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Mark Pentecost
Thorne Bay Ranger District
P.O. Box 19001, 1312 Federal Way
Thorne Bay, AK 99919-0001

Re: Thorne Bay Basin Integrated Management Project

VIA ONLINE COMMENT PORTAL

Dear Mr. Pentecost,

Established in 1947, Defenders of Wildlife is a national nonprofit conservation organization dedicated to the protection of flora and fauna in its native habitat. Defenders has nearly 2.2 million members and supporters nationwide, including over 6000 in Alaska. We have long advocated for the conservation of wildlife and habitat on Alaska's public lands, including the Tongass National Forest.

Defenders applauded the U.S. Department of Agriculture's July 2021 announcement of the Southeast Alaska Sustainability Strategy. The Thorne Bay Basin project is the first major initiative to begin implementing the Forest Service's new management priorities of habitat restoration, recreation, and building climate and community resilience. We appreciate the opportunity to provide these scoping comments on this important project.

Summary

The scope, duration and integration of the various proposed project components, including logging and roadbuilding, call for a thorough analysis at the outset. If this is to be accomplished via an Environmental Assessment (EA), then further opportunity for public review and input is critical. You have indicated that there will be such an opportunity for public review and comment on a draft EA, and we appreciate that. We encourage the Forest Service to develop a forestwide restoration program and EIS to which future projects can tier, and meanwhile project-level analyses should consider other reasonably foreseeable projects in addressing cumulative impacts.

We also appreciate that the stated project purpose and need is to implement objectives to achieve desired Forest Plan conditions and to implement the SASS. The Forest Plan requires the Forest Service to implement its own Wolf Habitat Management Program (Wolf Program), which was

finalized in 2017 due to a conservation concern for Alexander Archipelago wolves.[1] Because of the importance of deer to wolves, many Wolf Program recommendations serve to improve deer habitat, so implementing those recommendations will further the project purpose and level of success. Finally, the Forest Service must evaluate a range of alternatives with transparent analyses assessing the degree to which each would achieve the project purpose and need; assessing only the proposed action and no action is likely not sufficient.

Level of NEPA Analysis

This proposal is for 10-15 years of activities including young-growth harvest and associated roadbuilding, with 70-150 million board-feet anticipated to be harvested from 5800 acres. Temporary road construction and reconstruction is estimated at 48 miles. As the Forest Service notes, there is no authorization for vegetation management or road construction from the Prince of Wales Landscape Level Analysis Project decision, and no EIS to tier to in assessing the impacts of these actions. Logging and roadbuilding impacts at this scale can be substantial so if the Forest Service chooses to prepare an EA rather than an EIS, then it needs to include a thorough analysis with site-specific considerations.

The project's restoration components represent significant investments toward implementing the SASS, are anticipated to benefit wildlife and habitat over time, and are authorized by the existing POWLLA decision and EIS. That EIS, however, did not include site-specific impacts and the EA must carefully do so. The Forest Service must identify the specific timing, locations and methods for treatments, connectivity corridors, aquatic restoration, etc. as well as timber harvest and road construction, use and decommissioning so that impacts can be properly assessed. It must identify the ownership and/or Land Use Designation status of lands adjacent to the project area because that is relevant to potential connectivity corridors and to how the project area will interact with the broader landscape. It will be important to assess and establish methods of monitoring project activities and effects. There are also socioeconomic questions that the EA should address, such as likely employment opportunities and end use of wood products. As noted, an opportunity for public input on a draft EA will be critical for a project of this size and duration.

This project is responsive to the forestwide need for restoration and wildlife habitat improvement, but there is no overarching restoration plan to which this EA can tier. We encourage the Forest Service to create that overarching plan. Meanwhile, the agency can analyze projects like this for their own impacts and consider those together with likely future projects. The EA should address the cumulative impacts anticipated from this and other reasonably foreseeable projects in terms of restoration and recreation benefits, as well as young growth timber harvesting, roadbuilding impacts, and socioeconomic and other effects.

Purpose and Need

[1] Wolf Technical Committee. 2017. Interagency Wolf Habitat Management Program: Recommendations for Game Management Unit 2. Management Bulletin R10-MB-822. USDA Forest Service, USDI Fish and Wildlife Service, and Alaska Department of Fish and Game.

We appreciate the explicit references to implementing both the Forest Plan goals and desired future conditions as well as the SASS as the purpose and need for this project. The SASS ended large-scale old-growth logging in the Tongass and, as the Forest Service notes, focuses agency resources to support forest restoration, recreation, climate resilience, and sustainable young-growth forest management.

Given this purpose and need, the agency should develop and assess project alternatives using the metrics of restoration, recreation, resilience, and sustainable management in addition to pursuing the relevant goals and objectives from the Forest Plan.

Proposed Action

We appreciate the proposed activities designed to improve wildlife habitat. We consider habitat restoration to be a dominant management activity in the Tongass for the coming decades so that fish and wildlife populations have an opportunity to repopulate those recovering areas and restore ecological health to desired conditions set out in the Forest Plan.

The proposal mentions some of the treatments that the Forest Service will consider using but doesn't mention the Wolf Program recommendations already developed in 2017 (attached). That program was established as required by the Forest Plan in response to a conservation concern for Alexander Archipelago wolves in Game Management Unit 2, where the proposed project is located. The recommendations include thinning treatments and techniques designed to improve habitat quality in young-growth stands, especially for deer, which constitute an important food source for both wolves and people. After the first twenty years or so following an old-growth clearcut, habitat quality is typically very low for a great many decades until later seral forest characteristics can begin to return. The treatments are designed to accelerate this process.

