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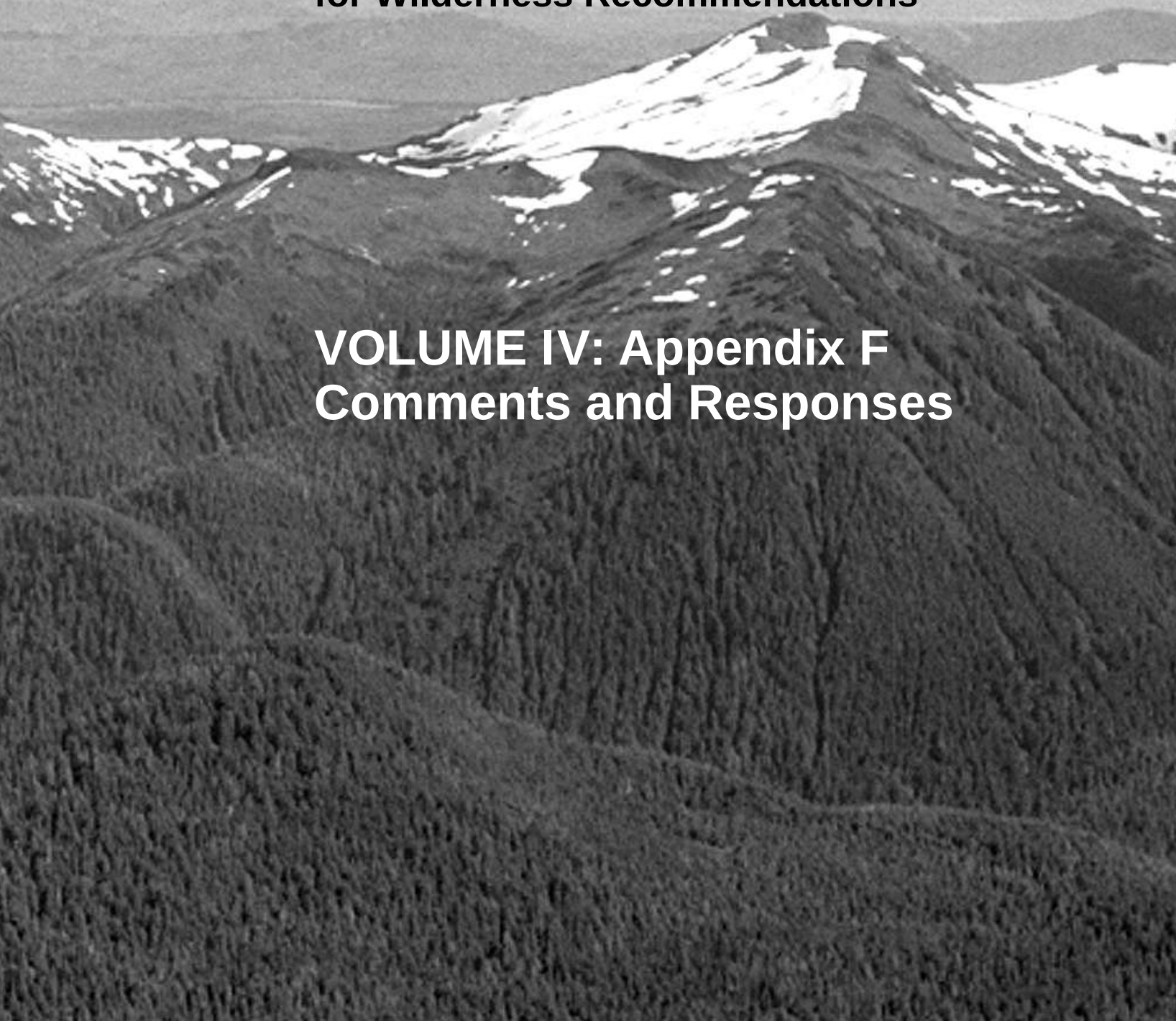
Tongass Land Management Plan Revision

Final Supplemental Environmental Impact Statement

Roadless Area Evaluation for Wilderness Recommendations



VOLUME IV: Appendix F Comments and Responses

Tongass National Forest
Land Management Plan Revision

Final
Supplemental Environmental Impact Statement

Roadless Area Evaluation for Wilderness Recommendations

Volume IV: Appendix F
Comments and Responses

United States Department of Agriculture
Forest Service–Alaska Region

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ATTACHMENT A LETTERS FROM AGENCIES, ELECTED OFFICIALS, AND TRIBAL GOVERNMENTS

Appendix F
Comments and Responses

A. Introduction

The Tongass Land Management Plan Roadless Area Evaluation for Wilderness Recommendations Draft Supplemental Environmental Impact Statement (Draft SEIS) was released for public review on May 17, 2002, initiating a 90-day comment period that ended on August 17, 2002. This appendix presents a summary of the substantive comments, written or oral, received during the public comment period and provides Forest Service responses to these comments. In addition, Attachment A provides copies of the comment letters received from agencies, elected officials, and tribal governments.

Background

The public submitted approximately 177,000 separate pieces of input during the public comment period. These pieces of input, referred to as "responses", were received in a number of forms including letter, fax, CD-ROM, public testimony, and via the project Web site (www.tongass-seis.net). Eighteen public hearings were held to elicit public comment over this period. These included 16 hearings in Southeast Alaska, a hearing in Anchorage, and an electronic public hearing held on the internet (Table F-1). All responses, both written and oral, were recorded and consolidated by the USDA Forest Service's Content Analysis Team (CAT) in Missoula, Montana.

Over 98 percent of the responses were form responses. Form responses were defined as 5 or more identical responses with identical text. A total of 46 different form letters were received, with the number of copies ranging from 5 to 42,272 copies. The remaining 2,983 non-form responses were received from all 50 states and at least 11 foreign countries, including Canada, the United Kingdom, and Australia. Every comment was considered, regardless of whether it was one comment repeated by thousands of people or a comment submitted by only one person. The emphasis in the comment review process is on the content of the comment rather than on the number of times a comment was received. Input generated through the public comment process does not represent a statistically valid random sample of the public's views. The comment analysis process is discussed in the following section.

Content Analysis

Public input on the Draft SEIS was documented and analyzed using a process called content analysis, which is a systematic method of compiling and categorizing the full range of public viewpoints and concerns regarding a plan or project. The content analysis process is designed to help the interdisciplinary team working on a project organize, clarify, analyze, and be responsive to information provided by the public. CAT's role in the process was to read each response, capture the meaning of each individual comment within that response, and provide that meaning to the interdisciplinary team and decision-maker in a clear, understandable form.

Upon receipt of each response, CAT assigned a unique identifier and identified the type of respondent (individual, agency, elected official, etc.) and geographic origin. This information was compiled in a database that allows the agency to query the comments in a number of ways. Comment coders read each response, highlighted substantive comments and labeled them by subject area. Each response was reviewed to ensure accuracy and consistency. Data entry personnel then copied the highlighted comments verbatim into the database. Analysts organized them by topic, and divided them into separate, distinct public concern statements. Each public concern statement was supported by representative quotations from the database.

Appendix F

Comment Response

The Interdisciplinary (ID) Team reviewed the public concern statements along with the sample quotations, considered the substance of the concerns, consolidated the individual comments into logical concern statements, grouped the concern statements into similar categories, and then developed responses to them. For many concerns, ID Team members reviewed the original letters or other input to ascertain the full context for the concern statement.

Table F-1. Location and Date of Public Hearings

COMMUNITY	LOCATION	DATE
Juneau, Alaska	Centennial Hall	June 18, 2002
Wrangell, Alaska	Wrangell Ranger Station	June 18, 2002
Yakutat, Alaska	Kwaan Conference Room	June 18, 2002
Angoon, Alaska	ANB Hall	June 18, 2002
Petersburg, Alaska	City Council Chambers	June 19, 2002
Ketchikan, Alaska	Discovery Center	June 24, 2002
Craig, Alaska	Craig Community Hall	June 25, 2002
Skagway, Alaska	City Council Chambers	June 25, 2002
Tenakee Springs, Alaska	Community Hall	June 25, 2002
Thorne Bay, Alaska	Bay Chalet	June 26, 2002
Haines, Alaska	City Council Chambers	June 27, 2002
Port Protection, Alaska	Port Protection	June 27, 2002
Kake, Alaska	Community Building	July 1, 2002
Sitka, Alaska	Centennial Hall	July 2, 2002
Nationwide	www.tongass-seis.net	July 8, 2002
Gustavus, Alaska	Community Assoc. Hall	July 10, 2002
Hoonah, Alaska	Hoonah Ranger Station	July 11, 2002
Anchorage, Alaska	Loussac Library, Wilda Marston Theatre	August 6, 2002

In accordance with 40 CFR 1503.4, the Forest Service generally considered responding in five basic ways to the substantive public comments identified in the following sections.

1. Modifying alternatives.
2. Developing and analyzing alternatives not given serious consideration in the Draft SEIS
3. Supplementing, improving, or modifying the analysis that the Draft SEIS documented.
4. Making factual corrections.
5. Explaining why the comments do not need further Forest Service response.

Review of the substantive public comments did not result in any changes or additions to the eight alternatives evaluated. After substantial consideration, it was decided that the range of alternatives was very broad and captured the effects of all possible new alternatives. The results of the content analysis did, however, result in a number of improvements, clarifications and updates between the Draft and Final SEIS. The following sections present the public comments and responses developed by the ID team. Comments and responses that address the various resources and public uses are presented in Section B. Comments about individual roadless areas are presented in Section C. Copies of letters received during the public comment period from Federal, State, and city or borough agencies, Tribal governments, and elected officials are presented in Attachment A. All of the responses received are available for review in the planning record.

Many comments received on the Draft SEIS concerned issues outside the scope of the SEIS, which is to evaluate and consider roadless areas within the Tongass National Forest for recommendations as potential wilderness. A number of comments, for example, recommended that changes be made to the existing 1997 Tongass Land and Resource Management Plan or questioned analyses presented in the 1997 Tongass Land Management Plan Revision Final EIS. While these and other comments received were outside the scope of the SEIS, comment summaries and responses are presented for a number of these types of comments, primarily to provide information to the public or clarify popular misconceptions.

B. Comments about Resources and Public Uses

This section of the Appendix presents a summary of all of the substantive resource and public use related comments, written or oral, received during the public comment period for the Draft SEIS and provides Forest Service responses to these comments. The comments and responses are assigned to one of the following categories. This section presents the comments and responses in the following order:

- General
- General-Ecological
- Soils, Geology, and Karst
- Water and Fish
- Wetlands
- Wildlife
- Wildlife – Species or Species Groups
- Old Growth and Viability Strategy
- Timber
- Minerals
- Transportation and Utilities
- Subsistence
- Recreation and Tourism
- Heritage Resources
- Economic and Social Environment

General

COMMENT: Local stakeholders who have been involved over the years with planning on the Tongass National Forest feel they have not been listened to. Some people said we should give added weight to local comments, while others felt all comments should receive equal merit. Some people expressed a desire to have comments from Native organizations and the Southeast Alaska Subsistence Resource Advisory Council weighted more heavily. Still others recommended that comments from state and federal resource professionals should get extra consideration. A small number of commentors expressed concern for the comment timeline, asking for an extended period to allow people who are busy in the summer a better opportunity to comment. Some commentors requested an e-mail address to send comments to.

RESPONSE: Approximately 177,000 pieces of comment correspondence (including individual testimony) were received in response to the Draft SEIS. A number of people from divergent viewpoints expressed concern that the Forest Service was not listening to them. This concern in part relates to the fact that areas have been considered for wilderness designation several times in the past (1979 and 1997 Forest Plans, ANILCA, TTRA). Not all of the areas considered, were designated in ANILCA or TTRA, and those who wanted them designated, still want them designated. Similarly, others who do not want these additional areas designated are concerned that we are still giving them consideration for wilderness. Some people on both sides conclude that the Forest Service is not listening to them. People do not agree on how our public lands should be managed to meet multiple-use sustained-yield mandates that include land uses from designated wilderness to areas managed with an emphasis on commodity production.

Comments received from all viewpoints are given equal weight when they are analyzed. The comment analysis is intended to identify each substantive comment relative to the SEIS and determine the best way to be responsive to the concerns expressed. It needs to be pointed out that, while the commenting process is not a vote, considering each substantive comment is important.

The comment period was open for more than 90 days, from mid-May through mid-August. Even though the comment period fell within a busy part of the year, the Forest Service feels this was an adequate time period to be able to review and make substantive comments on this supplement to the Forest Plan Final EIS. As noted above, approximately 177,000 separate pieces of input from individuals, organizations, officials and other entities were received.

An e-mail address was not provided because the Forest Service wanted electronic comments to be submitted to the Tongass SEIS Web site. This allowed commentors to determine if they wanted a Final SEIS, as well as, have ready access to the SEIS and related information. If a commentor did not want a Final SEIS, they only had to enter their name and Zip Code in order to activate the comment box. A full name and address was required for those that wished to have a Final SEIS sent to them. It also allowed easier analysis of comments and demographic information. Most of the requests for an e-mail address were from organizations or services that were collecting names and addresses from their members or contacts, and then generating form letters for submission to the Forest Service as comments. Some of these requested the opportunity to submit their letters to the Forest Service on a CD, which was accepted. Others contracted with local print and copy businesses in Missoula to download electronic letters and have them printed and delivered to the Content Analysis Team. Regular mail, FAX, and testimony at public and internet hearings were also available for the public to make formal comment. It should be noted that some e-mails were received by Forest Service officials, and these were forwarded to the Content Analysis Team for processing.

