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M. Earl Stewart, Tongass Forest Supervisor
c/o Regional Forester
Tongass National Forest
Alaska Regional Office
PO Box 21628
709 W. 7th Street
Juneau, AK 99802

Re: Audubon Alaska comments & objections on the Final Environmental Impact Statement and Draft Record of Decision for the *Prince of Wales Landscape Level Analysis Project*

December 28, 2018

Dear Mr. Stewart,

Thank you for the opportunity to provide comments and objections on the Final Environmental Impact Statement (FEIS) and Draft Record of Decision (Draft ROD) for the Prince of Wales Landscape Level Analysis Project (POWLLA). Audubon Alaska has strong concerns and objections to the POWLLA, the underlying analysis in the FEIS, and the decision in the Draft ROD. The issues we raised in our comment letter on the Draft Environmental Impact Statement (DEIS) have not been properly addressed. We remain concerned about how the POWLLA relates to the 2016 Forest Plan, the use of “condition-based” NEPA, the scientific basis for the habitat thresholds, and the way the agency compares old-growth across the alternatives. These topics require more clarity and analysis or the agency risks confusing the public and providing insufficient basis for its conclusions, in violation to the requirements under the National Environmental Policy Act (NEPA). We urge the agency to issue a revised EIS in order to address these issues.

FEIS does not expressly relate the POWLLA to the 2016 Forest Plan

We remain concerned that the agency is finalizing the POWLLA without proper reference to or express consideration of the 2016 Tongass Forest Land Management Plan. We raised this issue in our letter on the DEIS.¹ The FEIS fails to explain how the timber offerings in the POWLLA will

¹ Audubon Alaska, Comments on the Draft Environmental Impact Statement for the Prince of Wales Landscape Level Analysis (June 18, 2018), attached as Attachment A, at 2.

conform to the Forest Plan, particularly given that other timber sales could presumably occur elsewhere in the Forest over the next 15 years. The lack of specificity for when and where harvest will occur does not allow the public to determine whether this POWLLA conforms to the 2016 Forest Plan.

The use of condition-based NEPA is confusing and lacks necessary specificity

We remained concerned about, and now object to, the use of a “condition-based” NEPA process in the FEIS. Audubon Alaska raised this issue in our comment letter on the DEIS.² We remain strongly opposed to leaving “specific locations and methods” for the future. The decisions at the specific-level are different than the decisions and information at this general level. The agency’s refusal to tie the site-specific analysis to the NEPA process appears to violate the requirements under NEPA to take a “hard look” at the impacts to the human environment. The agency should issue a revised EIS that makes clear the agency will refrain from a “condition-based” approach and will instead conduct further NEPA analysis in the future when the activities become more specific and defined.

The use of habitat thresholds to analyze effects to wildlife populations remains confusing and lacks scientific basis

The FEIS continues to use habitat thresholds to analyze whether the POWLLA will impact selected wildlife species. We raised this issue in our comment letter on the DEIS,³ and we remain extremely concerned that the agency has still not addressed this problem. We find the Response to Comments provides a particularly insufficient answer. The agency merely says that “[t]he references cited as a basis for the use of these thresholds were refined between the DEIS and FEIS.”⁴ This does not provide Audubon or other interested members of the public enough guidance on how the agency addressed this issue in the FEIS.

The references in the FEIS that the agency asserts have been “refined” to support its conclusions still do not support the agency’s position. First, the FEIS does not explain why it uses the standard of species “persistence” to assess whether harvest will impact species of concern, when mere *persistence* does not necessarily equate to *healthy or viable* populations. Second, the FEIS (like the DEIS before it) used arbitrary habitat thresholds drawn from studies in entirely different contexts (e.g. the brown creeper used forests in urban settings down to about 27 percent forest cover⁵) to apply to WAAs on the Tongass (the brown creeper needs 27% of the SD67 habitat type and “[a]ccording to literature thresholds all WAAs have SD67 habitat to support brown creepers”⁶). The agency simply runs through how much habitat will remain in each WAA after the project’s completion, and concludes that all WAAs will retain habitat to support the species. In some instances, the agency

² Audubon Alaska, Comments on the Draft Environmental Impact Statement for the Prince of Wales Landscape Level Analysis (June 18, 2018), attached as Attachment A, at 2.

³ Audubon Alaska, Comments on the Draft Environmental Impact Statement for the Prince of Wales Landscape Level Analysis (June 18, 2018), attached as Attachment A, at 4-6.

⁴ Appendix D, at D76.

⁵ FEIS at 210.

