help support community resiliency, and provide economic development through an integrated approach to meet multiple resource objectives.
Maisch, John "Chris"	To help realize meaningful economic development, the Forest Service needs to articulate in the POW LLA how this project will support Section 101 of the Tongass Timber Reform Act of 1990 (TTRA) that states in part, "the Secretary shall to the extent consistent with providing for the multiple use and sustained yield of all renewable forest resources, seek to provide a supply of timber from the Tongass National Forest which (1) meets the annual market demand for timber from such forest and (2) meets the market demand from such forest for each planning cycle." Currently the "existing industry" is an old growth dependent industry and the majority of the industry believes that old growth harvest must continue until there is a sufficient quantity of young growth to supply the industry. The Forest Service needs to affirm the POW LLA Project will be consistent with the TTRA.	The purpose and need for the POW LLA Project encompasses multiple uses across the landscape including, but not limited to, both old- and young-growth timber, recreation, wildlife habitat, watershed improvement, and supporting transportation infrastructure. The project will comply with required laws and regulations, including the Tongass Timber Reform Act of 1990, the Multiple Use Sustained Yield Act of 1960, as well as the Tongass Land and Resource Management Plan (Forest Plan) as amended in 2016. The National Environmental Policy Act of 1969 requires Federal agencies to consider environmental effects that include, among others, impacts on social, cultural, and economic resources, as well as natural resources. The EIS prepared for the POW LLA will include an analysis of economic effects.
Maisch, John "Chris"	The Division of Forestry requests that the Forest Service incorporate into the POW LLA Project a reciprocal access agreement for State and federal land for improving efficiencies and to support economic development.	Agreements between government parties are handled at the national level and are beyond the scope of this project.
Maisch, John "Chris"	It is also important for this planning process to include the identification, prioritization, and maintenance of existing infrastructure related to the needs of the timber industry.	The reinvestment of timber receipts for local infrastructure, including transportation and recreation, is possible utilizing Stewardship contracting which may be part of the implementation of this project. Timber sales will be thoroughly analyzed and planned to help meet infrastructure investment with regards to both present and future needs.

Author(s)	Comment	Response
McDonald, Monte	Keep existing roads open for vehicles and ATV's. Keep old closed-out logging roads open for ATVs. Any roads re-opened leave open.	<p>In 2009 the Craig and Thorne Bay Rangers signed the Prince of Wales Access and Travel Management Plan. In accordance with 36 CFR 212.5(b) this decision identified the minimum road system for safe and efficient travel and for administration, utilization, and protection of National Forest System lands. This decision also designated the class of vehicle and, if appropriate, time of year for motor vehicle use. The decision is reflected on the Motor Vehicle Use Map and shows where motor vehicle use is allowed and which type of vehicles may be used. The allocated road maintenance budgets are not sufficient to keep all roads open. The process of closing a road to vehicle traffic and placing it in a condition that requires minimum maintenance is done to protect the environment (e.g. aquatic resources from increased sediment delivery to streams) and preserve the facility for future use. There is a range of methods used in closing a road depending on site specific conditions and appropriate maintenance level; however, the main idea is that the road will be in a mostly self-maintaining physical state. In recent years the Forest Service has actively engaged the public in providing access on new logging roads for firewood and other subsistence activities before closing the roads. Maps and brochures have been posted in communities and at Forest Service offices. Any changes to the Access and Management Plan as a result of the POW LLA will be informed by a travel analysis.</p> <p>Thank you for your comment. A variety of access options could be considered at the alternative design phase of analysis. Alternatives may include the option of potentially opening closed roads and maintaining currently open roads.</p>
McDonald, Monte	Develop a high-water ramp for boats at Ratz Harbor - small boats or skiffs - Keep the old ramp at El Capitan open it works for small boats and skiffs - maybe a little development.	Developing and improving recreation facilities including boat launches will be given full consideration and may be part of the Proposed Action or other alternatives.

Author(s)	Comment	Response
Petersen, Karen	<p>For the MicroSale Program, we would like you to include the following changes:</p> <ol style="list-style-type: none"> 1. Expand the Roadside EA to 1200 feet in Timber LUD areas only 2. Allow the salvage of dying or standing dead trees 3. Include the beach buffers in the OGR as part of the Roadside EA 4. Have RED CEDAR be exempted from the export policy in microsals 	<p>The Roadside EA may be superseded by the POW LLA EIS. New opportunities for small sales and microsals may be considered as part of the POW LLA Project. When we design alternatives for this project we will consider your suggestions. It would also be helpful for us if you could point out certain areas in the project where the type of material you are interested might be more prevalent and state any economic or physical limitations to your operations that you might have.</p>
Petersen, Karen	<p>For Small OLD GROWTH SALES please consider the following guidelines:</p> <ol style="list-style-type: none"> 1. EXEMPT all old growth for export in the round. 2. Do not require scaling for sales under 1MMBF 3. Offer timber units that have appraised NEGATIVE in the past at Tongass Standard Rates or even the POW MicroSale Rate. 	<p>Your comment to exempt old growth from export, change scaling requirements, and offer sales at different rates has been noted. All timber sales will comply with applicable current Forest Plan direction and Standard and Guidelines as well as Forest Service Manual and Handbook direction.</p>
Petersen, Karen	<p>For Young Growth sales that will be coming up the following thoughts might be incorporated:</p> <ol style="list-style-type: none"> 1. Allow 10 year contracts for YG sales. This would allow a mill owner to take a contract to the bank and get financing. And configure them so that only 500,000mbf need to be harvested per year. That would be a 5 mmbf total sale. 2. Allow YG to be exported (as opposed to Old Growth) 3. Require that all Recreation cabins on the Tongass be replaced with YG from Alaska only. 4. Allow Biomass Only sales from YG (ie firewood or chips) 	<p>Thank you for your suggestions. The length of timber sale contracts, export, and cabin construction requirements are not typically topics that are addressed within NEPA documents, but we understand the importance of them. Ideas for enhancing biomass opportunities will be further developed as the project moves forward. This may include an effects analysis of removing that type of material from precommercial thinning units as well as from commercial young-growth stands and as bi-products of old-growth harvests.</p>

Author(s)	Comment	Response
Petersen, Karen	Finally - Include biomass into NEPA documents. One of the challenges with all of the above is that when they did the NEPA originally on timber harvests they did not include any provision for biomass removal from a closed out timber sale. This means to just remove existing slash from timber units (we are told) will require all new NEPA which is very expensive. Even now they are NOT including biomass into the language of planning documents for new timber sales.	Ideas for enhancing biomass opportunities will be further developed as the project moves forward. This may include an effects analysis of removing that type material from precommercial thinning units as well as from commercial young-growth stands and as bi-products of old-growth harvests.
Prather, Erica	I strongly object to the Tongass Land Management Plan Amendment . Enough of this ancient rainforest has been logged, and since tourism is a staple of Alaska's economy, it is best to preserve these places for ages to come.	Thank you for your comment. Laws and regulations require the Forest Service to manage for multiple uses. The purpose and need for the project states that, through an integrated approach, we will consider multiple uses including but not limited to providing a sustainable level of forest products and providing opportunities for growth in the recreation and tourism sector. Alternatives will be developed which consider multiple uses across the landscape.
Sebastian, Joseph	Sealaska and the above mentioned land grant interests are still engaged in massive clearcut deforestation and round log export. What is the USFS going to do with Federal public lands to balance out the forest so people and communities can still engage in local, small scale industries and have enough wildlife habitats to support subsistence based dependent communities into the future.	<p>Thank you for your comment.</p> <p>Federal subsistence wildlife regulations only apply to Federal lands. ANILCA does not control or mandate activities on private lands. Cumulative effects from other non-federal land ownerships combined with this project's proposed activities will be analyzed in the DEIS.</p> <p>The provisions in ANILCA established a harvest priority for rural residents in an attempt to protect subsistence resource harvest. Under ANILCA, in times of resource scarcity or when demand exceeds biologically sound harvest levels, subsistence harvests have priority over other consumptive use of resources. In practice, this meant that commercial, sport, or other harvests were to be curtailed by state or federal fish and wildlife management authorities before subsistence harvests were limited.</p>

Author(s)	Comment	Response
		<p>The Alaska legislature subsequently passed a regulation to comply with ANILCA, but in 1989, the Alaska Supreme Court ruled in McDowell v. State of Alaska that a harvest priority for rural residents conflicted with the state constitution, which guarantees all Alaskans equal access to the state's natural resources. This ruling took the state out of compliance with ANILCA and the federal government has managed subsistence resources on federal lands in Alaska since 1990. As a result, federal subsistence harvests of fish and wildlife on the Tongass National Forest are presently managed by the Forest Service (Schroeder and Mazza 2005).</p> <p>ANILCA requires the analysis of the potential effects on subsistence uses of all actions on federal lands in Alaska. This analysis typically focuses on those food-related resources most likely to be affected by habitat degradation associated with land management activities. Three factors related to subsistence uses are specifically identified by ANILCA: 1) resource distribution and abundance, 2) access to resources, and 3) competition for the use of resources.</p> <p>This project will adhere to the current Forest Plan which outlines Standards & Guidelines for subsistence. Consultation to the Southeast Alaska Regional Subsistence Advisory Council will occur as mandated by Section 805 of the Alaska National Interest Lands Claim Act (ANILCA). Opportunity to provide comments related to subsistence use and activity will occur through the public hearing process as mandated by ANILCA 810.</p>