COMMENT: Several people felt that compromises made in the past to provide a balance of uses are being abandoned, such as ANILCA, Tongass Timber Reform Act, and the 1997 Forest Plan. They felt the Tongass National Forest should not recommend additional wilderness to honor prior negotiations contributing to the designation of existing Wilderness, LUD II, National Monuments, and development of the 1997 Forest Plan.

RESPONSE: Management of the Tongass is a controversial subject, as noted by the public interest during development of the Forest Plan. Alternatives included in the 1997 Forest Plan Final EIS did not include alternatives that considered Tongass roadless areas for wilderness. The SEIS is intended to correct that oversight. The SEIS does not abandon past negotiations, it presents alternatives for providing a range of recommendations for wilderness or LUD II to roadless areas on the Tongass and provides the Deciding Official with analysis of the effects of each alternative.

COMMENT: Some respondents expressed concern that the Tongass National Forest did not have, or needed to improve the government-to-government relationship with Alaskan Native Tribes.

RESPONSE: The Tongass National Forest has an ongoing Government-to-Government relationship with all the Federally Recognized Tribes and other Tribal organizations in Southeast Alaska. Each Tongass District Ranger helps to maintain these relationships by communicating with local Tribal contacts on specific projects. This level of communication, although variable across the Forest, has been successfully used for the SEIS. District Rangers provided briefings, information meetings, formal consultation meetings, and formal public hearings within or in the vicinity of communities throughout Southeast Alaska for, or readily available to the governments of Federally Recognized Tribes. Most Tribal Governments took full advantage of these opportunities.

COMMENT: Much concern was expressed about special interest group or political pressure overly influencing the land management decisions, especially related to wilderness or LUD II recommendations on the Tongass National Forest. Many were concerned that environmental organizations would be allowed to dictate land management policy, while many others were similarly concerned that timber industry groups would be allowed to dictate policies. Some expressed concern that their local or national elected officials did not represent their views of how the Tongass should be managed or its lands allocated for various uses. Many commentors pointed out that the Tongass was owned by the whole nation and that local stakeholders should not be allowed to dictate policies on the Tongass. Many expressed concern that the Forest

Service and/or the Bush Administration and elected officials would do the bidding of corporate America and the timber industry.

RESPONSE: A primary goal of the Forest Plan is to provide for the sustainability of the resources of the Tongass National Forest, while directing the coordination of multiple uses, such as outdoor recreation, timber, wildlife, fish, watershed, and wilderness. To accomplish this goal, the Forest Plan includes a wide range of land allocations spanning areas which essentially allow no land-disturbing activities to areas allowing intensive resource development, and a set of standards and guidelines which ensure that management objectives for these land allocations are met. Additionally, our goal is to manage the Forest to promote community stability in an environmentally sound manner. Providing a mix of goods and services that maximize net public benefit consistent with multiple-use and the sustained yield of all renewable forest resources is important. Clearly, people disagree on how the Forest Service should best manage the Tongass and whether additional areas should be recommended for wilderness and LUD II or not. One of the objectives of the SEIS has been to fairly evaluate all public input, regardless of where the information originated. Incorporating this divergent array of public comment with the expanse of relevant natural resource information into the Final SEIS allows the Deciding Official to take a hard look at how best to balance the many competing uses and conflicting values for both the short and long-term management of the Tongass National Forest. The Regional Forester is the Deciding Official and will determine whether or not to recommend additional wilderness after consideration of all public input.

COMMENT: Some respondents indicated that the Tongass National Forest should be an advocate for the conservation of natural resources and manage land according to scientific principles. Some respondents were concerned that the SEIS may not be using the best science and technology available to develop and analyze alternatives. They also called for land management decisions to be based on peer-reviewed studies.

RESPONSE: The current Forest Plan provides for the conservation and sustainability of natural resources. The 1997 Final EIS and related processes such as the use of scientific panels and peer review of various analyses helped assure the current Plan is based on sound scientific principals. The Forest Plan embraces an adaptive management approach, which refers to the continuous process of action-based planning, monitoring, research, evaluation, and adjustment. The SEIS is an extension of this science-based management approach. The SEIS has updated the various relevant analyses from the 1997 Final EIS to assure relationships are still valid; has added new information and approaches such as incorporation of the new system of ecosystem classification by Nowacki et al. (2001); has incorporated recent old-growth habitat work done by Caouette et al. (2000) and Caouette and DeGayner (2001); has done extensive literature research on wilderness and wildland values; has considered technical reviews by Dr. John Hendee; and other efforts to assure the SEIS is based on sound, scientific principals.

As noted in the Final SEIS, approximately 6.6 million acres of Congressionally designated wilderness, National Monument, or LUD II lands occur throughout the Tongass National Forest. Aside from wilderness, there are approximately 9.6 million acres of inventoried roadless areas on the Tongass. The 1997 Tongass Forest Plan allocated 74 percent of the roadless areas to non-development LUDs. The Forest Plan not only represents an advocacy for the conservation of natural resources, but it strikes a good balance between preservation of ecosystems while allowing for some development of resources in support of communities.

COMMENT: Some respondents were concerned that the Tongass National Forest did not follow the laws regarding wilderness recommendations in the 1997 Forest Plan, and that completion of the SEIS would not seriously consider all roadless areas for recommended wilderness. Similarly, some thought that because normal resource programs on the Tongass continued planning processes for projects, that the Forest Service was not taking the evaluation of roadless areas for wilderness consideration seriously.

RESPONSE: The purpose and need for the SEIS is to respond to the District Court's decision in *Sierra Club v. Lyons*, by evaluating roadless areas of the Tongass National Forest for wilderness

recommendations. The SEIS includes eight alternatives that respond to various combinations of public recommendations and wilderness capabilities for individual roadless areas. The Final SEIS alternatives range from recommending no additional wilderness to recommending 9.6 million acres of new wilderness. The planning for new projects in ongoing programs did continue. This varied by resource program and was most notable for those programs that have more complex or longer planning requirements. The Forest Service' intent was to complete work on projects or programs so long as they did not affect the eligibility of a given area to be considered for wilderness recommendation. In general, project planning continued, but project decisions or implementation of project decisions has been deferred.

COMMENT: Some respondents suggested the Final SEIS should fully address key legal, biological, technical, and social changes since the adoption of the 1997 Record of Decision. These and similar comments seemed to indicate a desire to enter into a complete revision process for the Tongass Forest Plan.

RESPONSE: The SEIS is a supplement to the 1997 Forest Plan Final EIS and thus, is not a re-analysis of the Forest Plan. The SEIS specifically responds to the District Court's decision requiring the Forest Service to evaluate roadless areas on the Tongass for wilderness consideration. The SEIS does look at the relevant changes in legal, biological, technical and social changes since adoption of the 1997 Plan. Some examples included in the SEIS relate to changes in the various industries in Southeast Alaska, the heightened interest in roadless areas nationally and on the Tongass, incorporation of various new ecological and biological analytic tools, and taking advantage of the higher powered mapping and analytic tools now available. All of these and other relevant efforts have been used to update information and analyses used in the 1997 Final EIS and included in the Final SEIS. Forest Planning is an ongoing effort and each Plan is expected to be updated periodically and as new issues indicate an appropriate need to amend or revise such Plans. NFMA and its supporting regulations require a Forest Plan to be reviewed periodically (each 5 years). The Tongass Forest Plan is scheduled to be reviewed during 2003 and 2004. Forest Plans are also assessed for formal revision 10 to 15 years after completion. Potential issues not relevant to the SEIS will be addressed, as appropriate, in these future Forest planning efforts.

COMMENT: Some respondents were concerned the SEIS did not include a Biological Assessment and Evaluation.

RESPONSE: Biological assessments were conducted for the 1997 Forest Plan (Forest Plan, Appendix J) and included consultation with the U.S. Fish and Wildlife Service, National Marine Fisheries Service, and other state and federal agencies. The SEIS is a supplement to the 1997 Forest Plan Final EIS under which the appropriate consultations were conducted. None of the alternatives considered in the SEIS would diminish existing protections for fish and wildlife species. Note that the Tongass National Forest has no threatened or endangered species besides marine mammals.

COMMENT: Many respondents were concerned about how the Roadless Area Conservation Rule was being applied on the Tongass National Forest.

RESPONSE: The Roadless Area Conservation Rule (Rule) was signed by the Secretary of Agriculture, in January 2000. In May 2000, the U.S. District Court for the District of Idaho enjoined the Forest Service from implementing the Rule. In response to an appeal of that injunction, it was lifted by a three Justice Panel of the 9th Circuit Court in December, 2002. This ruling has been subsequently appealed to the full 9th Circuit for consideration. Several other states, including the State of Alaska, filed lawsuits similar to the State of Idaho. The Forest Service issued an Advance Notice of Proposed Rulemaking that could make adjustments to the Roadless Rule in July 2001 followed by a public comment period that ended in September 2001. Public comment has been processed and the Agency continues to deliberate on a Final Rulemaking relative to the Roadless Rule.

The Chief of the Forest Service has issued interim direction for managing roadless areas that allowed road construction and timber harvest in inventoried roadless areas on forests which had a revised forest plan signed prior to July 27, 2001, and had completed a forest-scale roads analysis. The Revised

Tongass Land and Resource Management Plan was signed in 1997, and the forest has recently completed a forest-scale roads analysis. In accordance with the Rule, logical smaller portions of the Forest have already incorporated a forest-scale roads analysis.

COMMENT: Some respondents wanted to know why the Tongass National Forest would consider building new roads into roadless areas when it has a backlog of road maintenance. Similarly, if the current road system on the Forest had fish passage problems, why would the Forest consider building additional roads in roadless areas that could involve fish passage. They furthermore suggest funds be requested from Congress to eliminate the backlog.

RESPONSE: Not unlike other National Forests across the Nation, the Tongass National Forest finds itself with a backlog of road maintenance work. This is related primarily to two things; the downturn in the timber sale program, and the lack of sufficient funding to accomplish maintenance work. In the past, most roads on the Tongass were constructed and maintained by the active timber sale program. With a smaller timber sale program, the existing roads are needed less frequently by timber sale purchasers, thus any scheduled road maintenance needs to be accomplished by other users or paid for by non-timber funds. Many of the roads are used by the public for a variety of reasons, which include recreation, subsistence access, and other personal uses. The roads are also used by the Forest Service in accomplishing various resource program work. None of these programs alone are sufficient to provide for most road maintenance needs. As mentioned above, these scenarios are similar for other National Forests.

We do recognize the backlog of road maintenance needs on the Tongass and continue to seek funding and opportunities to correct problems with our roads. In early 2001, the Forest Service adopted a new road management policy, which requires the agency to maintain a safe, environmentally sound road network that is responsive to public needs and affordable to manage. The policy includes a science-based roads analysis process designed to help managers make better decisions on roads. We are conducting roads analysis and road condition surveys across the forest to better determine the state of our road system and to provide a framework for decision-makers when considering access management and transportation needs with resource protection. Forest Plan implementation projects such as timber sales also apply the roads analysis process tools to help determine which existing roads will be needed for long term management, and to determine the best management approach for new roads. With the various road analyses processes ongoing to address the existing Tongass road system along with where new roads are being considered, it is reasonable to conclude that the road maintenance backlog is being satisfactorily addressed and new roads being considered are not expected to add to the current backlog of road maintenance. While road maintenance needs are a pressing concern for the Forest Service on the Tongass, they are outside the scope of this analysis, which is narrowly focused on the effects of additional recommended wilderness. Effects on transportation and new road construction are discussed in the Transportation and Utilities section of the SEIS.

Fish passage on the existing road system is also a management concern for the Tongass. The majority of fish passage concerns have been identified using evaluation criteria that was not in place when the steam crossing structures were designed and constructed. For example, in the past, most emphasis was put on passage for adult salmon and juvenile coho salmon in most stream flow conditions during past design eras. Current design criteria include all age classes of all resident and anadromous fish during nearly all flow conditions. Stream crossing assessments are nearly completed for the Tongass, and this information will help guide how best to correct fish passage problems on a prioritized basis. Stream crossing correction projects are underway and over $2 million per year have been programmed over the next several years to address the fish crossing concerns. Similar to road maintenance concerns addressed above, fish passage concerns are outside the scope of this SEIS.

COMMENT: Some respondents felt the evaluation of roadless areas for wilderness consideration on the Tongass National Forest violated Section 708(b)(4) and Section 1326 (b) of ANILCA. They feel that Congress has already addressed potential wilderness areas when it enacted ANILCA and the Tongass Timber Reform Act. Additionally, they question the District Court's decision, which has led to the SEIS. Other respondents disagree with such an interpretation of ANILCA and feel evaluation of roadless lands for additional wilderness is appropriate. They also agree with the

Court in that the Tongass Forest Plan Final EIS was in violation of NEPA in that wilderness recommendations were not included in the alternatives for the Final EIS.

RESPONSE: ANILCA Section 708(b)(4) states: "unless expressly authorized by Congress the Department of Agriculture shall not conduct any further statewide roadless area review and evaluation of National Forest System lands in the State of Alaska for the purpose of determining their suitability for inclusion in the National Wilderness Preservation System." Section 1326 (b) states, "No further studies of Federal lands in the State of Alaska for the single purpose of considering the establishment of a conservation system unit, national recreation area, national conservation area, or for related or similar purposes shall be conducted unless authorized by this Act or further Act of Congress."

The SEIS and consideration of recommending wilderness is part of the Forest Plan Revision Final EIS and is a forest-specific evaluation and not a statewide evaluation. The 1997 Forest Plan Revision is a general land management plan and not a single purpose study.