⁶ FEIS at 210

appears to select the habitat threshold that allow it to conclude that enough habitat will remain.⁷ The FEIS fails to explain the differences in scientific design, assumptions, and context that apply to the different habitat thresholds in the literature. The FEIS fails to explain how these habitat thresholds relate to the Tongass and Prince of Wales, as well as the drawbacks of using these literature thresholds to apply to new contexts. Clarity and evidence are main components of the purpose of an EIS,⁸ but the agency's rationale for using these habitat thresholds remains opaque.

Moreover, in several instances in the FEIS, the agency does not provide a sufficient citation for the "refined" references. In the analysis of how harvest of HPOG will affect Prince of Wales spruce grouse, the agency refers to "Angelstam 2001b" and "Angelstam 2001"⁹ to support the premise that "WAAs with more than 20 percent HPOG habitat should be capable of providing habitat for the Prince of Wales . . . spruce grouse." But the FEIS does not provide either of these sources in the References section. Under Large Tree POG for brown creepers, the FEIS cites to "Blewitt and Marzluff (2005)" to point to a supposed 27 percent habitat threshold, but the source "Blewitt and Marzluff (2005)" is missing from the References section at the end of the document, and the embedded link in the FEIS links to an entirely different paper. The reference used to support the 47 percent habitat threshold for the bay species Keen's myotis¹⁰ is similarly not included in the references section. The use of missing references is very confusing, requires the public to second-guess the agency, and does not properly address NEPA's requirement to provide evidence to support statements.¹¹

We object to the arbitrary and confusing analysis of how the harvest of old-growth forest types will impact the selected wildlife species. The agency should issue a revised FEIS in order to correct these errors and provide a more justifiable scientific analysis.

The FEIS errs in its comparison of old-growth harvest between alternatives

The FEIS remains confusing in how it compares the harvest of productive old-growth (POG), high-volume productive old-growth (HPOG), and large-tree old-growth (the agency terms this habitat type "SD67"). We raised several related problems with how the agency analyzes these old-growth types in our comment letter on the DEIS:

The agency appears to contradict itself on how large-tree old-growth varies across the action alternatives. In one part of the DEIS, the agency says that the three action alternatives would

⁷ FEIS at 201 ("WAAs with more than 20 percent HPOG habitat should be capable of providing habitat for goshawks according to Iverson et al. 1996 while those above 50 percent should be capable of providing habitat for goshawks according to Doyle 2005.")

⁸ 40 CFR 1502.1 ("Statements shall be concise, clear, and to the point, and shall be supported by evidence that the agency has made the necessary environmental analyses.")

⁹ FEIS at 194.

¹⁰ FEIS at 210.

¹¹ 40 CFR 1502.24 ("[Agencies] shall identify any methodologies used and shall make explicit reference by footnote to the scientific and other sources relied upon for conclusions in the statement."); see also 40 CFR 1502.22 (Incomplete or unavailable information).

implicate HPOG at the same level.[8] But elsewhere, the agency says HPOG and SD67 would be proportional to the POG harvest,[9] implying that because Alternative 5 proposes less old-growth volume that it will include less HPOG and SD67 than Alternatives 2 or 3. The agency should clarify this issue.[10] If the alternatives all target HPOG at the same level, then the POWLLA will clearly continue high-grading the last of the best old-growth on Prince of Wales. If the alternatives vary in the amount of HPOG and SD67 that would be harvested, then the alternatives should each clarify how the proportion of HPOG and SD67 compares to the estimates of the original resource on the island.

[8] DEIS at viii (“All action alternatives would result in about the same reduction in High (HPOG) at the project area scale.”).

[9] See e.g. DEIS at 186 (“Large tree (SD67) habitat is assumed for analysis to be proportional to the total POG harvest; SD67 currently makes up about 19 percent of the POG on NFS lands in the project area. Therefore, if 100 acres of harvest is projected, it is assumed that 19 acres of that will be SD67 habitat.”).

[10] An inquiry to the agency on this matter was not answered by the close of the comment period.¹²

A review of the Response to Comments in the FEIS does not appear to directly respond to this issue. The response that is the closest in relevance is the issue termed “Wildlife: high-volume productive old-growth and size-density class 6/7”.¹³ But this response topic focuses on *effects* to the old-growth habitat types, rather than addressing the lack of *clarity*.