Author(s)	Comment	Response
Sebastian, Joseph	Given all of this recognition, only paltry efforts have been made to protect, restore or enhance deer habitat. No unified effort or long term vision of protection of wildlife habitats has taken place or even to be an idea worthy enough to be considered, never mind carried out. Any landscape protections that have taken place, ANILCA, TTRA, OGMR, or any others have only been haphazard efforts to protect places, or blocks of land in one piece. For example, Calder/Holbrook, 64000 acres, or Noyes Baker Lulu Is. at 75,000 acres. Road closures help wildlife recover.	<p data-bbox="1245 326 1944 440">Thank you for your comment. The current 2016 Forest Plan Amendment recognizes the importance of the beach and estuary fringe, riparian management areas, and old-growth reserves.</p> <p data-bbox="1245 483 1980 721">Management of old-growth forests for timber production is generally prohibited in these zones. Young-growth timber may however be managed via commercial harvests and non-commercial treatments under certain limitations and circumstances. The Record of Decision for the 2016 Forest Plan Amendment, pages 6 and 7, describes the limitations to commercial harvest of young growth in the beach and estuary fringe, old-growth reserves, and riparian management areas.</p> <p data-bbox="1245 764 1980 1002">Additionally, there are scenery Standards and Guidelines in the Forest Plan that define the allowable levels of old-growth harvest that can be seen from visual priority travel routes and use areas like Clarence and Sumner Straits. The Forest Plan does however now make additional allowances for the harvest of young-growth timber in the beach fringe and reduces the scenery Standards there in order to promote the transition to primarily young-growth harvesting.</p> <p data-bbox="1245 1045 1980 1187">Even though the Forest Plan allows certain levels of young-growth harvest in the beach fringe, portions of RMAs and in old-growth reserves, the POW LLA Project may elect to develop alternatives that avoid harvests in those areas. Your comment will be considered when we develop alternatives.</p>

Author(s)	Comment	Response
Sebastian, Joseph	<p>A number sticks in my mind, 2400 'red pipes' in the Tongass. I do not know how many red pipes are on POW Is, but I'd bet its 1500 or so, with 4500 miles of logging roads, maybe more.</p> <p>It should be a high priority to fix and restore these streams flows and culverts to allow fish travel to spawning sites. This can help provide local employment and begin to restore a sad area of shame to the USFS. Fishing is the #1 industry in Alaska while logging is less than one percent. Yet valuable fishery resources are suffering harm and further damaging stocks stat we all depend on. It's so stupid as to be unbelievable, except its too true. Further, stricter regulations should be in place to prevent future culvert instalations from going bad and turning damaging, to smolt and fish spawning.</p>	<p>Thank you for your comment.</p> <p>We are required to follow direction from the Forest Plan for maintaining or improving fish passage. Additionally, direction from the Clean Water Act and the Forest Plan requires that any new crossings over fish streams provide for fish passage. Should any new crossings be needed over fish streams, they will be designed to provide for fish passage. Additionally, we maintain a database of known fish crossings that includes road number and milepost, fish passage category, fish species that have been sampled at each crossing, and the amount of fish habitat above crossings that are impeding fish passage. Cumulative effects for fish and other aquatic resources are generally analyzed at the watershed level, and watersheds can then be prioritized for restoration activities including fish passage improvement.</p> <p>The need for restoration activities to improve watershed function and fish and wildlife habitat has been identified for the project area. We will consider the different types of restoration activities that could address this need, including the improvement of fish passage at road crossings, when we develop project alternatives.</p>
Sebastian, Joseph	<p>While steelhead fishing is so popular as to lead to overfishing and stream damage, all steelhead streams should be catalogued and restrictions that allow only a small portion of the streams should be open to fishing so to protect stream bank and spawning habitat areas from trampling, overuse, or destruction.</p>	<p>Thank you for your comment. This request is beyond the scope of the project. Regulation changes specific to sport and subsistence fishing need to be addressed by the Alaska Board of Fisheries and/or the Federal Subsistence Board processes.</p>

Author(s)	Comment	Response
Sebastian, Joseph	<p>This is a bad one, every year is hotter than the last. It is time to start protecting lands and forests lands as “carbon sinks”, clearcutting old growth has to end now. Old growth trees are the ones that absorb carbon from the atmosphere. These are really the only natural allies in carbon absorption we have in the natural world. Young second growth stands do not absorb carbon on the same scale, and clearcuts add massive amounts of carbon over the first twenty years. Intact landscapes have a greater chance of surviving climate change and the roadless policy is a valid tool to protect these large blocks of land.</p>	<p>Climate change will be addressed in the NEPA process, and the CEQ policy will be followed according to the interpretation and direction given by the Forest Service's Washington Office. NEPA requires that we analyze the full range of direct, indirect, and cumulative effects of the alternatives identified in an EIS.</p> <p>The value of carbon stored in forests is recognized as an Ecosystem Services Objective in the Tongass National Forest Land and Resource Management Plan (Forest Plan). This project will be following all Standards & Guidelines in the Forest Plan.</p>
Sebastian, Joseph	<p>Up to now, nothing has been done in regard to protecting forests and forest lands, both for climate change carbon sinks, and wildlife habitats and add blocks of natural old growth lands in a effort to prepare for the changes that are taking place. This needs to be addressed in the landscape analysis now taking place, to omit it, or mention it without doing anything that is meaningful or substantive, would be *****.</p>	<p>Climate change will be addressed in the NEPA process, and the CEQ policy will be followed according to the interpretation and direction given by the Forest Service's Washington Office. NEPA requires that we analyze the full range of direct, indirect, and cumulative effects of the alternatives identified in an EIS.</p> <p>The value of carbon stored in forests is recognized as an Ecosystem Services Objective in the Tongass National Forest Land and Resource Management Plan (Forest Plan). This project will be following all Standards & Guidelines in the Forest Plan.</p>

Author(s)	Comment	Response
Sebastian, Joseph	Rising ocean temperatures, and add ocean acidification to the list could wreak havoc on fishing dependent communities both off POW and the Region. Significant steps need to be taken to shore up land based protections, both for intact, protected wildlife habitats and fish stream restoration. Nobody really knows what is going to happen but now is the perfect time to effect road closures to back country or high country alpine and reduce road access to habitat areas in order to build up existing wildlife communities of deer bear and other wildlife groups.	<p>Climate change will be addressed in the NEPA process, and the CEQ policy will be followed according to the interpretation and direction given by the Forest Service's Washington Office. NEPA requires that we analyze the full range of direct, indirect, and cumulative effects of the alternatives identified in an EIS.</p> <p>The value of carbon stored in forests is recognized as an Ecosystem Services Objective in the Tongass National Forest Land and Resource Management Plan (Forest Plan). This project will be following all Standards & Guidelines in the Forest Plan.</p>

Author(s)	Comment	Response
Sebastian, Joseph	<p>In the middle 1990's, Pt Baker residents sued the USFS over a 42 MMBF log sale on N. POW because L.P. wanted to drive a spur road over a series of humps, to California Bay/ Pt Colpoys. We settled the suit with no more roads or spurs north of the #20 road, from Salmon Bay to Labrouchere Bay. The idea then and now, was to protect flat lowland (muskeg mostly) forest areas as now roaded because they were vital and important deer habitats. We felt that we needed the trees to balance the muskegs and many of these "beach access areas" by skiff were age old Pt Baker hunting grounds. Why ruin a good thing with a sale that would harm the balance. Viewed from the air or ground, the humps contained the timber and (in my experience) acted as deer apartment houses, the deer roosted on top of the humps with many points of access or escape from predators and then ranged in & thru out the muskeg portions grazing and feeding. If the humps were clearcut, the whole balance was destroyed. I've seen the relationship with my own eyes and am sure what I both knew and saw to be true.</p> <p>So, no further roads, north of the #20 road from Salmon Bay to Labrouchere Bay. Lets protect these important hunting grounds.</p>	<p>Thank you for your comment on the effects of roads to wildlife species and recommending road closures. The potential negative impact of roads on wildlife are considered during the analysis process. This project will adhere to all current Forest Plan Standards and Guidelines including those that pertain to wolf populations and road densities.</p> <p>We will consider your suggestion of road closures as a design criteria for the Project's Proposed Action or an alternative, especially in those VCUs and wildlife corridors identified.</p> <p>The enforcement of laws pertaining to legal and illegal fish and game harvest is beyond the scope of this project.</p>