Over the past 25 years congress has considered many potential wildernesses in Alaska, and twice has enacted legislation designating new wilderness on the Tongass (ANILCA, 1980 and TTRA, 1990) totaling 6.6 million acres of wilderness, national monument, and LUD II. The Forest Plan Revision Final EIS did not recommend additional wilderness. The District Court directed the Forest Service to conduct the SEIS. The purpose and need for the SEIS is to respond to the District Court's decision in *Sierra Club v. Lyons*, by evaluating roadless areas of the Tongass National Forest for wilderness recommendations.

COMMENT: Some respondents wanted the Forest Service to implement the 1999 Record of Decision for the Tongass because they feel it provides for more protection of specific areas and is less biased toward timber production. They were particularly interested in the 18 Areas of Special Interest included in the 1999 ROD.

RESPONSE: As noted in Chapter 1 of the SEIS, the District Court enjoined the Forest Service from implementing the 1999 Tongass Forest Plan Revision ROD. In the 1999 ROD, 18 Areas of Special Interest were identified where development LUDs would have been changed to mostly natural, or non-development, LUDs. In the SEIS, Alternatives 5, 6, 7 and 8 recommend all of the 18 Areas of Special Interest for Wilderness or LUD II designation. In recognition of the importance of being able to provide a supply of timber from the Forest for Southeast Alaska communities, the Tongass Timber Reform Act of 1990 directs, "…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 market demand from such forest for each planning cycle." A Forest Plan is an effort to strike a balance between all competing uses in a manner, which minimizes bias for any one of them. The Tongass Forest Plan, developed collaboratively and utilizing the best science, has been such an effort.

COMMENT: Many respondents indicated the Forest Service should preserve the Tongass as a nationally and internationally unique treasure.

RESPONSE: The Tongass National Forest is recognized as having global significance. Many of the factors that people list as reasons to protect the Tongass are already provided under the current Forest Plan through land use designations, as well as, existing Wilderness, National Monument, and LUD II. The SEIS includes alternatives that offer various levels of long-term, or Congressional, protection for roadless areas. The Forest Planning effort for the Tongass recognized the many values associated with the Forest. The mix of land use designations and standards and guidelines in the Forest Plan guide the Forest's staff of resource professionals to assure that management activities provide for short and long-term protection of the world quality land and resources found on the Tongass National Forest.

COMMENT: Some respondents indicated public land should be managed for multiple-use resulting in the largest benefit for the most people. Some people feel the Tongass has been managed for one resource at the exclusion of other resources. For example, some people feel that timber harvest has dominated all other resource uses. Others feel that wilderness is

incompatible with multiple-use management, while many others indicated roadless areas should be protected from resource extraction.

RESPONSE: The 1997 Forest Plan strives to provide a balance between resource development and preservation. A Forest Service goal is to provide a diversity of opportunities for resource uses that contribute to the local economies of Southeast Alaska, which in turn promotes community stability, in an environmentally sound manner. Providing a mix of goods and services consistent with multiple-use and the sustained yield of all renewable forest resources is the goal. Clearly, people disagree on how best to manage the Tongass, and whether additional wilderness or LUD II should be recommended or not. The SEIS evaluates a broad range of alternatives for additional recommended wilderness and LUD II. The Regional Forester is the Deciding Official and will determine whether or not to recommend additional wilderness or LUD II, and if so, where.

COMMENT: Some respondents were concerned that the Draft SEIS did not give enough emphasis to non-commodity forest values.

RESPONSE: The economic efficiency analysis presented in the *Economic and Social Environment* section has been expanded in the Final SEIS and discusses non-commodity values in more detail. In addition, a "Summary of Effects Matrix" has been added to Chapter 2. This matrix allows the reader to compare the effects of the alternatives on essentially all resource areas simultaneously, so that a cumulative picture of the net effect can be obtained. The matrix presents many quantitative measures, but uses qualitative comparisons where quantitative measures are not feasible.

This document is a Supplement to the 1997 Forest Plan FEIS (USDA Forest Service, 1997a). The selected alternative in the 1997 FEIS is the No Action alternative in this analysis. The 1997 Forest Plan provides for a balanced mix of forest values, including non-commodity values. This plan was developed using a significant collaborative process that included representatives from State of Alaska and Federal agencies, Tribal governments and organizations, communities and related organizations, industry and environmental organizations, research scientists, and many individuals working with the resource professionals of the Tongass National Forest. The 23 different Land Use Designations used to zone the Tongass National Forest in the Forest Plan represent significant efforts to balance the mix of commodity and non-commodity values available on the Forest. In addition, within areas that are zoned to allow commodity outputs, Forest Plan standards and guidelines provide additional protections for associated non-commodity values found in those areas.

COMMENT: Some respondents indicated the Final SEIS should comply with NEPA by including the site-specific impacts of not recommending a roadless area for Wilderness or LUD II designation. They also indicated the effects disclosed in the Draft SEIS did not provide adequate information on roadless areas related to not designating them for Recommended Wilderness or Recommended LUD II.

RESPONSE: The 1997 Forest Plan, based on the 1997 Final EIS, allocated all lands, including those inventoried as being in an unroaded condition, to development and non-development LUDs. The SEIS is part of the Forest-wide programmatic planning effort, which looks at the larger scale of landscape issues and uses. More detailed site-specific levels of analyses are usually more appropriate at the project level, which implements the Forest Plan. Because of the computer capabilities and breadth of information available for the Forest, the SEIS provides area and site-specific analysis for each roadless area in Appendix C, consistent with the scale of analysis needed to inform the decision-maker relative to recommending an area for wilderness or LUD II. Maps included in the SEIS are also useful in displaying specific information such as current land use designation, extent of roadless areas, and juxtaposition of recommended Wilderness for each alternative. The SEIS evaluates a range of alternatives that recommend from 0 to 9.7 million acres of additional Wilderness or LUD II. The impact assessment in Appendix C and in the SEIS has been expanded to provide a better disclosure of the effects of not recommending roadless areas for permanent protection.

COMMENT: Some respondents indicated the Forest Service should prevent the use of RS2477 to build roads in the forest.

RESPONSE: Revised Statute (RS) 2477 was enacted in 1866 and provides for a right-of-way for the construction of highways over public lands that are not reserved for public uses. RS 2477 was passed during a period when the federal government was promoting the settlement of the American West and Congress repealed the act in 1976. Construction and use of the right-of-way must have occurred while the lands were unreserved public lands, which would require the existence of the right-of-way before the lands were reserved for the Tongass National Forest. An RS 2477 right-of-way claim is adjudicated to determine its validity. The validity of RS 2477 claims are outside the scope of this analysis and cannot be affected by the decision in this ROD.

COMMENT: Most respondents expressed support for one or more of the eight alternatives. Support for Alternatives 6 or 8, which would provide for the highest level of protection of roadless areas, was the most prevalent, and support for Alternative 1, which would implement the current Forest Plan, was the next most prevalent. Some favored Alternatives 1, 2 or 4, which they felt would provide better support for local economic needs. Some thought Alternatives 3 or 5 represented a more balanced approach that recommended new wilderness while not discouraging development. Still others felt Alternative 7 provided a better balance.

RESPONSE: A number of people voiced their support for an alternative that does not recommend additional wilderness or does not affect the amount of area available for resource development. Clearly, people disagree on how best to manage the Tongass, and whether to recommend additional wilderness or LUD II, or not. The SEIS evaluates a broad range of alternatives for additional recommended wilderness and LUD II.

COMMENT: Many people voiced their displeasure for an alternative that does not recommend additional wilderness or does not reduce the amount of area currently available for resource development primarily due to their concern that the current Forest Plan does not provide adequate long-term protection for the Tongass. A number of people recommended against selecting Alternative 1 as they feel it would mean "caving in" to logging and mining industry special interest groups. Still others felt Alternative 1 does not respond to Key Issue 1 in the SEIS, which is "Additional wilderness protection will provide greater long-term protection of roadless area."

RESPONSE: All alternatives respond to the two Key Issues, including the No Action Alternative (Alternative 1), which responds to the issue of long-term protection by maintaining the status of existing Wilderness, LUD II, National Monument, and current non-development LUDs in the Tongass Forest Plan.

COMMENT: Many people recommended Alternative 6 or Alternative 8 to provide for the maximum long-term protection of roadless areas. Specifically people supported these alternatives as a means of providing long-term protection to the current roadless areas of the Tongass to preserve them for future generations. More people expressed a preference for Alternative 6 over Alternative 8 because they felt the LUD II designation is more appropriate for specific areas than a more restrictive wilderness designation.

RESPONSE: The Deciding Official has the option of choosing from any of the Alternatives, including recommending LUD II for specific areas. It should be noted that the Forest Plan provides for long-term protection and management of the lands and resources across the Forest. The debate is whether long-term protection equates to Congressional designation for areas rather than protections provided for in a Forest Plan consistent with the Multiple Use Sustained Yield Act, National Forest Management Act, and other laws and regulations pertinent to management of National Forest System lands. The current Tongass Forest Plan is consistent with all pertinent laws and regulations. It also should be noted that Forest Planning is an ongoing process and the Tongass Forest Plan will continue to be reviewed periodically and subject to revision as may be appropriate in the future.

COMMENT: A number of people recommended against selecting Alternative 6 or Alternative 8 as they feel it would mean "caving in" to environmental preservation special interest groups. Specifically people opposed these alternatives out of concern that they would permanently prevent the forest from being of benefit to the American people and economy.

RESPONSE: The Deciding Official has the option of choosing from any of the Alternatives, including recommending Wilderness or LUD II for specific areas. Forest Planning is an ongoing process and the Tongass Forest Plan will continue to be reviewed periodically and is subject to revision in the future, and as new issues are ripe for consideration. New issues can be related to changes in local economies or to provide for National needs. Responding to things like new issues may indicate a need to adjust the balance of an existing Forest Plan.

COMMENT: The concept of adaptive management as used in the Tongass Forest Plan is confusing to some respondents, as they appear to equate this to mean using alternatives to the clearcut harvest method.

RESPONSE: Adaptive management as used in the Tongass Forest Plan refers to the continuous process of action-based planning, monitoring, research, evaluation, and adjustment with the objective of improving implementation of the Plan. In other words, adapting the Plan to do what works best to meet multiple use objectives. The 1997 Record of Decision indicated that 65% of the harvest on the Tongass would be through even-aged management, which could include use of the clearcut harvest method. Ongoing Forest Plan monitoring since 1997 indicates only about 23 percent of the timber harvest has been by the clearcut harvest method. We continue to use a mix of silvicultural prescriptions and harvest methods in managing timber on the Tongass, and we continue to monitor the results of alternative harvest methods. However, analysis of what harvest method to use in a particular project area, is not appropriate for inclusion in this SEIS.

COMMENT: Some respondents believe the SEIS should have alternatives that would remove current wilderness designations and other development-limiting restrictions.

RESPONSE: The SEIS responds to the Court order to evaluate Tongass roadless areas for wilderness recommendations in a supplement to the 1997 Forest Plan Final EIS. Notwithstanding wilderness considerations, the Court did not find fault with the other land allocations included in the current Forest Plan. The SEIS has included new land use designation recommendations only for new wilderness or LUD II. The LUD II is included because Congress has used this designation on the Tongass along with wilderness designation in the past to provide increased long-term resource protection, but with more flexibility than with wilderness designation. The SEIS is evaluating the inventoried roadless areas on the Tongass and analyzing alternatives that would recommend additional wilderness or LUD II. Only Congress designates wilderness and legislated LUD II areas. It is not within the authority of the Forest Service to change those designations.

COMMENT: Many respondents indicated the Tongass National Forest should halt timber sales proposed in roadless areas.

RESPONSE: New decisions that would allow timber harvest and road construction in roadless areas are currently enjoined. After the Final SEIS is completed, activities in roadless areas is expected to be guided by the Forest Plan, which may or may not allow road construction and timber harvest in roadless areas.

COMMENT: Some respondents felt the Tongass National Forest should be managed to the same preservation standards that we demand of other nations because they believed more than 70 percent of the Tongass old growth had been clearcut already. They asked how the USA could ask Brazil and Peru, Indonesia and Southeast Asia to preserve their forests if we won't preserve our own? They also commented on how the Tongass National Forest is a valuable international resource that should be preserved for the benefit of the whole world and not short-term financial

reward for the few. Still others noted that the Tongass already provided substantial environmental protections, and the renewable timber resource should be managed to help offset the demands on other Nation's forests.

RESPONSE: The Tongass National Forest is managed for multiple use in accordance with the National Forest Management Act, the Multiple Use Sustained Yield Act, and other pertinent laws, regulations and policies. The Tongass has 19 designated Wildernesses, 12 designated LUD II areas, and smaller non-wilderness portions of two designated National Monuments that make up about 39 percent of the Tongass. An additional 39 percent of the Forest is zoned for non-development activities. Approximately 3.6 million acres of the Tongass National Forest (22 percent) are zoned to allow development. Under the current Forest Plan timber harvest can occur on about 0.7 million acres (4 percent) of the Tongass National Forest. Under the 1997 Forest Plan, development activities must meet stringent guidelines designed to protect the natural environment. The Forest Service believes that the land use designations and standards and guidelines established in the 1997 Forest Plan provide a balanced, sustainable and environmentally sound management plan for the Tongass National Forest.

