USDA

United States Department of Agriculture

Prince of Wales Landscape Level Analysis Project

Record of Decision and Appendices 1 - 4

Forest Service
Alaska Region

Tongass National Forest
Thorne Bay Ranger District and
Craig Ranger District

R10-MB-833m March 2019

Cover Photo: Prince of Wales Island alpine meadow. Credit: Molly Simonson

USDA United States Department of Agriculture | Forest Service | Tongass National Forest Alaska Region | 648 Mission Street Ketchikan, AK 99901 907-225-3101

File Code: 1950
Date: March 16, 2019

Dear Planning Participant:

I am pleased to announce that the Record of Decision (ROD) for the Prince of Wales Landscape Level Analysis Project (POW LLA) on the Tongass National Forest has been signed. The ROD and Appendices including Activity Cards, Implementation Plan, Travel Management decision and Errata are available for review at Forest Service offices at the Thorne Bay and Craig Ranger Districts, and the Ketchikan Forest Supervisor's office, and online at

http://www.fs.usda.gov/goto/tongass/powlla.

This ROD documents my decision to select Alternative 2 with modifications, hereafter called the Selected Alternative, and describes my rationale for the decision. This decision authorizes a wide array of site-specific activities and management strategies, including old- and young-growth timber harvest; precommercial thinning and wildlife habitat improvement; watershed improvement and restoration; recreation facilities maintenance, improvement, and development; and other infrastructure and non-infrastructure activities on the Thorne Bay and Craig Ranger Districts on Prince of Wales and nearby islands.

The FEIS and draft ROD were available for public review prior to this final decision, pursuant to the pre-decisional administrative review process (objection process) under 36 CFR 218, subparts A and B, and fifteen objections with standing were received during the 45-day objection filing period. The Reviewing Officer reviewed the draft decision, in accordance with 36 CFR 218.3(a) and 219.56(g), and provided instructions. I have complied with the instructions from the Reviewing Officer prior to signing the ROD. Project implementation may commence immediately after the decision is signed.

Copies of this letter have been directly mailed or emailed to those who have expressed interest in the project through scoping, comments, consultation, or requests to be on the mailing list.

For additional information, please contact Delilah Brigham, Project Leader, at (907) 828-3232 or email at dbrigham@fs.fed.us.

As the Forest Supervisor, I am responsible for this decision. Your interest in the POW LLA Project and management of the Tongass National Forest is appreciated.

Sincerely,

M. EARL STEWART
Forest Supervisor, Tongass NF

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PRINCE OF WALES LANDSCAPE LEVEL ANALYSIS PROJECT
Final Record of Decision
Prince of Wales Island, Alaska

Lead Agency: USDA Forest Service
Tongass National Forest

Responsible Official: M. Earl Stewart, Forest Supervisor
Tongass National Forest
Federal Building
648 Mission Street
Ketchikan, AK 99901

For Information Contact: Delilah Brigham, Project Leader
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Abstract:

The Responsible Official has selected Alternative 2, with modifications, from the Prince of Wales Landscape Level Analysis (POW LLA) Project Final Environmental Impact Statement (FEIS) as the Selected Alternative. The Selected Alternative incorporates input from a broad collaborative effort resulting in suggestions for a wide array of site-specific activities and management strategies, including old- and young-growth timber harvest; precommercial thinning and wildlife habitat improvement; watershed improvement and restoration; recreation facilities maintenance, improvement, and development; and other infrastructure and non-infrastructure activities. Invasive plant management includes manual, mechanical, and herbicide treatments. There will be no commercial harvest of old-growth stands in the area "North of the 20 Road" and within VCU 5280. The Selected Alternative also includes measures to minimize impacts to or improve wildlife habitat on National Forest System lands adjacent to communities to benefit subsistence users. The project area for the Selected Alternative is displayed in Figure 1 below.

The effects analysis for each resource is contingent on adhering to the requirements within the Activity Cards (Appendix 1) and following the processes described in the Implementation Plan (Appendix 2). The Activity Cards, Implementation Plan, and Travel Management (Appendix 3) are an integral part of this decision for accountability, tracking, decision-making, and documentation purposes. Appendix 4 includes Errata to the FEIS.

The Responsible Official for this project is the Tongass National Forest Supervisor, M. Earl Stewart.

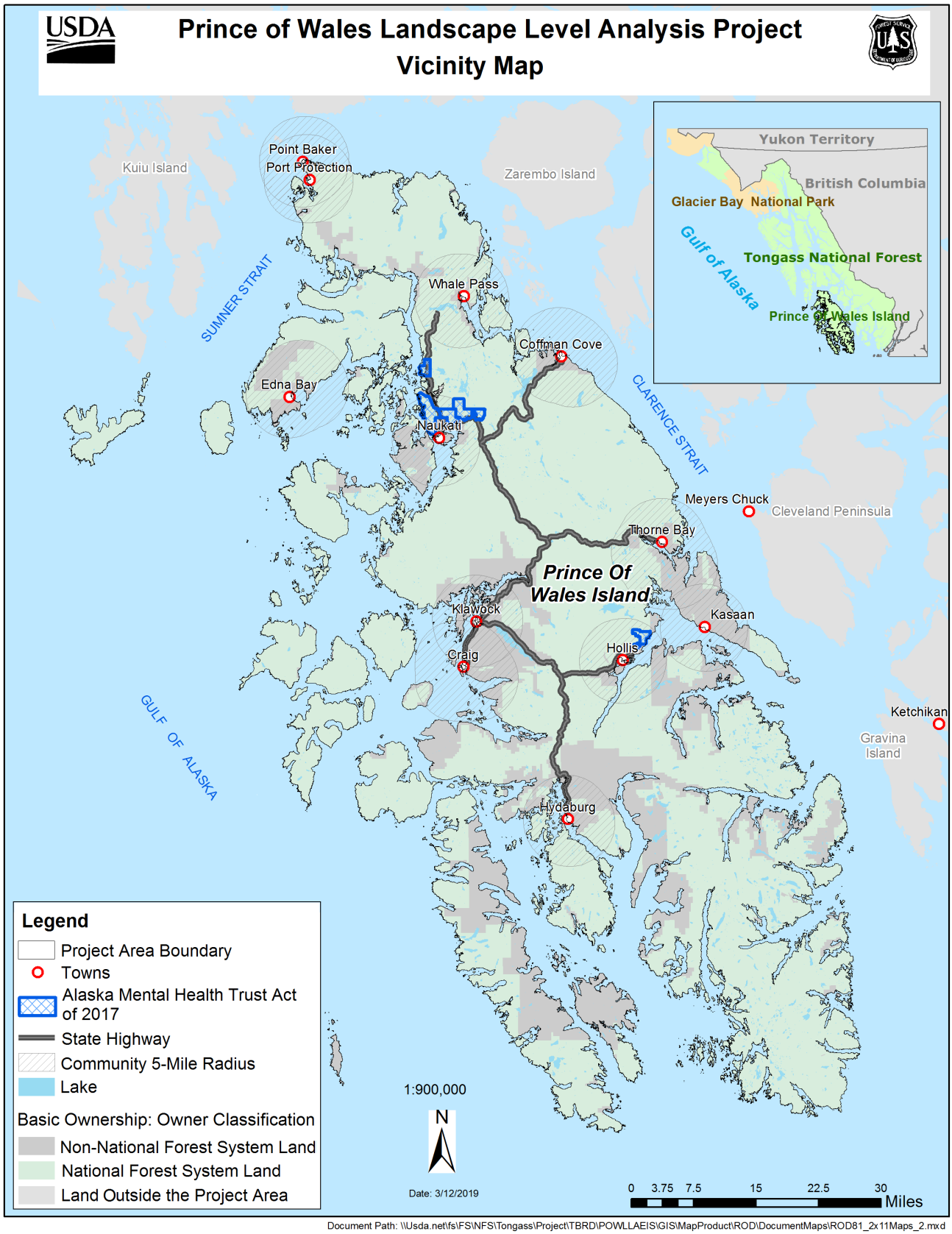

Figure 1. Vicinity Map

Prince of Wales Landscape Level Analysis Project Record of Decision and Appendices 1 - 4

Introduction

A draft Record of Decision (ROD) was made available for review under the project level pre-decisional administrative review, or "objection process" (Title 36 CFR 218, Subparts A and B). The Draft ROD documented my intent to select Alternative 2, with modifications as my Selected Alternative from the Prince of Wales Landscape Level Analysis (POW LLA) Project Final Environmental Impact Statement (FEIS) and the rationale for my decision. Fifteen objections were received from entities with the required standing to object to the Draft ROD.

This Record of Decision documents my selection of Alternative 2 with modifications as my Selected Alternative, and describes my rationale for the decision, including the purpose and need, the key issues I considered in the decision, a summary of the environmental analysis completed for this project, my consideration of public comments and objections, and consistency with the Forest Plan and other applicable laws and regulations including findings required by law. The ROD (see Exhibit 1) also contains the Reviewing Officer's instructions to me prior to implementing the decision.

Decision

Based upon the instructions from the Reviewing Officer and my review of public comments and the objections, the analysis contained in the FEIS, the project record, and the Forest Plan, I am selecting Alternative 2 in full, including the actions common to all alternatives as described in the FEIS, as the Selected Alternative, with the following modifications.

Modifications to Alternative 2 for the Selected Alternative

- Herbicide Use for Invasive Plants: In addition to current methods (manual and mechanical), herbicides will be an additional tool to treat invasive plant infestations as part of an integrated weed management approach to eradicate or control infestations of non-native, invasive plants across all management area types as described in Alternative 3 of the FEIS. New populations would fall into an adaptive management strategy of Early-Detection Rapid-Response (EDRR) that includes this new suite of control methods (manual, mechanical, and herbicides; see Appendix 1: Activity Cards). Herbicide use will be planned by prioritizing infestations based on species and size, following project design feature implementation, adhering to herbicide label requirements, the Pesticide Use Proposal process, and permitting and/or regulatory processes (all built into a site-specific Weed Management Plan).
- Proposed National Forest System (NFS) roads designated for storage (Maintenance Level 1) will be reviewed during harvest activities for availability of firewood and biomass. If firewood or biomass is available then the road may remain open (Maintenance Level 2) for 3 to 5 years once timber harvest activities are complete to allow for firewood or biomass collection. These roads will then be placed into storage to reduce maintenance costs. This short-term allowance will not change the overall effects analysis for resources. If temporarily leaving the road open for utilization of this material causes undue resource impacts, the road would be stored immediately instead.
- Along proposed temporary roads, limited short-term (up to 3 years) public access for gathering firewood or biomass will be allowed once timber harvest activities are complete, if there are no specific safety or resource concerns. These roads will then be decommissioned.

- No commercial harvest of old-growth stands is authorized in the area "North of the 20 Road" or within VCU 5280 as described in Alternative 5 of the FEIS.
- I am deferring the use and reconstruction of existing marine access facilities (MAFs) and construction of new MAFs until other agencies' recommended mitigations have been identified and resolved.

I am incorporating the project design features and measures to minimize adverse environmental effects of the Selected Alternative as part of my decision. These are described in Chapter 2 of the FEIS and, more specifically, in the Activity Cards (Appendix 1 of this ROD). I am also incorporating the Implementation Plan (Appendix 2 of this ROD), which is integral to my decision to ensure activities are implemented within the scope of the analysis in the FEIS and the Selected Alternative. I am satisfied that these project design features and measures are practicable and effective for avoiding or minimizing environmental effects. I am also delegating authority to the District Ranger to approve activities that would normally be under the authority of a District Ranger as outlined in the Forest Service Manual and Forest Service Handbook.

Features of the Selected Alternative

The Selected Alternative is designed to meet multiple resource objectives through an integrated approach that will improve forest ecosystem health and watershed function, help support community resiliency, and support economic development on the Thorne Bay and Craig Ranger Districts (consistent with the multiple-use goals and objectives of the Forest Plan, also described in Chapter 1 of the POW LLA Project FEIS).

To achieve these goals and objectives, the Selected Alternative identifies a variety of activities to be implemented over the next 15 years. The activities and management strategies fall within four broad categories: 1) Vegetation Management, 2) Watershed Improvement and Restoration, 3) Sustainable Recreation Management, and 4) Associated Actions. These activities are displayed in maps provided on the project website at: http://www.fs.usda.gov/goto/tongass/powlla. More information on specific activities within each category is detailed on the Activity Cards, Appendix 1.

Vegetation Management (Activity Cards 1-16, and 30):

- Up to an average of 25 million board feet (MMBF, volume measurement) of old-growth timber annually from suitable timber lands may be offered during the first 5 years of implementation, and up to an average of 15 MMBF of old-growth timber annually during the next 5-year period. An evaluation of the amount of old-growth timber remaining within the project area would occur 10 years after the decision, to determine if economical offerings are still available from the suitable timber land base during this last 5-year time period. This evaluation would be conducted using the Implementation Plan process (Appendix 2). Based on this evaluation, up to 10 MMBF of old-growth timber may be offered for years 10 and 11 of the project and up to 5 MMBF of old-growth timber for the final 3 years.
- Catastrophic blowdown and insect or disease breakout events will be reviewed on a case-by-case basis to determine if it is within the FEIS effects analysis, and if it should be included as part of the planned volume from this project.
- The old-growth small sales strategy is designed to ensure economical old-growth timber is available for operators, including availability beyond the 15-year timeline of this project and until sufficient young-growth timber is available to provide timber sales.