A closer look at the FEIS shows that the agency has modified some wording, perhaps in response to our comments on the DEIS about the confusion over old-growth acreages across the alternatives. But the changes do not appear to fix the problems we raised in our comment letter on the DEIS. The agency has changed the wording *from* “All action alternatives would result in about the same reduction in High (HPOG) at the project area scale”¹⁴ *to* “All action alternatives would result in a similar reduction in habitats at the project area scale on NFS lands, because for analysis purposes, it was assumed that all proposed acres by alternative would be harvested.”¹⁵ Later, the agency states that the harvest of HPOG will be the same across the alternatives, saying “All alternatives would result in about a 3 percent reduction in HPOG at the project area scale.”¹⁶ But these statements still conflict with the analysis deeper in the FEIS, which remains the same as the analysis in the DEIS.

The statement that the different alternatives would harvest a similar amount of habitats conflicts with information appearing later in the FEIS, which shows different acreages are implicated in the

¹² Audubon Alaska, Comments on the Draft Environmental Impact Statement for the Prince of Wales Landscape Level Analysis (June 18, 2018), attached as Attachment A, at 3-4.

¹³ Appendix D, at D-63

¹⁴ DEIS at viii

¹⁵ FEIS at viii.

¹⁶ FEIS at 196.

different alternatives. For example, the agency describes how the HPOG harvest would be relative to the general old-growth harvest:

HPOG habitat is assumed for analysis to be proportional to the total POG harvest; HPOG currently makes up about 47 percent of the POG on NFS lands in the project area. Therefore, if 100 acres of harvest is projected, it is assumed that 47 acres of that will be HPOG habitat.¹⁷

Later in the FEIS, Table 38 shows that the different alternatives would result in different acreages of old-growth harvest (23,269 acres of old-growth under alternative 2; 13,014 acres of old-growth under alternative 3; and 6,365 acres of old-growth under alternative 5).¹⁸ A simple calculation therefore reveals that there would be about 10,900 acres of HPOG harvested under alternative 2; about 6,000 acres of HPOG harvested under alternative 3; and about 2,900 acres of HPOG harvested under alternative 5. Therefore, the acreages for HPOG appear to vary across the alternatives. The FEIS analyzes the difference between 13,014 acres of old-growth under alternative 3 and 6,365 acres of old-growth under alternative 5.¹⁹ The agency should therefore have analyzed the difference between 10,900 acres of HPOG versus 2,900 acres of HPOG. The same problem appears to arise for the different old-growth habitat types analyzed in the FEIS. Moreover, the FEIS does not carry over the varying acreages of HPOG, SD67, and other old-growth types when it analyzes how the alternatives will impact wildlife at the WAA scale.

Thank you again for this opportunity to voice our concerns and objections to the Prince of Wales Landscape Level Analysis, and the FEIS and Draft ROD for this project. We urge the agency to correct its mistakes, conduct further analysis, issue a revised EIS, and provide the public another review and comment period, prior to issuing a Final ROD.

Sincerely,



Susan Culliney
Policy Director
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¹⁷ FEIS at 195.

¹⁸ FEIS at 176.

¹⁹ See FEIS at 176.

Attachments

- A. Audubon Alaska, Comments on the Draft Environmental Impact Statement for the Prince of Wales Landscape Level Analysis (June 18, 2018).



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VIA ONLINE PORTAL

Mr. M. Earl Stewart
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Re: Comments on the Draft Environmental Impact Statement for the Prince of Wales Landscape Level Analysis

June 18, 2018

Dear Mr. Stewart,

Ending old-growth clearcutting on Prince of Wales and across the Tongass National Forest is imperative as a matter of policy and as a matter of ecology. In 2013, the U.S. Department of Agriculture indicated the need to “speed the transition away from old-growth timber harvesting” on the Tongass National Forest.¹ In 2016, the Forest Service began to chart a path toward that sustainable future by finalizing an amendment to the Tongass Land Management Plan that started to limit old-growth clearcutting across the Tongass. This policy shift wisely reflects the urgent ecological situation that decades of old-growth clearcutting has created. The systematic removal of the large old trees has reverberated through ecosystems and greatly diminished habitat for birds, salmon, and wildlife.

The Prince of Wales Landscape Level Analysis (POWLLA) should enact the next step forward in ramping down the archaic (and heavily taxpayer-subsidized) practice of old-growth clearcutting. Prince of Wales has seen the bulk of the old-growth clearcutting over the decades, yet still boasts a few areas of awe-inspiring cathedral groves of giant old trees, which serve as habitat for unique birds and wildlife found nowhere else on earth. In many ways, Prince of Wales is the heart of the Tongass and offers an example of the dire need to shift the local economy away from reliance on clearcutting, and toward a more diversified economy that depends on keeping the large-tree old-growth standing for generations to come. The Draft Environmental Impact Statement (DEIS) for

¹ United States Department of Agriculture Office of the Secretary, *Secretary’s Memorandum 1044-009 Addressing Sustainable Forestry in Southeast Alaska* (July 2, 2013).

the POWLLA is commendable in its inclusion of recreation projects, its focus on effects to endemic birds and wildlife, and its specific analysis of large-tree old-growth. However, the POWLLA does not go far enough to bring old-growth clearcutting to a close by the end of the project timeframe. There are also serious issues associated with the NEPA process, the wildlife analysis, and the economic data utilized, as articulated in more detail below, that the agency must address in the FEIS.

