

December 31, 2018

David Schmid

Regional Forester

USDA Forest Service, Alaska Region

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Mr. Schmid,

I am objecting to the Draft Record of Decision for the Prince of Wales Landscape Level Analysis Project. I have status to object as I submitted previous comments during a comment period for the project. My objection is based on the comments previously submitted.

The Draft Record of Decision and the Final Environmental Impact Statement as presented violates the 2016 Tongass National Forest Land and Resource Management Plan. Specifically, many of the proposed activities and directions on how to implement those activities within the Timber Production LUD violate Timber Production LUD Standard and Guideline TIM5.

The 2016 Forest Plan, in Chapter One on page 1-5, lists the Priority of Direction, "should conflict or discrepancy between directions occur". Based on the Priority of Direction, LUD specific standards and guidelines have priority over Chapter 4 – Forest-wide Standards and Guidelines. Timber Production LUD specific Standard and Guideline TIM5 A. states:

"Locate and design timber harvest activities primarily to meet timber objectives. Include integration of other resources objectives, particularly wildlife and vegetative diversity, if they do not have a significant adverse impact on the timber resource goals. Timber harvest activities may include all silvicultural systems."

Attention must be given to the portion of TIM5 A. that states, "if they do not have a significant adverse impact on the timber resource goals".

When the Draft ROD and FEIS for the Prince of Wales Landscape Level Analysis Project are reviewed considering TIM5 A. several areas need adjustment, they include but are not limited to:

The set aside of an amount equaling 25% of the volume in sales greater than 10MMBF for small sales offerings

Any silvicultural prescription that reduces the amount of volume available for harvest or increases the cost of harvesting; examples, 2 age and uneven age silvicultural prescriptions

Decision Trees and Activity Cards that by including other resources objectives adversely impact timber objectives

The use of the Forest-wide "Legacy" Standard and Guideline in Timber Production LUDs, the leaving of 30% of unit for "legacy forest structure" is a significant adverse impact on timber resources; based on the Priority of Direction, LUD Standards and Guidelines trump forest-wide Standard and Guidelines

I am available and willing to meet with you and your staff to discuss resolution of these issues.

Sincerely,

Clarence Clark

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