Author(s)	Comment	Response
Sebastian, Joseph	<p>North Prince of Wales VCU's 528, 527, 529, 530, 534.1, 5342, 5330, will have to be closely examined to determine where and what road closures will be the most effective towards protecting wildlife. Each fall a nonstop hunting war on deer by hunters from all over SE AK takes place along the #20 road and its spur roads. It about time the USFS recognize and manage this area for what it really is, a bread basket of deer and deer availability that attracts hundreds if not thousands of people to hunt these. Lets try protecting the golden goose instead of further destroying it.</p>	<p>Thank you for your comment on the effects of roads to wildlife species and recommending road closures. The potential negative impact of roads on wildlife are considered during the analysis process. This project will adhere to all current Forest Plan Standards and Guidelines including those that pertain to wolf populations and road densities.</p> <p>We will consider your suggestion of road closures as a design criteria for the Project's Proposed Action or an alternative, especially in those VCUs and wildlife corridors identified.</p>
Sebastian, Joseph	<p>The 2 villages do not want any development of Lab Bay, or selection of N. POW lands off the #20 road in all the VCU's from Lab Bay to Salmon Bay Lake. We want those VCUs to remain federal public lands.</p>	<p>The enforcement of laws pertaining to legal and illegal fish and game harvest is beyond the scope of this project.</p> <p>A concern for the transfer of lands out of the National Forest System (NFS) is noted, specifically as a preference for the environmental protections that are required by the USFS as well as the effect on subsistence uses when they are no longer NFS lands.</p> <p>Land transfer actions are outside of the scope of the POW LLA Project and will not be proposed nor opposed as part of this analysis process. If a land transfer action is being considered outside of this project, it will be analyzed within the cumulative effects of any POW LLA proposed actions or alternatives.</p>
Sebastian, Joseph	<p>Also, the Calder Bay road is only less than a mile on a steep slope, from being connected to the back road into Lab Bay. This road should never be connected.</p>	<p>The land that a connector road could be built on falls entirely within Sealaska lands and is not part of this analysis. If Sealaska brings forth a proposal to the Forest Service to allow them to build a connector road it would need to be analyzed under NEPA and the public would need to be solicited for comments.</p>

Author(s)	Comment	Response
Sebastian, Joseph	<p>Perhaps a overview of all wild blocks of land on the greater POW Island and islands and determine the ratio of different lands types, uses.</p> <p>For example, the Perue Peaks area on N. POW is x-number of acres, by adding road closures to the area (leading into the area) the wild area could be expanded into a larger non-road (at least closed) habitat area. This adding of buffer areas to existing roadless, TTRA, ANILCA and other blocks of wild land could boost and add both to the wild but also to the habitat for deer and other creatures. If some measures are not taken soon to uphold and actively protect POW's wild land, it will all be frittered away little by little until it is gone, or sterile oaisis's in a sea of clearcuts.</p> <p>I'm sure there are other ideas out there to conserve our wild places, but the more cars, people, tourists, hunters, family's, on the island, the more pressure is put on the existing wild land base and wildlife resources. This issue should be addressed in full and come under protecting the golden goose, subsistence, global warming, carbon retention and bread basket landscapes. Also, roads are the single biggest threat to the wild, closing roads, or road removal is a step in the right direction. If fishing fails, deer meat will be more important than ever.</p>	<p>Issue: Effect of decreasing "wild" land component and increased human access on wildlife. Effects from the project on inventoried roadless areas andwilderness areas, and fromincreased human access to wildlife will be analyzed fully in the DEIS.</p> <p>Design Criteria: Consider overall configuration of wild blocks of land, including location and connectivity,on POW Island and outer islands and if actions can be proposed to protect or enhance them. Land Use Designations as outlined in the Forest Plan state what level of management may occur where. The project will adhere to all protections as outlined in the Forest Plan and will consider where management may be limited to achievebenefits to wildlife and human enjoyment of the forest.</p>

Author(s)	Comment	Response
Sebastian, Joseph	Expand Memorial Beach by adding the last patch of old growth forest east to Alder Creek and make a trail thru the woods that loops back to Memorial Beach. This is a well used and visited public area that should be expanded. It's the last beach old growth on that shore.	<p>Your comment for a loop trail in the Memorial Beach area is noted. The purpose and need for the POW LLA Project states that providing sustainable recreation opportunities on POW and surrounding islands is critical to maintaining the existing opportunities as well as to expand opportunities.</p> <p>We will consider your suggestion of a loop trail through the old -growth stand as a design criteria for the Project's Proposed Action or an alternative.</p>
Sebastian, Joseph	Make carbon maps of the POW Forest's and start using carbon retention or carbon release as a new measurement scale. That determines whether development takes place. Serious measures need to be taken to begin to meet climate change head on. Natural, unmodified landscapes have the best chance to respond to climate change conditions.	<p>Climate change will be addressed in the NEPA process, and the CEQ policy will be followed according to the interpretation and direction given by the Forest Service's Washington Office. NEPA requires that we analyze the full range of direct, indirect, and cumulative effects of the alternatives identified in an EIS.</p> <p>The value of carbon stored in forests is recognized as an Ecosystem Services Objective in the Tongass National Forest Land and Resource Management Plan (Forest Plan). This project will be following all Standards & Guidelines in the Forest Plan.</p>
Sheets, Robert	Development of recreation access for winter sports. This could potentially be done at places like Upper Steelhead, One Duck, Barron Mountain, Baird Peak, Sunnahae and near Control Lake. The issue is that these mountains often have snow suitable for winter sports but the access is impossible or very difficult unless the snow line is low enough. What is needed is a way to access the snow line either by road or improved trail wide enough for motorized use.	<p>Developing and improving recreation facilities including cabins, trails, and for winter recreation will be given full consideration and may be included as part of the Proposed Action or an alternative.</p>

Author(s)	Comment	Response
Sheets, Robert	Development of improved boat launches and docks. There are a number of places on the island that would benefit from an improved boat launch and dock to compliment the recreation opportunities the road system offers. Consider El Cap, Red Bay, West Arm, Sultzer Portage and Port Protection/ Lab Bay.	Developing and improving recreation facilities including boat launches will be given full consideration and may be part of the Proposed Action or other alternatives.
Sheets, Robert	Development of cabins that complement the recreation activities occurring on the outer coast of POW. Consider a cabin at Cape Ulitka and trail to Roller Bay. Consider a dock in Port San Antonio on Baker Island and a trail over to a cabin or three sided shelter in Little Veta Bay. Add a dock in Port Refugio that is suitable for off-loading 4 wheelers and an ATV trail into Arena Cove to a cabin or three sided shelter.	Developing and improving recreation facilities including cabins, trails, and for winter recreation will be given full consideration and may be included as part of the Proposed Action or an alternative.

Author(s)	Comment	Response
Sheets, Robert	Old Growth Timber Management Emphasize small sales.	<p data-bbox="1245 321 1980 418">Thank you for your comment. We will consider your suggestion of emphasizing small timber sales as a design criteria for the Project's proposed action or an alternative.</p> <p data-bbox="1245 451 1980 695">The 2016 Tongass National Forest Land and Resource Management Plan Amendment Record of Decision supports the harvest of old-growth timber while transitioning to a predominately young-growth harvest after about 15 years. After that time frame old-growth timber will continue to be offered at an average rate of 5 MMBF per year to support small operators and specialty products such as wood for musical instruments.</p> <p data-bbox="1245 727 1980 1153">Your comments to limit or ban round log export is noted. The Forest Service allows limited exports of unprocessed timber from National Forests in Alaska under general authority of the Organic Administration Act (16 U.S.C. §§ 473-482, 551 (2000)), NFMA (16 U.S.C. §§ 1600, 1611-1614 (2000)) and 36 CFR 223.201. One of the primary goals of the Tongass National Forest timber program is to contribute to the local and regional economies of Southeast Alaska. In keeping with this long-standing goal current law allows timber harvested from Federal lands in Alaska to be shipped out of Alaska only if "the supply of timber for local use will not be endangered" (16 U.S.C. §616). The Limited Export Policy provides flexibility for the Region to balance the economics of timber sales to meet statutory requirements.</p>

Author(s)	Comment	Response
Sheets, Robert	Conserve quality old growth spruce and cedar along the road system for small sale operators.	<p>Thank you for your comment. We will consider your suggestion of emphasizing small timber sales as a design criteria for the Project's proposed action or an alternative.</p> <p>The 2016 Tongass National Forest Land and Resource Management Plan Amendment Record of Decision supports the harvest of old-growth timber while transitioning to a predominately young-growth harvest after about 15 years. After that time frame old-growth timber will continue to be offered at an average rate of 5 MMBF per year to support small operators and specialty products such as wood for musical instruments.</p>
Sheets, Robert	Salvage dying yellow cedar where possible.	<p>Your comments to limit or ban round log export is noted. The Forest Service allows limited exports of unprocessed timber from National Forests in Alaska under general authority of the Organic Administration Act (16 U.S.C. §§ 473-482, 551 (2000)), NFMA (16 U.S.C. §§ 1600, 1611-1614 (2000)) and 36 CFR 223.201. One of the primary goals of the Tongass National Forest timber program is to contribute to the local and regional economies of Southeast Alaska. In keeping with this long-standing goal current law allows timber harvested from Federal lands in Alaska to be shipped out of Alaska only if "the supply of timber for local use will not be endangered" (16 U.S.C. §616). The Limited Export Policy provides flexibility for the Region to balance the economics of timber sales to meet statutory requirements.</p> <p>The salvage of dying yellow cedar, as well as other timber salvage, is encouraged under the current Forest Plan within development Land Use Designations. A wide range of alternatives will be considered under this project and an emphasis on the salvage of dying yellow cedar may be included in one or more of these alternatives.</p>