- For each old-growth large sale greater than 10 MMBF, an amount equal to 25 percent of that sale volume will be identified from the remaining potential project old-growth timber stands and placed in a pool for small sales offerings. Those designated stands will meet the following criteria:
  1. be generally within a quarter mile of an existing or planned road connected to the road system on POW and Kosciusko Islands;
  2. contain green timber with volume, species composition, and economically suitable for small operators;
  3. be compatible with yarding systems in use by and available to small operators, generally ground-based and short-span cable systems; and,
  4. generally, be grouped and offered with less than 3 MMBF per offer to meet the harvest and milling capacities of small operators.
- An average of 3 MMBF annually of young-growth may be offered during the first 7 years of implementation, and an average of 50 MMBF of young-growth timber annually during the next 8-year period, from suitable lands as defined under the Forest Plan. Young-growth harvest would occur in stands that generally have not reached 95 percent of the culmination of mean annual increment (see discussion in Appendix 1). Commercial harvest stands should, however, have generally reached a level of growth where at least 50 percent of the total volume occurs in trees with a merchantable height suitable to produce two 34-foot logs.
- Old- and young-growth commercial harvests will use various prescriptions and logging systems, and may provide material to purchasers through large sales, small sales, salvage sales, and microsales. Harvested trees generally are removed without the limbs and tops attached; however, the limbs, tops, and cull material could potentially be used as biomass and other products.
- Commercial harvest in young-growth stands will use two-aged or uneven-aged management wildlife-centric prescriptions and old-growth stands will be limited to uneven-aged management wildlife-centric prescriptions within a 5-mile radius around communities (see Figure 1). Prescriptions will be designed to improve or maintain deer habitat and existing wildlife corridors.
- Various treatments - including thinning, girdling, pruning, and slash treatments - may be used to improve wildlife habitat in young-growth stands. Treatments will be prioritized in deep snow winter habitat (south-facing stands below 800 feet in elevation) when consistent with stand objectives and desired future conditions. That is, as funding becomes available, deep snow habitat areas (especially in wildlife analysis areas (WAAs) with deep snow habitat concerns) would receive priority consideration for treatments, but the treatments would be consistent with stand objectives and desired future conditions.
- There will be no commercial harvest of old-growth stands in the area “North of the 20 Road” or within VCU 5280.
- Salvage opportunities for wood energy and other products may occur as allowed by the Forest Plan. Within Old Growth Habitat Land Use Designations (LUD), opportunities are limited to within one tree-length from the edge of the clearing limits of a road or landing.
- Up to 4,500 acres of young-growth stands may be precommercially treated, annually, for timber production, wildlife habitat improvement, and/or riparian improvement.

- Slash treatments (e.g., bucking to various lengths, delimbing, lop and scatter, machine/hand pile and burn, chipping, or crushing (see Activity Card 10)) may occur in thinned stands for wildlife habitat improvement.
- Tree planting and inter-planting may occur in any post-harvest unit to achieve desired species composition or regeneration requirements.
- Cone collection may occur to acquire native seeds for tree planting.
- Wildlife trees may be created using methods such as blasting, girdling, and fungal inoculation in young-growth stands to meet wildlife habitat objectives.

Watershed Improvement and Restoration (Activity Cards 25- 29 and 32-35):

- Instream restoration activities may occur on up to 200 miles of stream within the project area in any watershed identified as having a need to restore proper functioning condition. The Forest Service will consider opportunities for interpretive signs within restored watersheds for public education.
- Fish habitat improvements - such as lake fertilization, egg incubation boxes, fry stocking, and barrier modifications - may occur for fresh water systems that have shown a decrease in fish population or have potential for increased habitat.
- All newly installed fish-stream crossing structures must meet aquatic passage requirements.
- Existing stream crossings within the project area that do not allow for fish and aquatic organism passage at all flows (referred to as ‘‘Red crossings’’) will be replaced with appropriate structures meeting passage requirements, removed, or intentionally permitted to remain in place by regulatory agencies as funding allows.
- The Forest Service may use root wad or cut trees, and salvage cull logs and stumps to provide a source of large wood for stream and floodplain restoration.
- Historical surface water flow paths may be restored in areas where past management activities impeded natural water flows or created unnatural water flows to karst features. Activities may be implemented to restore soil productivity where detrimental soil conditions approach or exceed 15 percent of an activity area.
- Manual, mechanical, and herbicide treatments will be used to treat invasive plant infestations as part of an integrated weed management approach to eradicate or control infestations of non-native, invasive plants across all management area types. New populations would fall into an adaptive management strategy of EDRR. Herbicide use will be outlined in site-specific Weed Management Plans.

Sustainable Recreation Management (Activity Cards 36-40 and 43-46):

- Up to three new cabins and up to twelve new shelters that are boat or road accessible may be developed. Existing cabins may be decommissioned, but may be replaced in a more accessible location that has a higher potential of use. The POW LLA Project goal is to have no net loss of cabins. The Tongass National Forest is currently developing a Forest Sustainable Cabin Strategy. The goal of the strategy is to have no net gain of cabin deferred maintenance. The POW LLA Project will consider the Final Strategy, once completed, when implementing any cabin activity.
- Up to 50 miles of new trails may be developed. Trail uses may include walking, hiking, bicycling, mountain biking, and off-highway vehicles. Maintenance on existing trails will continue, but improvements may only occur on trails that have regular use and a need for

improvements. Spur trails to recreation structures may be developed. Interpretive information along new or existing trails will also be considered. Road-to-trail conversions will be considered.

- Up to three new campgrounds may be developed. Decommissioning of the Harris River Campground may occur in exchange for developing a campground at El Capitan.
- Interpretive and informational signs may be developed at existing or new recreation infrastructure and along existing or new roads and trails.
- Up to eight winter sport access points and areas for over-the-snow vehicle use may be developed. This may include pullouts, 60-foot wide vegetation clearings providing access to subalpine/alpine locations, and warming huts.
- A picnic day-use area near Neck Lake may be developed. In addition, to support input received from local youth, the Forest Service may permit a day use area on the island for uses such as frisbee golf, archery, and other youth activities.
- To enhance recreation experiences, activities may occur at recreation sites, trails, or along roads to provide or improve vistas, including timber stand thinning, pruning, or vegetation clearing.
- Opportunities for fresh- and saltwater canoe and kayak access points may be implemented, which could include spur trails, roadside pullouts, and shoreline improvements to mitigate bank degradation.

Associated Actions (Activity Cards 17-24 and 41-42):

- The Forest Service may construct up to 35 miles of NFS road and up to 129 miles of temporary road associated with the amount of commercial timber volume offered.
- Proposed NFS roads designated for storage (Maintenance Level 1) will be reviewed during harvest activities for availability of firewood and biomass. If firewood or biomass is available, then the road may remain open (Maintenance Level 2) for 3 to 5 years once timber harvest activities are complete to allow for firewood or biomass collection. These roads will then be placed into storage to reduce maintenance costs. This short-term allowance will not change the overall effects analysis for resources. If temporarily leaving the road open for utilization of this material causes undue resource impacts, the road would be stored immediately instead.
- Along proposed temporary roads, limited short-term (up to 3 years) public access for gathering firewood or biomass will be allowed once timber harvest activities are complete, if there are no specific safety or resource concerns. These roads will then be decommissioned.
- Site preparation, hazard tree removal, wildlife-proof garbage can installation and maintenance, and brushing and brush disposal may be implemented when applicable.

Rationale for the Decision

My selection of Alternative 2, as modified for the Selected Alternative, considers how best to meet the purpose and need for this project, the existing conditions within the project area, environmental effects, relevant issues and concerns, and public comments. My rationale is based on the project-specific environmental analysis included in the FEIS and appendices, as well as a review of the project record, which shows a thorough analysis using the best available science.

I selected Alternative 2 because it is aligned with the suggestions and comments submitted by the Prince of Wales Landscape Assessment Team, members of the public, local Tribes, other agencies, and the community interests across Prince of Wales.

As a modification to Alternative 2, I decided to incorporate the use of herbicide treatments on invasive plant populations (as described in Alternative 3 of the FEIS) to keep the infestation of noxious and invasive weeds on NFS lands to a minimum in accordance with Executive Order 13112 (1999), which directs me to prevent introduction of, and detect, control, and monitor invasive species.

I decided not to authorize commercial harvest of old-growth stands in the area "North of the 20 Road" and in VCU 5280 as outlined in Alternative 5 of the FEIS in order to address concerns expressed by individuals in the communities of Point Baker and Port Protection. They have stated that these specific areas are extremely important to their subsistence way of life and they have recommended that no further old-growth harvest should occur within them.

I have received public comments to leave some roads open for the availability of firewood and biomass. My decision is to leave the proposed temporary roads open for up to 3 years and the proposed NFS roads designated for storage open for 3 to 5 years once timber harvest activities are complete in order to allow for firewood or biomass collection. This short-term allowance will not change the overall effects analysis for resources. Each road will be reviewed during harvest activities for availability of firewood and biomass. If temporarily leaving the road open for utilization of this material causes undue resource impacts, the road would be decommissioned or stored immediately.

The Selected Alternative is within the framework of existing laws, regulations, policies, and the capabilities of the land, while meeting the stated purpose and need for this project. My authorization to implement the Selected Alternative is consistent with the Forest Plan and complies with the National Forest Management Act (NFMA).

Reviewing Officer Direction

I reviewed the objections to the Draft ROD and the Reviewing Officer's Responses to the Objections to the Prince of Wales Landscape Level Analysis Project dated March 1, 2019. I participated in the objection resolution meeting with the objectors both individually and as a group. I have followed the instructions provided in the Reviewing Officer's Responses to Objections. The response to the instructions is documented in the Response to the Reviewing Officer's Instructions for Required Actions for the Prince of Wales Landscape Level Analysis Project Record of Decision in Exhibit 1 of this ROD. The Selected Alternative complies with the Reviewing Officer's direction.

Purpose and Need

Though all three action alternatives meet the purpose and need of the project, they each do so to varying extents, with tradeoffs between resource effects and benefits. I have evaluated these trade-offs and both the beneficial and adverse environmental effects of all three action alternatives are documented in the environmental analysis in the FEIS. I also looked at how well each alternative responds to the purpose and need for action (described in the FEIS, Chapter 1). The purpose is to help move the project area towards the desired conditions in the Forest Plan, and to meet multiple Forest Plan resource goals and objectives. Those considered include (but are not limited to) Economic, Fish, Biodiversity, Recreation and Tourism, Subsistence, Timber, and Wildlife goals and objectives. The need comes, in part, from the Forest Service's obligation, subject to applicable law, to seek to provide a supply of timber from the Tongass National Forest that meets both market demand annually and for the planning cycle, and to restore and improve forest and watershed resources to a condition where they provide increased benefits to society (Tongass Timber Reform Act, Section 101).

Commercial, subsistence, and recreational fishing activities are important to many project area communities, both as an economic contributor (e.g., seafood processing and harbor usage fees) and for social and economic well-being, particularly in the smaller communities who rely on subsistence fishing as a food source. Ecosystem services (such as healthy watersheds and fisheries) and ecosystem restoration activities both contribute to employment in the natural resources and mining sectors. For example, commercial fishing, other commercial fisheries (including sea cucumber, sea urchin, and geoduck), and seafood processing have remained foundational components of the local economy, while a growing mariculture industry for kelp and oyster farms has expanded the seafood product portfolio for Prince of Wales Island.

I considered the effects of the proposed recreation projects in this project area and have found that the Selected Alternative provides a range of recreation opportunities that meet public demand, while maintaining, improving, and balancing the existing recreation inventory for the health and safety of all users. In addition, I have considered how these recreation opportunities may enhance local communities and could directly and indirectly contribute toward local socioeconomic development. Recreational opportunities arising from robust and sustainable fish stocks have fueled jobs in leisure and hospitality through the development of sport fish lodges, outfitter and guide services, accommodations, and related tourism services.

The forest products industry is a contributor to the local economy and is important to economic diversification. The timber industry in the project area includes medium and small timber sale purchasers, mill operators, and value-added wood product industries that are dependent upon a reliable supply of timber. Operators need economical timber to stay in business and loss of those operators would have an adverse impact on local economies. I considered the need to manage the timber resource in the POW LLA Project area so that it contributes towards the even flow of timber on an economical basis from the Tongass National Forest. The Selected Alternative would provide the best flexibility for the Forest Service in the development of timber offers. This would provide a variety in the range of timber products and the size of potential timber offers that could help meet industry demands, market conditions, and local needs identified through public involvement. The old-growth volume associated with the Selected Alternative should also support the most local manufacturing and milling job opportunities and direct income.

I considered how each alternative best supports a transition from old-growth timber harvest to primarily young-growth timber harvest. The Selected Alternative supports the offering of more old-growth volume to provide current local manufacturing, milling, and logging operations with the most time and revenue. This would allow them to move their operations towards young-growth operations and manufacturing, and to develop markets. A reliable supply of economically viable timber is critical to maintain the expertise and infrastructure of the existing timber industry during the transition.

Significant Issues

Issues or concerns submitted through comments during scoping were used to develop alternatives, either considered in detail or not, in the DEIS. Issues or concerns identified in public comments received for the DEIS were either incorporated into the FEIS or otherwise were responded to in Appendix D of the FEIS. The Selected Alternative best addresses the issues and concerns raised because it incorporates a wide range of activities and mitigation measures to address the purpose and need of the project.

