

Forrest Cole  
Forest Supervisor  
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648 Mission Street  
Ketchikan, Alaska 99901  
Re Draft SIR

June 23, 2014

Dear Forrest,

I hope all is well with you and yours. Retirement is good. I am certain that you know that the National Forest Management Act of 1976 explicitly refers to and accommodates NEPA. Every proposed action on the Tongass National Forest has a requisite NEPA document. The Big Thorne Project FEIS (BTP FEIS) effort is such a document. My comment on the Big Thorne Draft SIR, questions whether or not the BTP FEIS and/or the SIR has adequately (for NEPA 42 U.S.C. §4321 et seq. and 40 CFR 1500-1508) addressed cumulative effects or actions. Preparation of a SIR is to determine if a Supplemental FEIS<sup>1</sup> is required due to new information. The Draft SIR contends that there is no new information as it relates to a letter written by David K. Person Ph.D., at the Big Thorne Appeal period in August of 2013. The Draft SIR contends further that no Supplemental EIS is required. It is my contention that Dr. Person's letter is an adequate

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1 Supplemental EISs are required when "[t]here are significant new circumstances or information relevant to environmental concerns and bearing on the proposed action or its impacts." 40 C.F.R. §1502.9(c)(1)(ii) *CF: Kootenai Tribe of Idaho v. Veneman*, 313 F.3d 1094, 1118 (9th Cir.2002). As the Supreme Court has said: [T]he decision whether to prepare a supplemental EIS is similar to the decision whether to prepare an EIS in the first instance: If there remains "major Federal actio[n]" to occur, and if the new information is sufficient to show that the remaining action will "affec[t] the quality of the human environment" in a significant manner or to a significant extent not already considered, a supplemental EIS must be prepared.

description of the Cumulative effects of the Big Thorne Project and that the Big Thorne Project FEIS and ROD should be supplemented to reflect this cumulative effects discussion to an extent required by NEPA.

I present the following assessment as a NEPA practitioner from 1992-2012 for the Forest Service. I write these comments as a generalist and make no claims as any form of resource specialist but NEPA and the CEQ regulations have been a legal process that became my expertise during my tenure with the U.S. Forest Service. I am not affiliated with any NGO or contractor, I have received no remuneration for writing this comment.

I have commented to the USFWS recently about their efforts to analyze the state of the AA wolf in Southeast Alaska. This was my opinion. However in that opinion I did assert that I thought the FS has not taken the requisite "hard look" regarding the Forest Plan implementation in the Central Prince of Wales Island effort to provide timber resources to industry. I write now to explain this assertion and because my name is listed in the EIS as a major reviewer of the BT FEIS. I retired at the end October 2012 as the IDT leader for the Big Thorne project Draft EIS. After my retirement I did not review the FEIS or ROD. The Big Thorne project Draft EIS was just out for review when I left the FS. I did, extensively review the DEIS as IDT leader and COR for the contract between Tetrattech the firm that prepared the EIS for the Forest Service.

My comments regarding the current Draft Supplemental Information Report regarding the AA Wolf are as follows: Briefly, it is my contention that the BTP FEIS/ROD effort and the Big Thorne SIR I'm commenting on, while a thorough and exemplary environmental document in many ways, may not have an adequate cumulative

impact analysis (cf 40 CFR 1508.7) when compared to Dr. Person's Statement. This statement is a narrative of his assessment of the complete effect on Alexander Archipelago wolves in the Central Prince of Wales Island area and various wild life and game management units. The Wolf Task Force (WTF) which produced a report that was the basis of contention for the Draft SIR finding no new information.

Cumulative impact: FS in the NEPA process must answer: "Is the action of BT Project related to other actions? In the case of the AA wolf, harvest of wolves by hunters and trappers on POW have had individually insignificant impacts since the 1990s; however these incremental impacts have had cumulatively significant consequences that have led to a significant population decline that is now apparent according to all papers authored by DR Person relating to the AA wolf. Recent findings have

Is there a cumulative impact? To ignore analysis in the NEPA process the answer must find the number zero or describe no effect. This can't be done and the incremental impact over-time cannot be ignored. The peril is that the cumulative impact is missed or mislabeled as a direct effect or thought of in this case to be the purview of another agency or a private entity or person.