Author(s)	Comment	Response
Sheets, Robert	Reinvest timber receipts in the island's recreation and road infrastructure. Schedule and design timber sales to meet infrastructure investment needs.	The reinvestment of timber receipts for local infrastructure, including transportation and recreation, is possible utilizing Stewardship contracting which may be part of the implementation of this project. Timber sales will be thoroughly analyzed and planned to help meet infrastructure investment with regards to both present and future needs.
Sheets, Robert	Young Growth Management Continue emphasis on the transition. Require a proportional amount of young growth be included in every large sale.	The 2016 Record of Decision for the Tongass National Forest Land and Resource Management Plan Amendment supports transitioning to a more economically, socially, and ecologically sustainable timber program on the Tongass through increased young-growth harvest and a decrease in old-growth harvest. As such, the Agency expects to sell an average of about 12 MMBF of young growth and 34 MMBF of old growth per year during the first 10 years. From Year 11 through Year 15, it expects to sell an average of 28 MMBF of young growth and about 18 MMBF of old growth per year. The Forest Service expects to reach a full transition of 41 MMBF of young growth about Year 16. Young-growth sales are expected to continue to increase at a rapid rate after Year 16 and are expected to reach an upper limit of 98 MMBF about Year 18. Old-growth timber will continue to be offered at an average rate of 5 MMBF per year to support small operators and specialty products such as wood for musical instruments.

Author(s)	Comment	Response
Sheets, Robert	Allow 100% export of young growth over the next 15 years with a phase out period to begin at that time.	<p>The Record of Decision (ROD) for the 2016 Amendment to the <i>Tongass Land and Resource Management Plan</i> (Forest Plan) recognizes the importance of the export policy in regards young growth. The ROD states that the Limited Export Policy is important to sustaining the forest products industry during the transition to young-growth timber by allowing timber purchasers to export lower-value logs while establishing a market for young-growth-sawn products. In the early years of the transition, it may be the case there is a very limited local market for young-growth logs. In order to keep local operators in business, young-growth timber sale purchasers will have the option to export those logs which cannot be locally utilized, consistent with the Limited Export Policy. Export allowances beyond that programmatically approved under the current policy will continue to be considered on a case-by-case basis, even up to 100 percent export where it would further the goals and objectives of the Forest Plan and is also consistent with statutory requirements.</p>
Squibb, Dave	<p>The continuation of our subsistence way of life far into the future is of primary importance to us. The harvest of fish, wildlife, plants and wood products is the foundation of our local economy and is the overarching theme of these comments. We believe that economic health is rooted in ecological health.</p>	<p>Laws and regulations such as the Multiple Use Sustained Yield Act of 1960 (16 U.S.C. 528-531) (36 CFR 219.19) require that we consider multiple uses of National Forest System lands. The goal of multiple use management is to achieve products and services from a given area without impairing the productive capacity of the site.</p> <p>The purpose and need for the POW LLA Project encompasses multiple uses across the landscape including, but not limited to, timber, recreation, wildlife habitat, watershed improvement, and supporting transportation infrastructure. The Forest Service will consider the different types of activities that could address this need when we develop project alternatives.</p>

Author(s)	Comment	Response
Squibb, Dave	A healthy deer population which allows for sufficient harvest in an efficient manner is very important to us. Providing enough good quality habitat is vital to this goal. We believe that past practices have had negative impacts in our area.	<p data-bbox="1241 321 1980 532">Thank you for your comment and concern on deer habitat including winter range. The Forest Service agrees that a healthy deer population is very important as is providing quality habitat. Clearcuts in the first several years actually provide forage for deer, but as these areas get older and the canopy closes they generally provide less quality habitat for deer.</p> <p data-bbox="1241 570 1980 660">We will consider your suggestion of protecting important deer habitat as a design criteria for the Project's Proposed Action or an alternative.</p>

Author(s)	Comment	Response
Squibb, Dave	The north end is prone to harsh winter conditions due to its exposure to the cold influence of the Stikine River winds and the fact that the aspect of exposure for most of our valley is to the north. This makes preservation of winter range habitat especially important. Unfortunately most of the best winter range, the beach fringe was logged 50 to 60 years ago. The Labouchere Bay operation also targeted the best inland habitat with large scale clearcutting. Going into the future we recommend minimal harvest of old growth and a return of beach fringe to optimal winter range conditions.	<p>Thank you for your comment. The current 2016 Forest Plan Amendment recognizes the importance of the beach and estuary fringe, riparian management areas, and old-growth reserves.</p> <p>Management of old-growth forests for timber production is generally prohibited in these zones. Young-growth timber may however be managed via commercial harvests and non-commercial treatments under certain limitations and circumstances. The Record of Decision for the 2016 Forest Plan Amendment, pages 6 and 7, describes the limitations to commercial harvest of young growth in the beach and estuary fringe, old-growth reserves, and riparian management areas.</p> <p>Additionally, there are scenery Standards and Guidelines in the Forest Plan that define the allowable levels of old-growth harvest that can be seen from visual priority travel routes and use areas like Clarence and Sumner Straits. The Forest Plan does however now make additional allowances for the harvest of young-growth timber in the beach fringe and reduces the scenery Standards there in order to promote the transition to primarily young-growth harvesting.</p> <p>Even though the Forest Plan allows certain levels of young-growth harvest in the beach fringe, portions of RMAs and in old-growth reserves, the POW LLA Project may elect to develop alternatives that avoid harvests in those areas. Your comment will be considered when we develop alternatives.</p>

Author(s)	Comment	Response
Squibb, Dave	<p>Another species of concern to us is Marbled Murrelets. Hundreds if not thousands of them can be seen feeding in the waters of Sumner Strait just off the north shore of P.O.W. Declining populations in the Pacific northwest has triggered talk of a threatened or endangered listing which would have serious implications for local commercial fishing. As an old growth dependent species the Forest Service must identify and protect key habitat for these birds.</p>	<p>This project will adhere to all current Forest Plan Standards & Guidelines. The current Forest Plan includes direction on the Marbled Murrelet (p 4-92), including a buffer zone around an active nesting site. Habitat for this species is included in the Conservation Strategy.</p> <p>We will consider your suggestion of protecting Marbled Murrelet habitat as a design criteria for the Project's Proposed Action or an alternative.</p>
Squibb, Dave	<p>We do not recommend any local streams for habitat restoration</p>	<p>Thank you for your comment. This comment supports a No Action alternative for restoration in "local" streams at this time.</p>
Squibb, Dave	<p>We do however recommend a holistic approach to stream habitat protection at the watershed level. Most of our watersheds have been affected by extensive clearcutting and roading which increases water temperature, siltation and extreme runoff events. All of these impacts will be exacerbated by climate change but can be mitigated by maintaining existing old growth forest and allowing second growth to mature to near old growth condition before a limited second harvest occurs.</p>	<p>Watershed Resources Planning is outlined in the Forest Plan's Standards and Guidelines. Land use activities are to be planned such that adverse effects on soil and water resources are avoided. National and Regional Best Management Practices pertaining to Watershed Management will be followed as appropriate for logging operations, recognizing that what happens in a watershed can have a direct effect on aquatic habitat.</p>
Squibb, Dave	<p>It should also be acknowledged that many of our watersheds are dominated by Karst geology which demands special treatment.</p>	<p>The uniqueness, presence and challenges associated with karst watersheds is fully acknowledged. The Forest Plan provides Standards and Guidelines for Catchment Area Management specifically on karst lands.</p>

Author(s)	Comment	Response
Squibb, Dave	<p>The valley between Port Protection and Calder Bay is a very important wildlife corridor for this area which our communities have made special efforts to protect in the past. The recent transfer of land in this watershed which is common to Calder Bay and Hole in the Wall to Sealaska Corporation will bring significant clearcutting and certain degradation of fish and wildlife habitat. Remaining old growth in this corridor should be placed in an old growth habitat LUD.</p>	<p>We will consider your suggestion of emphasizing a wildlife corridor between Port Protection and Calder Bay as a design criteria for the Project's Proposed Action or an alternative.</p> <p>The proposal of changing the existing Land Use Designation to Old-growth Habitat LUD would require a Forest Plan amendment. We will consider your suggestion and it may be proposed and analyzed under an alternative.</p>
Squibb, Dave	<p>For other old growth stands in our area we recommend that harvest be designated for local manufacture and use. This would include personal use harvest and micro sales for local mills. It should be recognized that personal use harvest provides work for local mills as well as affordable building materials for local residents. The size of micro sales and total allowable harvest need to be established by local consensus.</p>	<p>We will consider your suggestion of emphasizing small timber sales and microsals around the Port Protection and Point Baker area as a design criteria for the Project's Proposed Action or an alternative.</p> <p>It would be very helpful if you could be specific about which portions of that area you would like to see have a small sale /microsale and free use emphasis.</p>
Squibb, Dave	<p>We also think that special considerations need to be made for cedar. Yellow cedar is in decline. This very valuable wood could be in short supply in the future. Red cedar, also very valuable and sought after, although not in any danger from disease, is not found in northern southeast and therefore of limited supply. Old growth stands of cedar should not be high-graded to maximize the profitability of timber sales.</p>	<p>We are currently working with the University of Alaska on a study regarding the salvage of yellow cedar wood products from declining stands. Information from the study will help inform the POW LLA. Our hope is that we figure out ways to best utilize this resource to help meet the needs of the local community. The outlook for redcedar is encouraging; however, redcedar appears to be flourishing in our forests with many young trees growing in to replace yellow cedar where decline has occurred. Redcedar is also doing well in old-growth stands on better drained sites. Here we are seeing many young trees growing into the openings that naturally occur and mid-story redcedar trees occupying older openings. We recognize this as an opportunity to use partial harvest methods to maintain these younger healthy trees while harvesting the mature and declining redcedar. Partially harvesting stands in this way should not be confused with high-grading.</p>