I considered the effects of this project on resources, including soils, wetlands, watersheds, fisheries, timber, wildlife habitat, scenery, recreation; rare, sensitive, and invasive plants; climate change, and

heritage. These resources were analyzed for this project, and results can be found in the POW LLA Project FEIS in the respective environmental effects sections. Five significant issues were identified and analyzed in the planning process, are summarized in Table 4 in Chapter 2 of the FEIS, and are discussed below.

Issue 1: Invasive Plant Management

Invasive plants displace native plant communities and may cause long-lasting economic and ecological problems within and outside the National Forest. Invasive plants can spread rapidly across the landscape to all land ownerships. There are currently about 2,300 acres of known infestation of invasive plants in the project area, on both NFS and non-NFS lands. Using only manual or mechanical treatments for invasive plant control may not effectively reduce the establishment and spread of some invasive plant populations to the degree that herbicide treatments would accomplish. I considered the potential environmental effects of exposure to the chemical properties contained within the herbicide to humans, soil, wildlife, aquatic resources, and non-target vegetation at a treatment site and I conclude that an integrated weed management approach using all treatment methods (manual, mechanical, and chemical) is appropriate for meeting our Forest desired condition considering costs, future resources to address this challenge, and effectiveness of the treatments. This conclusion is based on the relatively low levels of chemical use over a minor proportion of lands within the project area, coupled with minor to negligible risk of chemical exposure to humans and other resources. A comprehensive planning process prior to treatment, which includes site-specific design features for each resource, will further mitigate risks.

I approve the use of the following herbicides: Glyphosate, Imazapyr, and Aminopyralid. These herbicides were chosen specifically as they have proven to be the most effective, either alone or paired, in treating both the existing and potential future priority, non-native, invasive plant species within the project area. These herbicides readily bind to soil particles, reducing mobility within the soil, and quickly break down into harmless components. They are among the lowest-risk (and low-toxicity), widely-used, and scientifically-tested herbicide options. Addressing concerns specific to glyphosate, in 2015 the International Agency for Research on Cancer deemed Glyphosate “probably carcinogenic.” This determination was not based on exposure (how much or for how long), but rather on the hazard (could it cause cancer under any conditions). Red meat, hot tea, sunshine, working as a hairdresser, mobile phones and wood dust all have been analyzed and given the same designation (IARC 2016). Consequently, the inherent level of health risk is minimal and readily mitigated through full compliance with worker training requirements, herbicide label and Material Safety Data Sheet (MSDS) specifications, and project design features for safe herbicide storage, transportation, use, and disposal.

While herbicide use does carry a greater risk of effects to human health, it provides an effective form of treatment for many invasive plant populations. Combining the EDRR treatment strategy with herbicide use while populations are small and scattered is expected to reduce the overall treatment costs with less chemical use over the life of the project. Less disturbance is expected as fewer entries may be necessary than with only manual and mechanical treatments.

Herbicide effects on resources (as outlined in resource reports) that were analyzed as part of Alternative 3 (Final EIS, pg. 72, Table 6) should now be included as effects to those resources under the Selected Alternative.

This project represents an Integrated Pest Management Strategy for managing invasive species including EDRR and herbicide use. If this project is not implemented the invasive species program will continue to operate under the status quo. Under the current program, with manual and

mechanical treatment as the only means of managing invasive plant species, infestations will continue to spread resulting in larger infestation acres throughout the island. Without EDRR and herbicide use, new infestations will go unchecked while ongoing treatments will be limited to a minor portion of the high priority infestation acres. As a result, costs will continue to increase while overall effectiveness decreases. Without the ability to effectively manage infestations, the potential for degradation of ecological function within watersheds will continue.

Issue 2: Subsistence

Commenters expressed concerns about the cumulative effects of the proposed activities on subsistence resources and associated habitats. I recognize that subsistence hunting, fishing, trapping, and gathering activities are an important part of life for many residents within the project area (i.e., providing food, perpetuating cultural traditions, and increasing self-reliance). Implementation of the Selected Alternative does not present "a significant possibility of a significant restriction" of subsistence uses for the following subsistence resources: food plants, personal use timber, upland game birds and waterfowl, furbearers, salmon, other fin fish, seaweed, and marine mammals and invertebrates (see FEIS, Issue 2).

I considered the effects of project activities on deer habitat, access to deer subsistence resources, and competition for deer resources. The abundance and distribution of deer could be affected mostly by the loss of deep snow habitat in some WAAs (see FEIS, Issue 5). The loss of this limiting habitat type increases the importance of treating the young growth in south-facing low-elevation stands to reduce the effects of severe winter weather to deer. If there is a change in abundance and distribution of deer, there may be an effect on competition for deer because as hunter efficiency and success decrease in stands that transition into the stem exclusion stage of forest development, there is the potential for increased competition for deer in areas where habitat capability, and potentially deer abundance, is higher.

The construction or reconstruction of roads could provide greater access to areas previously not accessible. This could also affect subsistence both positively and adversely by providing access and dispersing hunting pressure, while creating the potential for increased competition for favored hunting areas among communities connected by the existing road system.

The direct, indirect, and cumulative effects associated with the project may present a significant possibility of a significant restriction of subsistence use of deer. The potential cumulative effects are due to the effects of activities on the abundance and distribution of deer, the competition for deer due to effects to deer habitat, and access to deer.

The Selected Alternative provides more balance overall, than the other alternatives, with considerations for types of treatments on different parts of the landscape. Over 50 percent of the total old-growth acres proposed for harvest in the POW LLA Project are prescribed uneven-aged management. Precommercial and commercial thinning will be used in young-growth stands to promote biodiversity by increasing understory vegetation growth in the short term. Where young-growth stands are allowed to mature over the long term, treatments will be designed to progress towards the development to old-growth stands quicker.

Wolfe 2004 explains a subsistence land use pattern called central-based use area which tends to be the typical pattern for communities with subsistence uses in Alaska. The "central-base" is the community itself and contains residences, businesses, schools, and services. The next area is the surrounding commons that are relatively open and undeveloped. Wolfe goes on to explain that subsistence users harvest most of their food in the commons immediately surrounding and

contiguous to their communities. As noted in the July 15, 2017 Corrected NOI Scoping Letter (p. 3), I took into consideration various projects and strategies that were proposed through public input including limiting old-growth harvest around communities to maintain deer habitat and winter range, prioritizing young-growth treatments to promote deer habitat, and maintaining existing and creating new wildlife travel ways for a variety of species. Rather than creating an exclusionary buffer around subsistence communities in which no harvesting would occur, my interdisciplinary team and I developed the wildlife-centric prescriptions that would allow some harvesting while addressing subsistence users concerns. We chose to propose a 5-mile radius from subsistence communities within Alternative 2 with these prescriptions (two-aged and uneven-aged harvest) with the belief that that distance would be enough to address the significant subsistence issues raised early in the project development without being overly restrictive (see Draft Issue Statements and Alternatives, pp. 2 and 11).

Issue 3: Timber Supply and Timber Sale Economics

I evaluated the concerns for providing for economical timber sale offerings within the context of fluctuating timber markets, the amount of timber volume currently available for offer from the Tongass National Forest, and the relative environmental effects of the Selected Alternative. I find that the Selected Alternative provides the best balance overall. The Selected Alternative would offer the most timber volume and the most old-growth volume of the alternatives considered in detail, which in turn would offer the most flexibility and opportunity for the Forest Service to tailor the products made available. The Forest Service would then be able to design the size of potential timber offers that could help meet industry demands, market conditions, and local needs identified through public involvement. The increased old-growth volume associated with the Selected Alternative would also support the most local manufacturing and milling job opportunities, and direct income. Local manufacturing jobs are most dependent on the old-growth volume offered since little local manufacturing of young growth is currently occurring in Southeast Alaska; thus, the Selected Alternative could be the most beneficial for local manufacturing.

More old-growth volume would allow current local manufacturing, milling, and logging operations the most time and revenue to move their operations towards young-growth processing and manufacturing. The Selected Alternative would also give industry the most time, under current practices, to develop infrastructure and markets for the project area's extensive young growth, while allowing young-growth stands additional time to grow and add volume. This project represents a large portion of the timber volume to be offered by the Tongass for the next 15 years. If a continuous supply of timber is not provided, then timber industry operators would need to either obtain this volume elsewhere on the Tongass or from non-National Forest System lands. Operators that could not obtain their timber supply may have to close their businesses. If this happens, local community economies may be impacted either by direct employment or indirect expenditures. The expertise and skills of these operators would be lost and may delay the transition to young-growth management.

Road construction is a factor when evaluating economical timber sale offerings. Project road costs are determined utilizing the Region's road cost guide. The road cost guide is derived from best available estimates of the labor, materials, and equipment necessary to perform particular road construction, maintenance, or decommissioning. The road cost guide is updated at least annually. Labor rates come from the Department of Labor and other sources. Equipment rates come from Equipment Watch, and other sources. Additional information on pricing sources are located in the project record.

Issue 4: Watershed Function

Water quality and properly functioning watersheds are important for aquatic ecosystems and the services they provide. Many project area watersheds are in near-natural condition and have not been impacted by past land management. However, about 30 watersheds may be at risk for maintaining ecological function due to past management practices; these watersheds need restoration to prevent further decline in function. Degraded watershed condition in the project area resulted from past timber harvest and road building. The USFS Watershed Condition Framework defines "degraded" condition or "degraded" habitat as similar to "severely altered" or "impaired" relative to natural potential condition (USDA Forest Service, 2011, Watershed Condition Framework FS-977, page 3). Following national guidance (USDA Forest Service, 2011, Watershed Condition Classification Technical Guide FS-978), a series of spreadsheets were developed to assign Watershed Condition scores for attributes that link management activities. Watershed function is scored based on the following criteria (per watershed): number of impaired waterbodies; number of known water quality problems; number of dams or diversions; percent of aquatic habitat artificially blocked; percent of riparian timber harvest; percent roaded area in vulnerable riparian habitat; percent expected life forms present; degree of exotic or invasive aquatic species present; road and trail density; proximity of roads and trails to aquatic habitat; amount of mass wasting; percent with productive soil; percent with disturbed soils; percent of watershed with soil contamination issues; percent deforested; percent of watershed with terrestrial invasive species; and percent affected by insect and disease.

The "30 watersheds" identified in the FEIS have scores of 1.4 or higher, since several in the 1.4 range had already been identified by the Prince of Wales Landscape Assessment Team as watersheds with restoration needs. The Tongass Timber Reform Act (TTRA) of 1990, subsequent Forest Plans (1997, 2008, and 2016) and Best Management Practices (BMPs) have increased protection measures for watershed condition and aquatic habitat. BMP and Forest Plan monitoring show that these practices are effective (USDA Forest Service 2017, USDA Forest Service 2015).

Though changes to peak flow rates are possible, the potential for peak flow rate increases in 36 watersheds (FEIS, Table 37) represents a worst-case scenario. Careful consideration of potential changes to peak flow rates will be made during the implementation phase of the project. Given the geographic location of specific activities, professional judgement based on the analysis method provided in the FEIS will be followed to minimize or eliminate potential adverse effects to aquatic resources. Forest Plan direction and components will be followed.

The Transportation section of the FEIS (Tables 86 and 87) shows the amount of road construction and maintenance proposed for each action alternative. Road maintenance is anticipated to have negligible adverse effects to aquatic resources. Although it causes short-term, localized increases in sediment, road maintenance is necessary to protect aquatic resources and prevent long-term effects to water quality, fish habitat, and aquatic organisms. Re-opening roads (bringing a Maintenance Level 1 road to Maintenance Level 2 standards) could have minor to moderate effects to aquatic resources from reconstruction activities. The effects to aquatic resources from road building within 300 feet of fish habitat are expected to range from minor to moderate.

The Selected Alternative authorizes the most instream restoration and fish habitat improvement activities. Restoration activities could have positive long-term effects to aquatic resources and fish habitat improvement activities may increase salmon production.

This project represents a large portion of the watershed restoration efforts and aquatic organism passage projects for the Tongass for the next 15 years. If watershed restoration or aquatic organism passage activities are not implemented, that could lead to further degradation of watershed systems

that are in need of restoration and could prevent generations of fish from accessing habitat. If this happens, local subsistence may be impacted by a decrease in fish abundance and distribution. Local community economies may be impacted either by direct employment or indirect expenditures.

Issue 5: Wildlife Habitat and Connectivity

I considered the effects of timber harvest and road construction on wildlife habitat. Vegetation management can affect wildlife habitat through modification of vegetation characteristics or habitat composition. The POW LLA FEIS includes the analysis of several different habitat types including non-winter, average and deep snow, productive old growth (POG), high volume POG (HPOG) and large tree POG (SD67).

The analysis of the proposed activities at the WAA scale show no difference between the different alternatives, because all alternatives assume that all acres proposed for timber harvest will be harvested. The analysis also assumes that all acres will be harvested by even-aged harvest methods. These assumptions were necessary because at the time of the analysis it was unknown which specific acres would be harvested, and by what harvest method. The specific location of proposed harvest (which WAA) will be determined during implementation. Therefore, for the analysis it was assumed all acres would be harvested in order to analyze the maximum effect.

The acres of POG remaining post-project are the same for both NFS and all lands, because the POG acres on all non-NFS lands are assumed to provide no habitat for wildlife species. This allows for a maximum effect analysis.