It is perhaps better, to think of the AA wolf as an "actions analysis." This would give us a more useful positioning to the actual existing condition and where the notion of the requisite "hard look" is missing.

The Forest Service was tasked to collect the actions that are be present in an environmental document according to rubrics on

"lumping" and "splitting," in order to assess the consequences of those actions. In doing so "Impacts" then are the result of our analysis of actions.

So, if regarding the wolf the FS started with (1) the proposed action which harvests trees and builds roads, plus (2) the alternative actions which also harvests trees and builds roads and (3) the no action alternative we find the timber base in appropriate LUDs that could provide a timber sale. Also in the no action alternative); add (4) connected actions and (5) similar actions; don't overlook (6) existing actions where we find the killing of wolves occurring in the project area through State of Alaska and Federal subsistence laws; also we find killing of wolves outside the intended parameters of these laws.

These are 6 of the possible 8 kinds of actions than can be present in an environmental document. For purposes of comment of course I am only noting timber harvest and road building and the legal and extra-legal killing of wolves.

So there are two more types of actions that must run through and analysis of cause and consequence. One event leads to another. Actions lead to impacts. Directly, indirectly. Primary, secondary, tertiary, etc. Step by step, the process should get from an "original" cause to its consequences. What is missing from the requisite "hard look" follows:

The Big Thorne FEIS engaged in a seemingly thorough analysis of all aspects of the project area but the Environmental document split the legal and extra-legal killing of wolves in its analysis which should lead to the chain of causation - will entirely account for the impacts we should expect to find.

Actions which have no relationship to other actions except through their consequences could be called (7) cumulative actions. Here we find the legal and extra-legal killing of the AA wolf hiding from analysis in the BT project effort. If the reduction of wolf population evident in the existing condition, it is found that optimum deer winter range is receding in the existing condition, legal wolf harvest and extra-legal wolf harvest is impinging on an already reduced population, and the new numbers of legal wolf harvest and extra-legal wolf harvest suggest a trend toward zero wolves in Central POW island, and it is unclear, or a risk that a timber harvest scheduled from BTP will exacerbate the taking of wolves to zero, then the new information is significant. The SIR allows that the process engendered a risk, however and the courts require a description and extent of this risk. The BTP takes a crack at this but calls the effect an indirect effect<sup>2</sup> of road building. Twenty years ago it probably was and indirect effect. Dr. Person has pointed out that this may no longer be the case.

The following is an attempt to only illustrate an existing condition as it relates to the wolf, and separate but similar actions to try to ascertain a complete effect, it comes from almost a decade on Prince of Wales island and there is no attempt to make it absolutely chronological, nor is there any attempt to describe this as science to scientific statements are foot noted. And I will allow I may be wrong, or not exact in some of my descriptions. This however shows POW Island actions over time actions that are seemingly unrelated individual

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<sup>2</sup> BTP FEIS-8 Summary

effects but when examined incrementally may have significant cumulative effects.

### **Working men, halibut and wolves and bear— Island actions with hidden cumulative effects**

Before industrial logging came to Prince of Wales Island, wolves took down deer working from the beach and up drainages. They crept around huge spruce and cedars and ambushed deer or corned them amid beach drift wood or windfalls, or ran them down in muskeg wolves hunted effectively in packs. Wintering deer in among windfall and wood and timber stands were targets, deer moved with pressure to other locations. With snow melt and deer moving inland wolves moved there too. Pockets of wintering in the central part of island had deer that never saw the ocean; the wolves took them there too. A landscape the size of Delaware of forest rippled over mountains that rose up from glacier made valleys, spruce, hemlock and cedar waving slowly as rain forest foresters came and began hiking deep into the woods up creeks and on out to ridges that stretched into the alpine summer deer pasture. They were laying out roads and designating units of "harvest" that laid out the boundaries of what would come next.

