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First name: Patrick

Last name: Lavin

Organization: Defenders Of Wildlife

Title: Alaska Policy Advisor

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Dear Forest Service:

Defenders of Wildlife (Defenders) appreciates this opportunity to comment on the above-referenced project. Established in 1947, Defenders is a national, science-based non-profit conservation organization. With 1.8 million members and supporters nationwide, including over 6000 in Alaska, Defenders works to conserve and restore native species and habitat throughout the country, including on national forest system lands and the Tongass National Forest.

For many of the same reasons expressed in our comments on the Prince of Wales Landscape Level Analysis (POWLLA), we have grave concerns about this proposal. The project starts with the faulty premise that liquidating the remaining old-growth forest stands on northern POW is both economically sound and consistent with the Forest Plan - it is actually neither. Worse, given a situation calling out for substantial and long-overdue investments in restoration and actions to conserve precious remaining habitat and imperiled wildlife, the Forest Service is proposing more of the same destructive logging and roadbuilding that created the ecological challenges now facing the forest and POW specifically.

We urge the Forest Service to reimagine what can happen on POW and on the Tongass to achieve the intended transition out of industrial old-growth logging - without first cutting down the largest and rarest remaining stands and the fish and wildlife they support.

Purpose and Need

The scoping notice states that

The purpose of the Twin Mountain II Timber Sale is to implement the 2016 Forest Plan direction to move the project area toward the desired future conditions described in that plan. More specifically, the purpose is to manage the timber resource for production of sawtimber and other wood products to meet public demand and to meet multiple resource objectives.

The Forest-wide desired conditions, however, don't correspond to the statement. The desired condition that appears to relate to the stated project purpose is that "The Forest is managed to produce desired resource values, products, services, and conditions in ways that also sustain the diversity and productivity of ecosystems."¹ The wood products mentioned in the statement of purpose may be among the "products" mentioned in the desired condition. But they only fit within the desired condition if produced "in ways that also sustain the diversity and productivity of ecosystems," and the Forest Service should amend the purpose to include the latter phrase in order to implement the actual Forest Plan direction.

In addition to the general ecosystem diversity and productivity constraint on the desired condition of producing wood products, there is also this desired condition:

Opportunities for hunting, trapping, and viewing game species are being provided. World-class wildlife resources such as brown bears and wolves are relatively abundant and available for human use and enjoyment in

perpetuity.2

The recognition and promotion of the world-class wildlife resources of the Tongass is appropriate and significant. There are indeed wildlife species on the Tongass that cannot be found elsewhere in the national forest system, let alone in an abundance that humans can use and enjoy, and the Forest Service plays the critical lead role in ensuring that continued abundance for these treasured animals. The specific mention of brown bears and wolves reflects their unique status given their near-total eradication from the landscape in much of the rest of the country.

As discussed further below, the wolf population on the forest, and on Prince of Wales island specifically, is not meeting this desired condition. It will be difficult or impossible to proceed with the old-growth logging and roadbuilding components of the proposed project in a manner consistent with this broad desired condition or with the more specific Forest Plan requirements applicable to wolves and habitat. The statement of purpose should incorporate the desired conditions for the world-class wildlife resources on the Tongass and the analysis must address the degree to which the project can be consistent with the goal of providing for an abundance of bears and wolves available for human use and enjoyment in perpetuity.

Alternatives

The Forest Service should fully explore alternatives that minimize or avoid the further loss of old-growth habitat on POW. As noted above, the stated "need" for wood products links to just one of many desired conditions or outcomes on the forest. There is no requirement that the products derive from old-growth and sourcing them from young-growth would avoid undermining other desired conditions. Available information suggests a strong need for restoration and wildlife habitat improvement efforts, in service of the desired condition that "[f]ish and wildlife habitat is maintained and improved to ensure sustainable fish and wildlife and their uses." Pursuing one desired condition, and narrowly defining it to require old-growth logging, while undermining other desired conditions and ignoring actions needed to achieve them would be arbitrary.