Procedural issues

Reference Tongass transition

The Prince of Wales Landscape Level Analysis must reference the transition away from old-growth harvest as articulated in agency policy documents. The Tongass Land Management Plan was amended in 2016 in order to “expedite the transition away from old-growth timber harvesting”.² As a project undertaken in accordance with the TLMP, the POWLLA must expressly acknowledge this connection and reiterate the Forest Service’s intent to transition away from old-growth harvest.

Condition-based NEPA

The agency should not use a condition-based NEPA process for this project. According to the agency, a “condition-based” NEPA process analyzes treatments and activities, but “specific locations and methods” are determined at points in the future.³ The legal authority for this approach is not clearly stated in the DEIS. Further, a conditioned-based process is a problem because it eliminates future analysis when it is needed the most, at the time of implementation when the details and management conditions are more clarified. The agency appears to acknowledge the lack of specific information:

“In addition, as more resources or technology become available, they will also contribute to the process of gathering more information on the project area and continuing to refine existing condition information. For example, Tongass National Forest is anticipating extensive coverage of this project area in the near future from a type of remote sensing called LiDAR (Light Detection and Ranging), which will help inform decision making on the project. It is likely that additional streams, plant populations, karst features, unsuitable soils, landslides, wetlands, nests, dens and cultural sites occur in un-surveyed areas, prior to implementation. While some areas have not received reconnaissance from survey crews, the confirmation of these additional occurrences is not essential for a reasoned choice among alternatives. Any newly discovered sites would receive the appropriate protections under the Forest Plan and relevant laws or regulations. Additional field surveys prior to implementing activities may be required as identified on the Activity Cards.”⁴

Decisions on future activities, including timber sales, wildlife treatments, and recreation infrastructure will clearly require further analysis when the details are closer to confirmation. The

² U.S. Forest Service, Tongass Land and Resource Management Plan Record of decision (December 2016) at 5.

³ U.S. Forest Service, *Prince of Wales Landscape Level Analysis Draft Environmental Impact Statement* (April 2018) (hereafter “DEIS”), at i.

⁴ DEIS Appendix A, at 49.

agency appears to be attempting something akin to a Programmatic EIS, but without intention to issue Supplemental EISs at the activity-level stages. The public requires more than a single 45-day comment period to analyze and comprehend a complex DEIS that will govern land management activities on Prince of Wales for the next 15 years. And the agency will require more information at future steps when it begins to implement specific timber sales and actions. The way that different projects (including recreation, restoration, and timber harvest) unfold across the landscape will matter greatly for each project as it occurs in real time. In the FEIS, the agency should identify those activities (including but not limited to timber sales) that will require further NEPA analysis in the future, when more specific decisions have been made about where and when these activities will occur.

Comparison of old-growth harvest in the alternatives

The agency should be credited for eliminating an alternative that would have maximized the old-growth offering to up to 100 MMBF per year. However, the remaining alternatives do not go far enough to effect the transition away from old-growth and do not adequately consider the cumulative effects of old-growth highgrading that has occurred for more than six decades on Prince of Wales. Alternative 5 comes the closest to a new and sustainable approach on the Tongass. But even this alternative allows too much leniency for industrial-scale clearcutting to target large-tree old-growth forests for the next 15 years.

The alternatives should effect the transition away from old-growth called for in agency policy documents by including a mechanism to ramp-down industrial-scale old-growth harvest. The agency briefly considered an alternative that would have provided 5 MMBF per year to solely small-scale purchasers or “cottage” industry.⁵ But the agency eliminated this alternative from further consideration because it would not provide the “time for larger mills to increase their utilization of young-growth or locate another source of old-growth”.⁶ If the agency is in fact trying to provide a limited time for large mills to transition away from old-growth, then all of the alternatives should include a mechanism to ramp down large-scale sales over the 15 year period. Alternatives 2 and 3 provide for a certain percentage of the offerings to be limited to small-scale operators,⁷ but the agency should add an element in which that percentage increases to 100% of small-scale sales over the course of the project’s 15 years.