About 7 (not 70) percent of the commercial size old growth has been harvested on the Tongass National Forest. If the Forest Plan were to be implemented for the next 120 years, 83 percent of the old growth forest would still be present. It is a combination of the amount of old growth projected to be available through time along with assuring the old growth is also available in strategic locations across the Forest, that it is reasonable to conclude sustainability and ecological function of the Forest Plan conservation biology strategy.

COMMENT: Some respondents indicated the Final SEIS should carefully distinguish between the potential different effects associated with designating areas LUD II rather than Wilderness.

RESPONSE: The SEIS distinguishes between the potential different effects associated with recommending areas LUD II rather than Wilderness, as appropriate. This is most distinguishable throughout Chapter 3 of the SEIS and in particular, associated with Alternative 6. Alternative 6 is the only alternative that includes Recommended LUD II.

General - Ecological

COMMENT: A few respondents suggested the Final SEIS should analyze the distribution and ecological characteristics of watersheds across the entire Tongass. Others suggested the Forest Service should preserve ecosystem health, genetic and species diversity, and ecological integrity on the Tongass. Still others indicated the Forest Service should allow resource management to improve forest health.

RESPONSE: Individual watersheds of high value or high public interest found within individual roadless areas were considered in the SEIS (particularly in Appendix C). Analyzing the distribution and ecological characteristics of all individual watersheds across the Tongass would require a high level of detail and intensity that would not likely yield any new information relevant to recommending an area for wilderness or LUD II. Each individual roadless area description in Appendix C includes a broad array of information relevant to the ecological characteristics of each roadless area.

The 1997 Forest Plan preserves ecosystem health, genetic species diversity and ecological integrity. The Plan balances the need to protect large areas of intact ecosystems (13.2 million acres of non-development and wilderness LUDs) with the need to provide resource develop opportunities for Southeast Alaska communities (3.6 million acres of development LUDs). The SEIS evaluates alternatives that provide the same or increased levels of long-term protection to roadless areas on the Tongass. It should be noted that forest health, including high risks related to forest fires, generally is not a significant issue for the Tongass National Forest.

COMMENT: Many respondents thought the Tongass National Forest should prohibit industrial-scale commercial logging in order to avoid further negative impacts to ecosystem integrity, fisheries and forest users.

RESPONSE: Since the closure of the two pulp mills in 1993 and 1997, the timber industry in Southeast Alaska is made up largely of small to very small family-owned businesses. The Forest Plan provides for short- and long-term functioning ecosystems and integrity. The Forest Plan includes an extensive old-growth habitat conservation strategy that is one of the best in the World. There are no threatened or endangered species found on the Tongass National Forest, other than marine mammals. A primary goal of the Forest Plan is to provide for the sustainability of the resources of the Forest while directing the coordination of multiple uses such as outdoor recreation, timber, wildlife, fish, watershed, and wilderness. These do not have to be mutually exclusive and in fact rarely are.

COMMENT: Some respondents suggested the Tongass National Forest should protect its landbase as a natural laboratory vital for helping us understand the unique ecosystem processes of Southeast Alaska.

RESPONSE: The 1997 Forest Plan currently allocates 78 percent of the Forest to non-development LUDs, including wilderness. Many research projects are currently underway on the Forest in both roaded and roadless areas, and opportunities exist for many more. Establishing long-term protection through Wilderness or LUD II recommendation would be advantageous for some research efforts that depend on large blocks of roadless habitat. Wilderness protection could hinder other research efforts by restrictions related to access or methods of research. For example, the Forest has been trying to obtain forest inventory plot information within existing Wildernesses for several years and has been unable to accomplish this because of helicopter access restrictions on the more remote areas. Another example of this could be related to increasing our knowledge of karst and cave related resources on the Tongass, and potential restrictions on types of access and the equipment necessary to safely conduct exploration and inventories.

COMMENT: Some respondents suggested the SEIS needs to consider global warming. Some people requested the Forest halt all logging and road building to prevent global warming. Others suggest global warming will increase the frequency of wildfires, therefore, the Forest Service should promote new road construction to facilitate future firefighting efforts.

RESPONSE: The 16.8 million-acre Tongass National Forest contains approximately 5.5 million acres that grows commercial-sized stands of trees. The current Forest Plan allocates approximately 664,000 acres as suitable for timber management. Sustainable timber management, including the vigorous second-growth stands of timber, on 12 percent of the tree-growing ground, or 4 percent of the Forest, on the Tongass will not significantly contribute to global warming. Additionally, there are nearly 4 million acres of forest on the Tongass that are not considered of commercial quality, but certainly contributes to the function of the ecosystems found in Southeast Alaska. It is not likely that global warming will dry out the Tongass at such a rapid rate that the Forest should be installing fire-fighting access roads at this time.

PUBLIC COMMENT: Some respondents felt the Final SEIS should consider the impact of withdrawing land from timber harvest on the global environment by transferring timber demand overseas.

RESPONSE: It is likely true that timber harvest will have some effect in lessening demand for timber resources in other areas of the world that have fewer environmental safeguards than are included in the Tongass Forest Plan and associated timber management program. However, the amount of timber produced on the Tongass is a very small percentage of the overall global demand for timber products. What is likely more important, is being able to produce timber resources in a sustainable and environmentally safe manner as can be done on the Tongass National Forest, and how management of those resources significantly contribute to the sustainability of local economies in Southeast Alaska.

COMMENT: Some respondents felt the current ecological protections included in the Tongass Forest Plan were more than adequate. They were concerned that the broad scheme of protection afforded by current wilderness and LUD designations on the Tongass exceeds by many times such protection elsewhere in the National Forest system. Because the 1997 Forest Plan and the SEIS discuss effects analyses in terms of risks, they wanted to point out there actually was very little risk included in the Plan for most resources.

RESPONSE: The comments regarding the use of risk analyses and protections in place with the 1997 Forest Plan is noted. The 1997 Forest Plan EIS (including Appendix N) provided extensive risk analyses regarding the extent of ecological protection under the alternatives being considered. Based on these risk analyses, the 1997 Forest Plan ROD concluded that the selected alternative provided adequate ecological protection. It is not the intent of the SEIS to redo these analyses.

COMMENT: The Final SEIS should acknowledge the important ecosystem role of woody debris and consider the direct and cumulative impacts of biomass removal on forest ecosystems. The Tongass National Forest should prohibit logging until mycorrhizal species are cataloged and impacts to these species are assessed.

RESPONSE: The Forest Service agrees that coarse woody material and associated life forms is an important component of the forest ecosystem. In contrast to some forested areas in the Lower 48, lack of large wood, or related biomass, on the forest floor as a result of logging is not a significant issue on the Tongass. Abundant logging slash is usually left after logging operations. Additionally, trees and patches of trees left in harvest units will contribute to large woody material through time in places where logging occurs. If localized areas are identified where a lack of large woody debris is a concern, the issue would be addressed during the site-specific analysis for that project. Prohibiting logging for biomass related reasons, is beyond the scope of the SEIS.

COMMENT: Several respondents expressed concern over past logging practices on State, private and National Forest System lands, and requested permanent protection for the remaining unroaded areas on the Tongass to compensate for past practices. Of particular concern was the practice of harvesting without stream protection and the level of harvest on private land.

RESPONSE: Timber harvest practices continue to evolve, especially regarding protective measures around streams and riparian areas. The standards and guidelines in the 1997 Forest Plan incorporate the most current Best Management Practices, and are much more stringent in protecting habitat than the previous Forest Plan. The State of Alaska Forest Practices Act is used to guide timber harvest and road construction activities on State and private lands to assure considerations for fish and wildlife resources. While the SEIS does not propose changes to the existing standards and guidelines, it does look at alternatives that incorporate varying levels of long-term protection for roadless areas on the Tongass by recommending them for wilderness or LUD II. The old-growth habitat conservation strategy presented in the 1997 Forest Plan was developed with consideration given to the amount of harvest on adjacent State and private lands.

COMMENT: A few respondents suggested the SEIS should have established frameworks for alternative construction based primarily on ecological considerations.

RESPONSE: The SEIS is a supplement to the 1997 Forest Plan Final EIS, which considered as many as 34 alternatives during its development. An alternative based primarily on Ecological Sections was considered for the Final SEIS, but there were concerns relating to quality and manageability of areas if they were based on manageability alone. It was also determined that the existing alternatives captured a range of additional ecological section representation, while addressing other issues at the same time. Therefore, it was dropped from further consideration. Each alternative considers in detail all applicable ecological components potentially significantly affected. Appendix C of the SEIS addresses ecological components relative to each roadless area, while Chapter 3 sections like Biodiversity and the Relative

Contribution portion of the Wilderness section summarize aspects of the landscape relative to Biogeographic Provinces and Ecological Sections and Subsections. Chapter 2 of the Final SEIS includes additional information related to why an alternative based strictly on ecological consideration is not included. Additionally, Chapter 3 has information relative to use of Ecological Sections and Subsections, which were not included in the Draft SEIS.

Soils, Geology, and Karst

COMMENT: Some respondents were concerned the SEIS did not contain a full analysis of soil ecology effects. Others indicated that soil erosion is a natural process that will occur regardless of management and should not be of too much concern.

RESPONSE: Potential effects on soil ecology were considered in the 1997 Forest Plan Final EIS (pages 3-197 to 3-201), and have been incorporated by reference. Potential site-specific effects to soil resources are considered during project level environmental analysis. Further analysis of soil erosion and other site-specific effects is outside the scope of this programmatic Supplemental EIS. The analysis in the Soils section of Chapter 3 of the Final SEIS is sufficient to fully disclose the trade-offs for the public and Deciding Official to understand potential effects of recommending additional areas as wilderness or LUD II, or not.

COMMENT: Some respondents were confused about information in Tables 3.2-1 and 3.2-9 and whether data in the Draft SEIS on acres of timber harvested included areas affected by road construction. They thought that total old growth harvest since 1900 was in excess of 500,000 acres. They also noted Table 3.2-1 may have used incorrect road mileages, specifically 4,650 miles of permanent road used in the 1997 Final EIS and 5,008 miles of total road used in the Draft SEIS.

RESPONSE: The acres of old growth harvest shown in Table 3.2-9 of the Draft SEIS includes areas affected by road construction within harvest units, but does not include the area covered by roads outside harvest units. Table 3.2-9 shows a Forest-wide total of 434,574 acres of timber harvest. Table 3.2-1 indicates 15,024 acres covered by roads based on an average of 3 acres per mile of road. Note that large portions of these acres are not on commercial forest lands, and many of these acres are included inside harvest units. Based on the information in the SEIS, if none of the acres impacted by road construction were included in the Forest-wide total of previous timber harvest (which is not the case), and if all roads were constructed exclusively through commercial forest land (also not the case), the two totals could be added together for a maximum harvest of 449,598 acres.

The footnote in Table 3.2-1 in the Final SEIS has been changed to reflect the area covered by roads has been updated and is not as of 1995 or 1997. Also note that the SEIS uses total miles of roads, which is different than total miles of permanent roads. The Tongass has an active program of decommissioning those roads which are not considered permanent.

COMMENT: Some respondents recommended the Final SEIS should include comprehensive geological survey data because they were concerned timber harvest could lead to deforestation.

RESPONSE: Notwithstanding karst geology, basic geological information is gathered during site-specific project analysis, usually related to landslide stability. The remainder of the geologic data came from published USGS mapping. These maps are constantly being updated by the site or project specific data. There is little concern on the commercial forest lands of the Tongass for deforestation. In fact, most areas reforest naturally with native tree species in such large numbers that they require thinning in just a few years.

COMMENT: Some respondents felt the Forest should strengthen forest plan standards and guidelines for karst land protection because they were ineffective. They especially indicated the

need for more discussion of soil effects to karst lands from roading and timber harvest. These commentors also recommended some or all karst lands for wilderness designation.

RESPONSE: Potential resource development effects to karst and caves were considered in the 1997 Forest Plan Final EIS (pages 3-82 to 3-86) and are considered during site-specific project level environmental analysis. The Forest Plan contains standards and guidelines designed to protect caves and karst areas (Forest Plan, Appendix I). Additionally, project site-specific mitigations provide additional protections during implementation of the Plan. Monitoring of implementation of the standards and guidelines since 1997, and reported in the Annual Monitoring Reports, have indicated the need for some adjustments to the standards and guidelines. These adjustments have been implemented in ongoing projects even though they have not been formally adjusted with a Forest Plan amendment. Such an amendment could be issued with a future project decision, such as the Kosciusko Timber Sale Final EIS expected to be issued in the next several months. The Final SEIS includes an expanded Karst section.

A panel of world renowned karst experts convened on the Tongass during the summer of 2002 to address the effectiveness of the Karst and Cave Standards and Guidelines included in the 1997 Forest Plan. Preliminary findings from that assessment include confirmation of the fact that these are world-class resources most similar to karst lands found on Vancouver Island and the Queen Charlotte Islands of British Columbia, Canada, portions of Patagonia (Chile), Tasmania, and the west coast of the South Island of New Zealand. The assessment also found existing standards and guidelines are not perfect but the analysis process is sound, and the adjustments that have been incorporated on an adaptive management principle to those standards, are generally well reasoned and logical.

Some people recommend wilderness protection for some or all karst lands on the Forest. While karst and caves were not a driving issue during formulation of alternatives, roadless areas that contain karst and cave features are included in various alternatives. The roadless area descriptions (Appendix C) include information on karst features, if present, for each area.

A large group of respondents specifically listed a group of 21 roadless areas under analysis suggesting that these areas receive wilderness designation or at least a higher level of protection. The total acreage of these areas is 134,422 acres, mostly found as relatively small inclusions within inventoried roadless areas. Under current Forest Plan LUDs and the Karst and Cave standards and guidelines, 111,442 acres, or 83 percent of the karst resources within the above mentioned 21 Roadless Areas of concern are in some form of protected status.

