



**File Code:** 1570  
**Date:** March 1, 2019

Ms. Patricia Pesko



Dear Ms. Pesko:

This letter is in response to your objection to the Prince of Wales Landscape Level Final Environmental Impact Statement (FEIS) and draft Record of Decision (ROD) on the Tongass National Forest. The Responsible Official, Forest Supervisor Earl Stewart, and I, as the Objection Reviewing Officer, have read your objections and have reviewed the FEIS and the draft ROD.

As provided for under the regulations, on February 20, 2019, the responsible official and I hosted a meeting in Klawock with the project objectors and other interested individuals. We discussed many aspects of the projects and the analysis. While we were unable to reach consensus or resolution on all objection issues, I believe it was a constructive meeting. I have reviewed your objection and my responses are attached.

As specified at 36 CFR 218.11(b), I must provide a written response to your objection; however, this response need not be point-by-point. As such, this letter satisfies the requirements of 36 CFR 218.11, Resolution of Objections.

**Issue:**

You request that the harvest of old-growth trees should be limited to 5 years rather than the 15 years proposed and that selective harvest be used in some areas in place of clear cutting.

**Response:**

It appears that you believe there is a proposal to end clearcutting in 15 years with the decision on this project. That is not the case, the life of this project is 15 years. What happens after that is undetermined at this time. Clearcutting is allowed within this area by the National Forest Management Act (NFMA) and the Forest Plan. The draft ROD, FEIS, and supporting project record considered other alternatives that eliminated or constrained old-growth management over the 15-year planning period; however, they were eliminated from detailed analysis because they did not meet the purpose and need for the project. Both even-aged (e.g., clearcutting) and uneven-aged (e.g., selection cutting) management harvest methods are proposed. Each method would be used where they best meet the purpose and need for the project, based on site-specific information and preparation of a site-specific silvicultural prescription.



**Issue:**

You suggest that second growth harvest should be minimal, as these areas are some of the most important habitat for wildlife.

**Response:**

To minimize young growth harvest would not be in line with Forest Plan direction. The 2016 Forest Plan Amendment was focused on transitioning to second growth (young growth) harvest and away from old-growth harvest (Forest Plan p. 16).

It is generally assumed that the acres currently in the stem exclusion stage (older second growth stands) provide little habitat for most wildlife species. Research (Cole 2010 and Hanley 2005) indicates that the older second growth stands have relatively less value to most wildlife species when compared to old growth stands and are not currently some of the most important habitat for wildlife (FEIS Ch. 3 p. 218). In the short term, there are benefits to some species by resetting young growth stands back to the stand initiation stage and increasing the forage availability (compared to what the stem excluded young growth stand is currently providing) (FEIS Ch. 3 pp. 218-221).

**Issue:**

You are concerned that increased roads and access to wildlife will increase accessibility for hunters and poachers and especially as it affects the declining wolf populations.

**Response:**

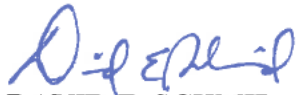
The FEIS includes discussion on wolf mortality specifically as it relates to road density (access) on Prince of Wales Island.

A discussion on wolf sustainability is included in the FEIS, and the Forest Service does implement a Forest-wide program, in cooperation with the Alaska Department of Fish & Game (ADF&G) and the US Fish and Wildlife Service (USFWS), to assist in maintaining long-term sustainable wolf populations thru the Interagency Wolf Habitat Program.

The FEIS tiers to the 2016 Tongass Land and Resource Management Plan which carries forward wildlife and habitat conservation measures from the Conservation Strategy which was first developed for the 1997 Forest Plan. The Forest Plan determined that with the conservation strategy in place, even with full implementation of the Forest Plan, it would be expected to have a moderate to very high likelihood to maintain viable, well-distributed wildlife populations, including wolves.

**Conclusion:** My review constitutes the final administrative determination of the Department of Agriculture: no further review from any other Forest Service or Department of Agriculture official of my written response to your objection is available (36 CFR 218.11(b)(2)). The responsible official may sign the Record of Decision for this project once any instructions are completed.

Sincerely,



DAVID E. SCHMID  
Regional Forester  
Reviewing Officer

Enclosure: Objection Response POWLLA 19-10-00-0025

cc: Kristina Rutledge, Earl Stewart, Delilah Brigham