The agency deserves credit for analyzing high-volume old-growth (HPOG) and large-tree old-growth (SD67) separately from productive old-growth (POG). This is an important distinction because POG can include smaller volume forests that do not necessarily provide the same value to wildlife as the large-tree old-growth; nor are smaller-tree old-growth forests as strongly implicated in timber interest. However, it is not clear in the DEIS whether the large-tree old-growth varies across

⁵ DEIS at 33.

⁶ DEIS at 33.

⁷ DEIS at 94.

the alternatives. The agency appears to contradict itself on this point; and in tables comparing the alternatives the old-growth should be broken down by HPOG and SD76.

The agency appears to contradict itself on how large-tree old-growth varies across the action alternatives. In one part of the DEIS, the agency says that the three action alternatives would implicate HPOG at the same level.⁸ But elsewhere, the agency says HPOG and SD67 would be proportional to the POG harvest,⁹ implying that because Alternative 5 proposes less old-growth volume that it will include less HPOG and SD67 than Alternatives 2 or 3. The agency should clarify this issue.¹⁰ If the alternatives all target HPOG at the same level, then the POWLLA will clearly continue high-grading the last of the best old-growth on Prince of Wales. If the alternatives vary in the amount of HPOG and SD67 that would be harvested, then the alternatives should each clarify how the proportion of HPOG and SD67 compares to the estimates of the original resource on the island. In order to help the public understand how the alternatives compare on this issue, the agency should break up old-growth by HPOG and SD67 in the DEIS at places like Table 2 on page 20.

Wildlife issues

Analysis of WAAs

The benefit and utility of breaking old-growth out into HPOG and SD67 for analysis is apparent in the discussion of wildlife issues, including how much of the high-volume forests the agency anticipates will remain in different Wildlife Analysis Areas (WAAs) following the POWLLA. It is striking to see how different WAAs have been treated over the years, resulting in varying levels of remaining large-tree old growth. While the inclusion of these data is welcome, the agency uses an incorrect method to determine whether sufficient habitat remains for wildlife in each WAA.

The agency cites Soule & Sanjayan (1998) and Fahrig (1997) to hold that thresholds of 20% or 50% habitat remaining is appropriate to assess persistence for key birds and wildlife.¹¹ This is an overly simplistic approach to species population health and persistence; an analysis should also incorporate reproductive rates, emigration, fragmentation, and the quality of the matrix (the non-habitat areas that make up the space between habitat fragments).¹² Contextual factors like the food web in which the species operates is another potential contributor and could magnify or modify the effect of habitat loss on population health.¹³

⁸ DEIS at viii (“All action alternatives would result in about the same reduction in High (HPOG) at the project area scale.”).

⁹ See e.g. DEIS at 186 (“Large tree (SD67) habitat is assumed for analysis to be proportional to the total POG harvest; SD67 currently makes up about 19 percent of the POG on NFS lands in the project area. Therefore, if 100 acres of harvest is projected, it is assumed that 19 acres of that will be SD67 habitat.”).

¹⁰ An inquiry to the agency on this matter was not answered by the close of the comment period.

¹¹ DEIS at 157-158.

¹² L. Fahrig, *How much habitat is enough?* Biological Conservation 100:65-74 (2001).

¹³ Carlos J. Melian and Jordi Bascompte, Food web structure and habitat loss, Ecology Letters 5:37-46 (2002).

Even if the agency were to use habitat loss alone as a proxy for population health, the thresholds cited in the DEIS are from publications that do not readily apply to the context of habitat left for birds and wildlife in a Southeast Alaska rainforest system. In Soule and Sanjayan (1998),¹⁴ the authors discussed that 50% of habitat *worldwide* may be required in order to conserve *global biodiversity* in very broad terms. This is not a proper basis on which to hold that a 50% threshold is sufficient at the WAA level for birds and wildlife in the Tongass.

In Fahrig (1997), the author *simulated* habitat loss and fragmentation for breeding habitat with particular applicability to endangered species, concluding that the simulated species survived to a threshold of about 20% habitat remaining. While this model appears applicable to the conservation biology debate about size and extent of loss and fragmentation writ large, caution is warranted for use in on-the-ground conservation within a specific ecosystem type. Furthermore, the author of this publication makes the important distinction that “[o]f course many organisms, particularly habitat specialists, depend on habitat types that make up less than 20% of the pristine landscape before alterations by human activities. These organisms are likely to be particularly vulnerable to habitat loss.”¹⁵ In other words, for birds and wildlife that are highly dependent on a special habitat (as the birds and wildlife analyzed in the DEIS are highly dependent on large-tree old-growth), these conclusions are not necessarily applicable. Other studies support the notion “that the more specialist a species, the more negative its spatial response to landscape fragmentation and disturbance.”¹⁶ The 20% threshold is questionable when applied in the manner used in the DEIS. The DEIS needs to explain these distinctions, or expand on its rationale and works cited to support its premise.