Though it has been suggested that karst lands are underrepresented in the current wildernesses, the Forest feels that, in many cases, there are other more appropriate land use designations to protect the sensitive karst areas and those appropriate as baseline karst watersheds in which to conduct research on karst processes and monitor over time. The Forest Plan includes a Special Interest Area LUD, which includes many of the more sensitive karst areas. Additional high value karst areas could be placed in this LUD in the future. These allocations would still protect these sensitive karst systems and allow access and research to continue unfettered by the restrictions that a wilderness designation would bring.

COMMENT: Some respondents were concerned the SEIS did not address road building, logging and mining impacts on groundwater, primarily in areas of karst.

RESPONSE: As indicated in the SEIS, more complete descriptions of the water environment are provided in the *Water* section of Chapter 3 in the 1997 Tongass Forest Plan Revision Final EIS (pages 3-313 through 3-324). The specific effects of resource development such as mining, road building and logging on water quality is conducted during the environmental analysis for an individual project, and is outside the scope of the SEIS. Note that the Karst section in Chapter 3 of the Final SEIS has been expanded and groundwater is addressed in more detail than in the Draft SEIS.

Water and Fish

PUBLIC COMMENT: Some respondents suggested the SEIS should incorporate the best science available regarding the value of roadless watersheds to fisheries.

RESPONSE: The Forest Plan provides protection for watersheds through management prescriptions and forest-wide standards and guidelines. Many of the standards and guidelines in the 1997 Forest Plan Revision Final EIS were based to a large extent on the recommendations of the Alaska Anadromous Fisheries Habitat Assessment (AFHA, 1995). AFHA is considered the most comprehensive scientific review available for the Tongass. The 1997 Forest Plan ROD notes that the standards and guidelines and other direction included in the 1997 Forest Plan meet or exceed all of the recommendations by AFHA. There are divergent views among scientists regarding how much protection is necessary across the Tongass. The use of scientific panels is one way of incorporating the best of those views, and represents how the Forest Plan incorporated protections for fisheries. The salmon fisheries of Southeast Alaska have seen record returns in recent years, indicating that current upland management practices do not appear to be significantly affecting the salmon resource.

COMMENT: Some respondents suggested using types of very specific measures in the SEIS to assess potential effects on fisheries resources. These included numbers of culverts per mile of road and other similar site-specific information.

RESPONSE: The degree of assessment asked for is usually conducted at the project level and is dealt with during the environmental analysis for an individual project where roads already exist or specific new roads are proposed. This level of detail is not reasonable for this programmatic Supplemental EIS. Also, the areas under evaluation in the SEIS are the roadless areas of the Tongass.

COMMENT: Some respondents felt the SEIS should analyze effects of the various alternatives on fish habitat and fishing dependent communities. The analysis should include effects of roading and logging on fish habitat, especially in primary fish producing watersheds. Some respondents suggested using analytical approaches like a fine-screened landform analysis to assess potential effects on fish resources. Some thought the SEIS should explain why the highest value fisheries watersheds may be logged when the SEIS says roads "..pose the greatest risk to fish resources on the Tongass..".

RESPONSE: As noted in the Draft SEIS (page 3-18), effects of the alternatives on fish resources are expected to be at or below the level predicted for Alternative 11 in the 1997 Forest Plan Revision Final EIS (1997 FEIS pages 3-46 through 3-73). The analysis of effects on fish habitat included in the Forest Plan Final EIS, have been incorporated by reference. It is reasonable to assume that any alternative to the No Action alternative which proposes various levels of recommended wilderness or LUD II will have the same or less effects on fisheries (and most other resources) than SEIS Alternative 1 which is most reflective of the Forest Plan and Alternative 11 in the Forest Plan Final EIS.

Note that the statement in Chapter 3 of the SEIS "..pose the greatest risk to fish resources.." is used out of context in the comment. The Forest Plan provides protection for fish habitat and watersheds through management prescriptions and forest-wide standards and guidelines to the point that no significant effects are anticipated. As noted in the 1997 Forest Plan ROD (page 18), distinguishing high-value watersheds from low-value ones poses significant analytical and administrative problems. For example, the high fish-value watersheds proposed by the State of Alaska were identified by an analysis of coho habitat capability, pink salmon escapement, and sport fishing use. This approach could overlook additional factors such as use by other salmon, steelhead, or sensitive or unique fish populations, subsistence uses, or others, which are also important when determining fish values. Thus, the decision was made to incorporate all the recommendations made in the Anadromous Fish Habitat Assessment (AFHA) report and apply riparian standards and guidelines in all watersheds on the Forest, not just the highest value watersheds.

Specific effects of roading and logging within a given watershed are best analyzed at the project level. Some Ranger Districts on the Tongass are currently conducting ecosystem assessments at the watershed scale, which provides a framework for analyzing the existing condition of resources within a larger landscape. While these analyses provide a means of addressing cumulative effects within a watershed that has experienced some level of resource development, it is not necessary to have the same level of detail for the analyses for this programmatic Supplemental EIS, which is focused on roadless areas that could be recommended for wilderness or LUD II.

COMMENT: One respondent from the Game Creek community indicated the Final SEIS should address the impact of logging on flooding.

RESPONSE: Fluctuations in water flow within a watershed can be the result of many factors, including road building and logging. As noted in the response above, the specific impact of resource development such as mining, road building and logging is conducted during the environmental analysis for an individual project, and is outside the scope of this programmatic Supplemental EIS.

COMMENT: Some respondents felt the SEIS needed to analyze the site-specific effects of bark deposits from log transfer facilities to inland marine waters.

RESPONSE: Analysis of the effects of bark deposits from log transfer facilities is outside the scope of this programmatic Supplemental EIS, which is evaluating areas for wilderness recommendation. This is usually a project level issue, and is dealt with during the environmental analysis for an individual project. Note that the Forest Plan includes stringent siting, operating and monitoring standards and guidelines for log transfer facilities to assure protection of potentially affected marine and upland resources.

COMMENT: It was unclear to some respondents regarding how the SEIS identified potential effects of wilderness designation on fish habitat enhancement projects. Some wanted a list of the 158 potential projects included In the SEIS.

RESPONSE: As described in the Chapter 3 - Fish Habitat Enhancement section of the SEIS, fish enhancement projects planned in areas that are recommended for wilderness likely would not be compatible with wilderness objectives. While ANILCA allows for aquaculture development within wilderness, projects proposed within wilderness or recommended wilderness would have to pass a much broader scope justification analysis than projects outside of wilderness, and thus have a much higher likelihood of not proceeding. The level of restriction on fish enhancement projects would be roughly proportional to the number of acres recommended for wilderness. While a table in the SEIS listing each potential fish enhancement project would be of interest to some reviewers, we do not believe it would provide additional information necessary for the Deciding Official to consider. Note that the SEIS does include a table which summarizes the projects by category, and the individual roadless area descriptions in Appendix C address potential fish enhancement projects.

COMMENT: Some respondents suggested the SEIS include more analysis regarding the benefits of existing fish habitat enhancement projects.

RESPONSE: Most fish enhancement projects are a cooperative effort between the Forest Service and Alaska Department of Fish and Game and other private and agency partners. Both agencies continue to monitor results of fish enhancement projects and share the information gathered. Decisions on whether or not to move forward with new enhancement projects are outside the scope of the SEIS, and will be based on project level environmental analysis.

COMMENT: Some respondents suggested the SEIS should consider future site-specific effects of logging and milling on water quality, including clean up of processing sites.

RESPONSE: Analysis of the impact of logging and road building on water quality is a project level issue, and is dealt with during the environmental analysis for an individual project. Water quality issues associated with processing facilities are regulated by other agencies including the Environmental Protection Agency (EPA) and the Alaska Department of Environmental Conservation (ADEC), and are outside the scope of this programmatic Supplemental EIS.

COMMENT: One respondent suggested the Tongass National Forest should monitor for dioxin at the Alaska Pulp Corporation processing facility.

RESPONSE: Monitoring for dioxin is outside the scope of this programmatic Supplemental EIS to evaluate roadless areas for wilderness recommendation. Monitoring and enforcement of environmental contaminants at a processing facility on non-National Forest System lands would normally fall under the duties of the Environmental Protection Agency. The Alaska Pulp Corporation pulp mill near Sitka has been closed since 1993.

COMMENT: Some respondents suggested the Tongass National Forest should implement an adaptive and dynamic management approach to ensure protection of fisheries.

RESPONSE: The Tongass Forest Plan is based on an adaptive management concept that includes ongoing monitoring and evaluation, including research projects being conducted by the Pacific Northwest Forest Experiment Station. The monitoring of Forest activities and programs is an integral part of the Tongass National Forest adaptive management program. For more information on monitoring and adaptive management, see the current Tongass Monitoring and Evaluation Report (for the year 2001). Implementing an adaptive and dynamic management approach to ensure protection of fisheries is beyond the scope of this programmatic Supplemental EIS.

COMMENT: Some respondents suggested the SEIS should acknowledge the ecological roles of woody debris in streams.

RESPONSE: The Tongass Forest Plan recognizes the value of woody debris in streams and the importance of maintaining streamside habitat. This is reflected in the standards and guidelines included in the Plan, but is beyond the scope of this programmatic Supplemental EIS.

COMMENT: Some respondents felt the Tongass National Forest should protect intact watersheds to avoid the high costs of restoration. Others recommended high-value watersheds should receive permanent protection because of the potential effects of timber harvest and associated roading on fish habitat. Others indicated there are enough safeguards in the current Forest Plan, and potential effects on fish habitat or watersheds should not be a reason to designate watersheds as wilderness.

RESPONSE: Many intact watersheds are already protected either as Wilderness, LUD II or with a non-development land use designation through the 1997 Forest Plan. In addition, Forest Plan standards and guidelines provide substantial protection for resources within watersheds that are available for resource development. These measures are designed to minimize the need for future restoration costs. The SEIS analyzes the effects of alternatives that could provide additional long-term protection of the current inventoried roadless areas.

COMMENT: Some respondents said the Tongass National Forest should prohibit roading and logging in estuary areas.

RESPONSE: The 1997 Forest Plan includes standards and guidelines that established a 1,000-foot beach and estuary buffer that restricts road building and commercial timber harvest in these areas. Also, this issue is beyond the scope of this programmatic Supplemental EIS.

COMMENT: Some respondents indicated the Tongass National Forest should prohibit waste dumping by cruise ships in salmon migration corridors.

RESPONSE: Monitoring and enforcement of cruise ship wastewater discharge is outside the scope of this programmatic Supplemental EIS designed to evaluate areas for wilderness recommendation. Monitoring and enforcement of wastewater discharge in a navigable waterway would normally fall under the duties of the Coast Guard and the Environmental Protection Agency.

COMMENT: Some respondents indicated the Tongass National Forest should effectively implement habitat protection measures such as stream-side buffers, and should consider implementing expanded buffers.

RESPONSE: The Forest Plan includes comprehensive standards and guidelines for protection of riparian and stream related resources on National Forest System lands. Based on ongoing Forest Plan monitoring, stream-side buffers are being effectively implemented. In many cases, buffers are expanded beyond the minimum 100 feet for Class I and Class II streams for onsite considerations and for reasonable assurance of wind firmness. The Annual Forest Plan Monitoring and Evaluation Report includes additional information on the implementation and effectiveness of stream-side buffers (See *Fish* section of the FY 2001 Forest Plan Monitoring and Evaluation Report).

Wetlands

COMMENT: Some respondents were concerned that potential logging impacts to wetlands may be used as an excuse to justify additional wilderness recommendations.

RESPONSE: The Forest Service agrees that potential effects to wetlands from logging and road construction are not justification for additional wilderness recommendations.

Wildlife - General

COMMENT: Many respondents indicated the Tongass National Forest should protect wildlife and fish habitat, key unroaded drainages, and old-growth reserves and buffer strips, and other undeveloped areas, by recommending to Congress roadless areas be designated wilderness or LUD II.

RESPONSE: The 1997 Forest Plan incorporates extensive fish and wildlife conservation measures including the old-growth habitat conservation strategy, standards and guidelines designed to protect Riparian Management Areas in accordance with the intent of the Alaska Anadromous Fish Habitat Assessment (1995), 1,000-ft beach and estuary fringe buffers, and a number of species-specific standards and guidelines. Furthermore, 78 percent of the Tongass is being managed under non-development LUDs, including wilderness. Based on the extensiveness of these measures, the Forest believes that the 1997 Forest Plan provides substantial protection, just not all in the form of Congressionally designated areas.

COMMENT: Some respondents suggested the Tongass National Forest should initiate extensive research and monitoring to protect wildlife, including effectiveness monitoring and adaptive management.

RESPONSE: Research programs on the Tongass National Forest are being conducted by the Forest Service Pacific Northwest Research Station, the Alaska Department of Fish and Game, and other entities. The Forest Service is continually monitoring its resource activities and adapting management based on the findings of that monitoring. We conduct project-level monitoring as well as Forest Plan monitoring. The monitoring of Forest activities and programs is an integral part of the Tongass National Forest adaptive management program. For more information on monitoring and adaptive management, see the current Tongass Monitoring and Evaluation Report (for the year 2001).

COMMENT: Many respondents expressed concern that clearcutting is the primary harvest method under the Forest Plan, yet biologists advocate cutting methods that better mimic natural disturbances. Some also expressed concern that partial harvest methods that have been used are not significantly better than clearcutting for maintaining stand structure. Some respondents felt the Forest should prohibit clearcutting and road building on the Tongass National Forest.