Table R-1 below shows the acres remaining by habitat type for the Selected Alternative and the percentage of the estimated current acres, and the percentage estimated to have been available in 1954.

Table R-1: Acres remaining by habitat type for the Selected Alternative and the percentage of the estimated current acres, and the percentage estimated to have been available in 1954.

	NFS ac	% remaining		All lands ac	% remaining	
		Of current	Of 1954		Of current	Of 1954
Non winter habitat	1,602,449	98	90	1,602,449	78	71
Average snow	727,349	97	78	727,349	83	66
Deep snow	49,449	98	66	49,449	98	52
Productive old-growth (POG)	791,643	97	79	791,643	84	67
High-volume POG (HPOG)	368,240	97	66	368,240	81	54
Large-tree POG	154,805	97	71	154,384	68	50

1 - Non winter habitat: Includes all vegetation types, except young growth at stem exclusion, at all elevations

2- Average snow: All POG below 1,500 feet elevation.

3- Deep snow: HPOG below 800 feet elevation in south-facing stands

4- Productive old-growth (POG)

5- High-volume POG (HPOG): Three tree size and density classes that represent the highest volume strata—SD5S, SD5N, and SD67 types

6- Large-tree POG (SD67) class: Representing the most productive of the POG types, and typically containing the highest density of large trees

On NFS lands, all WAAs with habitat concerns include at least one form of mitigation, and many WAAs include multiple mitigation measures. Overall, the greatest effect is more likely to be to

habitat, such as HPOG that is used by species with limited dispersal capabilities (e.g., the Prince of Wales flying squirrel and spruce grouse). The impacts may be exacerbated when WAAs with greater impacts are adjacent to each other or on islands. Species with greater dispersal capabilities may be less affected by habitat loss in any one area; however, this reduced effect could be negated if WAAs with higher impacts are adjacent to each other or on islands.

The Forest Plan Conservation Strategy was designed to address effects to species through the network of old growth reserves (OGRs) and other non-development land use designations (LUDs), combined with Forest-wide standards and guidelines intended to maintain important habitat components, and functional connectivity across the landscape, including through development LUDs. The conservation strategy is expected to maintain viable, well-distributed populations across the Forest, even with full implementation of the Forest Plan's expected harvest levels. For a complete review of the Forest Plan Conservation Strategy, including assumptions underlying the design of the OGR system, refer to Appendix D of the 2016 Forest Plan Amendment FEIS, Appendix D of the 2008 Forest Plan FEIS, and Appendix N of the 1997 Forest Plan FEIS.

While there may be increased risk of effects to wildlife resources in the Selected Alternative, it will allow for a more comprehensive effort to address wildlife concerns across the project area such as limited winter habitat and elevational corridors at a landscape scale.

Table R-2: Summary of effects of the proposed activities to species that occur or are more likely to occur within the project area on the Tongass National Forest or in adjacent waters.

Species/Issue	Presence		Direct, Indirect and Cumulative Effects	
	Species Present in Analysis Area[1]	Species Habitat Present in Analysis Area	Level of Influence[2/] Determination	Reason for Determination/ Level of Influence
Threatened and Endangered Species[3]				
Humpback Whale Mexico DPS	Yes	Yes	Not likely to adversely affect	May increase marine disturbance or alter habitat that could affect the marine environment with use of marine access facilities and barge traffic associated with timber harvest.
Steller Sea Lion Western DPS	No	Yes	Not likely to adversely affect	May increase marine disturbance or alter habitat that could affect the marine environment with use of marine access facilities and barge traffic associated with timber harvest.
Critical Habitat				
Steller Sea Lion	N/A	Yes	No Effect	Would not alter habitat
Regional Forester Sensitive Species				
Queen Charlotte Goshawk	Yes	Yes	May impact individuals, but not likely to cause a trend towards federal listing or loss of viability	On NFS land, due to the overall amount of HPOG habitat remaining at the project-area scale, as well as the implementation of conservation measures, it is expected that NFS lands should be able to continue to support goshawk populations over time; however, the overall loss of HPOG habitat on all lands could contribute to downward population trends for this species in the project area.
Management Indicator Species (MIS)				
Alexander Archipelago Wolf	Yes	Yes	Moderate to major	Since there is a downward trend with the deer due to changes in deep snow habitat and effects to wolves are linked to effects to deer, it

Species/Issue	Presence		Direct, Indirect and Cumulative Effects	
	Species Present in Analysis Area[1]	Species Habitat Present in Analysis Area	Level of Influence[2/] Determination	Reason for Determination/ Level of Influence
				is likely that there may be a downward trend with wolves. Also contributing to the downward trend in wolves would be the effects of an increase in road density.
American Marten	Yes	Yes	Moderate	Average Snow: On NFS lands at the project area scale, there is currently about 81 percent of the estimated 1954 average snow marten habitat remaining (decline of about 19 percent). The maximum effect from the POW LLA results in an additional loss of about three percent, resulting in a total loss of average snow habitat of about 22 percent since 1954 on NFS lands (78 percent remaining). Average snow marten habitat loss on all lands is estimated to be about a 14 percent reduction from current, resulting in a total loss of average snow marten habitat on all lands since 1954 of about 34 percent. The overall loss of average snow marten habitat on all lands could contribute to downward population trends for this species in the project area. Deep snow: At the project scale, there is currently about 67 percent deep snow habitat remaining (a loss of about 33 percent since 1954). The maximum effect of the POW LLA Project results in about a two percent loss of deep snow habitat on NFS lands. Since 1954, there is expected to be an overall decline of about 34 percent in deep snow habitat on NFS lands. At the project-area scale on all lands, there is estimated to be a 47 percent decline in deep snow habitat since 1954. This habitat loss may contribute to local downward population trends for this species.
Black Bear	Yes	Yes	Moderate	On NFS lands, the POW LLA Project contributes only a three percent decline in POG habitat, resulting in an overall decline in POG habitat of about 21 percent since 1954. On all lands, a 13 percent reduction of POG from current may occur; this reduction may contribute to a change in population status. A 33 percent reduction in habitat is estimated since 1954 when considering lands in all ownership. It is expected that NFS lands should be able to continue to support bear populations over time, due in part to the conservation measures applied on NFS lands; however, the loss of POG habitat on all lands could contribute to downward population trends for this species in the project area.
Brown Creeper	Yes	Yes	Moderate	At the project area scale on NFS lands, there is estimated to be about a three percent decline

Species/Issue	Presence		Direct, Indirect and Cumulative Effects	
	Species Present in Analysis Area[1]	Species Habitat Present in Analysis Area	Level of Influence[2/] Determination	Reason for Determination/ Level of Influence
				in the SD67 habitat as a result of the POW LLA Project; overall on NFS lands there is estimated to be about a 29 percent decline (71 percent remaining) in SD67 habitat since 1954. On all lands, the estimated habitat loss is currently about 27 percent. A total SD67 habitat loss is estimated to be about 50 percent since 1954 on all lands. On NFS land, due to the overall amount of SD67 habitat remaining at the project area scale, as well as the implementation of conservation measures it is expected that NFS lands should be able to continue to support bat and brown creeper populations over time; however, the overall loss of SD67 habitat on all lands could contribute to downward population trends for these species in the project area.
Sitka Black-tailed Deer	Yes	Yes	Moderate to Major	Activities under the POW LLA Project are likely to affect the abundance and availability of deer either indirectly from forest treatments of habitat or directly from harvest. At the project area scale on NFS lands, the POW LLA Project results in about a two percent decline in deep snow habitat; however since 1954 there is expected to be an overall decline of about 34 percent in deep snow habitat (66 percent remaining). With the conservation measures applied on NFS lands in WAAs with potential deep snow deer habitat concerns and the estimated two percent habitat decline as a result of the POW LLA Project, this project is not expected to contribute to a change in population status. The effect at the project area scale on NFS lands results in a total decline in deep snow deer habitat since 1954 of about 34 percent habitat loss since 1954 that may contribute to local downward population trends for this species. At the project area scale on all lands, there is estimated to be a 48 percent decline in deep snow habitat since 1954. This habitat loss may contribute to downward population trends for this species in the project area.
Other				
Migratory Birds	Yes	Yes	Moderate	There may be moderate direct effects on individuals or small groups and their nests from the disturbance caused by timber harvest and other activities. Most migratory birds are tied to POG habitat. See effects to deer, bear, shrew or ermine above.
Subsistence	Yes	Yes	Significant possibility of a significant	The abundance and distribution of deer may be affected, mostly due to the loss of deep snow habitat in some WAAs .The project alternatives

Species/Issue	Presence		Direct, Indirect and Cumulative Effects	
	Species Present in Analysis Area[1]	Species Habitat Present in Analysis Area	Level of Influence[2/] Determination	Reason for Determination/ Level of Influence
			restriction for deer	would not present "a significant possibility of a significant restriction" of subsistence uses for most subsistence resources (food plants, personal use timber, upland game birds and waterfowl, furbearers, and marine mammals). The project alternatives may present "a significant possibility of a significant restriction" of deer.
Endemics	Yes	Yes	Moderate	A 3 percent reduction in POG habitat as a result of the POW LLA Project is not expected to contribute to a change in population status. The cumulative effect is that POG habitat is estimated to decline about 21 percent on NFS lands since 1954. It is expected that NFS lands should be able to continue to support shrew populations over time, due in part to the conservation measures applied on NFS lands. On all lands, a 13 percent reduction of POG from current may occur; this reduction may contribute to a change in population status. The loss of POG habitat on all lands (about 33 percent) could contribute to downward population trends for these species in the project area.

1 "Yes" if the species is known or is likely to occur in the analysis area or in marine waters adjacent to the analysis area. "No" if the species has not been documented or is not likely to occur in the analysis area.
2 Level of influence of the effects for management indicator species includes "negligible", "minor", "moderate", or "major". Levels of influence are defined in the "Fish and Wildlife Resource Report". Determinations are only required for listed and sensitive species. Determinations for threatened and endangered species include "no effect", "not likely to adversely affect", or "likely to adversely affect" (Bosch 2004). Determinations for candidate species include "no effects", "not likely to jeopardize proposed species, or adversely modify proposed critical habitat", or "likely to jeopardize proposed species, or adversely modify proposed critical habitat". Determinations for sensitive species include "no impacts", "beneficial impacts", "may impact individuals but not likely to cause a trend to federal listing or a loss of viability", or "likely to result in a trend to federal listing or a loss of viability" (Bosch 2004).
3 There will be negligible/no effect to other listed or candidate species because these species do not or rarely occur and/or key habitats are not present in or around the analysis area.
4 All-inclusive of the 14 stocks of listed anadromous fish that could occur in Southeast Alaskan waters during their life cycle. The list include: green sturgeon (southern), Chinook salmon (Upper/Lower Columbia, Puget Sound, Spring/Summer/Fall Snake River, and Upper Willamette River), Sockeye Salmon (Snake River), Coho Salmon (Lower Columbia River), Chum Salmon (Summer Hood Canal), and Steelhead (Lower/Upper/Middle Columbia River, Snake River Basin, and Upper Willamette River).

I considered public comments on The Interagency Wolf Habitat Management Program: Recommendations for Game Management Unit 2 (Interagency Wolf Habitat Management Program). The Forest Plan has already incorporated direction, protection, and mitigation measures that are similar to the recommendations for the Interagency Wolf Habitat Management Program. The Forest Plan components include, but are not limited to:

- Develop an aggressive young-growth management program to maintain, prolong, and/or improve understory forage production and to increase the development of old-growth

characteristics in young-growth timber stands for a variety of wildlife species" (Forest Plan: WILD2.I.A);

- Identify habitat improvement projects to meet wildlife habitat and populations objectives. Consider the following factors to assess habitat improvement project opportunities and priorities:
    a. to meet state wildlife population objectives;
    b. to meet subsistence use needs;
    c. existing habitat in poor condition compared to its potential;
    d. habitat with a history of receiving high level of use" (Forest Plan: WILD1.III.A.1.a-d); and
- Forest-wide, within the beach fringe, riparian buffers, and other lands not suitable for timber production, consider designing young-growth treatments to accelerate old-growth characteristics in order to increase connectivity for wildlife" (Forest Plan: WILD1.VI.B).

Therefore, I decided that the Forest Plan provides for the management and protection of deer habitat and wolf populations and the Selected Alternative did not need to have additional recommendations incorporated from the *Interagency Wolf Habitat Management Program*.

Conclusion

I believe that the Selected Alternative provides the best mix of activities across the landscape that will meet multiple objectives with consideration for near-term and long-term management goals. The Selected Alternative would maintain and expand recreation opportunities and infrastructure within the project area for growth in the recreation and tourism business sectors. It authorizes restoration activities in watersheds to reestablish self-sustaining habitats that promote viable fish, wildlife, and plant populations, which also contribute to commercial, subsistence, traditional, and cultural uses. The Selected Alternative also provides a supply of timber that would support local jobs and facilitate the industry transition to a sustainable wood product industry based on young-growth management on the Tongass National Forest. The timber resource may be managed for production of sawtimber and other timber products from suitable forest lands made available for timber harvest, on an even-flow, long-term sustained yield basis and in an economically efficient manner, while also improving forest resource conditions.