Author(s)	Comment	Response
Squibb, Dave	<p>Both of these logging methods have damaged important wildlife habitat and adversely affected subsistence uses in different ways.[...]We do not think that there should be any harvest of beach fringe second growth in the future for several reasons. First are the harsh winter conditions on the north shore which make the beach fringe critical habitat. There is some discussion of doing commercial thinning to try and improve habitat. We do not think that is a viable option. There is no definitive research which shows that this can be done in a way that is both effective and economical. In order to make a profit off of the timber too much would have to be cut to get the desired ecological benefit.</p>	<p>Thank you for your comment. The current 2016 Forest Plan Amendment recognizes the importance of the beach and estuary fringe, riparian management areas, and old-growth reserves.</p> <p>Management of old-growth forests for timber production is generally prohibited in these zones. Young-growth timber may however be managed via commercial harvests and non-commercial treatments under certain limitations and circumstances. The Record of Decision for the 2016 Forest Plan Amendment, pages 6 and 7, describes the limitations to commercial harvest of young growth in the beach and estuary fringe, old-growth reserves, and riparian management areas.</p> <p>Additionally, there are scenery Standards and Guidelines in the Forest Plan that define the allowable levels of old-growth harvest that can be seen from visual priority travel routes and use areas like Clarence and Sumner Straits. The Forest Plan does however now make additional allowances for the harvest of young-growth timber in the beach fringe and reduces the scenery Standards there in order to promote the transition to primarily young-growth harvesting.</p> <p>Even though the Forest Plan allows certain levels of young-growth harvest in the beach fringe, portions of RMAs and in old-growth reserves, the POW LLA Project may elect to develop alternatives that avoid harvests in those areas. Your comment will be considered when we develop alternatives.</p>

Author(s)	Comment	Response
Squibb, Dave	We are also opposed to stewardship contracts which would use proceeds from old growth sales to offset costs of habitat rehabilitation, that is a bad trade-off in our opinion	<p>Your opposition to stewardship contracting has been noted.</p> <p>The 2014 Farm Bill included permanent authorization of stewardship contracting for the Forest Service. Stewardship contracting authorities allow the exchange of goods for services. The value of the goods potentially provides a source of funds to accomplish service/restoration activities for which funding may not otherwise be available. The value of those goods, under a stewardship contract scenario, will be exchanged for desired service work within the project area under the same contract.</p> <p>The Forest Service Handbook (FSH) 2409.19, Chapter 60, provides policy and direction for stewardship contracting, and states that the "determination whether or not to use stewardship contracting as a tool ultimately lies with the line officer" (FSH 2409.19, 61.2).</p> <p>The public law and Forest Service policy referenced above established the authorities for the Forest Service to enter into stewardship contracts, and describes how stewardship contracts are intended to be used. Three additional key components provided by policy direction in FSH 2409.19 at 60.2, 60.3, and 61.1, respectively, are: stewardship contracts are an implementation tool; multiple NEPA documents may be used for a single stewardship contracting project; and the Regional Forester must approve the use of stewardship contracting authority to implement projects.</p> <p>While stewardship contracting is one of the tools that may be used to implement POW LLA Project activities, it is important to note that the decision to do so has not yet been made.</p>

Author(s)	Comment	Response
Squibb, Dave	We have also been adamantly opposed to any new road construction north of the 6020 road. We would therefore be opposed to any road construction to access beach units in an attempt to avoid impacts to tidelands and lower logging costs.	<p>Timber sales are designed to be economical; this includes not constructing excessive road segments. Use of existing roads and potential new construction will be thoroughly analyzed. The need for maintenance, reconstruction and new construction will largely be driven by timber harvest and the need to haul harvested timber.</p> <p>Temporary roads are decommissioned when their use period is over. National Forest System roads are analyzed to determine the appropriate long-term use and travel management strategy.</p>
Squibb, Dave	There are benefits to both habitat and timber production possible from thinning, however there are different methods which give different results for benefiting habitat as opposed to timber production. There are also units which were logged on poor soils, mostly karst which should not be re-harvested. These should be identified and left to regenerate without thinning.	<p>We will consider the suggestions of maintaining or increasing road closures, including utilizing gates, and limiting any new road construction as a design criteria for the Project's proposed action or an alternative.</p> <p>Unproductive soils do not support the plant and tree growth that is suitable for timber production. Very shallow soils on karst terrain that are susceptible to removal are located within the high-vulnerability karst areas and have Forest Plan harvest restrictions. All areas proposed to be harvested will adhere to the R10 Soil Quality Standards, Regional and National BMPs, and the 2016 Forest Plan.</p>

Author(s)	Comment	Response
Squibb, Dave	Areas to be pre-commercially thinned should be prioritized to achieve the most benefit to wildlife habitat using the most effective methods.	<p>One desired future condition "wildlife objective" in the Tongass National Forest Land and Resource Management Plan is to include a young-growth management program to maintain, prolong, and/or improve understory forage production, and to improve habitat distribution, including future old-growth characteristics in young-growth timber stands for wildlife on lands both suitable and not suitable for timber production.</p> <p>Stem exclusion/light exclusion within an older young-growth stand that precludes understory growth can have a negative affect for wildlife. Earlier timed precommercial thins (PCT) can have a more progressive benefit for deer and other wildlife. In some instances wildlife enhancement projects have been done in youngerstands that havehad PCT treatments;they had variable spacing, andused pruning and girdling. This has been done to accommodate wildlife values.</p> <p>Wildlife habitat improvementthrough precommercial thinning remains an important goal to the wildlife program and the Forest. As the analysis in this project progresses to create alternatives, these comments will be considered.</p>
Squibb, Dave	When stands reach maturity they should be selectively harvested for local markets in a manner that will also benefit wildlife.	<p>Uneven-aged management of young-growth stands will be considered.</p>

Author(s)	Comment	Response
Squibb, Dave	We do not see the need to construct any new roads for the course of this planning period.	<p>Timber sales are designed to be economical; this includes not constructing excessive road segments. Use of existing roads and potential new construction will be thoroughly analyzed. The need for maintenance, reconstruction and new construction will largely be driven by timber harvest and the need to haul harvested timber.</p> <p>Temporary roads are decommissioned when their use period is over. National Forest System roads are analyzed to determine the appropriate long-term use and travel management strategy.</p>
Squibb, Dave	Other than the road to Memorial beach recreation area, all roads north of the main road extending toward the Sumner Strait shore should be decommissioned, The Calder road should be decommissioned to protect the wildlife corridor which we propose, only Sealaska corporation would benefit from keeping that road open.	<p>We will consider the suggestions of maintaining or increasing road closures, including utilizing gates, and limiting any new road construction as a design criteria for the Project's proposed action or an alternative.</p> <p>Thank you for your comment on the effects of roads to wildlife species and recommending road closures. The potential negative impact of roads on wildlife are considered during the analysis process. This project will adhere to all current Forest Plan Standards and Guidelines including those that pertain to wolf populations and road densities.</p> <p>We will consider your suggestion of road closures as a design criteria for the Project's Proposed Action or an alternative, especially in those VCUs and wildlife corridors identified.</p> <p>The enforcement of laws pertaining to legal and illegal fish and game harvest is beyond the scope of this project.</p>

Author(s)	Comment	Response
Squibb, Dave	Finally, we do not see any need to widen and pave the main road any farther north than Whale Pass. What we have now is perfectly adequate for present and future use. Improving the road will only lead to increased use and increased competition for subsistence resources.	Improvements to widen and pave this section of road is outside the scope of this analysis. We suggest you review the 2016 Environmental Assessment and Decision Notice, "Improvements for Neck Lake & El Capitan Cave Roads EA".
Squibb, Dave	We have also opposed any development by the Forest Service on this site and we continue to do so.	Opposition to any development at Labouchere Bay is noted. This may be considered as a design element in an alternative or multiple alternatives.
Squibb, Dave	With the acquisition of land in the nearby Calder / Port Protection corridor by Sealaska Corporation we adamantly oppose the use of the Lab Bay LTF for their logging operations.	Your opposition to the use of the Lab Bay log transfer facility is noted.
Squibb, Dave	We do not want to have any more land in our area turned over to Native Corporations and we expect the full support of Forest Service officials in ensuring that does not happen. Neither do we want to see any land turned over to the State of Alaska for their forestry program. While state ownership is still public land, State laws which guide timber harvest have very weak protections for fish and wildlife habitat. Another very important consideration for our community is the fact that only on federal land is our subsistence priority recognized under section 810 of ANILCA.	A concern for the transfer of lands out of the National Forest System (NFS) is noted, specifically as a preference for the environmental protections that are required by the USFS as well as the effect on subsistence uses when they are no longer NFS lands. Land transfer actions are outside of the scope of the POW LLA Project and will not be proposed nor opposed as part of this analysis process. If a land transfer action is being considered outside of this project, it will be analyzed within the cumulative effects of any POW LLA proposed actions or alternatives.