RESPONSE: This issue is beyond the scope of this programmatic Supplemental EIS. However, the 1997 Forest Plan limits the use of even-aged systems (e.g., clearcutting) only to areas "where such a practice is determined to be the best system to meet the objectives and requirements of Land Use Designations" (page 4-96). The Plan also requires that systems other than clearcutting are to be considered through an appropriate project level prescription process and proposes the use of both two-aged and uneven-aged silvicultural systems. The 1997 Forest Plan Record of Decision indicated a ratio of about 65 percent clearcut harvests to 35 percent non-clearcut harvests. In practice, since the adoption of the 1997 Forest Plan, a much higher percentage of the harvest prescriptions on timber sale projects have been non-clearcut harvests. These partial harvest prescriptions are most often designed to provide big tree structure that will be available in the second growth stands of timber for more diverse habitats in the future. Non-clearcut harvest prescriptions are also often used to maintain important scenic values while allowing those areas to be able to contribute harvest volume in support of the Southeast Alaska economy. The use of these other systems is somewhat experimental in Southeast Alaska, and it will take some time and evaluation before it is determined which systems work best for growing timber and for maintaining wildlife habitat, scenery, and other resource values.

COMMENT: Some respondents indicated the Forest Service is not implementing extensive wildlife inventories and monitoring projects, as required by the Forest Plan, and has modified the list of Management Indicator Species (MIS). Because of this, they said the Tongass National Forest should recommend immediate protection for large tracts of undisturbed forest as wilderness to protect wildlife.

RESPONSE: The Forest Service, the Alaska Department of Fish and Game, and others, are involved in wildlife research projects on the Tongass. Monitoring efforts are underway on both the project level and at the Forest level (see Annual Monitoring Reports). The Tongass has not modified the list of MIS and is continuing to monitor these species according to the Forest Plan. The process of determining if modifying the MIS list is desirable or necessary, is likely one of the topics to be considered in the Forest mid-Plan review to be conducted in 2003/2004.

Large tracts of undisturbed forest are protected within existing wilderness, existing LUD II areas, and other non-development LUDs (including Old Growth Reserves), under all of the alternatives. Note that even after full implementation of the 1997 Forest Plan (about the year 2120), 83 percent of the original (1954) productive old growth would remain.

COMMENT: Some respondents indicated the Tongass National Forest should recommend wilderness areas to add large, intact wildlife habitats to the National Wilderness Preservation System. The SEIS should contain a discussion of how rare and valuable the remaining large,

undeveloped areas of the Tongass are today, especially for wildlife. The vast majority of the Tongass roadless areas offer a combination of wilderness attributes unmatched anywhere outside of Alaska. They further indicated the Tongass National Forest should select Alternative 6 or Alternative 8 to protect fish and wildlife habitat.

RESPONSE: The roadless areas of the Tongass (and Alaska, in general) are high in wilderness attribute values, and they represent areas that are very large, relative to other roadless areas in the United States. However, Alaska already has the highest percentage of any state in designated wilderness (over 15 percent), and the Tongass has the highest percentage in wilderness in the National Forest System (35 percent if one counts only wilderness and 39 percent if one also counts non-wilderness national monument and LUD II). Further, preserving more of the ecological types on the Tongass does not necessarily compensate for the lack of preservation of biodiversity in the other states. Additional information has been added to the Final SEIS regarding the relative contribution of Tongass roadless areas to the National Wilderness Preservation System.

The Forest Service Handbook directs us to consider the capability, availability, and need for wilderness before recommending areas for wilderness designation. The capability of Tongass roadless areas as wilderness is very high. However, the availability of many areas is much lower because other uses are restricted under wilderness classification. In addition, the need for additional wilderness in Southeast Alaska is not as clear, because of the prevalence of existing wildernesses. Extensive intact habitats will be preserved under the existing Forest Plan, even without additional wilderness designation. After 50 additional years of Forest Plan implementation, over 86 percent of the Tongass is still expected to be roadless and 83 percent of the original productive old growth on the Tongass will still be present.

COMMENT: Some respondents indicated the Tongass National Forest should police logging camps to protect wildlife from illegal harvest associated with the camps and should quit building new roads because of the legal and illegal harvest associated with them.

RESPONSE: These issues are beyond the scope of this programmatic Supplemental EIS, which is evaluating roadless areas for wilderness recommendations. The potential for increased legal and illegal harvest associated with roads and logging camps is addressed in project-specific NEPA documents. Alaska Department of Fish and Game is primarily responsible for setting seasons and bag limits in roaded and roadless areas, both on and off the Tongass, and for law enforcement associated with hunting and poaching.

COMMENT: Some respondents suggested the Forest Service should analyze the quality of wildlife habitat in original old-growth forests versus thinned stands.

RESPONSE: This issue is beyond the scope of this programmatic Supplemental EIS. The 1997 Forest Plan specifically recognizes the wildlife habitat values associated with old-growth on the Tongass, and is especially reflected in the conservation strategy of the Plan. Additionally, the Forest Service has conducted studies to assess the values of old growth versus managed stands, including various treatments. See the report by DellaSala et al. (1994. *Effectiveness of silvicultural modifications of young-growth forest for enhancing wildlife habitat on the Tongass National Forest, Southeast Alaska),* which compares old-growth and young-growth forests after several treatments, including thinning. Additional studies are ongoing.

COMMENT: Some respondents suggest the Final SEIS should facilitate public and agency assessment of roadless area values by including GIS maps showing critical old-growth areas, critical wildlife habitat, karst, and many other resource related attributes.

RESPONSE: Substantial information was processed for the SEIS and much of it is shown on maps with supporting information. Please review the larger scale maps of individual roadless areas that are included on the Draft and Final SEIS CD-Rom as well as on the Tongass SEIS Web site. These maps have been enhanced for the Final SEIS and now include productive old growth, as well as suitable timber, along with streams (by stream class) and many other features. Also, review the many attributes that are

quantified for each roadless area in Appendix C, which also has been expanded for the Final SEIS. Many other maps and GIS analyses were used to assess the values of the roadless areas and for the development of the SEIS, and are in the planning record.

COMMENT: The Final SEIS should fully disclose the amount of logging that has taken place in the forest, the extent of recovery, and the impact of human activities on all native wildlife species.

RESPONSE: The Draft SEIS shows the amount of harvest that has taken place on the Tongass by Biogeographic Province and Ecological Subsection in Tables 3.2-12 and 3.2-15 of Chapter 3. The 1997 Forest Plan Final EIS provides substantial disclosure relative to human activities on the Tongass National Forest and adjacent areas as applicable. Additionally, the descriptions in the Affected Environment portions of the SEIS represent the net effect of historic human activities on old growth and wildlife.

COMMENT: Some respondents suggested the Final SEIS should analyze forest fragmentation and clear-cutting impacts to wildlife viability.

RESPONSE: The issue of how forest fragmentation and clearcutting impacts wildlife viability is beyond the scope of this programmatic Supplemental EIS which analyzes roadless areas for wilderness recommendations. However, extensive wildlife viability analyses were conducted for the 1997 Forest Plan Final EIS, and projects that implement the Forest Plan conduct appropriate site-specific wildlife related analyses.

COMMENTS: Some respondents felt the Tongass National Forest should not plan timber sales adjacent to cutover land grants.

RESPONSE: This issue is beyond the scope of the SEIS. However, timber sale project evaluations always consider the cumulative effects of timber sales adjacent to non-National Forest System harvest areas.

COMMENT: Some respondents indicated the Tongass National Forest should manage the Forest to limit impacts to threatened and endangered species.

RESPONSE: Outside of certain marine animals, there are no threatened or endangered species that have been identified on the Tongass. The Forest Plan contains extensive measures that seek to limit potential effects to sensitive species and all species that use the old-growth forests of the Tongass. The conservation strategy included in the 1997 Forest Plan is considered by many to be one of the best in the world.

COMMENTS: Some respondents indicated the Tongass National Forest should include a larger, fully protected beach fringe for all LUDs.

RESPONSE: The 1997 Forest Plan includes a 1,000-foot beach and estuary fringe that does not include programmed timber harvest. The beach and estuary fringe in conjunction with other LUDs and standards and guidelines provide adequate protection for important beach fringe habitat. Modification of the beach and estuary fringe standards and guidelines is outside the scope of the SEIS.

COMMENTS: Some respondents suggested the Final SEIS should acknowledge that ecosystem recovery from clearcutting may be functionally impossible, while others suggested acknowledgement that logging enhances wildlife habitat was important. Still others said to supervise on-going clearcuts to ensure protection of wildlife habitat.

RESPONSE: Trees vigorously grow back on the Tongass after clearcut and other timber harvests. In areas that are managed for timber production, where the second growth is harvested within 150 years of the initial regeneration harvest, the forest will not attain its former stage of “old-growth.” Where partial

harvest methods are used, some characteristics of “old-growth” will be retained within a stand through many cutting cycles. As the habitat grows through various successional phases, it will be more or less attractive to various wildlife species. If an area that has been harvested is not re-entered, succession will indeed continue and eventually, over a long period of time, the stand will return to an “old-growth” state. After 120 more years of managing eligible areas for timber production on the Tongass, about 83 percent of the original old growth will still be in place. The Forest Plan includes extensive standards and guidelines to assure protection of resources, including for wildlife habitat, while planning, designing and implementing timber sale projects.

Wildlife – Species or Species Groups

COMMENT: Some respondents felt the Tongass National Forest should retain roadless areas to protect the ecological and wilderness values of the Tongass and prevent increases in mortality rates of large carnivores.

RESPONSE: Based on the allocation of land use designations and the standards and guidelines in the 1997 Forest Plan, all the alternatives considered in the SEIS will provide a high degree of protection for the ecological and wilderness values of the Tongass. Currently, there are 5.8 million acres of wilderness and 9.6 million acres of inventoried roadless lands on the Tongass under existing conditions. The analysis presented in the Roadless Areas section of Chapter 3 of the SEIS shows that even under Alternative 1, there would still be 5.8 million acres of wilderness and at least 9.2 million acres of other roadless lands remaining on the Tongass after 10 years. After 50 years, 5.8 million acres of wilderness and at least 8.7 million acres of other roadless lands would remain.

This means that 92 percent of the Tongass is currently roadless (including wilderness) and, even with full implementation of the Forest Plan and no further wilderness designation, 90 percent would remain roadless after 10 years and 86 percent would remain roadless after 50 years. These estimates assume full implementation of the Forest Plan, including timber harvest and road construction at the maximum level allowed under the ASQ (the first 5 years of Forest Plan implementation indicate that future harvests are likely to be less). The Forest Plan will protect the ecological and wilderness values of the Tongass, and minimize any increases in large carnivore mortality rates. As noted in the 1997 Forest Plan ROD, if interagency monitoring efforts suggest that excessive bear mortality occurs as a consequence of road access, then road access management will be implemented and hunting regulations will also be examined.

COMMENT: Some respondents felt the Final SEIS should improve analysis of the relationship between roads and brown bear habitat. The Tongass National Forest should retain large roadless areas to protect brown bears and their habitat.

RESPONSE: Extensive analyses related to brown bear habitat and roads is included in the 1997 Forest Plan Final EIS, which is incorporated into the SEIS by reference. As noted in the 1997 ROD for the Forest Plan, concerns exist about road access as a potential contributing factor to brown bear mortality. The Forest Plan addresses concerns for brown bear habitat through the old-growth conservation strategy, and by providing for the majority of the Tongass to be kept in non-development LUDs. In addition, the Forest Plan includes a standard and guideline that requires evaluation of the need for additional protection of important brown bear foraging sites, which could result in 500-foot forested buffers to provide protection during feeding (in development LUDs). Further, if interagency monitoring efforts suggest that excessive bear mortality occurs as a consequence of road access, then road access management will be implemented and hunting regulations will also be examined.

The Forest Plan is believed to provide sufficient protection to ensure the viability of brown bear populations in Southeast Alaska. It is recognized in the Wildlife section of Chapter 3 in the SEIS that brown bear would likely benefit from any of the SEIS action alternatives.

COMMENT: Some respondents felt the current Forest Plan standards and guidelines are inadequate in preventing wolf mortality. The Tongass National Forest should provide more protection for wolves, including protection of Honker Divide. Some other respondents indicated the Final SEIS should change the current forest management direction to ensure adequate protection of deer habitat to provide for both wolves and subsistence.

RESPONSE: An interagency wolf conservation assessment was developed in cooperation with U.S. Fish and Wildlife Service and the Alaska Department of Fish and Game to synthesize the best available information to address wolf conservation. Using the major findings contained within the assessment, the Forest Plan provides a high likelihood of sustaining viable wolf populations in Southeast Alaska (1997 FEIS, pages 3-399 to 3-406, and Appendix N). As noted in the 1997 ROD for the Forest Plan (page 34), the wolf assessment identified three principal management considerations to address wolf viability concerns:

- Maintain a long-term prey (deer) population,
- Provide large roadless and unfragmented reserves, and
- Take steps to limit potentially unsustainable human-induced mortality in some areas, both legal and illegal.

Access management may be implemented where analysis indicates road access is contributing to unsustainable wolf mortality rates; however, state-established hunting and trapping seasons and bag limits may also need to be reviewed.

The Forest Plan is believed to provide sufficient protection to ensure the viability of wolf populations in Southeast Alaska. It is also recognized that wolves would likely benefit from any of the SEIS action alternatives that would provide long-term protection for additional roadless areas. For example, nearly all of the Honker Divide is included in the Old-growth Habitat LUD in the Forest Plan and the two existing roads in the area have been closed to the public for several years. Similarly, the Forest Plan is believed to provide adequate protections for deer to provide for both wolves and subsistence uses.