Also, the agency must develop alternatives that incorporate the biologically-preferable Old-Growth Reserve (OGR) sizes and configurations recommended by the interdisciplinary team, and that implement the Wolf Habitat Management Program.

Wildlife

The POWLLA FEIS relied on habitat loss thresholds of less than 50%, 50-80%, and over 80% as proxies to characterize impacts to wildlife species as minor, moderate or major, respectively. This manner of impact assessment broke from years of precedent and its simplistic approach fails to bring the best available science together with local conditions and knowledge. The FEIS was vacated by the district court on other grounds but the habitat thresholds represented another way in which that EIS failed to adequately assess impacts. As numerous commenters pointed out, the Forest Service must consider a great deal of more site-specific factors in order to assess the impacts of different alternatives on wildlife species and their habitat - including wolves, deer, marten, flying squirrels, goshawks and more.

The Twin Mountain II EIS should fully assess those factors and impacts. The population status and habitat needs and availability vary for the different species impacted by the proposal. The habitat loss thresholds approach used in the POWLLA process will not result in an adequate assessment.

Wolves

The Standards and Guidelines for AA wolves in the Forest Plan instruct the agency to

Provide, where possible, sufficient deer habitat capability to first maintain sustainable wolf populations, and then to consider meeting estimated human deer harvest demands. This is generally considered to equate to the habitat capability to support 18 deer per square mile (using habitat capability model outputs) in biogeographic provinces where deer are the primary prey of wolves. Use the most recent version of the interagency deer habitat capability model and field validation of local deer habitat conditions to assess deer habitat, unless alternate analysis tools are developed. Local knowledge of habitat conditions, spatial location of habitat, and other factors need to be considered by the biologist rather than solely relying upon model outputs.³

This Forest Plan direction confirms that relying on habitat loss threshold percentages is inadequate to assess project impacts on wolves or deer, and much more specific local knowledge and information will be necessary to comply with the Forest Plan and with NEPA.

The Forest Service has recognized that POW wolves are an important component of the overall Tongass population that it must maintain as well-distributed and viable. "The [POW] population is genetically isolated from other Tongass populations, which presents profound implications for maintaining well-distributed wolf populations in light of local declines, given that these populations are more sensitive to human activity and habitat disturbance than wolf populations elsewhere in the state."⁴

Further, this population suffered an unprecedented level of mortality from the 2019-2020 trapping season - 165 wolves, from a population estimated in Fall 2018 at 170. This unsustainable mortality, together with the proposed elimination of the Roadless Area Conservation Rule on the Tongass and the current administration's revival of industrial-scale old-growth clearcutting, resulted in a petition to list the Alaska population of Alexander Archipelago wolf under the Endangered Species Act. The EIS must consider the information presented in the petition and its implications for this project and for habitat management on POW and surrounding islands in general.

Given the mortality concern for POW wolves, the agency is required to implement its Wolf Habitat Management Program (Wolf Program).⁵ The Wolf Program includes significant habitat, road, den, mortality, and "human dimensions" management actions designed to conserve the vulnerable POW wolf population. This project must implement the Wolf Program and the EIS must assess the impacts of the different elements of implementation, and their tendency to conserve wolves, deer and habitat, as well as any old-growth logging, and its tendency to destroy important wolf and deer habitat.

It is not clear that any old-growth harvest on POW is consistent with the Forest Service's wolf conservation responsibilities, and the EIS must address whether it is. If any can be deemed compatible at all, then pursuant to the Wolf Program it should be sourced from higher elevation, north-facing slopes because these provide less favorable deer habitat. The EIS must be very clear about whether and how any old-growth logging is compatible with wolf conservation on POW, and if so where this compatible logging could be done.