Analyzing population health against remaining large-tree old-growth in different WAAs is probably species-dependent. The agency keyed into species characteristics and habits in its analysis,¹⁷ and it should use these publications and experts to determine ways to analyze population viability for each key species. For example, the DEIS notes specific habitat needs for Marbled Murrelets:

Marbled murrelets typically nest on mossy-limbed branches of large, mature coniferous trees within stands of structurally complex, coastal high-volume old-growth forest (DeGange 1996; Kulets et al. 1995; Ralph and Miller 1995).¹⁸

Therefore, the appropriate measure for Marbled Murrelet population viability in each WAA may be percent of large-tree old-growth that are within a certain distance of coastal habitat. By consulting with experts and publications on the Marbled Murrelet and other birds and wildlife, the agency may

¹⁴ Soule M.E., and M.A. Sanjayan. 1998. Conservation targets: Do they help? *Science* 279:2060–2061.

¹⁵ Fahrig, L. 1997. Relative effects of habitat loss and fragmentation on population extinction. *Journal of Wildlife Management* 61:603–610, at 608-609.

¹⁶ Vincent Devictor, Romain Juliard, and Frederic Jiguiet, *Distribution of specialist and generalist species along spatial gradients of habitat disturbance and fragmentation*, *Oikos* 117:507-514 (2008).

¹⁷ See e.g. specific references on Prince of Wales Flying Squirrel and Prince of Wales Spruce Grouse, DEIS at 171-172.

¹⁸ DEIS at 171.

determine a method that is more accurate and appropriate than the arbitrary application of thresholds of 20% or 50% habitat remaining in each WAA.

The agency has taken an important step by starting to consider how habitat loss has (and will continue to) affect birds and wildlife in the project area. But unfortunately, a 45-day comment period does not grant sufficient time for the public to provide, and for the agency to grapple with, the information needed to delve into these complex topics. The agency should take the time to research, compile, and study information about the remaining habitat left on Prince of Wales and whether it is sufficient for supporting viable populations of birds and wildlife. To the extent that the agency does not have capacity to address this, it should expand its capacity to work on these issues.

Wildlife treatments studies and data

The agency appears to be operating on the assumption that second-growth treatments like thinning, gap creation, and other methods are beneficial to wildlife.¹⁹ Any method that does restore wildlife function to second-growth forests would be worthy of consideration in vegetation management. But using these methods when the outcomes are unknown risks setting habitat back and is a potential waste of limited funds. The use of purported wildlife treatments in stewardship contracting²⁰ extremely concerning and, even when the prescriptions are fulfilled,²¹ may not benefit wildlife as required by the stewardship contracting program. Until the agency can point to studies that more definitively show the benefit of these treatments on wildlife, it should refrain from using these methods in wildlife areas like beach fringe, riparian management areas, and old-growth reserves.

If the agency has access to studies or information that point to the wildlife benefits of certain treatments, it should provide the public with those data. One option is to provide an appendix of these studies in the FEIS or include a section in the FEIS with an explanation of where the agency is getting its information on this topic. If the agency, like the public and the scientific community, currently lacks these data, then it should incorporate a rigorous experimental design to a limited number of treatments, and begin to collect and analyze those data as part of this Landscape Level Analysis.

¹⁹ DEIS Appendix B at B-26, B-27; DEIS at 6 (“*Objective*: Design and implement structural and nonstructural wildlife habitat improvement projects,” “*Objective*: 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.”).

²⁰ USDA Forest Service, *Washington Office Activity Review of Timber Sale Administration, Sale Preparation, Stewardship Contracting, NEPA and Timber Theft Prevention Region 10* (2016).

²¹ Data coming out of the Big Thorne operations indicate that more valuable timber may have been removed than allowed under contract. The Big Thorne contract required that tree cutting in some parts achieve a certain thinning result, with the thinning to be spread out evenly through all tree species. But from observations in the field it appears that the operator targeted the bigger and more valuable tree species, leaving behind the less valuable tree species, for a skewed distribution in the forest makeup that was left behind. See USDA Forest Service, *Washington Office Activity Review of Timber Sale Administration, Sale Preparation, Stewardship Contracting, NEPA and Timber Theft Prevention Region 10* (2016), at 11 (Issue 5, Finding 2).