Wolves took down deer working from the beach and up drainages. The timber industry came soon and began to build roads first out of Craig and Klawok. Then Hollis, Thorne Bay, Naukati, Coffman Cove, Hydaberg. Cook shacks bunk houses began to appear, company stores sold snacks and cigarettes, and Copenhagen cans of chewing tobacco, each camp had home guards where a wife or, two appeared, State

land came up for sale and like the 1800s in Kansas, houses began to appear, rough at first then nicer houses and cabins.

Wolves took down deer working from the beach and up drainages. Bunkhouses, still housed men and float planes took them to "town," Ketchikan the first city in southeast Alaska as you go north. Scores of bars and two days if you could remember it, was later called fun, no one thought it strange to send a float plane for pizza. Men began to trap out the newly made roads, marten and mink and occasionally wolf pelts were taken from around the camps, and sometimes up beaches from boats.

The unconnected system of logging roads that dot the island was how men took down large trees, working from the beach and up drainages. The pulp mills created clear cut forests around Revillagigedo Island to take down rafts of logs from the Archipelago of Islands on the North American coast, the long straight grains of Sitka spruce that made everything from pianos and violins and were prized ships spars but, then the pulp mill produced fiber slush and spun the forest towers into rayon for skirts, pant suits and blazers and all the while the late rubber had hit the road in the lower 48 with rayon strands woven in the tires as men began to trap further out the newly made roads, marten and mink and occasionally wolf pelts were taken from around the camps, and sometimes up beaches from boats. The state of and the federal subsistence laws Alaska authorized the taking of wolves.

Men took down large trees, working from the beach and up drainages building roads and made their way to head waters and started working on the slopes, the pulp mill ran three shifts, and the loggers came to town and still men and women began to trap out the newly made roads, marten and mink and occasionally wolf pelts were taken from around the camps, and sometimes up beaches from boats.

Wolves took down deer working from the beach and up drainages. The roads began out of every logging camp from and gradually worked toward each other and the central part of the island, each logging camp, on the island sea locked and remote, began to become villages with wives and children and schools and little churches, and barged in groceries. Every winter some families began to trap out the newly made roads, marten and mink and occasionally wolf pelts were taken from around the camps, and sometimes up beaches from boats, targeting those animals with highest price per pelt. Wolves were never the highest price. Some biologists that were experts on wolves predicted that wolf population would decrease as more roads appeared.<sup>3</sup>

Men took down large trees, having worked away from the beach now proceeded around each drainage and around the island and roads built of island rock and granite began to connect each village, and logging was money and jobs were plentiful and loggers tramped their camp for another with the same pay, or sometimes better and each time a Camp supervisor did any unreasonable thing, or too many mistakes were made in the rigging and with each unreasonable thing

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<sup>3</sup> Person 1999

there was more danger and they began calling themselves tramps, with nose bag of thermos and gear and duffle bags, a sharp set of cork boot some of them left one camp for another and worked the like work, all over the Archipelago Island all making various stops. Some of them set chokers some of them worked rigging and some of them fell trees, Some of them made it their life and some of them made money to go to college so they could, have a life; one timber faller put himself through dentistry school and bought cabin cruiser and he came back with his wife to the islands every summer for thirty years, long after the bunkhouses and cook shacks were gone, fixing folks teeth, and while tourists came to catch halibut and salmon and men took down fewer large trees, working from the beach and up drainages. Every winter some families began to trap out the newly made roads, marten and mink and occasionally wolf pelts were taken from around the camps, and sometimes up beaches from boats, targeting those animals with highest price per pelt. Wolves were never the highest price.