Author(s)	Comment	Response
Squibb, Dave	<p>The Point Baker Community Association is dissatisfied with how this planning process has been carried out to date. In our opinion, the Forest Service is relying too heavily on the non governmental organization, POWCAC to gather comments, a legal responsibility. For a number of reasons Point Baker has not participated in POWCAC meetings since it[rsquo]s inception. Yet they seem to be tasked with gathering our input. Also, when public meetings were scheduled to distribute information and ask questions on the planning project, none were scheduled in Point Baker, and this was in December when travel by road down the island is very treacherous, if possible at all. Efforts were made by Forest Service personnel to answer questions via teleconference and this was appreciated, but this did not happen until right before Christmas when some residents were traveling for the holidays. We asked for an extension to the scoping comment deadline, but were told by the District Ranger that one could not be granted on such short notice.</p> <p>Point Baker does not plan on participating in any POWCAC meetings in the future regarding forest planning. We request that the Forest Service provide us with up to date information and adequate time and opportunity to comment on Landscape Level Analysis projects as they proceed.</p>	<p>The POW LLA Project is being analyzed under the requirements of the National Environmental Policy Act of 1969 (NEPA), which requires citizen involvement to make better informed decisions. We are conducting abroad public participation effort and there will be several more official public comment periods, not just the scoping period that followed the publication of the Notice of Intent to Prepare an EIS in the Federal Register on November 30, 2016.</p> <p>A collaborative group, calling themselves the Prince of Wales Landscape Assessment Team, has independently formed to provide information to the Forest Service regarding the POW LLA project. This group was not formed by the Forest Service and the Forest Service does not manage or control the group. All members of the public as well as any other group who would like to provide input to the POW LLA Project are encouraged and welcomed to do so.</p>

Author(s)	Comment	Response
Squibb, Dave	<p>The residents of Point Baker have a vision of how the forest that surrounds us will look in the future. We place a high value on a fully functioning forest ecosystem which can sustain healthy fish and wildlife populations, provide high quality wood products for commercial and personal use, offer excellent recreational opportunities, much appreciated solitude and also remain a critical carbon storage bank to help slow the warming of our planet. To achieve this vision we think there needs to be a more rapid transition away from old growth logging than is proposed in the Forest Plan and the harvest of second growth needs to happen at a moderate level.</p> <p>With this plan we are embarking on a new path towards a sustainable forest economy, we look forward to working with other island residents and Forest Service professionals who might share our vision to make it a reality.</p>	<p>Laws and regulations such as the Multiple Use Sustained Yield Act of 1960 (16 U.S.C. 528-531) (36 CFR 219.19) require that we consider multiple uses of National Forest System lands. The goal of multiple use management is to achieve products and services from a given area without impairing the productive capacity of the site.</p> <p>The purpose and need for the POW LLA Project encompasses multiple uses across the landscape including, but not limited to, timber, recreation, wildlife habitat, watershed improvement, and supporting transportation infrastructure. The Forest Service will consider the different types of activities that could address this need when we develop project alternatives.</p>

Author(s)	Comment	Response
Stanton, Loren	<p>I believe that access is an issue that is on one hand being increased and on the other being decreased. Increasing access with paved roads is ok but the "berms" on forest service roads need to be filled in and smoothed over. Berms discriminate against the aged and infirm. They discriminate against the disabled. Able bodied and young people can access all areas of POW. They can easily defeat berms with numerous means. People who are older cannot access those areas any longer. If the USDA can dig them up they can put them back and let nature take its course. I would prefer some minimal maintenance - this could be important given the recent decision to harvest second growth timber. All those logging roads that have been cut off, grown over, or allowed to deteriorate will be needed to cut the second growth. All the roads should be open to alland over the next 30-40 years they will be used by everyone: the second growth timber cutters, the bird watchers, the hunters, fisher folks, campers, and those who love to explore the fourth largest island in the USA. Please allow access to grow and remove all the gates placed and maintained by the US Government (of the people by the people). Make it so as I get older I will still have access to some of my favorite places in the world.</p>	<p>In 2009 the Craig and Thorne Bay Rangers signed the Prince of Wales Access and Travel Management Plan. In accordance with 36 CFR 212.5(b) this decision identified the minimum road system for safe and efficient travel and for administration, utilization, and protection of National Forest System lands. This decision also designated the class of vehicle and, if appropriate, time of year for motor vehicle use. The decision is reflected on the Motor Vehicle Use Map and shows where motor vehicle use is allowed and which type of vehicles may be used. The allocated road maintenance budgets are not sufficient to keep all roads open. The process of closing a road to vehicle traffic and placing it in a condition that requires minimum maintenance is done to protect the environment (e.g. aquatic resources from increased sediment delivery to streams) and preserve the facility for future use. There is a range of methods used in closing a road depending on site specific conditions and appropriate maintenance level; however, the main idea is that the road will be in a mostly self-maintaining physical state. In recent years the Forest Service has actively engaged the public in providing access on new logging roads for firewood and other subsistence activities before closing the roads. Maps and brochures have been posted in communities and at Forest Service offices. Any changes to the Access and Management Plan as a result of the POW LLA will be informed by a travel analysis.</p> <p>Thank you for your comment. A variety of access options could be considered at the alternative design phase of analysis. Alternatives may include the option of potentially opening closed roads and maintaining currently open roads.</p>

Author(s)	Comment	Response
Tierney, Patrick	<p>A landscape level look at this scale is a sound approach to land management. I would encourage participants and other land managers to get involved in the process and voluntarily provide current resource data to complete the landscape level picture, this project will be a great success in managing the lands for the greater good while providing insight to opportunities for coordination, cooperation, economic growth and stability for all of POW.</p>	<p>Thank you for your comment.</p>
Trojan, Jan	<p>Please use volunteers for manual invasive weed management. The problem areas are all by fish streams. The testing of Glyphosate other than IARC has been one sided. Results given to USDA, EPA provided by the company that sells the product.</p> <p>Prince of Wales is not Round up ready!</p>	<p>Forest Plan direction is for invasive species to be treated using an integrated pest management approach. This approach includes evaluating weed infestations to select the appropriate treatment methods. The invasive plant program on Prince of Wales Island is currently limited to manual treatments. For some species and populations, manual pulling is an effective option. District staff and volunteers have conducted such treatments in the past and will continue to use this method where appropriate. Volunteer efforts are a valuable contribution to any invasive plant management program and are greatly appreciated by the agency. In order to adequately treat all current and future invasive plants, an expanded toolkit is required.</p> <p>Based on the current invasive species inventory, 613 acres of high-priority invasive species occur on the Thorne Bay and Craig Ranger Districts. The invasive species inventory for the island is not a complete census, but includes an extensive survey along the road system of POW in addition to infestations documented during plant surveys for past projects and incidental infestations mapped by Forest Service staff. A review of these populations indicates that 272 acres are located within Riparian Management Areas. The two most common invasive species in RMAs are orange hawkweed and reed canarygrass which respectively comprise 49 and 194</p>

Author(s)	Comment	Response
		<p>acres of the infested areas in RMAs.</p> <p>Several species common to riparian systems spread rhizomatously. Digging rhizomatous species can increase spread through root fragments broken apart by treatment efforts and accidentally left behind. Furthermore, digging along streambanks disturbs soil and contributes to increased sedimentation.</p> <p>The herbicide glyphosate has been approved by the US Environmental Protection Agency and is certified for use by the State of Alaska. Glyphosate adheres strongly to soil particles making leaching very unlikely, and it is readily degraded by soil microorganisms. Precautions and appropriate application methods are posted on the product label; environmental and human health risks can be greatly reduced by following label guidelines. Although glyphosate can be toxic to fish, aquatically labeled formulations can be utilized when conducting treatments near waterbodies to reduce contamination. The IARC report mentioned in the comment, found a probable correlation between cancer risk and a specific user group: agricultural workers. This particular user group has potential for exposure to glyphosate at high levels for extended periods of time because of application methods and frequently repeated applications.</p> <p>Application methods that present unacceptable levels of risk to desirable vegetation or other resources would not be selected by the US Forest Service. Prior to use by the Forest Service the effects of using glyphosate would have to be analyzed in a NEPA document. Invasive plant management targets only high-priority invasive plants by applying the chemical directly to the invasive plant, so that harm to adjacent desirable forest vegetation is minimized. This differs greatly from "Round-up</p>

