United States Department of the Interior

FISH AND WILDLIFE SERVICE
Anchorage Fish and Wildlife Field Office
605 West 4th Avenue, Room G-61
Anchorage, Alaska 99501-2249

June 23, 2014

Forrest Cole
Attn: Forest Plan Amendment
Tongass National Forest
648 Mission Street
Ketchikan, AK 99901

Subject: Draft Big Thorne Supplemental Information Report

Dear Forrest,

Staff of the Fish and Wildlife Service (FWS) have reviewed the draft Supplemental Information Report (SIR) and associated appendices for the Big Thorne Project, dated May, 2014. We participated in the interagency Wolf Task Force that was convened to address questions posed by the Regional Forester and have been involved with the project as a member of the Old Growth Reserve interagency review team. We also provided comments during scoping for the project and on the draft environmental impact statement. Our comments on the draft SIR follow.

Wolf Viability

We are concerned that statements in the SIR regarding the conclusions of the Wolf Task Force, with respect to viability of wolves on Prince of Wales Island, are misleading. As you know, there were disagreements among members of the Wolf Task Force on the risks to wolves posed by the Big Thorne Project. The SIR states that "Neither perspective held by the Task Force members agrees with the ultimate conclusions of the Statement" (that wolf viability on Prince of Wales Island is at risk from implementation of the Big Thorne Project) (p. 7), implying that the wolf population is believed by all members of the Task Force to be secure. A similar statement is found in the second bullet item on page 7: "None definitively agreed with the final conclusions in the (Person) Statement." In fact, the Fish and Wildlife Service explicitly declined to state whether or not we believe this to be the case. As we stated in a March 28, 2014 email to task force facilitator Greg Hayward and the rest of the Wolf Task Force:

> "As you know, we recently completed a review of a petition to list the Alexander Archipelago wolf on Prince of Wales Island. Our 90-day finding…concludes that listing may be warranted pending a more complete 12-month status review. Given the short time frame allocated for the response to Dr. Person's statement, we are unable to determine the validity of his statement that the Big Thorne Timber Sale project, in combination with existing and foreseeable cumulative impacts, may

jeopardize viability of wolves on Prince of Wales Island. Our status review and decision will ultimately be the result of a more thorough evaluation of the best available information, and will analyze more than just the effects of the Big Thorne Timber Sale. We do believe, however, that there is compelling evidence that some concern is warranted, and that a cautious approach would be prudent."

The report of the Wolf Task Force actually does conclude (p. 12) that there is some risk that wolves on Prince of Wales Island could be jeopardized if adequate deer winter range is not protected and wolf harvest is not adequately regulated. So, while it is true that none of the members of the Wolf Task Force explicitly stated that viability of wolves on Prince of Wales Island will be jeopardized by implementation of the Big Thorne Project, the Fish and Wildlife Service specifically did not rule it out. The final SIR should recognize this.

Additional Mitigation Measures

The draft SIR evaluates changes to Old Growth Reserves, implementation of legacy structure standards, and potential inclusion of additional mitigation measures to reduce impacts to wolves. In each case, the SIR concludes that no modification is necessary based, among other things, on "the findings from the Task Force regarding new information and my evaluation of the conclusions by that team" (pp. 9, 10, and 12).

The Wolf Task Force did not discuss any of these elements of the Big Thorne Project, and our report does not mention them. There was disagreement among the Task Force membership on whether or not to evaluate these issues and make recommendations. Some Task Force members (including the Fish and Wildlife) were willing to recommend ways to reduce impacts of the timber sale on wolves. Other members were not. Ultimately, we discussed the Person Statement in some detail but did not discuss or report on Old Growth Reserves, legacy structure, or other mitigation measures that could be incorporated into the Big Thorne Project. The SIR should not imply that the Wolf Task Force report supports no project modifications that would reduce impacts to wolves.

Old Growth Reserves

Specific rationale for each Old Growth Reserve in the project area are discussed in the April, 2013 Interagency Old Growth Reserve Review, which was produced in support of the Big Thorne Project. This document evaluated proposed changes to the reserves, and provided recommendations on where proposed modifications would provide "comparable achievement" of Old-Growth Land Use Designation goals and objectives, and where they would not. The Fish and Wildlife Service participated with the Forest Service and Alaska Department of Fish and Game in production of this report.