Big black bears always took salmon working from the beach and up drainages wolves ate salmon too. Splashing of spawning fish, big Coho's and Sockeye and pink salmon as well, while the big belly dragger black bears were noted in the outdoor press as largest in the world and anyone could come take trophies from all over the world as Alaska game regulations with modest tag prices encouraged sportsmen to come for big black bears or two if the wanted. And the bear population that outnumbered people for a time came down in great numbers, without much notice and the Island resident always took few bears for food and generally in the spring, and the press became instead

advertisements and the lodges began to sell package tours with a Chevy Suburban and an Island map, and with various expertise hunters came and bought tags and shot bears in the spawning streams and drank liquor and wounded bears and shot sows with cubs and drank liquor and shot bear, it didn't take too many years before everyone stopped seeing belly draggers and the State sealers began sealing to the out of state hunters, teddy bear sized bears and sows were taken and the orphaned cubs showed back up at the lodges and the ardent bear hunters began to call this wrong, and the State in time changed the rules after, a lot of the damage was done, on Prince of Wales Island where nature was constant before 1954, but now the roads began to connect, and the logs could go to the big mill in Craig and little mills all over the island, as the pulp mills were shutting down forty years later and when they and some of the foresters saw a diminishing end of the thought of never ending supply of men taking down large trees, working from the beach and up drainages. The fifty year sales were bought back from the pulp mills and though diminished the logging went on the camp left, leaving villages, that formed city governments and had to think of infrastructure up keep that the camps had left, Schools, and jobs with the logging going on across the island and the roads helped commerce and the communities were connected, and wolves took down deer working from the beach and up drainages where now a patch work of timber patches made a mosaic from the air, no need to plant trees in the rain forest land, the trees came back, the big trees were gone forever if the clearcuts were rotated every 50-100 years, like well,

like, Aldo Leopold said, like cabbage<sup>4</sup> and though Aldo showed another way, Foresters continued with the cabbage patch model and showing how this could all be managed and Forest plans were planned and all the nations' laws were mentioned and it was still that, men taking down large trees, working from the beach, and up drainages but it was harder to do because the laws set speed limits. And because just like a car it is easy to go over the speed limit, folks started to sue, for different reasons and it seemed to those that were there, a carpet of trees came back in five years' time, jobs were plentiful and the timber industry workers, and Forest Service workers began to stay and villages became incorporated and politics was always a part of the industry of timber, some from each side left the timber industry, some became fishermen, some bought little stores and started up gas stations, or became charter boat fishermen, and some started little mills, the road became pavement over time and soon there were fewer timber sales.

Wolves took down deer working from the beach and up drainages and the villagers could trap beaver otter marten and wolves and kill deer for winter meat, salmon and halibut already canned up was larder as well. Grocery stores once distant, then became closer for some, protein was taken seasonal but often immediate and had to be taken as groceries were expensive, so like taking a coat along on a cold winters day, every house hold was allowed five deer per person and all the Salmon and halibut they could catch, and then in time some noticed not as many deer and thought

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<sup>4</sup> Leopold, Aldo (1966-12-31). A Sand County Almanac: With Other Essays on Conservation from Round River (Kindle Locations 2656-2673). Oxford University Press. Kindle Edition.

of the wolves and first blamed them, while seeing winter range, still disappearing on trucks, no one noticed dead fawns that had nothing during severe winters to eat. Only a few saw boatloads of bucks coming in on Charter boats<sup>5</sup>, No one saw wolves killed on the beach just for fun, winters snow depth not letting them out of inland stands of refuge, and the Islands of refuge became deer holding pens, this all came after time while men took down large trees, working from the beach and up drainages. Slowly at first, tourists had arrived every summer and lodges appeared; charter boats caught the "Barn Door" Halibut& pictures were taken and no one thought of these three hundred pound, flat fish as the egg laying mothers that kept up the stock and behemoths were caught and the pictures continued to be taken and the halibut stock started to diminish. The commercial fishermen were limited to week long seasons and tourists from Texas and tourists from Tennessee, tourists form California, New York, Japan, Minnesota and everywhere else came with thousands of dollars to spend and Chicken Bay which was named for the good eating "chicken halibut," fish of around twenty pounds were mostly all gone. The chickens and their mothers were taken away and the big fish were all distant, at a several hour boat ride. The summers brought traveler halibut from the far north and villagers could long lined a year's catch but as the charter boats and everyone else took the big ones and the stocks began to wane, and after arguing for some time the biologists got a handle on this and there were less charter boats just in time, still, wolves took down deer working