Economic issues

Acknowledge old-growth timber harvest economic problems

The DEIS highlights the importance of the large-scale timber operations to the local economy. But the DEIS must similarly address the economic detriments that come with ongoing industrial-scale old-growth harvest. Taxpayers spend tens of millions on the Tongass timber program. In return, timber revenues barely top out over a million dollars annually. The Tongass timber subsidy arises by the net loss between what is spent and what is recouped from timber sales. In 2013,²² the timber program on the Tongass cost over \$21 million, and generated just over \$1 million in revenues, for a shortfall of \$20 million. Note that individual timber sales provide another good metric for this loss. According to Forest Service reports, the Big Thorne had *losses* totaling \$1.7 million.²³ The agency should incorporate analysis of these economic ramifications in the FEIS.

Distinguish and analyze economic value of recreation and tourism

The FEIS should include more information on the sustainable economic benefits that stem from healthy populations of birds and wildlife. The forests on Prince of Wales are worth more than the subsidized price of clearcutting their timber. The giant old trees, the birds and wildlife, and roadless wild areas all provide benefits that are not easily monetized, but which nonetheless represent economic value. The tourism industry is growing in Southeast Alaska, and opportunities exist for smaller communities like those on Prince of Wales to harness that growth for a local economic boost.

Americans love to watch birds and wildlife, and spend good money to do so. Wildlife-watching and birding involve tens of millions of people and is a multi-million dollar industry in the U.S. In 2016, 86 million Americans reported participating in wildlife-watching activities, with more than 45 million specifically watching birds.²⁴ Of these, over 23 million people traveled away from home to watch wildlife, and 16 million people traveled to watch birds in 2016. Wildlife watchers spent about \$11.5 million on trip-related expenses for watching wildlife, and about \$64 million in equipment and other expenses related to wildlife watching.

The FEIS should include data on wildlife watching interest and Southeast Alaska's tourism numbers. Alaska is well-known for its wildlife and draws tourists from around the world, and Southeast Alaska is a big part of Alaska's tourism market. About 45% of Alaska's visitors in 2016 participated in

²² Updated information is available for timber revenues through 2016. However, tracking dollars that are spent on the Tongass timber program is not easy. Money allocated by Congress to the U.S. Department of Agriculture, and down to the Forest Service, and finally to the amount contributed to the Tongass timber program specifically, is not information that is readily available to the public. In 2014 Headwaters Economics researched and calculated the cost of the Tongass timber program, in part by submitting FOIA requests to the Forest Service Region 10, but the report only calculates that figure through FY2013.

²³ <https://www.peer.org/news/news-releases/forest-service-scalped-on-tongass-timber-sales.html>

²⁴ U.S. Fish and Wildlife Service, *2016 National Survey of Fishing, Hunting, and Wildlife-Associated Recreation* (August 2017) available at https://wsfrprograms.fws.gov/subpages/nationalsurvey/nat_survey2016.pdf.

wildlife viewing, and 9% participated in birdwatching specifically.²⁵ In 2016, Southeast captured 67% of the visitors in Alaska,²⁶ and nearly all of these visitors (95%) were traveling there for the purpose of vacation or pleasure,²⁷ and a large majority of these are cruise visitors²⁸.

The wildlife-based tourism industry in Southeast deserves more attention and investment as part of the POWLLA. There is untapped potential for smaller communities like those on Prince of Wales to harness the overall growing tourism industry to capture interest in birding tourism and wildlife viewing tourism in their local areas. More than 350 species of birds can be found in Southeast Alaska, with many of these unique to the region and therefore highly attractive to those people who enjoy seeing new species and adding to their “life list” of birds. The endemic plants, birds, and animals of Prince of Wales Island could be particular draws for nature-minded visitors. Interesting birding areas in Southeast Alaska remain off the beaten path and represent an opportunity for local Alaskans to attract visitors and capitalize on that economic resource. For example, Audubon Alaska is developing the *Southeast Alaska Birding Trail*, which will connect visiting birders with good birding spots in Southeast communities, including several sites on Prince of Wales Island.²⁹

Unfortunately the POWLLA DEIS presents a profound imbalance in its priorities by neglecting to incorporate this tourism data and information. The DEIS prioritizes large-scale timber operators over all other forest uses, and minimizes the importance of the sustainable industries that depend on the very forest resource that the large-scale timber industry continues to diminish. It is time for the agency to prioritize sustainable forest uses like small-scale timber operators, recreation, restoration, tourism, as well as fishing and hunting, even if it means a diminishment in industrial-scale logging by the end of the 15-year project timeframe.