Author(s)	Comment	Response
Walker, Doug	<p>I feel it is vital to keep the recreation opportunities a priority. With the decline in logging, tourism through recreation is vital for residents of Prince of Wales. Keeping all of the back roads open and brushed for access either by vehicles or four wheelers is important. The amount of hunters that are drawn is good for the local economies. Also revenue for the state in license and tag fees. Without access to the existing roads, I think you will see a decline in tourism. We residents who support all local business, should have good access to all existing roads.</p>	<p>ready" methods whereby herbicide is applied indiscriminately across a large area of chemically resistant crops (Roundup Ready™).</p> <p>In 2009 the Craig and Thorne Bay Rangers signed the Prince of Wales Access and Travel Management Plan. In accordance with 36 CFR 212.5(b) this decision identified the minimum road system for safe and efficient travel and for administration, utilization, and protection of National Forest System lands. This decision also designated the class of vehicle and, if appropriate, time of year for motor vehicle use. The decision is reflected on the Motor Vehicle Use Map and shows where motor vehicle use is allowed and which type of vehicles may be used. The allocated road maintenance budgets are not sufficient to keep all roads open. The process of closing a road to vehicle traffic and placing it in a condition that requires minimum maintenance is done to protect the environment (e.g. aquatic resources from increased sediment delivery to streams) and preserve the facility for future use. There is a range of methods used in closing a road depending on site specific conditions and appropriate maintenance level; however, the main idea is that the road will be in a mostly self-maintaining physical state. In recent years the Forest Service has actively engaged the public in providing access on new logging roads for firewood and other subsistence activities before closing the roads. Maps and brochures have been posted in communities and at Forest Service offices. Any changes to the Access and Management Plan as a result of the POW LLA will be informed by a travel analysis.</p> <p>Thank you for your comment. A variety of access options could be considered at the alternative design phase of analysis. Alternatives may include the option of potentially opening closed roads and maintaining currently open roads.</p>

Author(s)	Comment	Response
Walker, Doug	<p>Fishing is also a vital boost to the local economies. I would like to see better boat accesses to various parts of the Island. Ratz harbor, Calder Bay, are a couple of examples. Not all fisherman can afford to be guided, although the guided fishing is great for local business and economy. Better boating access to different areas of the island will give people opportunities to self guide.</p>	<p>Developing and improving recreation facilities including boat launches will be given full consideration and may be part of the Proposed Action or other alternatives.</p>
Wensel, Ronald and Jami	<p>Being new in business, I lack both the capital & experience to purchase a larger sale. The microsale is perfect for an entry level format, & if the following changes could be made reducing current restrictions, my business would be greatly benefited.</p> <ol style="list-style-type: none"> 1. The existing 800' barrier be maintained as it pertains to conventional logging, but no distance restriction be placed on trees salvaged by helicopter extraction, because the environmental impact is so low. 2. That green trees considered by the Forest Service to be compromised be offered for sale. 3. That green trees be offered for sale on a tree by tree basis. 4. That areas which classification eliminates the possibility of harvesting green timber be approved for salvaging dead standing, & trees blown down, if extracted by helicopter. 5. That like thinning, salvage of dead trees be allowed in the riparian areas, if they are extracted by helicopter. 6. That leaning trees be offered for sale if they are root sprung, without being restricted by angle of incline. 7. That the existing road system not be further reduced, that bar ditches in place for water shed not be so large that they restrict passage, & that roads be maintained for the benefit of industry, recreation, subsistence, & wildlife. 	<p>The Roadside EA may be superseded by the POW LLA EIS. New opportunities for small sales and microsales may be considered as part of the POW LLA Project. When we design alternatives for this project we will consider your suggestions. It would also be helpful for us if you could point out certain areas in the project where the type of material you are interested might be more prevalent and state any economic or physical limitations to your operations that you might have.</p>

Author(s)	Comment	Response
White, Jessica	Please stop the logging of this beautiful land.	<p>We are required by the National Environmental Policy Act to analyze a reasonable range of alternatives which meets the stated purpose and need, goals and objectives, and responds to issues identified during the scoping process.</p> <p>Requests that no old-growth harvesting or road construction occur as part of this project are noted. This may be considered as a design component of an alternative or multiple alternatives.</p>
Williams, Austin	<p>Southeast Alaska's economy remains strong despite the recent overall economic downturn in Alaska, and is buoyed by its healthy fish and wildlife habitat, productive salmon streams and scenic beauty. Managing the Tongass with fish, wildlife and visitor services at the forefront is the key to ensuring local communities and economies are strong and stable.</p>	<p>The POW LLA Project is a relatively large-scale NEPA analysis project with an overarching purpose to improve forest ecosystem health, support community resiliency, and provide economic development through an integrated approach to meet multiple resource objectives. The POW LLA Project will be refined over the next year with extensive public input. The Forest Service looks forward to engaging in meaningful dialogue with the public regarding the most relevant and valued ecosystem services, readily-available data, and appropriate qualitative and quantitative methods for assessing contributions to social and economic sustainability.</p>

Author(s)	Comment	Response
Williams, Austin	<p>This large-tree old-growth forest, which historically covers less than five percent of the Tongass, is among the most valuable habitat for fish and wildlife. The overwhelming weight of the scientific community recognizes the extraordinary value of the remaining big-tree old-growth and has repeatedly called on the Forest Service to speed up the transition and end its old-growth timber sale program.</p> <p>The time is now for the Forest Service to shift its Tongass timber program to one that plans and implements appropriately-scaled timber sales that support the region's small mills and encourage local manufacturing of young-growth forest products. Old-growth bridge timber volume should be prudently metered out over time and designed to encourage investment in transition technologies and entrepreneurship with the local timber industry. Local milling and processing should be required, while costly export-based timber sales that prioritize volume at the expense of other interests should be a thing of the past. Additionally, young-growth projects should be designed to improve forest health and function.</p>	<p>The Record of Decision for the 2016 Forest Plan Amendment outlines the strategy for the transition to a forest products industry based primarily on young growth. This project will follow Forest Plan direction regarding that transition. Even though the Forest Plan allows for old-growth harvest, the POW LLA may elect to develop alternatives that limit or avoid it. Your concerns for old-growth conservation will be considered during alternative development.</p>

Author(s)	Comment	Response
Williams, Austin	<p>Timber sales of all types should avoid impacts to our region’s strong economic base of fisheries and tourism. Once-productive salmon streams no longer support abundant salmon runs and ample wildlife populations when clearcut logging disrupts the recruitment of large-woody debris, erosion overburdens nearby streambeds, or road-stream crossings cut off important spawning or rearing habitat. Tourists and recreationists don’t travel to the Tongass to see and hike through large swaths of clearcut lands; they come to take in its scenic beauty and in-tact landscapes. The Forest Service has identified roughly 65 watersheds in need of significant restoration as a result of past logging and road-building activities and estimates it will cost \$100 million to address the backlog of unmet watershed restoration needs. Much of this unmet restoration need is located on POW, and should not be compounded by new timber projects in sensitive areas. If the Tongass timber program is to truly support the local and regional economy, it must be designed with the fishing and tourism industries at the forefront and to, in every way possible, avoid and minimize impacts to fish and wildlife habitat.</p>	<p>Watershed Resources Planning is outlined in the Forest Plan's Standards and Guidelines. Land use activities are to be planned such that adverse effects on soil and water resources are avoided. National and Regional Best Management Practices pertaining to Watershed Management will be followed as appropriate for logging operations, recognizing that what happens in a watershed can have a direct effect on aquatic habitat.</p>
Williams, Austin	<p>Significant opportunity exists as part of the POW LLA to design young growth projects so they provide local employment, improve the function and productivity of fish and wildlife habitat, and demonstrate the potential for a successful transition to benefit all sectors of society.</p>	<p>We appreciate your input. It would be helpful to us if you could provide more information about how you might envision the Forest Service designing young-growth projects to meet these objectives.</p>

Author(s)	Comment	Response
Williams, Austin	<p>? Conduct a Comprehensive Inventory of Restoration Needs. As discussed above, decades of industrial logging and road building has taken its toll on POW. While various efforts, from the Cobble Assessment to the Prince of Wales Island Unified Watershed Assessment, have initiated the process of identifying impacts to fish and wildlife, much remains undocumented and unknown. As part of the POW LLA, we encourage the Forest Service to conduct a comprehensive inventory of managed lands and impacts to fish and wildlife on POW and develop a list of restoration needs that stakeholders can work with the Forest Service to prioritize.</p>	<p>Thank you for your comment. Surveys for potential restoration needs are underway for the POW LLA Project and will continue during implementation of the project. Parameters will be outlined in the EIS for restoration projects and may be included in different alternatives. Prioritization of projects will depend on multiple factors and more likely happen during implementation of the project.</p>
Williams, Austin	<p>? Establish a Comprehensive Monitoring Program for Past and Future Restoration Projects. The Forest Service and its partners have invested significant resources to complete major restoration projects on Sal Creek, the Harris River, Staney Creek, Twelve Mile Creek and at other locations. The Forest Service should revisit these sites, and future ones, at regular intervals to assess the effectiveness of restoration activities and inform the planning of future projects.</p>	<p>The Forest Service follows an established monitoring protocol, which evaluates pre-restoration channel condition with post-restoration conditions immediately following instream work, 1, 2, 5, and 10 years after restoration actions. Forest Service Alaska Region fisheries biologists and hydrologists, in collaboration with scientists and staff of the Pacific Northwest Research Station, developed a systematic approach to measuring stream habitat variables in Southeast Alaska. Over the last 15 years, over 300 stream reaches have been measured by trained employees using standard protocols defined in the Alaska Region's Aquatic Habitat Management Handbook (USFS 2001). The predominant use of this dataset is to define the natural range of variability in common stream types in unmanaged watersheds, and to compare results to managed watersheds. Statistical analysis of these datasets (Tucker and Caouette, 2008) has revealed three parameters that show consistent difference between managed and unmanaged watersheds with t-test results at or above the 95 percent confidence intervals. These parameters, called Fish Habitat Objectives (FHO), are width/depth ratio, key woody debris, and pool frequency, and appear strongest in flood plain channels and moderate gradient mixed control reaches (see</p>