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<sup>5</sup> Jackie Sundie Coffman Cove, Alaska, Comment on the Fish and Wildlife Service (USFWS) Proposed Rule: Endangered and threatened wild life and plants: Alexander Archipelago wolf 2014.

from the beach and up drainages. Clearcuts in mosaic grew back plentiful forage, strings of mild winters, let deer slip through wolves and men and for a good time deer numbers were up, roads adjacent to clearcuts were for a time shooting galleries each fall. After hunting the alpine, the deer lower down could be found in the clearcuts. And a rest from the road and nice buck would fall, the rut would deliver more and boats following the beach could come back with a boat load of bucks. To round out each families take, and then charter folks began to do this.

Men took down large trees, no longer working up from the beach. The drainages were logged leaving a bath tub ring of harvest around all the island's creeks. Save the centermost part and the Karta wilderness, and the Honker divide and the south half of the island. The inner portions of timber taken were deer winter range and soon there was less and less of it, more roads more hunters less deer, and now, there were less wolves to take down less deer working from the beach and up drainages and men took to killing wolves, no longer working up from the beach, but working up roads, and no longer for pelts in the winter, men took to killing wolves because they were wolves because they also ate deer, and the fewer wolves became few wolves in the central part of the Island, that now save the beach road on the Clarence straight was surrounded by pavement, and 4 wheel drive pickups could speed from side to side of the island and crawl up most roads until deep December and hiking in and setting snares became predator control for the few that warred on wolves, and called themselves the wolf patrol and they left the snares and hoped for death and never came

back to check. Some biologists called it the end of the wolves upcoming, and others said they'd be alright, but when they started to investigate and collared the wolves and tracked them with airplanes and counted them for three years on the beach and in the muskegs, the wolves were down to a few, and in one year with the extra-legal predator control, the few became three and the dens were all empty save one and it now may be some time even then if measures were taken, though none are planned until wolves once again took down deer working from the beach and up drainages and if no measures are taken the wolves crash to zero and if the Central Island wolves disappear; there are still packs to the north though not very many, and packs to the south, though not very many, and maybe they'll come back and maybe they won't if measures aren't taken, so just like the halibut and bear the biologists disagreed<sup>67</sup> some say the winter range can be logged and others say too much is gone and now it can't, because there may have been wolf numbers now significantly close to zero, and now there are less deer and court cases and lawyers and judges will decide to weigh in on the decision making.

Some of the actions are unrelated some are related and some after incremental actions over time become cumulative effects. A winnowing process would show an answer. However, like bears and halibut State and Federal agencies had to assess stocks and make changes in methods and means of take. Stocks were depleted from incremental take. Wolf stocks have been depleted in a similar manner because of more human pressure and the advent of roaded

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<sup>6</sup> Person Statement 2013

<sup>7</sup> Draft SIR

connection between communities. While BTP planning effort might be seem to be beyond the purview of wolf trapping regulations, in the realm of the Forest Service, it must be well described.

Wolves have been harvested by means of traps set along roads throughout the roaded history of POW Island. Together there have been past and present incremental actions of taking of wolves both legally and extra-legally, which very apparently has led to a significant wolf population decline. This is a cumulative effect and the cumulative effect is the significantly new information that would require a supplement. Because the EIS treats the effect as an indirect effect of road building, and there is a cogent assertion that this is really a cumulative effect.<sup>8</sup> Together legal and extra-legal wolf taking have formed a consequence that is prompting TES listing. Split apart and half of these affects unassessed they form a fatal NEPA flaw. Without analysis of their combined consequence, regardless of listing, the Big Thorne Project may be in some form of legal jeopardy.

One "event" leads to another. This chain of events might be long or short, but it is chain of events that establishes the scope of an environmental document. Thus regarding the "Scope" of the AA wolf as it relates to the BT FEIS and SIR really boils down to (1) actions and (2) the impacts of those actions. But "actions" and "impacts" may have the same qualities, and may be indistinguishable. For example, when the "action" is to kill wolves by legal harvest and extra-legal harvest, the "impact" may be a significant population decline toward the point of extirpation. But killing a wolf by any means is the "action"

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<sup>8</sup> Big Thorne Project FEIS S-8 Summary

that causes the "impact" of wolf population decline. Perhaps the USFWS will find that Alexander Archipelago wolves are fine. Dr. Person's two decade long prediction that now seems to be plausible and most likely make conclusions in the DSIR less than convincing.