COMMENT: Some respondents indicated the Tongass National Forest should use an updated deer habitat capability model and explain the use of the high "multiplier" in the model. The Final SEIS should provide site-specific deer habitat information in community assessments and roadless area descriptions, and rank the alternatives in terms of preserving long-term deer habitat capability.

RESPONSE: The interagency deer habitat capability model that was developed and used for the 1997 Forest Plan Revision provided an estimate of habitat capability. The model was not necessary for relative analyses conducted for the SEIS, nor for ranking the alternatives. Conducting site-specific deer habitat capability analyses (or other site-specific type analyses) is beyond the scope of this programmatic Supplemental EIS.

The model is currently being reviewed by a group of interagency biologists and could be modified as part of the ongoing implementation of the Forest Plan. It could also be reviewed as part of the Forest mid-Plan review, which is expected to begin in 2003. Alternative 11 from the 1997 FEIS is used as the benchmark throughout the SEIS, and it ranked relatively high in the conservation of deer habitat, protects most of the highest quality deer winter range, and maintains relatively high deer densities.

The Forest Plan provides sufficient protection for deer habitat to ensure the viability of deer populations in Southeast Alaska. Alternatives 1, 2 and 4 would be the same as the current Forest Plan in terms of the amount of deer habitat protected. Based on the Land Use Designation Group (Table 2-24 and Figure 2-9, in Chapter 2 of the SEIS), the remaining alternatives in order of increasing long-term protection for deer habitat would be 3, 5, 7, 6 and 8.

COMMENT: Some respondents said the Tongass National Forest should prohibit logging to safeguard deer populations. Some other respondents indicated timber harvest should be allowed to enhance deer production.

RESPONSE: The debate on whether or not timber harvest enhances or diminishes deer habitat is outside the scope of this analysis. A primary goal of the Forest Plan is to provide for the sustainability of the resources of the Tongass National Forest, while directing the coordination of multiple uses, such as outdoor recreation, timber, wildlife, fish, watershed and wilderness. The 1997 Forest Plan provides for viable deer populations across the Forest while allowing timber harvest to occur within development LUDs. As noted in the *Wildlife* section of the SEIS, the Forest Plan goes beyond providing for viable deer populations, by providing an estimated 83 percent of the 1954 habitat capability. This level of habitat capability is expected to provide for viable and huntable populations of deer across the Forest. The SEIS does not prohibit logging on the Tongass but, as explained in the *Wildlife* section, alternatives that recommend additional Wilderness or LUD II do affect the amount of important deer habitat throughout the Forest that could be available for potential development. While timber harvest may increase forage for deer in the short term (0-20+ years) and pre-commercial thinning may extend that time somewhat, even-aged timber harvests do not provide thermal cover in the winter and deep snows can make the forage within a harvested area unavailable during a harsh winter. The 1997 Forest Plan provides for a mix of resource uses while protecting important wildlife habitat.

COMMENT: Some respondents indicated the Tongass National Forest should protect wetlands to sustain migratory bird populations wherever possible.

RESPONSE: The 1997 Forest Plan includes standards and guidelines for the protection of wetlands in general (Forest Plan, page 4-111). These standards and guidelines require that alteration of, or new construction on wetlands be avoided, wherever there is a practicable, environmentally-preferred alternative. In addition, the 1997 Forest Plan includes standards and guidelines for the maintenance and enhancement of important wetland habitats that receive significant use by waterfowl and shorebirds (Forest Plan, pages 4-115 to 4-116). Protection of wetlands to sustain migratory bird populations is beyond the scope of the SEIS.

COMMENT: Some respondents expressed concern that current Forest Plan protections do not provide for viability of wildlife populations. They cite various studies and peer reviews during the development of the 1997 Forest Plan. Others feel no additional wilderness is needed because current protections do provide for viability of wildlife. Other respondents indicated the Tongass National Forest should manage the forest to preserve habitat for bald eagles, marbled murrelets, goshawks and migratory birds.

RESPONSE: The 1997 Forest Plan incorporated an old-growth habitat conservation strategy to provide for viability of wildlife species comprised of two key components:

- The first component is a forest-wide system of reserves, composed of three elements:

  1) all non-development LUDs, including wilderness; 2) large, medium and small mapped old-growth reserves; and 3) all islands smaller than 1,000 acres.

- The second component is the set of standards and guidelines that apply in development LUDs, where commercial timber harvest is permitted. In these areas, the standards and guidelines will sustain key components of the landscape, including a 1,000-foot beach fringe, riparian habitat, important nesting habitat, and other important resource values.

In addition to the old-growth strategy, the 1997 Forest Plan provides additional standards and guidelines for the specific protection of threatened, endangered, and sensitive species (pages 4-88 to 4-93), and other wildlife (pages 4-112 to 4-117), including the goshawk (pages 4-90 to 4-91), bald eagle (page 4-113), and marbled murrelet (page 4-117). Based on the habitat conservation strategy and specific standards and guidelines, the 1997 Forest Plan provides for the preservation of habitat for bald eagles, marbled murrelets, goshawks, and migratory birds on the Tongass. All the alternatives

considered in the SEIS are expected to adequately protect the wildlife populations on the Tongass, with the action alternatives providing additional levels of permanent protection to roadless habitats.

COMMENT: Some respondents indicated the Tongass National Forest should perform project level inventory surveys for raptors and herons as directed by the standards and guidelines of the 1997 Forest Plan.

RESPONSE: The method used to identify raptor and heron nests during project level inventory is outside the scope of the analysis for the SEIS.

COMMENT: Some respondents suggested the Tongass National Forest should not permit logging prior to the completion of catalogues and impact assessments for arthropod species. Others indicated the need to analyze effects of logging on the Red backed Salamander.

RESPONSE: Conducting site specific inventories or analyses is best done at the project scale, and is beyond the scope of the SEIS. The Forest Service does not believe that all logging would have to be prohibited until catalogues and impact assessments for arthropod species are completed. Please refer to the Final EIS for the 1997 Forest Plan, including Appendix N, for an analysis of effects on wildlife and biodiversity, and in particular the conservation biology strategy developed for the Plan.

COMMENT: Some respondents indicated the Tongass National Forest should acknowledge the potential existence of cave-dwelling threatened and endangered species.

RESPONSE: There is potential for the existence of not-yet discovered cave-dwelling species that could be classified as threatened or endangered on the Tongass. Because of the karst standards and guidelines and the protection of some karst areas by LUDs, we believe these species would be protected, if they exist. This subject is beyond the scope of the SEIS.

COMMENT: Some respondents said the Final SEIS should include information on how much productive, low-elevation old-growth is located in designated wilderness or legislated LUD II areas. They indicated the FEIS should also acknowledge that logging has disproportionately targeted high-volume, low-elevation old-growth stands. Additionally, they said the low elevation, coarse canopy stands of old growth should be designated wilderness to protect these rare stands of old growth.

RESPONSE: As indicated in the SEIS and in supporting materials used during the public comment period for the Draft SEIS, approximately 3 million acres of productive old growth are located below an elevation of 800 feet, and 1.7 million acres of old growth are located in designated wildernesses. About 2.2 million acres of productive old growth is considered to be high volume old growth and about 1.4 million acres is considered high volume old growth below 800 feet in elevation. About 540,000 acres of old growth are mapped as high-volume, coarse-canopy old growth, which is considered to provide high habitat quality. Approximately 8 percent of the productive old growth on the Tongass has been harvested in the past 50 years and about 16 percent of the high volume old growth has been harvested.

Timber harvest on the Tongass National Forest in the past did target accessible lower elevation drainages in the past. However, the rate of timber harvest has slowed to a fraction of what it was and about 83 percent of the productive old growth will still remain after 120 more years of timber management (under the current Forest Plan). The SEIS considers old-growth values on each individual roadless area in Appendix C, and in Chapter 3 in sufficient detail to inform the Deciding Official in relation to recommending wilderness or LUD II by alternative.

COMMENT: Some respondents said the Tongass National Forest should protect old-growth stands for spiritual values, recreation, biodiversity, and to protect bear habitat.

RESPONSE: A number of people expressed their desire that the Forest Service protect all of the remaining old-growth for spiritual values, recreational opportunities and to maintain biodiversity. These are some of the underlying values represented in Key Issue 1 as presented in the SEIS. The SEIS alternatives represent various levels of permanent protection for old-growth stands on the Tongass. The Comparison of Alternatives table in Chapter 2 of the SEIS, displays the effects of each alternative by Key Issue. Productive old-growth remaining after 120 years is one measure of ecological values protected. As the table indicates, from 83% to 89% of the original (1954) productive old-growth would remain after 120 years. The alternatives afford different levels of protection to the remaining old-growth, with higher levels of permanent protection (wilderness and LUD II) in Alternatives 6 and 8, and more reliance on Forest Plan land use designations in Alternative 1. The other alternatives fill in the spectrum between 1 and 8.

COMMENT: Some respondents said the Tongass National Forest should consider the cumulative impacts from old-growth timber harvests on adjacent non-federal lands and the reduction to National Forest old-growth through land conveyances.

RESPONSE: The 1997 Forest Plan Revision Final EIS included substantial information on cumulative effects and accounted for them in appropriate land use designation decisions and standards and guidelines included in the Forest Plan. The conservation biology strategy that addresses the old growth ecosystem and related habitats was designed in part to account for activities on non-National Forest System lands in Southeast Alaska. Cumulative impacts are addressed as appropriate in the SEIS. In particular, Table 3.2-20 in the *Biodiversity* section identifies the total land area by ownership and various measures of productive old growth in each ecological subsection of the Tongass. Further, it identifies the estimated cumulative amount of productive old growth harvested over the long term by ecological subsection and the cumulative percentage of productive old growth harvested over the long term by ecological subsection.

COMMENT: The majority of respondents were concerned because they thought that most of the old growth on the Tongass National Forest had been harvested, especially the lower elevation larger stands of trees. Many claimed that over 70% of the larger stands of old growth had already been harvested, or that most of the low elevation old growth had been harvested. Others were concerned because they thought that the Tongass still had large areas of old growth forests. Some said that the SEIS should clarify how much of the old-growth trees on the Tongass have been harvested. Others claim that there is little productive old growth located in existing wildernesses.

RESPONSE: The amount of old growth found on the Tongass can be found in the Chapter 3, Biodiversity section of the SEIS. Related information can also be found on the SEIS Web site (www.tongass-seis.net). The 16.8 million acre Tongass National Forest includes 9.4 million acres of old growth, of which about 5 million acres are considered to be of commercial size (also called the productive old growth forest). More than 3 million acres of productive old growth is located below an elevation of 800 feet. About 2.2 million acres of the commercial size old growth on the Tongass is considered the higher volume larger stands of old growth. About 540,000 acres are considered to be high-volume, coarse-canopy old growth, which is considered to be of high habitat quality. About 8 percent of the productive old growth and 16 percent of the higher volume stands have been harvested on the Tongass National Forest after 50 years of forest management. Under the current Forest Plan, about 83 percent of the commercial size old growth identified in the early 1950s would be protected and remain after the next 100 years of Forest Plan implementation. About 1.7 million acres of productive old growth is located in designated Wilderness on the Tongass.

Old Growth Reserves and Wildlife Viability

COMMENT: Some concern was expressed that the 1997 Forest Plan does not adequately protect old growth habitat. Others expressed concern that the old growth reserves were not adequate to provide for species viability including threatened and endangered species. Some felt the implementation of the Forest Plan old growth strategy did not always incorporate recommendations of interagency biologists. And some respondents expressed concern that too much land and timber was included in the system of old growth reserves.

RESPONSE: The 1997 Forest Plan includes an extensive old-growth habitat conservation strategy. This strategy consists of very large, large, medium and small reserves located strategically across the Tongass. It also provides for connectivity of the reserves and addresses old growth structural needs through time within the matrix part of the strategy where developments may occur through time. Because so little of the landscape across the Tongass has been developed, these lands provide for a functioning ecosystem across that landscape. Except for certain marine mammals, the Tongass National Forest has no Threatened or Endangered Species, or species that appear to be trending in that direction.

Small old growth reserves are located within the matrix part of the old-growth habitat conservation strategy, and during project planning are assessed to assure they meet design requirements for the overall strategy. Design requirements are included in Appendix K of the Forest Plan. Interagency biologists (Forest Service, U.S. Fish and Wildlife Service, and Alaska Department of Fish and Game) assess each of the small reserves for adjustment needs as part of project planning. The biologist's role is to define the best biological scenario relative to the strategy, and in particular for adjustment needs of the small reserves. The role of the Deciding Official for the project is to consider this information along with all other issues and resource management information and options associated with a given project area. Project decisions since 1997 have adjusted small old-growth reserves, which has resulted in an increase of about 12,400 acres being allocated to the system of small old-growth reserves. This increase has included about 2,400 acres of old growth that could have been suitable and available for timber harvest. NEPA and a reasonable range of alternative approaches often require looking at various ways of meeting differing, and often competing, objectives. The NEPA decisions for each project that resulted in adjustments to small old-growth reserves included the rationale for the adjustments.

COMMENT: Some respondents were concerned that the Draft SEIS did not provide adequate information describing the forest structure and composition of inventoried roadless areas, including tree species composition. Some respondents recommended the Final SEIS include information regarding large tree or coarse-canopy old growth habitat. They often referred to this portion of the old growth forest as the volume classes 6 and 7 habitats.