Author(s)	Comment	Response
		<p data-bbox="1245 324 1980 443">Paustian 1992 for explanation of stream process groups). Two additional measures of pools were significant at the 90 percent confidence interval in floodplain systems: pool length and a normalized measure of residual pool depth.</p> <p data-bbox="1245 483 1980 907">This guidance postulates that these same parameters (width/depth ratio, key woody debris, and pool frequency) are effective in measuring response to habitat restoration. In other words, if the measurements have the sensitivity and repeatability to become statistically significant as a watershed responds to habitat degradation associated with intensive management, then these same parameters should show quantifiable responses in the opposite direction upon completion of a restoration project. Large wood, pool length, and pool depth are also measured to document trends through time of restored streams. In addition to these core parameters, photo-point monitoring (USFS, 2002) is also completed to help project staff interpret the results of monitoring to forest managers, partners, and the general public.</p>

Author(s)	Comment	Response
Williams, Austin	<p>? Create a Restoration Pipeline of Important Fish and Wildlife Restoration Projects. Based on the inventory and monitoring work discussed in the above bullets, the Forest Service should identify future potential restoration projects on POW. These potential new projects should be prioritized based on the severity of the past impact, the potential for improvement to fish and wildlife productivity, the accessibility of the area, and the utilization of the area or the fish and wildlife produced in the area by local stakeholders, among other relevant factors. The Forest Service should take care to avoid areas that are likely to be impacted by future logging or road building. Once the priority list of restoration projects is identified and prioritized, the Forest Service should work to complete related engineering and planning for the priority projects to create a pipeline of projects and partnership opportunities. Individual restoration projects should be designed and planned to achieve particular and measurable resource objectives</p>	<p>The Forest Service prioritizes watersheds for restoration based on a core national protocol by the USDA called the WatershedConditionFramework (WCF). The framework is designed to assess and track changes to watershed condition using aquatic and terrestrial indicators. Evaluation of these indicators classifies a watershed's condition into three classes: <i>Functioning Properly</i>, <i>Functioning at Risk</i>, or <i>Impaired Function</i>. Those with <i>Functioning at Risk</i> or <i>Impaired Function</i> outcomes can be listed as a priority watershed for restoration work. Priority watersheds are further assessed and a Watershed Restoration Action Plan (WRAP) is developed. The WRAP identifies essential projects that are needed to improve the watershed functionality. These projects include actives such as stream restoration, road maintenance and storage, replacing or removing fish barrier structures, andwildlife thinning treatments.In thepast public involvement, partners, and integrated resource involvement within the Forest Service has helped to develop the essential projects. Once essential projects have been completed the watershed condition is reclassified and removed from the priority watershed list. Additionally, improvements in the watershed are tracked in a national database in the corporate Watershed Classification and Assessment Tracking Tool (WCATT).</p>

Author(s)	Comment	Response
Williams, Austin	Based on lessons learned from the Big Thorne timber sale and the Luck Creek restoration project, the Forest Service should take care to avoid intermingling large-scale old-growth timber sales and restoration projects.	<p>Your opposition to stewardship contracting has been noted.</p> <p>The 2014 Farm Bill included permanent authorization of stewardship contracting for the Forest Service. Stewardship contracting authorities allow the exchange of goods for services. The value of the goods potentially provides a source of funds to accomplish service/restoration activities for which funding may not otherwise be available. The value of those goods, under a stewardship contract scenario, will be exchanged for desired service work within the project area under the same contract.</p> <p>The Forest Service Handbook (FSH) 2409.19, Chapter 60, provides policy and direction for stewardship contracting, and states that the "determination whether or not to use stewardship contracting as a tool ultimately lies with the line officer" (FSH 2409.19, 61.2).</p> <p>The public law and Forest Service policy referenced above established the authorities for the Forest Service to enter into stewardship contracts, and describes how stewardship contracts are intended to be used. Three additional key components provided by policy direction in FSH 2409.19 at 60.2, 60.3, and 61.1, respectively, are: stewardship contracts are an implementation tool; multiple NEPA documents may be used for a single stewardship contracting project; and the Regional Forester must approve the use of stewardship contracting authority to implement projects.</p> <p>While stewardship contracting is one of the tools that may be used to implement POW LLA Project activities, it is important to note that the decision to do so has not yet been made.</p>

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Williams, Austin	<p>Improve the Public Outreach and Education Program for POW. The Forest Service should expand and improve existing outreach and education partnerships with local communities, schools and the various stakeholders. The Forest Service is the dominant landowner on POW and has an obligation to local communities and the larger American public. While local communities and other stakeholders benefit immensely from surrounding federal public lands, these benefits are poorly communicated by the Forest Service and poorly understood by the public. In particular, the Forest Service should focus on better communicating to the public the economic benefits of forest lands to the fishing (commercial and sport) and travel industries, the potential economic opportunity from restoration and other forest health projects, as well as the important subsistence and cultural benefits.</p>	<p>The suggestion for a more robust public outreach and environmental education program for Prince of Wales Island is noted. These types of activities can be conducted without the need for analysis in a NEPA document, unless it incorporates ground disturbing activities, such as installing interpretive signs along a recreation route. Environmental education components requiring analysis through a NEPA process may be included as potential design criteria for consideration in alternative development.</p> <p>On a related note, the 2012 Planning Rule and increased focus on consideration of ecosystem services in federal government decision-making has provided significant motivation for the Forest Service to further consider contributions to social and economic sustainability. The POW LLA Project will be refined over the next year with extensive public input. The Forest Service looks forward to engaging in meaningful dialogue with the public regarding the most relevant and valued ecosystem services, readily-available data, and appropriate qualitative and quantitative methods for assessing contributions to social and economic sustainability. Increased public outreach regarding Forest Service's contributions to the social and economic sustainability is noted.</p>
Williams, Austin		<p>Laws and regulations require the Forest Service to manage for multiple use. The POW LLA Project is a relatively large-scale NEPA analysis project with an overarching purpose to improve forest ecosystem health, support community resiliency, and provide economic development through an integrated approach to meet multiple resource objectives.</p> <p>The POW LLA Project will be refined over the next year with extensive public input. The Forest Service looks forward to engaging in meaningful dialogue with the public regarding</p>

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	<p>Create a Comprehensive Recreation and Visitor Services Plan for POW. POW is a great place for recreation and travel. In addition to our on-island members, TU members from throughout the state and beyond travel to POW to experience its unique fishing and hunting opportunities, public-use cabins, karst features, trails and picnic areas, among other sites. The Forest Service should develop and implement a long-term plan for improving visitor services and recreation opportunities on POW, with a particular focus on primitive and remote recreation services. New and expanded hiking trails, tent platforms, public-use cabins, canoe trails, and other similar recreation facilities will help enhance the visitor experience, promote local economic activity, and better serve the communities and visitors of POW.</p>	<p>current socioeconomic conditions and future opportunities to support the social and economic sustainability of Prince of Wales Island communities. Notably, the recreation and tourism economic sector has grown in importance over recent decades. Developing and improving recreation facilities will be given full consideration as part of the Proposed Action, alternatives, and related analyses. A range of alternatives will be considered which analyzes multiple uses across the landscape and also includes a thorough analysis of the economic and social environment.</p> <p>In 2009 the Craig and Thorne Bay Rangers signed the Prince of Wales Access and Travel Management Plan. In accordance with 36 CFR 212.5(b) this decision identified the minimum road system for safe and efficient travel and for administration, utilization, and protection of National Forest System lands. This decision also designated the class of vehicle and, if appropriate, time of year for motor vehicle use. The decision is reflected on the Motor Vehicle Use Map and shows where motor vehicle use is allowed and which type of vehicles may be used. The allocated road maintenance budgets are not sufficient to keep all roads open. The process of closing a road to vehicle traffic and placing it in a condition that requires minimum maintenance is done to protect the environment (e.g. aquatic resources from increased sediment delivery to streams) and preserve the facility for future use. There is a range of methods used in closing a road depending on site specific conditions and appropriate maintenance level; however, the main idea is that the road will be in a mostly self-maintaining physical state. In recent years the Forest Service has actively engaged the public in providing access on new logging roads for firewood and other subsistence activities before closing the roads. Maps and brochures have been posted in communities and at Forest Service offices. Any</p>

Response to Comment (By Comment Author)

Author(s)	Comment	Response
		changes to the Access and Management Plan as a result of the POW LLA will be informed by a travel analysis.

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