Should the FS have lumped or split legal and extra-legal wolf harvest?

Numerous case law decisions regarding Federal Actions must be "lumped" if:

- Action A (legal wolf harvest) and Action B (extralegal wolf harvest), Road are "links in the same bit of chain.
- Action A (legal wolf harvest) and Action B (extra-legal wolf harvest) are similar actions. Failing to analyze similar actions has stopped Tongass planning efforts in the past.
- Action A (legal wolf harvest) and Action B (extra-legal wolf harvest) constitute "the big picture"
- Action A (legal wolf harvest) and Action B (extra-legal wolf harvest) have cumulative impacts; are "cumulative actions"

BT Project seems to ignore impact of extra-legal harvest of wolves yet they are unarguably similar actions, may constitute the "big picture," when compared to legal harvest. In that the TES listing is being assessed by the USFWS it is warranted that this issue be given a careful reading of 40 CFR 1508.7 noted below. The law requires a process regardless of who made the impact. Further the process requires an assessment in space and time: Consequences may be:

- Incremental with past actions – What does the proposed action add to the actions that have been taken (past actions add up to the existing situation)?

FS has a continuing timber program that has built roads into habitat used by wolves. It has been alleged since road mileage increases with each new timber harvest; this past action has allowed hunting and trapping to have contributed to legal and possibly extra-legal wolf take affecting wolf population. Legal wolf take is quantified. Extra-legal wolf take has been noted, but has not been quantified; an assumption abides from biologists and appellants that a number high as the legal wolf take has been ongoing. BT Project will build more roads. Wolf population has fluctuated in a downward trend with legal and extra-legal harvest since 1990s, and it seems it has significantly declined by 2014. It has been predicted since the 1990s that legal wolf take, combined incrementally with extra-legal wolf would begin a population decline that may crash toward zero on Prince of Wales Island. Existing condition is in reality that the wolf population is significantly less than the FEIS has predicted. This may be new information that the SIR should acknowledge.

- Incremental with other present actions – What does the proposed action add to other actions that are now occurring (see “Actions” table for actions to include)?

Wolf population has fluctuated with legal and extra-legal harvest since 1990s, and now has apparently declined to low levels that some biologists say challenges wolf viability. BT Project will build still more roads that to some extent affect

the wolf population. The proposed action without mitigation will do little in the short term to alleviate the downward trend, even though commercial thinning might help the prey base for the wolf. The current ongoing population decline is known to a certain extent even though the study is not complete. Numbers seem to indicate that the population of wolves in the central portion of Prince of Wales Island is approaching zero. Extra-legal wolf take appears to be mostly responsible for this rapid decline of the wolf population in Central Prince of Wales island—and it's been going on for some time. Documentation of this deliberate depopulation effort is available. This may be new information that the SIR should acknowledge.

- Incremental with reasonably foreseeable future actions – What does the proposed action add to future actions that are reasonably foreseeable (without regard to what agency or person takes such action)?

If legal harvest stops, or is curtailed, extra-legal harvest may continue, thus putting continued incremental pressure on wolf populations throughout the life of the project.

It seems a good case may be made that extra-legal harvest of wolves has had an incremental impact on wolves that may be significant regardless of whether USFWS lists the AA wolf. This may be new information that the SIR should acknowledge. It seems likely that Dr. Person has shown there is new information about extra-legal harvest. Since his letter, there may be more. There is no evidence of the FS making an effort to determine the numbers of extra-legal harvest were at the level Dr. Person ascertained. While the ongoing wolf study since 2009 may have

new evidence, there is no mention of preliminary findings by either the WTF or the SIR.

BTP may be an example of an Agency using biological science and management science exclusively to describe how things work. 40 CFR 1508.7<sup>9</sup> requires that the Agency describe additionally, how things relate.