The DEIS acknowledges that tourism and recreation are important facets of the economy on Prince of Wales Island:

“Tourism-related services provide employment opportunities in many communities on the island. Craig is the largest community and has a number of tourist amenities, which enables it to attract many of the tourists traveling from Ketchikan. However, other communities in the project area also earn income supplying goods and services to tourists.”³⁰

“Tourism, including wildlife viewing and sport fishing, have become an important component of Prince of Wales’ economy. Improving Forest Service roads, establishing daily ferry service between Ketchikan and Prince of Wales Island via the Inter-Island Ferry

²⁵ See McDowell Group, *Alaska Visitor Statistics Program Summer 2016* (May 2017), at 5-11 - 5-13.

²⁶ McDowell Group, *Alaska Visitor Statistics Program Summer 2016* (May 2017), at 5-2.

²⁷ McDowell Group, *Alaska Visitor Statistics Program Summer 2016* (May 2017), at 12-1.

²⁸ McDowell Group, *Alaska Visitor Statistics Program Summer 2016* (May 2017), at 12-2.

²⁹ See <http://ak.audubon.org/news/southeast-alaska-birding-trail-guide-southeast-natural-wonders>

³⁰ DEIS at 279.

Authority, and adding regularly-scheduled commuter flights have supported a growing visitor industry and greatly improved island access for residents.”³¹

Local socio-economic activity and public health and safety could potentially see beneficial effects from the development of new infrastructure and improvements to existing [recreation] sites. With increased recreation opportunities on the island there is the potential for more visitation to POW, which could increase economic opportunities for local businesses.”³²

However, this acknowledgement is not reflected in the EIS’s analysis. While the agency notes that the recreation components of the POWLLA offer a “long-term opportunity for a growing recreation and tourism industry,”³³ nowhere in the DEIS does the agency acknowledge the tension between supplying large-scale operators with old-growth timber for the next 15 years and the future sustainability for recreation and tourism.

The DEIS fails to consider how to make recreation and tourism thrive in the communities of Prince of Wales. Where the agency goes to great lengths to ensure that the large-scale timber operator will have enough supply over the lifetime of the project, it is disappointing to see the agency gloss over tourism and recreation. The agency misses an opportunity to grapple with how to grow these sustainable industries:

“Outfitter and guide activities on Prince of Wales Island and its outer islands would continue at current levels into the foreseeable future.” Page 248.

“Passengers on cruise ships stopping at POW would not typically use NFS lands.” Page 252.

“[L]imited data restricts us from accurately quantifying resident recreation use on POW.”

“There is limited data to accurately quantify non-resident recreation use on POW.”

“There is limited data that accurately quantifies regional recreation use on POW.”³⁴

Nor does the agency appear to provide employment data except for the timber industry.³⁵ As a federal agency with access to State of Alaska data as well as federal data, the Forest Service should research and incorporate data for other industries and forest uses on Prince of Wales Island. The FEIS should include employment data for the wide variety of job types that depend on the forest resource. The FEIS should also incorporate visitor data and recreation use data. If the agency does not have access to these data, then it should extrapolate from available data or create a plan to start collecting these data on Prince of Wales.

³¹ DEIS at 271.

³² DEIS at 247.

³³ DEIS at 289.

³⁴ DEIS at 233.

³⁵ DEIS at 280 (Table 74).

Conclusion

Thank you for the opportunity to comment on this Draft Environmental Impact Statement for the Prince of Wales Landscape Level Analysis. Ending old-growth clearcutting on Prince of Wales by the end of the project timeframe is an economic and ecological necessity. The promotion of recreation, the acknowledgement of endemic birds and wildlife, and the breakdown of old-growth by HPOG and SD67 are important and tangible steps the Forest Service has taken to more accurately analyze the impact of continued timber harvest on Prince of Wales. Unfortunately, the disproportionate care taken to ensure the viability of the industrial-scale old-growth logging industry, the cursory method for analyzing wildlife viability in relation to large-tree old-growth left in each WAA, and the low level of attention paid to the economic value of the sustainable industries all point to a missed opportunity to truly transition the forest into a more sustainable version of itself. We look forward to seeing our comments incorporated into the FEIS. We also strongly urge the agency to discard the condition-based NEPA approach and instead identify future decision points, particularly timber sales, at which NEPA will still apply.

Sincerely,

A handwritten signature in cursive script that reads "Susan Culliney".

Susan Culliney
Policy Director
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