Deer

Because deer are the primary prey for POW wolves, the Wolf Program contains many actions designed to improve deer habitat. Clearcutting old-growth isn't among them. The EIS should assess actions that improve habitat for deer on POW instead of making things worse.

POWLLA expert commenters noted that, in addition to using the novel and feckless habitat thresholds, the Forest Service had also changed the historical definition of deep snow habitat for deer, using high-volume old-growth instead of the SD67 category. The Twin Mountain II EIS should return to the longstanding prior definition, or explain why the agency believes that the high-volume old-growth metric better describes the deep snow habitat critical for deer survival.

Deer are also an important subsistence resource on POW, and the EIS must examine baseline conditions for deer and assess the project's impact on the agency's ability to provide habitat to support sufficient deer populations for both wolves and human use, per the Forest Plan direction.

POW Endemics

Regarding wildlife populations endemic to southeast Alaska, the Forest Service has stated that "[t]he long-term viability of these endemic populations is unknown, but of increasing concern since island endemics are extremely susceptible to extinction because of restricted ranges, specific habitat requirements, and sensitivity to human activities such as species introductions."⁶

Numerous concerns were raised during the POWLLA process regarding this unknown viability and the project only increased that concern since it lacked any analysis or information to indicate that removing 235 MMBF of timber from across the landscape would help ensure endemic species' viability. The Twin Mountain II EIS must closely assess the impacts to all POW endemics, including impacts to their very viability on the island, specifically including the POW flying squirrel, POW spruce grouse, and POW ermine.

Queen Charlotte goshawk

Maintaining sufficient habitat to support a [Queen Charlotte goshawk] breeding population on [POW] is fundamental to maintaining the viability of the [Queen Charlotte goshawk].⁷ Evidence provided during the POWLLA process indicated that the Forest Service is failing to retain sufficient habitat to account for "three critical spatial components of the nesting home range:" nest area, post-fledging family area, and foraging area.⁸ More specifically,

[S]patially explicit analyses of contributions to northern goshawk breeding season habitat revealed that TLMP conservation measures contribute about half the secure habitat recommended for PFAs of breeding pairs in the southern portion of this species range (Reynolds et al. 1992) and was less than half the relative amount of preferred habitat documented in nest areas in Southeast Alaska.⁹

The Twin Mountain II EIS must assess baseline conditions for Queen Charlotte goshawks on the island and in the project area, and address whether sufficient habitat is or will be available following any project implementation.

Old Growth Reserves

As noted in Defenders' comments and subsequent objection to the POWLLA project, many OGRs on POW do not comply with Forest Plan requirements and need to be modified. Some of these OGRs are within the Twin Mountain II sale area and thus are directly implicated by this proposal. The POWLLA IDT assessed numerous OGRs and recommended biologically preferable modifications to bring them into Forest Plan compliance.¹⁰ The Forest Service must, at minimum, present an alternative in the draft EIS that brings all OGRs in the project area into compliance with the Forest Plan. And it should consider land uses and designations beyond the project area as necessary or helpful in assessing the composition and function of OGRs within the project area - e.g., their value in terms of providing connectivity to adjacent lands, or habitat not otherwise provided nearby, etc.

Conclusion

Past old-growth clearcutting and roadbuilding have created a situation where pursuing more of these activities is inconsistent with Forest Service goals and obligations to provide habitat for fish and wildlife, especially on POW. Yet these projects are still proposed. The only reason for that seems to be that cutting old-growth was once important to the regional economy. But much has changed since then, including our understanding of the

ecological impacts of liquidating this rare, effectively irreplaceable habitat type, and the regional economy itself. There is now a strong demonstrated need for restoration and wildlife habitat improvement - activities that would create jobs without the destruction. We encourage the agency to develop a project and EIS that promotes these desired outcomes and creates the jobs to fulfill them, instead of outcomes like more habitat loss and worse conditions for wildlife, with little to show for it but our treasured ancient trees shipped overseas in the round.