In addition to recommending numerous best practices to improve habitat values in young-growth forests, especially for deer, the Wolf Program also addresses den and road management. Denning is challenging for wolves in GMU 2 and we urge the Forest Service to manage dens conservatively, per its own Wolf Program:

> Within GMU 2, dens are typically located in loose, dry soils, under root-wad cavities of large living or dead trees, within dense canopies of old-growth forest, near freshwater, often on peninsulas or islands, on gentle, low-elevation slopes, and farther from logged stands and roads than random sites (Person and Russell 2009). Large proportions of the GMU 2 landscape are considered unsuitable for den sites due to logging and topography, and availability of the combined characteristics that provide quality den sites may be limited (Person and Russell 2009). Therefore, management should aim to protect den sites, as well as sufficient foraging habitat to successfully rear pups at each den in perpetuity. We specifically recommend: a) perpetually protecting all documented wolf dens (active and inactive) with noncircular polygons of not yet determined size to ensure the specific den sites remain attractive and b) protecting some not yet determined proportion of old-growth foraging habitat within core foraging areas

utilized by wolves during denning to ensure the dens remain a viable place to rear pups.[2]

The median distance of breeding wolves' core home range from a den site was subsequently measured at 3756 meters[3] and the Forest Service should use that figure to construct the noncircular polygon den buffer rather than the minimum protection afforded for denning wolves in the Forest Plan of just 1200 feet.[4] Additionally, "the shape of the protected polygon surrounding the den should be selected to maximize high quality denning habitat (flat, low elevation terrain, in old-growth forests, near freshwater and distant from high density road areas). Therefore, the buffer width may vary to accommodate high-priority habitat but should not be less than 734 m (the minimum buffer width for breeding wolves). To maintain foraging habitat for wolves during denning season, it is recommended the proportion of old-growth forest should not be reduced below the current values (61% of the core home range area for wolves associated with an active den)."[5] The Forest Service should address whether dens are known or likely present in areas that may be impacted by project activities. It should present maps depicting the relevant landscape considerations for den protection, including presence of old-growth habitat, type of terrain, proximity to freshwater and roads. Ultimately the agency must seek to minimize impacts to denning wolves by creating appropriate den buffer polygons consistent with the science that has been done to inform these actions.

Additionally, road density is an important wolf conservation consideration because it is correlated with wolf mortality.[6] The Forest Plan states that limiting road density to 0.7-1.0 miles per square mile may be necessary for areas of conservation concern – like GMU 2.[7] Also, "local knowledge of habitat conditions, spatial locations of roads, and other factors need to be considered by the interagency analysis rather than solely relying upon road densities."[8] Road density tends to be fairly high on Prince of Wales island, so this is a topic that the Forest Service should develop in its analysis. Timing is also a consideration in road closures as a management action because wolves are known to avoid areas with high road densities during denning season but select these areas during winter.[9] The Forest Service should address existing and projected road locations, densities and wolf mortality, local knowledge on these topics, and ultimately how the project's road components can be managed to minimize impacts, including those on wolves.

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[2] Wolf Technical Committee at 26.
[3] G. H. Roffler (http://orcid.org/0000-0002-8534-3664) and D. P. Gregovich, 2019. Wolf space use during denning season on Prince of Wales Island, Alaska, at p.9) Alaska Dept of Fish and Game, Division of Wildlife Conservation. (Roffler 2019).
[4] Forest Plan at 4-91.
[5] Roffler 2019.
[6] E.g., David K. Person and Amy L. Russell, 2008. Correlates of Mortality in an Exploited Wolf Population. The Journal of Wildlife Management 72: 1540-1549.
[7] Forest Plan at 4-91.
[8] Id.
[9] Roffler, G. H. et al. 2018. Resource selection by coastal wolves reveals the seasonal importance of seral forest and suitable prey habitat. For. Ecol. Manage. 409: 190–201.

In sum, the Forest Service should explicitly incorporate and implement the Wolf Program recommendations, as well as relevant information developed since, into the project design as required by the Forest Plan.

Alternatives

The proposed action mentions total estimated acreages for both logging and restoration activities and briefly mentions the no action alternative, but the EA should assess a reasonable range of alternatives for the degree to which they can accomplish the stated purpose and need. Those alternatives could vary in terms of the methods, locations, sequencing, and overall footprint and impacts of this 10-15 year effort. The EA should explore the spatial, temporal, logistic and other considerations, including seral stage and other site-specific local forest conditions, bearing on the question of how restoration efforts can be accomplished most broadly and effectively in the project area, and assess alternative ways of achieving that. It should assess and resolve to the extent possible any tension between paths to achieve the different management goals of the project, such as the restoration and timber production goals, and developing alternative proposals to do so if appropriate.

In sum, we are encouraged to see the Forest Service striving to implement the greatly heightened emphasis on habitat restoration announced in the SASS. We urge the agency to develop an overall restoration program at a scale commensurate with decades-long restoration effort that will be needed to restore healthy ecological function and predator-prey relationships, including but not limited to those between wolves and deer. Success on this particular effort will depend in part on a thorough assessment of impacts and benefits via the NEPA process supported by public input, and on a robust monitoring effort that documents project activities and progress over time.

Sincerely,

/s/

Patrick Lavin
Alaska Policy Advisor
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