The current BTP FEIS/ROD has many facts, including: estimated numbers for wolves, numbers of deer per square mile, acres of deer winter range existing, miles of road density existing, the fact of extra-legal wolf harvest that may be as much as wolf harvest, the possibility of unsustainability of wolf population has been stated, a description of the project area and the general economic state, a description of island human demographics, all facts gleaned from deductive and inductive analysis. However there is no description of how the existing effects in the project area environs relate to cumulative effects of the AA wolf, its population status, and the proposed and alternative action of the BTP FEIS/ROD. This is to be considered as a past, present, and future sense and it is to be considered regardless of what agency is involved. The FS admits that there is likely to be a further decline of the wolf population but that packs are resilient and posits that the wolves are likely to rebound and pretty much allows that the health of the wolf rest with ADF&G and the USFWS.

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<sup>9</sup> 40 CFR 1508.7 *Cumulative impact.*

“Cumulative impact” is the impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (Federal or non-Federal) or person undertakes such other actions. Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time.

There is information that suggests the numbers of wolves and the legal harvest and the extra-legal harvest is as dire as has been predicted by wolf biologists for over a decade is true<sup>10</sup>(Person and Brinkman 2013), and the latest data present in the ongoing Forest Service and ADF&G joint effort that has been collaring wolves in the project area since 2009; the notion of the SIR is to ignore these significant new facts. What is really new in the Statement by Dr. Person is a description of how the existing condition for the past 60 years relates to the current wolf population and the cumulative effects that have occurred. The final SIR should rethink Dr. Person's statement in conjunction with his papers and compare the cumulative effects analysis of the BTP FEIS/ROD. A comparison will suggest that Dr. Person's Statement is a persuading description of the complete effect. The complete effect is what NEPA seeks to discover. The BTP resource report on wildlife and subsistence has a closer description of the existing condition over time—perhaps this will suffice.

The Big Thorne Project ROD states "Collectively this [meaning the selected alternative] has the potential to result in localized declines in the deer population, and thus the prey base for wolves." What the Forest Service misses is that the wolf has become a prey base for humans in legal and and extra-legal methods that may warrant its placement on an endangered list and that this has come about as a cumulative effect of over utilization relative to the BT Project. The FS answer is there are wolves in other WAAs. But there is an indication that stocks in these WAAs may have declined as badly as the packs in Central

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<sup>10</sup> Person, D. K., and T. J. Brinkman, "Succession Debt and Roads: Short- and Long-Term Effects of Timber Harvest on a Large-Mammal Predator-Prey Community in Southeast Alaska." In *North Pacific Temperate Rainforests*, edited by G. H. Orians, and J. W. Schoen. Seattle, WA: University of Washington Press (Person and Brinkman 2013)

Prince of Wales Island. Again, and to conclude, the new information Dr. Person provides is that the cumulative effect of 60 years of project action is now evident with current Alexander Archipelago wolf study that is still ongoing. This seems to be significant and analysis should further describe past, present, and future effects in a manner that satisfies 40 CFR 1508.7. With all the expertise the FS has ignored the human factor that has been present all along. The wolf patrol really is no different than timber industry advocates. They all have self-interest in the resources on POW. We have come to a point where there is imbalance and must rely on law to guide our way through the cross purposes of self-interest. This is a wonderful nation that proceeds in this manner. If the Forest Service no longer has the decision space to decide an unbiased outcome for wolves the USFWS will, or the courts will. Wolves, or short-term industry gains? As a timber sale planner of many years and now retired, I'm hopeful for the wolves this time. But my hope is for people too, residents of POW will be harmed by draconian road closures that preclude subsistence deer. For my money as a tax payer I'd like to see a new ROD that implements the young growth harvest and a SIR that fairly looks at facts and the scope and prepares a supplement for the remaining timber harvest that gives the wolf and the USFWS the benefit of the doubt. Mitigation measures may alleviate many concerns and a timber sale could proceed. Thank you.

Sincerely,

James R. Kelly