Public Involvement

Many individuals, organizations, and agencies participated in and provided comments for this analysis which I have considered in making my decision. I want to especially acknowledge the Prince of Wales Landscape Assessment Team (POW LAT); the communities of Port Protection and Point Baker; Klawock; and Craig; the Southeast Island School Districts; the local Tribes; and the many other public participants in this planning process. I want to thank them for their cooperative work in developing and proposing projects to be considered by the Forest Service, and for providing information for this project. Some of these comments were incorporated into the alternatives and others were considered but eliminated from further study as documented in Chapter 2 of the FEIS. Table 4 of the FEIS identifies the proposed activities incorporated in the action alternatives.

During initial scoping and throughout the collaborative process, the Forest Service received suggestions for a wide array of site-specific activities and management strategies on NFS lands in the project area. Suggestions included old- and young-growth timber harvest; precommercial thinning and wildlife habitat improvement; watershed improvement and restoration; recreation facilities maintenance, improvement, and development; and other infrastructure and non-infrastructure activities. Many of the suggestions from the Prince of Wales Landscape Assessment Team (a local

group comprised of diverse interests from across Prince of Wales Island) were included in the Selected Alternative, as well as suggestions from public comments from a vast array of interests.

Public involvement is detailed in the POW LLA Project FEIS (on pages 10 to 13) and documented in the project record. This action was originally listed as a proposal on the Tongass National Forest Schedule of Proposed Actions in October 2016 and updated periodically during the analysis. Scoping was initiated when the Notice of Intent was first published in the Federal Register on November 30, 2016. In response to public comments on the proposed action received from initial scoping, as well as internal comments, the Forest Service refined the project purpose and need, developed a more detailed proposed action, and published a Corrected Notice of Intent (CNOI) in the Federal Register on July 6, 2017. The Notice of Availability for the DEIS was published in the Federal Register on May 4, 2018, starting a 45-day comment period. The Forest Service received more than 50,000 written comments (including about 40,000 form letters) from agencies, organizations, and individuals during the 45-day DEIS comment period. Substantive comments within the scope of this project have been addressed and incorporated into the FEIS to the extent practicable. I have reviewed the many public and agency comments we received during this analysis and the responses to those comments are provided in the FEIS, Appendix D.

Alternatives

Alternatives Considered in Detail

The Forest Service designed four alternatives for detailed analysis as part of the POW LLA Project. These include the no-action alternative (Alternative 1), the proposed action (Alternative 2), and two additional alternatives (Alternatives 3 and 5), which were developed in response to issues and for a reasonable range of alternatives. With the exception of Alternative 1, all alternatives were designed to meet the purpose and need for the POW LLA Project. For a full description of the alternatives, see Chapter 2 of the FEIS.

Alternative 1

Alternative 1, the no-action alternative, provides a baseline against which to measure and compare impacts of the various action alternatives, and it represents the existing condition in the project area. Under Alternative 1, none of the specific management activities as proposed in the FEIS would be implemented to accomplish project goals and objectives. Natural disturbances and current management of the project area would continue. Ongoing activities such as recreation, firewood gathering, road and trail maintenance, invasive plant treatments, and other routine forest management activities not associated with this decision would continue as authorized by previous decisions. This alternative does not meet the purpose and need for this project.

Alternative 2

Alternative 2, the proposed action, meets the purpose and need as stated for the project. A highly collaborative public process was used to develop the proposed action. During scoping and throughout the collaborative process, the Forest Service received suggestions for a wide array of site-specific activities and management strategies. Input from local youth, the POW LAT (a local independent collaborative group), the tribes, and the general public were used to finalize the proposed action.

This alternative simultaneously provides a variety of management activities to support a stable long-term economy for the local communities and maintains important fish and wildlife habitat. The

proposed old-growth and young-growth harvest volume is designed to provide an opportunity for local mills to shift to a primarily young-growth industry as outlined in the Forest Plan.

Alternative 3

Alternative 3 addressed public concerns from past management and its effects to the spread of invasive plants by including herbicide treatment (Issue 1), subsistence opportunities (Issue 2), watershed function (Issue 4), and wildlife habitat (Issue 5). This alternative also supported local small mills and provided a limited time for larger mills to increase their utilization of young-growth or locate another source of old-growth to supplement their timber supply (Issue 3). It included less old-growth harvest, emphasized more young-growth harvest, and incorporated other design features, such as some recommendations from the Interagency Wolf Habitat Program and avoiding increasing peak flows in watersheds above the research level beyond what is required in the Forest Plan to limit the effects of harvest and emphasize improvements in habitat on NFS lands adjacent to non-NFS lands (see Table 4 in the FEIS).

Alternative 5

Alternative 5 was developed, in response to public comments from the December 2017 draft issues and alternatives public comment period, to address concerns that the Forest Service did not fully consider reducing the amount of old-growth timber for offer. The other components of this alternative are similar to either Alternative 2 or 3 for each activity listed, depending on which best aligned with comments received during this comment period (see Table 4 in the FEIS).

Alternative 5 addressed all issues to some degree in its design, but emphasized Issues 2, 4, and 5 by incorporating stream restoration, no increases in peak flow rates (resulting from management activities), maintaining and improving wildlife habitat across the landscape, and incorporating the Interagency Wolf Habitat Program recommendations fully. It incorporated manual and mechanical treatments to eradicate, control, or contain populations of invasive plants (Issue 1). Like Alternative 3, it emphasized a more-rapid shift to primarily young-growth harvest by limiting the old-growth harvest to 5 MMBF annually, which may have required local mills to increase their utilization of young-growth or locate another source of old-growth to supplement their timber supply (Issue 3).

Alternatives Considered but Eliminated from Detailed Analysis

Four alternatives were considered but eliminated from detailed analysis throughout the planning process. These are presented in the FEIS Chapter 2, under “Alternatives Considered but Eliminated from Detailed Study.” They include Alternative 4, which was introduced during the December 2017 draft issues and alternatives public comment period in response to requests that we expand the potential timber base into areas not available for commercial harvest under the Forest Plan. As Appendix 4 clarifies, Alternative 4 also considered modifications of karst standards and guidelines, new sites in which telecommunications infrastructure may be placed, and reconfigured old-growth reserves based on an interagency review, all of which would require amending the Forest Plan. Although these were not specifically listed in the DEIS or FEIS as part of Alternative 4, they were included in the December 2017 Draft Issue Statements and Alternatives description of alternatives considered by the Responsible Official, located on the project website and in the project record.

During project level environmental analysis, for project areas that include or are adjacent to mapped old-growth habitat reserves, the size, spacing and habitat composition of mapped reserves may be further evaluated (2016 Forest Plan, p. 3-63). Under limited circumstances, a line officer may decide to modify the size and location of an OGR using a two-step process of an Interagency OGR Review followed by a Decision process (2008 and 2016 Forest Plans, Appendix K). I used my discretionary

authority to request an interagency OGR review to jointly identify the biologically preferred location for OGRs within the project area, as per Step 1 of Appendix K of the 2016 Forest Plan. Although the Forest Plan (Appendix K) calls for the interagency team to be comprised of USDA Forest Service, USFWS, and ADF&G biologists, only one USFWS biologist joined us in the review on February 2, 2018 (see Document 833_1988, February 2018 POW LLA Interagency OGR Review in the project record). Without all three agencies contributing to the review, I do not consider the team that developed recommendations to have met the Forest Plan requirements of Step 1. Despite this, as the FEIS notes on page 175, we discussed OGR concerns including connectivity, distance, and acre requirements at this review. Those OGR concerns were either: 1) addressed and fixed in the 2018 OGR review document, or 2) in some cases, the 2018 review team acknowledged that a concern existed but could not be rectified given the situation on the landscape and no recommendations were made, usually due to land in other ownership or location of the OGRs on an island (FEIS, p. 175). Of the OGRs that were recommended to be modified by the 2018 review team, only two overlapped with activities proposed by this project that may affect the reconfiguration. Both of these OGRs currently meet Forest Plan acre requirements. There would not be any meaningful differences between alternatives for comparison of impacts to the proposed OGR modifications. Given the limited participation and the lack of substantive proposals to modify OGRs, the review recommendations were included in Alternative 4 but not proposed as a stand-alone alternative.

For this project, after considering the limited OGR team's recommendations in Alternative 4, I decided to remove Alternative 4 from detailed analysis. The Decision process in Appendix K (second step) states that at a minimum, the biologically preferred OGR will be considered in an alternative. Since step 1 was not met owing to the lack of participation of the interagency review team, the rest of the process steps outlined in Appendix K do not apply. Even so, Alternative 4 fulfilled them by considering the biologically preferred OGRs. However, in addition to the factors provided above, it would have unnecessarily required Forest Plan amendments when other alternatives that met the purpose and need of the project could be implemented within the existing Forest Plan framework. For all these reasons, I considered the recommendations of the limited OGR review team in Alternative 4 but eliminated that alternative from detailed analysis.

Environmentally Preferred Alternative

The Council on Environmental Quality defines the environmentally preferable alternative as "the alternative that will promote the national environmental policy as expressed in NEPA's Section 101." Ordinarily, this means the alternative that causes the least damage to the biological and physical environment; it also means the alternative which best protects, preserves, and enhances historic, cultural, and natural resources. 40 CFR 1505.2(b) requires that one or more environmentally preferable alternatives be disclosed. The environmentally preferable alternative is not necessarily the alternative that will be implemented, and it does not have to meet the underlying need for the project. It does, however, have to cause the least damage to the biological and physical environment and best protect, preserve, and enhance historical, cultural, and natural resources.

I have reviewed the direct, indirect, and cumulative effects of each alternative.

I have determined that Alternative 1, the no-action alternative, is the environmentally preferable alternative. This alternative is environmentally preferable because it would result in no environmental effects and thereby best protects, preserves, and enhances historical, cultural, and natural resources on the National Forest. Alternative 1 does not meet the purpose and need, but it does provide me with a baseline to measure the direct and indirect effects of the action alternatives.

Of the action alternatives in the FEIS, I have identified Alternative 5 as the environmentally preferable alternative because it describes the fewest acres of timber harvest, has an increased amount of aquatic habitat restoration proposed, and focuses more on wildlife habitat prescriptions and mitigations, and as a result, would cause the fewest environmental impacts.

Mitigation

My decision includes the project-specific design features and mitigation measures needed to minimize adverse environmental effects of the Selected Alternative as described in the Activity Cards, ROD Appendix 1, located on the POW LLA Project webpage (http://www.fs.usda.gov/goto/tongass/powlla). I am satisfied that these are practicable and effective in avoiding or minimizing environmental effects. I have found them to be effective when implemented elsewhere on the Forest.

Monitoring

Monitoring is a tool which involves observing the results of management activities as a basis for evaluation. The NFMA requires national forests to monitor and evaluate their Forest Plans (36 CFR 219.12). Monitoring of the Selected Alternative will be performed during implementation of activities and as part of the Forest Plan monitoring program as shown on the Tongass public website. Specific monitoring items are outlined in Chapter 2 of the POW LLA Project FEIS and are included in the Activity Cards, ROD Appendix 1, located on the POW LLA Project webpage (http://www.fs.usda.gov/goto/tongass/powlla).

Consistency with the Forest Plan and other Applicable Laws and Regulations

As the Responsible Official, it is my responsibility, prior to making a decision, to ensure that this project is consistent with the Tongass National Forest Land and Resource Management Plan (Forest Plan) and other applicable laws and regulations. The Forest Plan describes in detail Forest-wide management direction, goals, objectives, desired conditions, standards, and guidelines.

The POWLLA FEIS uses a condition-based approach where specific harvest units and roads will be determined during implementation through a collaborative public process and interdisciplinary review. Activity Cards and maps were included with the FEIS and Draft ROD and will also be part of this Final ROD. The Activity Cards were designed to honor the public process developed at the community level during the POW LLA NEPA process, to be a resource for the public and Forest Service resource specialists, to assist in alternative development, and to accompany the EIS to provide clarity for environmental effects analysis and guide implementation (FEIS, Appendix A, p.A-1). Information about each activity includes what it usually accomplishes, how it is typically implemented, what constraints and resource-specific guidelines apply, and when it would be implemented. The Implementation Plan identifies that unit and road -specific cards will be developed when specific harvest units and road locations are determined as part of the Implementation Plan process. This Implementation Plan allows for more collaboration during implementation, and responsiveness to dynamic on-the-ground conditions, new science information, and public input. This process provides for publishing unit and road cards online and providing an opportunity for public review and comment before final line officer decisions on specific project activities are made. This has been clarified in the Implementation Plan, ROD Appendix 2, under step 4. I have determined this process is an alternative way to fully comply with Forest Plan Standard TIM3.1.C, which is no longer applicable in terms of the timing of when unit cards are provided. This Record of

Decision, in combination with the Activity Cards and Implementation Plan including unit and road cards, will be used throughout the implementation process to ensure that all aspects of the project are implemented consistent with the Forest Plan and within the scope of effects analyzed in the POW LLA FEIS.

I have determined that the Selected Alternative is consistent with all Forest Plan direction and will contribute to Forest Plan goals and objectives. My decision to implement the Selected Alternative is consistent with all applicable laws and regulations including NFMA, National Environmental Policy Act (NEPA), Alaska National Interest Lands Conservation Act (ANILCA), Endangered Species Act, and the other laws presented in the section "Findings Required by Law and Regulation" in this ROD.