The Big Thorne Project Record of Decision modifies several of the reserves, primarily to make additional timber available for harvest. Fish and Wildlife Service does not believe that the modifications made to the reserves in Value Comparison Units 5800 (Ratz Mountain), 5850 (Sandy Beach) or 5810 (Luck Lake) provide comparable achievement because they either

replace south-facing slopes and elevational corridors that are important to deer and other species with high-elevation, north-facing lands (VCU 5800) or they remove forest land from the existing reserves without providing any replacement whatsoever. Such actions undermine the integrity of the Tongass Conservation Strategy and reduce our faith that the strategy will protect old-growth forest dependent wildlife as intended.

Deer Winter Range and Isolated Elevational Migration Corridors

In our December 10, 2012 letter to the Forest Service on the Big Thorne Project Draft Environmental Impact Statement (DEIS), the Department of the Interior recommended that forest stands classified as "deep snow deer winter range" and isolated elevational migration corridors be excluded from harvest, to protect habitat for deer, the primary prey of wolves on Prince of Wales Island. We note that many such units have been included in the unit pool, across the project area. Impacts to deer, wolves, and subsistence hunters could be reduced by protecting these forest stands from logging, or by managing them in ways that retain their ability to intercept snow.

The 2008 Tongass Land and Resources Management Plan (Forest Plan) directs the Forest Service to provide sufficient deer habitat capability to maintain sustainable wolf populations and human deer harvest demands (Forest Plan, p. 4-95). Protecting important winter range and seasonal migration corridors is key to accomplishing this direction.

Wolf Habitat Management Plan

The Forest Plan also directs the Forest Service to develop and implement a "Wolf Habitat Management Program" where wolf mortality concerns have been identified (Forest Plan, p. 4-95). The Department of the Interior explicitly stated such a concern in our December 10, 2012 comment letter on the Big Thorne DEIS (p. 3). Others (like Dr. Person in his Statement) have, as well. The interagency wolf project currently underway in the Big Thorne project area documented an estimated 80 percent wolf mortality rate (clearly unsustainable) over the winter of 2012-2013 (Person and Larson 2013). We understand that a similar mortality rate was observed over the 2013-2014 winter, although no written report is yet available.

The Fish and Wildlife Service participated in a Wolf Task Force effort in 2011 in response to wolf mortality concerns expressed during the Logjam Timber Sale (which is also on Prince of Wales Island, and near the Big Thorne project area), but that Task Force was disbanded following its first meeting, before a Wolf Habitat Management Plan was developed. We recommend that such a plan be developed prior to implementation of the Big Thorne Project.

The Forest Plan also requires the Forest Service to reduce mortality risk to wolves where interagency analysis has identified unsustainable wolf mortality from road access and associated human-caused mortality (Forest Plan, p. 4-95). Reports by Person and Logan (2012) and Person and Russell (2008), and Person and Larson (2013) which were all interagency efforts, clearly document unsustainable wolf mortality associated with road-based wolf trapping and hunting in the Big Thorne project area. We recommend that additional road management be implemented

and incorporated into Travel Management regulations, to reduce risks to wolves, prior to implementation of the Big Thorne Project.

Conclusion

The Fish and Wildlife Service maintains a high interest in the Alexander Archipelago wolves of Southeast Alaska, as we have been petitioned to list this endemic subspecies. We were also petitioned to list the wolves on Prince of Wales Island as a distinct population segment. Our desire is to assist the Forest Service and others in securing conservation of the wolf so that listing will be unnecessary. We remain available to work with you toward that end.

When we make our listing decision, we will base it on the best available information relative to threats from habitat loss, overharvest, inadequacy of existing regulations, and other factors, as required by the Endangered Species Act. We urge the Forest Service to use its authority to protect and improve habitat for wolves and their primary prey, particularly where concerns have been expressed by knowledgeable scientists and others. Please contact Steve Brockmann of my staff at steve_brockmann@fws.gov or (907) 780-1181 if you have questions about any of the matters discussed above.

Sincerely,

Socheata Lor
Field Supervisor

Cc: Doug Vincent-Lang, ADF&G
Kim Titus, ADF&G
Greg Hayward, USFS
Brian Logan, USFS