Findings Required by Law and Regulation

Alaska National Interest Lands Conservation Act (ANILCA) of 1980; Section 810

Subsistence Evaluation: The subsistence analysis is presented in Chapter 3 of the FEIS. Based on the information in the FEIS, cumulative effects and effects within the foreseeable future from this project may result in a significant possibility of a significant restriction to subsistence use of deer due to the potential effects on the abundance and distribution of, competition for, and access to deer. Because there was a finding of a significant possibility of a significant restriction to subsistence use of deer, subsistence hearings were held in Whale Pass, Klawock, Hydaburg, Point Baker, Naukati, and Kasaan. A significant possibility of a significant restriction was not found for any other resources.

Finding: In accordance with ANILCA Section 810, I have made a determination for the subsistence finding that the direct, indirect, and cumulative effects of the Selected Alternative will not result in a significant possibility of a significant restriction on the subsistence use of any resources, except for deer. This is due to the effects to the abundance and distribution of, competition for, and access to subsistence resources. This is consistent with the Forest Plan finding that full implementation of the Plan could lead to a significant possibility of a significant restriction on subsistence use of deer. The potential foreseeable effects, directly and cumulatively, from the Selected Alternative will not have a significant possibility of a significant restriction on subsistence uses for other resources, including bear, furbearers, marine mammals, waterfowl, salmon, other finfish, shellfish, and other foods such as berries or personal use timber (including firewood).

The evaluation determined that this project has complied with ANILCA by considering the following three considerations described below.

Necessary and Consistent with Sound Management of Public Lands

I have determined that the Selected Alternative is necessary and consistent with sound management of public lands. In this regard, I have evaluated this project against the NFMA, the ANILCA, the Tongass Timber Reform Act, the Wilderness Act, the 2016 Tongass Land and Resource Management Plan, and the Alaska State Forest Resources and Practices Act. Based on the analysis presented in the POW LLA Project FEIS, the findings I have made in this ROD, and the analysis for the Forest Plan, I have determined that the Selected Alternative strikes a balance between meeting the resource needs of the public and protecting forest resources.

Amount of Public Land Necessary to Accomplish the Proposed Action

I have determined that the amount of land necessary to implement the Selected Alternative is, considering sound multiple-use management of public lands, the minimum necessary to accomplish the purpose of this project. The entire forested portion of the Tongass is used by at least one rural community for subsistence purposes for, at a minimum, deer hunting. It is not possible to avoid all of these areas in implementing resource use activities, such as timber harvesting and road construction, and attempting to reduce effects in some areas can mean increasing the effects in other areas. The Forest Plan includes components and LUD prescriptions that provide for management of or limit activities in many of the areas important for subsistence uses, such as beaches and estuaries, and anadromous fish streams.

Reasonable Steps to Minimize Adverse Impacts to Subsistence Uses and Resources

Many subsistence uses are protected by Forest Plan Chapter 4 Forest-wide Standards and Guidelines for wildlife, fish, and riparian areas, among others. I have determined that, consistent with the overall multiple-use goals and protections of the Forest Plan, and mitigations outlined in the Activity Cards and Implementation Plan, fish and wildlife habitat productivity will be maintained by the Selected Alternative.

Bald and Golden Eagle Protection Act of 1940 (as amended)

I have determined that the Selected Alternative complies with the most recent information for bald eagle protection requirements in 50 CFR Part 22.

Clean Air Act of 1970 (as amended)

I have determined that emissions from the implementation of the Selected Alternative will be of short duration and are not expected to exceed State of Alaska ambient air quality standards (18 AAC 50).

Clean Water Act (1977, as amended)

The Selected Alternative will comply with the Clean Water Act and meet the goals of Alaska's water quality standards. Clean Water Act Sections 208 and 319 address nonpoint source pollution caused by activities such as timber harvest. The site-specific application of best management practices (BMP), with a monitoring and feedback mechanism, is the approved strategy for controlling nonpoint source pollution as defined by Alaska's Nonpoint Source Pollution Control Strategy. In 1997, the State of Alaska approved the best management practices in the Forest Service's Soil and Water Conservation Handbook as consistent with the Alaska Forest Resources and Practices Regulations. The best management practices are incorporated into the Forest Plan.

Forest roads, as defined by the U.S. Army Corps of Engineers guidance, are exempt from Clean Water Act Section 404 permitting requirements if they are constructed and maintained in accordance with best management practices to assure that flow and circulation patterns and chemical and biological characteristics of the waters are not impaired (404)(f)(1)(E). The best management practices are specified in 33 Code of Federal Regulations (CFR) 323. These specific best management practices have been incorporated into the Forest Service's BMP 12.5. All forest roads and trails that do not fall under the silvicultural exemption will go through the 404 permitting process. This process further ensures that wetland losses will be held to the minimum feasible number.

The POW LLA Project will implement both the National Best Management Practices and Alaska Region Best Management Practices.

Endangered Species Act of 1973 (as amended)

A biological assessment (BA) for this project was prepared for the threatened and endangered fish species, humpback whale, and designated critical habitat for Steller's sea lion. I concur with the finding of "May affect, but is not likely to adversely affect" for the threatened and endangered fish species and the humpback whale (Mexico Distinct Population Segment (DPS)) and the designated critical habitat for sea lion. The BA was sent to the National Marine Fisheries Service (NMFS) as part of the Section 7 consultation under the Endangered Species Act. At the request of NMFS, the Tongass National Forest also provided additional information on the FEIS and associated documents in order to facilitate meaningful and continued informal consultation.

After review of the effects of the selected alternative, I have determined that there will be no irreversible and irretrievable commitments of resources that have the effect of foreclosing the formulation or implementation of any reasonable and prudent alternatives during the ESA section 7 process. The project is designed to minimize the effects on listed species. The activity cards (FEIS, Appendix A) list Forest Plan Standards and Guidelines, BMPs, and other resource protections required to minimize adverse effects. Section 7 consultation continues and the NMFS and Forest staff are working collaboratively to complete the process.

Federal Cave Resource Protection Act of 1988

Karst resources exist in the project area, as described in the FEIS. By implementing the Forest Plan karst and cave management direction and through mitigation on the Activity Cards, I have determined that the Selected Alternative will not have a direct, indirect, or cumulative detrimental effect on any significant cave (karst) resource in the POW LLA Project area.

Magnuson-Stevens Fishery Conservation and Management Act

The Magnuson-Stevens Fisheries Conservation Act requires the Forest Service to consult with the NMFS for any activities that may affect essential fish habitat (EFH). The potential effects of the project on EFH are discussed in Chapter 3 of the FEIS. Chapter 3 also includes a description of the EFH in the project area, the proposed activities, and the measures that will protect these essential habitats. I have reviewed the potential effects of the project on EFH discussed in the FEIS Chapter 3 and have determined that this project may adversely affect EFH because of the effects of timber harvest activities, road construction, and activities at the log transfer facilities; however, these effects will be minimized through the use of Forest Plan direction, best management practices, and design measures.

NMFS was formally consulted on the project when they were sent an electronic copy of the DEIS on April 27, 2018. NMFS requested a hard copy during a phone conversation with the Forest Service October 9, 2018. We responded to this request and hard copies of the FEIS, draft ROD, and all associating appendices and maps were sent on November 1, 2018. NMFS provided no conservation recommendations. Information on applicable best management practices, standards and guidelines, and design measures and criteria to minimize effects to EFH are presented in Appendices 1 and 2 of this ROD, and in Chapter 3 of the FEIS.

Marine Mammal Protection Act of 1972

Actions authorized in the Selected Alternative will not have a direct, indirect, or cumulative effect on marine mammals. All marine wildlife guidelines, including special prohibitions on approaching humpback whales in Alaska as defined in 50 CFR 216 will be followed during project implementation. These marine mammal viewing guidelines are administered by the NMFS and enforced by the Coast Guard, and they are deemed sufficient for their protection.

National Forest Management Act (NFMA) of 1976 (as amended)

The NFMA requires several specific determinations in the ROD. These are consistent with the governing Forest Plan, a determination of clearcutting as the optimal method of harvesting, if used, and specific authorizations to create openings over 100 acres in size.

Tongass Land and Resource Management Plan (as amended)

Based on the discussion that follows, as well as that of the 2016 Forest Plan, I have determined that this decision is consistent with the Forest Plan as amended.

Clearcutting as the Optimal Method of Harvesting

Based on the information presented in the FEIS and Forest Plan direction, I have determined that clearcutting is the optimal method of harvesting where it is applied. Site-specific information and rationale where clearcutting is optimal will be presented in the silvicultural prescriptions as part of the implementation process. Clearcutting (an even-aged management method) has been prescribed in this project to preclude or minimize the occurrence of potentially adverse impacts from windthrow where the potential is moderate to high, to remove or reduce mistletoe infestations, and to reduce wounding due to logging damage to adjacent trees.

Harvest Openings Over 100 Acres in Size

I have determined that there will be no created openings in excess of 100 acres with the harvest of the Selected Alternative units (Forest Plan, page 4-69).

The National Forest Management Act (NFMA) and the Forest Plan allows for openings greater than 100 acres if "such cuts are carried out in a manner consistent with the protection of soil, watershed, fish, wildlife, recreation, and esthetic resources, and the regeneration of the timber resource" (NFMA, Section (6)(F)(v)). I am limiting opening size to less than 100 acres for the POWLLA Project to protect wildlife resources by reducing habitat connectivity loss and fragmentation to address wildlife corridor concerns from past harvest in the project area.

Wildlife populations may become isolated, and therefore at greater risk of local extirpation, if fragmentation hinders movement of individuals between subpopulations (Wilcove *et al.* 1986). The degree to which this occurs depends on species-specific dispersal capabilities, the distance between habitat patches, and conditions within the matrix between habitat patches. Species such as the Prince of Wales flying squirrel and spruce grouse would benefit from smaller opening sizes due to their more limited dispersal capabilities. Species such as deer could benefit from the retention of corridors placed to reduce the potential opening size. The implementation of the legacy standard and guideline and the placement of legacy retention acres can be used to reduce potential opening size. Limiting the size of the potential openings reduces possible adverse effects to these species.

National Forest Transportation System Final Administrative Policy and Final Rule

The FEIS and this ROD are prepared to be consistent with the Forest Service Transportation Final Administrative Policy and Final Rule (2001), as well as the Tongass National Forest Level Roads Analysis (2003), Prince of Wales Access and Travel Management (2009), and the POW LLA Project travel analysis (Appendix 3). I have determined that the proposed road system is "the minimum road system needed for safe and efficient travel and for administration, utilization, and protection of NFS lands" (36 CFR 212.5).

National Historic Preservation Act (NHPA) of 1966 (as amended)

The preparation of the POW LLA Project FEIS is considered an undertaking within Section 106 (and implementing regulations at 36 CFR 800) of the NHPA. As a planning document I have determined that it has no potential to affect historic properties in accordance with the *2017 Programmatic Agreement Among the USDA Forest Service, Alaska Region, the Advisory Council on Historic Preservation, and the Alaska State Historic Preservation Office Regarding Heritage Program Management On National Forests in the State of Alaska* (PA) (USDA Forest Service, 2017) Appendix B.I. Administrative Actions.

Activities (referred to in this section as "undertakings") implemented based on the POW LLA Project FEIS and ROD may have potential effects to cultural resources. POW LLA Project details are lacking for Section 106 analysis for discrete activities; therefore, a finding of effect cannot be made at this time. Once specific undertakings are identified, Section 106 procedures at 36 CFR 800 shall be followed to determine whether or not historic properties exist and if they will be affected. The Forest Service shall review each proposed undertaking within the POW LLA Project area on a case-by-case basis. Should a determination be made that an undertaking will have an adverse effect on historic properties, Standard 106 procedures at 36 CFR 800.5 shall be followed, including consultation with the State Historic Preservation Office (SHPO), and potentially the Advisory Council on Historic Preservation (ACHP). A Memorandum of Agreement or a Programmatic Agreement may be prepared to mitigate adverse effects. At every step in the Section 106 process there shall be ongoing consultation with federally recognized tribes, Alaska Native Claims Settlement Act (ANCSA) corporations, non-federally recognized tribes, certified local governments, and other interested parties.

The ROD hereby documents that Section 106 procedures have not yet been concluded, for the reasons described above, with the signing of this ROD. No new undertakings will be authorized without Section 106 procedures being completed.

Tongass Timber Reform Act (TTRA) of 1990

I have determined this project is in compliance with the relevant provisions of TTRA. Any timber harvested under the Selected Alternative will provide part of the timber supply to the Tongass National Forest's timber program, as stated in Section 101 of the TTRA "… 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 annual market demand from such forest for each planning cycle."

No commercial timber harvest will occur within 100 feet of any Class I stream or any Class II stream flowing directly into a Class I stream, as required in Section 103 of the TTRA.

The Wilderness Act of 1964 (as amended)

This Act initially protected 54 wilderness areas (9.1 million acres) by withdrawing them from standard multiple-use management, and it established a process for adding new lands to the National Wilderness Preservation System.

Five designated wilderness areas exist in the project area, as described in the FEIS. I have determined that, by implementing the Forest Plan wilderness management direction, and mitigation on the Activity Cards, the Selected Alternative will not have a direct, indirect, or cumulative detrimental effect on wilderness resources in the POW LLA Project area.

Applicable Executive Orders

Executive Order 11988 (Floodplains)

Per Executive Order 11988, I have determined that the Selected Alternative avoids occupation and alteration of floodplains.

Executive Order 11990 (Wetlands)

I have determined that the long- and short-term adverse effects associated with the destruction or modification of wetlands in the implementation of the POW LLA Project will be avoided to the greatest extent possible. The techniques and practices required by the Forest Service serve to maintain the wetland attributes, including values and functions. In some areas, soil moisture regime and vegetation composition or structure may be altered; however, these altered acres would still be classified as wetlands and would function as wetlands in the ecosystem.

Where wetlands cannot be avoided, road construction will adhere to best management practices, which include, at a minimum, the Federal baseline provisions in 33 Code of Federal Regulation (CFR) 323 and State-approved best management practices. There will be approximately 92 acres of wetland that will no longer function as wetland due to road construction in the Selected Alternative.

Executive Order 12898 (Environmental Justice)

The FEIS analyzed environmental justice to determine whether a disproportionately high and adverse human health or environmental impact on minority populations, low-income populations, or Indian tribes was likely to result from the proposed action and any alternatives. The Executive Order specifically directs agencies to consider patterns of subsistence hunting and fishing when an agency action may affect fish or wildlife. I have determined that no communities are identified as being adversely affected in this area, and that the Selected Alternative would not have a disproportionately high and adverse effect on the health of the environment of the minority, low-income, or Indian populations that use the POW LLA Project area.

Executive Order 12962 (Aquatic Systems, Recreational Fisheries)

Per Executive Order 12962, I have evaluated the effects of the Selected Alternative on aquatic systems and recreational fisheries and determined that the Selected Alternative is consistent with Executive Order 12962, in that it maintains and improves the quality, function, sustainable productivity, and distribution of U.S. aquatic resources for increased recreational fishing opportunities. Adverse effects on aquatic systems are minimized through project design, application of Forest Plan direction, best management practices, and site-specific mitigation measures.

Executive Order 13007 (Indian Sacred Sites)

Executive Order 13007 directs federal agencies to consider the protection of American Indian sacred sites and allow access where feasible. In a government-to-government relationship, the tribal government is responsible for notifying the agency of the existence of a sacred site. A sacred site is defined as a site that has sacred significance due to established religious beliefs or ceremonial uses, and which has a specific, discrete, and delineated location that has been identified by the tribe. I have determined that tribal governments or their authorized representatives were consulted and they did not identify any specific sacred site locations in the project area.

Executive Order 13112 (Invasive Species)

A risk assessment completed for the FEIS evaluated the status of invasive species in the project area and the effects from the proposed activities on them. The specific measures to minimize the introduction and spread of invasive plant species in the Selected Alternative are provided in the Activity Cards, Appendix 1 of this ROD.

Executive Order 13175 (Consultation and Coordination with Indian Tribal Governments)

Executive Order 13175 directs federal agencies to respect tribal self-government, sovereignty, and tribal rights, and to engage in regular and meaningful government-to-government consultation with tribes on proposed actions with tribal implications. I have complied with this Order and have consulted with and provided information about this project to the following federally recognized tribal governments: Craig Tribal Association, Hydaburg Cooperation Association, Klawock Cooperation Association, Ketchikan Indian Corporation, Metlakatla Indian community, Organized Village of Kasaan, Organized Village of Kake, Organized Village of Saxman, and Wrangell Cooperative Association.

This consultation is documented in Chapter 1 of the FEIS, as well as in the public involvement records.

Executive Order 13186 (Migratory Birds)

The Migratory Bird Treaty Act of 1918 (amended in 1936 and 1972) prohibits the taking of migratory birds, unless authorized by the Secretary of the Interior. The law provides the primary mechanism to regulate waterfowl hunting seasons and bag limits, but its scope is not just limited to waterfowl. The migratory species that may stay in the area utilize most, if not all, of the habitats described in the analysis for breeding, nesting, and raising their young. The effects on these habitats were analyzed for this project. The proposed activities under the POW LLA Project are likely to affect the abundance and availability of migratory birds due to forest treatments of habitat.

Executive Order 13186 provides for the conservation of migratory birds and their habitats and requires the evaluation of the effects of Federal actions on migratory birds, with an emphasis on species of concern. Agencies are to support the conservation and intent of the migratory bird conventions by integrating bird conservation principles, measures, and practices into agency activities and by avoiding or minimizing, to the extent practicable, adverse impacts on migratory bird resources when conducting agency actions.

A Memorandum of Understanding (MOU) was entered into between the Forest Service and the USFWS to strengthen migratory bird conservation (USDA 2008b). The MOU requires that the Forest Service, within the NEPA process, evaluate the effects of agency actions on migratory birds.

This includes, to the extent practicable, evaluating and balancing the long-term benefits of projects against short- and long-term adverse effects, pursuing opportunities to restore or enhance habitat, and considering approaches to identify and minimize take.

Project actions such as thinning, tree removal, or slash treatments could result in unintentional take (harm, harass or death) of migratory birds. But consistent with the definition of take (see the Biological Assessment for definitions), the project effects are insignificant and discountable and unlikely to contribute to a measurable negative effect on affected bird populations. Recent opinion states that "take" under the Migratory Bird Treaty Act applies only to affirmative actions that have as their purpose the taking or killing of migratory birds, their nests, or their eggs, so timber sales and all other USFS management activities that do not have this express purpose are in the clear for incidental take under this regulation (DOI legal opinion (m-37050).

While the Forest Plan does not address the management of migratory birds specifically, it does include standards and guidelines for cavity nesters, seabirds, waterfowl and shorebirds, and raptors. Under the Selected Alternative, migratory bird habitat would be maintained by the Forest Plan Conservation Strategy, the beach fringe and riparian buffers and standards and guidelines, and the Legacy Forest Structure standard and guideline that protect habitat features that are important for migratory birds on a stand level.

I have determined that the decision will not have a significant direct, indirect, or cumulative effect on any migratory bird species in the project area. However, there may be moderate direct effects on individuals or small groups and their nests from the disturbance caused by timber harvest and other activities.

Executive Order 13443 (Facilitation of Hunting Heritage and Wildlife Conservation)

Executive Order 13443 directs federal agencies to facilitate the expansion and enhancement of hunting opportunities, as well as the management of game species and their habitat. The analysis considered and disclosed the effects on hunting activities. I have determined that the Selected Alternative will maintain hunting opportunities by adhering to the Forest Plan standards and guidelines that maintain habitat for hunted species.

Federal and State Permits

Any federal and State of Alaska permit necessary to proceed with an authorized activity will be obtained before implementation. See Chapter 1 in the FEIS for examples of types of permits that may be required.

Results of the Objection Process pursuant to 36 CFR 218

A legal notice was published November 17, 2018, that began a 45-day objection period for the Draft ROD. Fifteen objections which had standing in accordance with 36 CFR 218 to file an objection to the Draft ROD were received during the objection filing period. A formal objection resolution meeting was held on February 20, 2019 at Klawock, Alaska. On March 1, 2019, the Reviewing Officer issued a written response to the objectors detailing how the points raised in these objections have been addressed, which also included specific instructions to me, the Responsible Official, pursuant to 36 CFR 218.11(b). The written response to the objections, and my response to the specific instructions therein, have been added to the project record. My response to the Reviewing Officer's instructions is included with this ROD as Exhibit R-1, below. The Reviewing Officer's

response indicated I could move forward with this decision for the POW LLA Project once I have complied with these instructions (39 CFR 218.12(b)).

Process for Implementation

The Implementation Plan (Appendix 2 of this ROD) is integral to the analysis of effects and the Selected Alternative in this ROD.

The Implementation Plan documents the process for implementation of the activities. The plan is meant to be a 'living' document and may need to be adjusted, as noted in Appendix 2, as we learn more through the implementation of each activity. As activities are designed, the process will likely be smoother and new technology or expertise may be used.

The Implementation Plan is designed to be consistent with the Forest Plan. The intent is that the Implementation Plan will be used over a 15-year timeframe.

Activities will be put into action by following the implementation process as outlined in the Implementation Plan. The implementation process starts when the public or the Forest Service presents an activity proposal at either the autumn or spring workshop. It is my intent to hold a spring workshop as soon as the final decision is signed. It is my expectation that a wide array of activities for all resource areas will be presented at these workshops, and that those present will help to determine locations, activity design components, methods, mitigation measures, prioritization ranking, and integration opportunities.

These refined activities will then be placed on the Project Out-Year Plan if they meet requirements in the Activity Cards, analysis in the FEIS, and are authorized under this ROD. In order to receive input from the public on activities to be implemented, the Project Out-Year Plan will be sent out for public comment after each workshop. We will be requesting written substantive comments on changes to the activities listed, the locations, activity design components, methods, mitigation measures and integration opportunities as outlined in the Project Out-Year Plan. The comment period will be 30 days. I will consider all comments received during workshops and comment periods to finalize activities for implementation that adhere to the FEIS, ROD, and Forest Plan.

Funding for the variety of activities authorized under this decision will be obtained through various avenues (e.g. appropriations, partnerships, grants, stewardship contracting) and activities will be implemented based on the prioritization developed during public workshops.

It is my hope that the public will be involved with implementation and our required resource surveys and monitoring.

The Forest Service will continue working cooperatively with our partners, other state and federal agencies, local and Tribal governments, and the public on this and other projects.

Implementation Date

Implementation of decisions subject to the objection process may commence immediately after a final decision is signed. There is not a requirement to publish notification of the decision.

Contact Information

For additional information concerning this decision, contact Tyler Gunn, District Ranger, Craig Ranger District, P.O. Box 500, Craig, Alaska, 99921, or call (907) 826-3271. Or contact Delilah

Brigham, Interdisciplinary Team Leader, P.O. Box 19001, Thorne Bay, Alaska, 99919, or call (907) 828-3232.

Responsible Official

The Responsible Official for the POW LLA Project is M. Earl Stewart, Forest Supervisor for the Tongass National Forest.

M. EARL STEWART
Forest Supervisor

Date

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Exhibit R-1

Response to the Reviewing Officers Instructions for Required Actions for the POW LLA Project Record of Decision

Results of the Objection Process Pursuant to 36 CFR 218

The Prince of Wales Landscape Level Analysis Project draft Record of Decision (ROD) was subject to review and objection pursuant to 36 CFR 218, Subparts A and B regulations (the objection process). Fifteen objections were received from entities with the required standing to object during the objection filing period. The objection letters are available for review online at http://www.fs.usda.gov/goto/tongass/powlla.

Objection Resolution Meeting

On February 20, 2019, the Responsible Official, Forest Supervisor Earl Stewart and the Reviewing Officer, Regional Forester David Schmid hosted a meeting in Klawock, Alaska with the objectors and other interested individuals to discuss the issues raised in the objections. All objectors were given an opportunity to present their concerns. While resolution was not met on all objection issues, the meeting helped clarify the issues and the objectors are encouraged to continue discussion with the Forest Service as the project is implemented.

Written Response to Objections and Instructions to Forest

After a deliberative and extensive review of concerns raised and remedies suggested by objectors, on March 1, 2019 the Reviewing Officer issued written responses to the objectors that responded to their objection points, summarized as issue statements. Those response letters are available online at http://www.fs.usda.gov/goto/tongass/powlla. The objection responses also provided me with instructions to address and update certain areas in the analysis that were brought up during the objection process.

Specifically, the objection response directed me to complete the following items before signing the Final ROD for the Prince of Wales Landscape Level Analysis Project:

Instruction: *The Responsible Official needs to fully document why he chose not to exceed the 100 acre even-aged opening limit; i.e., why the openings did not meet the specific condition exemptions identified in NFMA.*

Forest response: Additional discussion was added to the ROD under "Harvest Openings Over 100 Acres in Size" (page 25) to explain my rationale to limit opening size.

Instruction: *I am instructing the Responsible Official to clarify in Appendix B Implementation Plan the steps necessary to develop economic timber offerings, consistent with Forest Service Manual 2432.3 and 2432.4.*

Forest response: Additional text was included in the Implementation Plan, Timber Checklist (page 296), to clarify the process of the gate system and the associated documentation as outlined in FSM 24.32.3 and 2432.4.

Exhibit R-1 - Response to the Reviewing Officers Instructions

Instruction: *The Responsible Official needs to provide additional documentation in the project record supporting direct jobs and income calculations. Include in the project record the 2012 memo from Susan J. Alexander; Employment Coefficients and Indirect Effects, for NEPA planning: 2012 Update.*

Forest response: The 2012 memo from Susan J. Alexander was included in the project record as project record 833_0613. The title was clarified to make it easier to find.

Instruction: *The Responsible Official needs to explain the rationale (e.g., include a literature citation) used to determine the use of a 5-mile buffer around subsistence communities in Alternative 2.*

Forest response: Additional discussion was included in the ROD, Issue 2: Subsistence (page 9-10), to explain why I chose to include wildlife-centric prescriptions within a 5-mile radius of subsistence communities in Alternative 2.

Instruction: *The Responsible Official needs to insure that the watersheds referred to meet the definition of "degraded" in terms of watershed condition and function, define what that term means, and describe the criteria used to measure those conditions.*

Forest response: Additional discussion was included in the ROD, Issue 4: Watershed Function (page 11), to define "degraded" and how watersheds was evaluated to determine their condition.

Instruction: *In order to clarify that the FEIS and ROD are consistent with the 2016 Forest Plan, the Responsible Official should provide conclusory statements for black bear, marten, Sitka black-tailed deer, gray wolf, and brown creeper as to how the proposed changes in habitats specific to each MIS would or would not contribute to population trends for these species and what that contribution would be (e.g., contribute to stable population, upward trend, downward trend) and concise rationale supporting that conclusion. A summary table would also assist in providing rationale and clarity.*

Forest response: Conclusory statements for black bear, marten, Sitka black-tailed deer, gray wolf, and brown creeper as to how the proposed changes in habitats specific to each MIS would or would not contribute to population trends, as well as a comparison table for each habitat type, are included in the ROD, Issue 5: Wildlife Habitat and Connectivity (pages 13-16).

Instruction: *The Objector alleges the Forest Service failed to explain the differences between the Forest Service's view of likely impacts and the view of others in the scientific community. The Objector cites a few references. Documentation in the project record could not be found to explain or rebut this claim.*

If documentation is available that discusses or rebuts the claim then it should be located and referenced. If it has not been discussed, then some discussion is warranted.

Forest response: Information regarding the differing opinions on the risks/benefits of young-growth treatments is in the section on young-growth in the FEIS, pp. 3-218 through 3-221. A comprehensive spreadsheet for all resources to track discussion on literature cited is in the project record, PR# 833_2301.

Instruction: *The Responsible Official needs to provide additional context or clarifying statements of why all action alternatives would result in "similar" reduction in habitats. Providing a table to clearly disclose to the reader potential acres of POG, HPOG, and SD67 harvested under each alternative as well as current POG acres would help with context.*

Ensure all acres displayed in the table are consistent with those already in the FEIS. In addition, provide supporting narrative discussion to clarify the relative differences in potential harvest of HPOG and SD67 habitat between alternatives that points back to the table provided. A good narrative example of this can be found in the Large Tree POG (SD67) Direct and Indirect Effects discussion for Alternatives 2, 3, and 5 (FEIS ch.3; p.212). The sum of 317,658 acres identified above should be validated as well.

Forest response: Clarification of why all action alternatives would result in the same reduction in habitat acres at the WAA scale has been added to the ROD under Issue 5: Wildlife Habitat and Connectivity (pages 12-13). Tables displaying the changes in the different habitat types by alternative at the project area scale has been added to the project record (Project Record 833_2408).

Instruction: *The Responsible Official will clearly explain the rationale of how developing and making public the activity cards and implementation plan best informed the public during this stage of the decision process and how developing unit cards, as specific harvest units and transportation routes are identified, is the most appropriate approach for this project, and meets the intent of the Forest Plan guideline. The Responsible Official should also tie into this explanation, how opportunities for public input to the proposed sales will be solicited and used and how the unit and transportation cards would be available and used for this process.*

Forest response: Discussion has been added to the ROD, Consistency with the Forest Plan and other Applicable Laws and Regulations (pages 21-22) explaining how we meet the intent of the Forest Plan. The Implementation Plan (pages 254, 258, and 259) has been updated to clarify when and how unit and roads cards will be available to the public for review and opportunity to comment on them.

Instruction: *I am instructing the Responsible Official to ensure that all documents used in the analysis are referenced and those documents (or relevant portions of the documents) are included the record, including the following:*

- *Needs additional clarification of record: Record index # 833_2309 takes the reader to: Angelstam, P. 2004. Habitat thresholds and effects of forest landscape change on the distribution and abundance of black grouse and capercaillie. – Ecol. Bull. 51: 173–187. Suspect this may represent information similar to that of Angelstam 2001b and Angelstam 2001 as interpreted for the FEIS, but this is not the reference cited in the document as the earlier cited documents appear to have been preliminary to the final 2004.*
- *Correction needed in FEIS (errata): FEIS p. 3-179 states: Research by Mikusinski and Angelstram (2000) indicated a habitat threshold for bears (brown) of about 50 percent habitat remaining. Research by Heinen (1998) indicated that mice did show a habitat threshold; however, this same research showed that chipmunks had a habitat threshold of about 30 percent habitat remaining. Since there were habitat thresholds defined specifically for shrews the 30 percent defined for chipmunks was used. Therefore a threshold of 50 percent was used for the analysis of effects to bear habitat and 30 percent for shrews. No thresholds were determined for ermine.*

Forest response: References have been corrected and added in the errata for the FEIS (Appendix 4). Missing references have been added to the project record.

Exhibit R-1 - Response to the Reviewing Officers Instructions

Instruction: *In my review of the FEIS, I noted the following error which I am instructing the Responsible Official to correct prior to signing the ROD.*
An errata is needed to remove the following from the FEIS (p. 21)

> *"The Alaska Roadless Rule will not make any changes to the 2016 Forest Plan or projects currently being implemented or proposed for implementation."*

Forest response: Removal of this sentence and modification of the paragraph has been placed in the errata for the FEIS (Appendix 4).

Instruction: *The Responsible Official needs to include justifications and supporting documentation referencing regional road costs. This may be done with a regional average tracking spreadsheet or some other method that demonstrates methodologies used and sources relied upon for his conclusions.*

Forest response: Discussion on regional road costs was added to the ROD under Issue 3: Timber Supply and Timber Sale Economics (page 10). Supporting documentation outlining where regional costs were derived was added to the project record (project record 833_2405).

Instruction: *While the FEIS clearly tiers to the Conservation Strategy to insure a moderate to very high likelihood maintain viable, well-distributed populations, it is not clear what parts of the strategy will be implemented for which species and under what circumstances.*

Forest response: Information on how the components of the Conservation Strategy and the Forest Plan are designed to minimize or eliminate effects to species has been placed in the errata for the FEIS (Appendix 4) and in the project record (record 833_2406).

Instruction: *For clarity I am instructing the Responsible Official to include a list the herbicides that will be allowed by the decision in the ROD and include a clarification that impacts from herbicide use under Alternative 3 should now be applied to inform the final decision.*

Forest response: A list of herbicides allowed by the decision has been added to the ROD under Issue 1: Invasive Plant Management (page 8). Additional discussion on why these were chosen has been included in the rationale in the ROD under Issue 1: Invasive Plant Management (page 8).

Instruction: *I am issuing the following instruction to the Responsible Official to clarify that a karst vulnerability assessment will be conducted prior to any surface management practice. Add the following to Activity Card No. 35: "A karst vulnerability assessment will be completed prior to any surface management practice, including application of herbicide in karst terrain".*

Forest response: This sentence has been added to Activity Card 35 in Appendix 1 under the Geology/Karst resource box.

Instruction: *During my review of the FEIS I noted that while the proposed changes to old-growth reserves were included in Alternative 4, it may benefit the reader if this was more clearly stated.*
Alternative 4 also included the following statement "All other proposed activities within Alternative 4, besides the expanded timber base and additional telecommunication sites that require a Forest Plan amendment, are included within one of the other alternatives being analyzed in detail" (FEIS, p. 36). This statement is inaccurate and needs to be

modified in an errata which identifies that the proposed changes to old-growth reserves were not included in other alternatives and states the rationale for eliminating this action from detailed study.

Forest response: All components of Alternative 4 that require a Forest Plan amendment have been added to the FEIS through the errata (Appendix 4). Clarification and discussion have been added to the ROD under Alternatives Considered but Eliminated from Detailed Analysis (page 19-20) to explain in more detail why this alternative wasn't considered in detail, but eliminated from detailed analysis.

Instruction: *I am instructing the Responsible Official to add an errata to reflect the changes originally requested by SEACC in their POWLLA DEIS comment letter. To address the SEACC comment, the errata could strike and change the last paragraph on p. 3-315 to read:*

> *"Expansion of mining activities could impact social and economic conditions in the project area. With respect to rare earth mining, efforts to develop the Niblack and Bokan Doton-Ridge mines have unknown timeframes (FEIS Appendix C). Effects from mineral development in the project area are potentially substantial, including creation of jobs. However, neither of these mines is operational, and neither has submitted an operations plan and therefore do not constitute a reasonably foreseeable future action. There is no surface-disturbing activity on NFS lands and no foreseeable anticipated disturbance to NFS lands at this time. These effects are the same for all Alternatives."*

Forest response: This paragraph has been added to the errata for the FEIS (Appendix 4) to replace paragraph in the FEIS.

Instruction: *The Responsible Official needs to address in the final decision how catastrophic blowdown would be treated if it occurs. This clarification would assist with future management actions. Flexibility could allowed to decide during the Implementation Plan process whether it would be part of the timber offered from this decision or, if a large enough area, it should be covered under another analysis.*

Forest response: Clarification on how catastrophic blowdown will be considered has been added to the ROD under Vegetation Management (page 2), to the errata for the FEIS (Appendix 4), and Activity Card 15 (Appendix 1).

Recommendation: *The Responding Official may choose to provide a map depicting the T77 watersheds and conservation areas within the project area available to the Objector.*

Forest response: The 2016 Forest Plan Amendment FEIS included maps that had the T77 and TNC/Audubon Conservation Priority Areas depicted (Suitable Land). As this project adheres to the Forest Plan and the Alternative 5 map is available through the Forest Plan, I decided not to proceed with this recommendation.

Recommendation: *The Responsible Official may choose to include an overview of expected impacts from climate change on hydrologic systems and fish habitats as to inform public and managers of expected challenges that may be encountered over the life of the POWLAA decision. This material will come from the 2016 Tongass National Forest Plan*

FEIS and from the Climate Change Vulnerability Assessment for Aquatic Resources in the Tongass National Forest (EcoAdapt 2014).

Forest response: Expected impacts from climate change on hydrologic systems and fish habitats are mentioned several places in the FEIS (POW LLA FEIS pp. 62, 132, 139, 319) and discussed in greater detail in the Tongass Forest Plan (pp. 3-11 – 3-19) and the Climate Change Vulnerability Assessment for Aquatic Resources in the Tongass National Forest (EcoAdapt 2014). As this project tiers back to the Forest Plan for climate change effects and as any further discussion in the ROD would pull from discussions from these two documents I have decided not to proceed with this recommendation.

Recommendation: *If incidental damage to black bear dens becomes an area-specific concern, protections/considerations for avoidance and protective buffers could be added to the Activity Cards.*

Forest response: The Forest Plan standard and guideline for snag and cavity nesting habitat has been added to the appropriate activity cards. Black bear dens are frequently in snags or cavities in trees and can be protected under this standard and guideline. The agreement between the Forest Service and ADF&G to actively cooperate on information concerning bear dens has been added to the introduction to the Activity Cards (Appendix 1). We will continue working actively working with ADF&G and share new information on black bear dens.

Recommendation: *The Responsible Official may add criteria in the ROD to ensure alternate means of implementing restoration projects when funding is not assured.*

Forest response: As the ROD under Process for Implementation (page 30) and the Implementation Plan (page 259) discusses funding and how projects will be prioritized for implementation, I decided not to proceed with this recommendation.

Recommendation: *Because the summaries of potential impacts to species resulting from changes in distribution and abundance of forest cover types are embedded throughout the body of the FEIS and supporting reports, I recommend that the Responsible Official provide a summary table of cumulative impacts and conclusions tied to the type of analysis conducted for each species: RFSS - effects on individuals (MANLAA), MIS - effects on habitat and populations trends, Endemics - effects on population viability/sustainability, Migratory birds - effects to individuals and populations (incidental take, but no effect to populations).*

Forest response: A summary table of cumulative impacts and conclusions tied to the type of analysis conducted for each species, including endemics, is included in the ROD, Issue 5: Wildlife Habitat and Connectivity (pages 13-16).

Additional discussion on migratory birds has been added to the ROD under Executive Order 13186 (Migratory Birds) (pages 28-29).

Recommendation: *I recommend the Responsible Official consider splitting Activity Card 15 into two separate cards (15a for individual trees/ small patches and 15b for large catastrophic events and/or adding it to one of the decision trees for the Final ROD.*

Special consideration would need to be given if the catastrophic damage was large enough to negate the phased implementation of this project e.g. more volume was damaged than allowed for during the entire 15 years and is counted against the volume to be offered.

Forest response: Clarifications on how catastrophic blowdown will be considered has been added to the ROD under Vegetation Management (page 2), to the errata for the FEIS (Appendix 4), and Activity Card 15 (Appendix 1).These clarifications address the concerns about catastrophic events therefore I decided not to proceed with this recommendation.

Summary

In response to the Reviewing Officer's letter and instructions, I have completed these updates and clarifications to the Prince of Wales Landscape Level Analysis Project Record of Decision as documented in my letter to the Reviewing Officer, below.

Exhibit R-1 - Response to the Reviewing Officers Instructions

USDA United States Department of Agriculture | Forest Service | Tongass National Forest Alaska Region | 648 Mission Street Ketchikan, AK 99901 907-225-3101

File Code: 1950
Date: March 16, 2019

Subject: Reply to instructions in "Reviewing Officer Responses to Eligible Objections for the Prince of Wales Landscape Level Analysis Project"

To: Dave Schmid, Regional Forester

This memo documents my review of the "Prince of Wales Landscape Level Analysis Project Reviewing Officer Responses to Eligible Objections" dated March 1, 2019, with particular emphasis on the "Instruction" and "Recommendation" sections throughout these documents.

This memo details my response to your instructions, including corrections in errors in the Final Environmental Impact Statement through an errata; clarifications in the Final Record of Decision on Forest Plan consistency, wildlife effects, and herbicide use; and clarifications in the Appendix 1 (Activity Cards) and Appendix 2 (Implementation Plan).

If you have further questions, please contact Delilah Brigham, Interdisciplinary Team Leader, at 907-828-3232 or delilah.brigham@usda.gov.

Sincerely,

M. EARL STEWART
Forest Supervisor, Tongass NF