RESPONSE: The request for individual tree species documentation by alternative is a fine-filter analysis that is not likely to yield additional information relevant for the Deciding Official to recommend additional wilderness or LUD II. The Final SEIS does include an estimate of the amount of high-volume, coarse-canopy old growth, which maps the volume class 6 and 7, across the Forest and for inventoried roadless areas. In particular, the volume class 6 and 7 areas were analyzed and results incorporated into the Final SEIS in Appendix C and in the Biodiversity section of Chapter 3. The Biodiversity section in the SEIS provides results of various analyses of the effects of alternatives on the old-growth ecosystem.

Timber

COMMENT: Some respondents were concerned that the SEIS did not disclose or identify the location of all areas with suitable timber volume, potential roads, and potential timber sales in roadless areas. In addition, it was unclear to them how many acres are considered suitable and available for timber harvest.

RESPONSE: The SEIS used the same process for identifying suitable timberlands as outlined in Appendix A of the 1997 Forest Plan Revision. This involves a two-step process. First, the tentatively suitable timberland is identified for the Forest for all productive forest land that has not been legislatively withdrawn, is capable of being harvested without irreversible resource damage, and able to be restocked within 5 years after harvest. Secondly, for each alternative, the suitable timberland scheduled for timber production is selected from the tentatively suitable based on the land allocation and management objectives of the alternative. The suitable timberland can be mapped in GIS, but since there will always be unmapped conditions affecting the suitability found during project implementation, a management implementation reduction factor (MIRF) was applied to the mapped suitable timberland for analysis. Without this fall-down factor, timber volume estimates would have been overstated.

Each individual roadless area description in Appendix C of the Draft SEIS includes the acres of productive old growth, acres of tentatively suitable, and acres of suitable available timberland for the subject roadless area. Additionally, each description identifies timber sales under contract, timber sales that have been NEPA cleared but not under contract, as well as other potential timber sales included on the Forest 10 Year Timber Sale Plan. This information is also readily available in the Planning Record.

For the Final SEIS, individual roadless area maps show locations of various resources, including the mapped suitable timberland. These can also be found on the Tongass SEIS Web site (www.tongass-seis.net). The areas identified as suitable on the maps correspond with those portions of individual roadless areas that are within development LUDs. While the mapped suitable cannot account for MIRF, it does give one a picture of where future timber sale and associated roading projects could occur consistent with the current Forest Plan.

COMMENT: Some respondents were concerned that the short-term wood products effects analysis presented in the Draft SEIS overestimated the potential negative effects of wilderness designation. One respondent stated that much of the existing volume under contract identified in this analysis would be harvested in 2002. They also felt that any lost volume could be replaced by timber volume from other roaded areas of the Forest. Another respondent pointed out that the analysis included the volume under contract to Gateway Forest Products who are bankrupt.

RESPONSE: The analysis presented in the Draft SEIS addressed the short- and long-term effects of the alternatives on the wood products industry. The short-term effects analysis assessed the percent of the existing volume under contract (timber sales that have been sold, but not harvested) that would be in Recommended Wilderness or LUD II areas, as well as the percent of other sales in the 10-year timber plan that could be affected. The total estimated volume under contract when the Draft SEIS was prepared was 317 MMBF. While a portion of this volume has been harvested over the past year, the vast majority remains unharvested. The short-term effects analysis has been updated in the Final SEIS using volume under contract data from September 2003. The volume under contract at this time was approximately 295 MMBF. The revised volume excludes the Saook Timber Sale (23.4 MMBF) which was cancelled by mutual agreement in 2002.

There is not enough available volume in roaded areas to support the current timber industry in Southeast Alaska. Much of the timber in roaded areas is on a longer rotation to meet other resource objectives such as protection of areas seen from cruise ship routes, areas important for deer winter range, and other sensitive areas. While this timber will become more available as the current second growth stands mature, these areas are often very important to meet the short term multiple use objectives associated with their location. About 50 percent of the suitable timberland on the Tongass is roaded, but at least half of those acres have already been harvested and are not scheduled for reentry for another 50 years or so. The roaded component of the suitable timberland has an estimated sustained harvest level of about 50

MMBF. Annual market demand is presently estimated to be 152 MMBF, which suggests that under normal conditions the roaded land base would support about one-third of current market demand.

Gateway Forest Products (Gateway) filed for bankruptcy in 2001 and announced in April 2002 that the sawmill and veneer mill they owned in Ketchikan would be auctioned off to resolve the bankruptcy. The sawmill was auctioned off, but the city of Ketchikan purchased the veneer plant with the expectation of finding an operator to take it over (it is currently shutdown). All or a portion of the volume currently under contract with Gateway may be manufactured at the veneer plant if an operator is found. It is also possible that Gateway may subcontract or third-party this volume to other local processors. A portion of the volume may ultimately be turned back to the Forest Service for reoffer. At this time, it is anticipated that the volume will eventually contribute to sawmill employment and this is reflected in the updated analysis presented in the Final SEIS.

COMMENT: Some respondents believe that the projected ASQs of 86 MMBF and 89 MMBF associated with Alternatives 6 and 8, respectively, would be sufficient to support a viable wood products industry.

RESPONSE: The projected ASQs for Alternatives 6 and 8 have been revised to 92 MMBF and 96 MMBF in the Final SEIS, respectively. As discussed in the SEIS, the ASQ is a ceiling that includes both economic and uneconomic timber and realistically only 70 percent of the economic component is expected to be harvested. Of the 70 percent harvested, approximately 28 percent is assumed to be utility or low grade saw logs. This suggests that the available saw log volume under Alternatives 6 and 8 would be about 40 MMBF. This volume may support personal use, a couple of very small mills, and no more than one of the current larger sawmills, but it would not be sufficient to support the current projected annual demand of approximately 152 MMBF. It is also possible that this type of long-term reduction in the available timber supply would have detrimental effects on the infrastructure needed to maintain the industry (supplies, subcontractors, skilled workforce), which could, in turn, have serious implications for the future of the industry.

COMMENT: One respondent thought that the analysis presented in the Draft SEIS overestimated the effects of designating wilderness because effects are identified for the Juneau Ranger District, which does not have a significant timber program or support a major forest products industry.

RESPONSE: The SEIS assesses the potential effects of the alternatives on suitable timber land by Ranger District. The more restrictive alternatives would affect the suitable timber land on all of the Ranger Districts. The results of this analysis are presented in Table 3.3-3 of the SEIS.

COMMENT: Some respondents said the Tongass National Forest should promote logging in order to meet the nation's wood and paper product needs and reduce demand on foreign lumber.

RESPONSE: The 1997 Forest Plan allows for a mix of resource uses on the Tongass, including an average timber harvest level of up to 267 MMBF per year. The SEIS analyzes a range of alternatives for recommending wilderness or LUD II for roadless areas on the Forest. The Allowable Sale Quantity (ASQ) under these alternatives would range from 259 MMBF under Alternatives 1, 2, and 4 to 92 MMBF and 96 MMBF under Alternatives 6 and 8, respectively. The local industry is currently in a period of transition, as it adjusts to recent structural and market changes. Recent investments in dry kilns and other wood treatment options suggest that future wood products operations in the region may be more oriented toward local and national uses, as well as niche markets. Local production also contributes to regional and local economies.

COMMENT: One respondent stated that the Final SEIS should incorporate an analysis of mills and Native Corporation responses to decreased supply of Tongass National Forest timber. They reasoned that a reduction in supply from the Tongass would result in an increase in the price that Southeast Alaska mills would be willing to pay for logs. This, would, in turn, lead to more Native Corporation timber being processed in the region, rather than exported as raw logs.

RESPONSE: The current status of the wood products industry in Southeast Alaska is discussed in the *Economic and Social Environment* section of the SEIS. This discussion suggests that the scenario portrayed in the comment is very unlikely to occur.

COMMENT: Some respondents suggested the Tongass National Forest should implement mid-level planning analysis for timber sales.

RESPONSE: The Forest Service has completed or is currently conducting landscape analysis or ecosystem analysis at the watershed scale (EAWS) for several areas on the Tongass. These analyses are not NEPA documents and no decision is tied to them. They are, however, useful in identifying existing information and highlighting areas of concern for different resources. Most project level analysis includes development of a Logging System Transportation Analysis (LSTA), which considers the full roading and timber harvest opportunities available in a planning area, from which a potential harvest unit pool is developed. Not all potential units within a project area are carried forward to alternatives for a current project, but barring resource constraints it is likely that units deferred in a given entry may be included in alternatives for a future project in the same area. These are determinations made at the project level, and not appropriate for inclusion in this programmatic level SEIS.

COMMENT: Many respondents indicated the Tongass National Forest should manage resource harvest in a sustainable, non-impactive manner that encourages small local businesses and economies. Others suggested the SEIS should promote value-added manufacturing of wood in Southeast Alaska. Still others felt the Tongass should promote recycling of wood materials rather than allow new timber harvesting.

RESPONSE: The timber industry in Southeast Alaska is made up of small to very small local family owned wood processing businesses. Their contribution to local economies is significant in terms of year-round jobs that pay well, as well as the services they require from other local businesses. In addition, their salaries are often spent within the local areas further contributing to the economy. This is discussed in the *Economic and Social Environment* section of the SEIS. The 1997 Forest Plan provides for ecologically sound and sustainable forest management. For example, most of the Forest is off limits to timber harvest because the other resource values from those lands are considered higher than the timber they could produce there, such as high value wildlife habitats or the highly scenic areas seen from cruise ships. The 1997 Forest Plan provides for a mix of land uses and values managed in a balanced way to protect all resource values. The mix of small and very small family owned businesses continue to move towards more value-added wood processing. Wood products are recycled as much as is practicable in Southeast Alaska, however, most of the wood used for construction and manufacturing is imported from the lower 48 states and elsewhere. The local small and very small wood processors are actively trying to get a share of this market.

COMMENT: Some respondents felt the Tongass National Forest should manage the Forest for multiple use and permit additional logging to protect jobs. They indicated the Forest Service should provide timber sales that are economic to operate. Additionally, they felt the Forest Service should offer at least 300 million board feet of timber volume annually, and they should offer multi-year sales to encourage investment. Some respondents also indicated that areas that allow timber harvest should be managed primarily for timber.

RESPONSE: The 1997 Forest Plan and Record of Decision provided for an ASQ of 267 million board feet per year as a ceiling or maximum average of timber that could be harvested from the Forest. The

scheduled yield from Alternative 1 (No Action) in the SEIS analysis is estimated to be 259 MMBF, slightly less than 267 MMBF. This difference is a result of changes in small old-growth reserves and land ownership, as well as revised mapping of the vegetation layer and differences in the methodology used to calculate the ASQ. Alternatives 2 and 4 would also have ASQs of 259 MMBF. This number would be reduced under the other alternatives. None of the scenarios evaluated in the SEIS would allow an average annual harvest of 300 MMBF.

The Tongass National Forest strives to offer timber sales for bidding that are as economic as possible. Timber sales in more sensitive areas usually require more mitigation to assure all resource objectives are met. This often increases the cost of operating these sales. When timber market conditions are low, as they have been in recent times, the cost of operating a sale may be more than the current value of the timber. As a result, some recent Tongass timber sales have not sold and some of the existing volume under contract has not been harvested. The Forest Plan allows timber harvest subject to being able to meet the overall objectives of the resources found in a potential timber sale area. Permitting additional logging, making timber sales more economic, or changing the ASQ to at least 300 MMBF is beyond the scope of the SEIS.

COMMENT: Some respondents stated that timber is a renewable resource and should be managed as such. Others stated that old-growth and wilderness are not renewable resources and logging in roadless areas is not a renewable practice.

RESPONSE: Trees are a renewable resource, especially on the Tongass, where growing conditions are very favorable. Based on average growth rates across the Forest, most second-growth stands will be ready for harvest about 80 to 120 years after the initial harvest. Old growth characteristics may take 200 years or more to fully develop after a stand has been clearcut harvested. Using alternative harvest methods, that leave large trees or patches of trees, new stands of timber can begin exhibiting some old growth characteristics in less than 100 years. This will not replace old growth, but such characteristics can be beneficial to species that use those types of habitats. The 1997 Forest Plan provides for protection of about 80 percent of the productive old growth through time. The Forest Plan does not direct maintaining the entire forest in an old-growth state; rather it provides for a balanced mix of resources. The balance includes young growth as well as old growth.

COMMENT: Some respondents felt the SEIS should analyze the alternatives' impacts on the Prince of Wales micro-sales or other small sales programs on the Tongass.

RESPONSE: The micro-sales program on Prince of Wales is based on selling timber accessible from the existing road system, or from future roads built as part of a larger timber sale program. Selecting an alternative that recommends roadless portions of POW for wilderness or LUD II would have no immediate effect on the micro-sales program, but could affect the availability of roadside micro-sales in the future.

COMMENT: One respondent was confused about the acres of old growth, projected to be harvested in the next 35 years, and the total productive old growth projected to be harvested through time.

RESPONSE: The rotation age for second growth timber stands varies between 70 and 170 years depending on management objectives and desired future condition of a given area. The application of two-aged and uneven-aged harvest in existing old growth extends the time required for conversion from old growth harvest to the first entry in second growth. Not all of the second growth stands harvested are available for reentry. Of the approximately 400,000 acres harvested since the 1950's, only 180,000 acres are available for reentry under the current plan. The remaining 220,000 acres are in LUDs that do not permit harvest or are excluded by direction, usually because the second growth is in riparian or beach fringe buffers no longer available for harvest.

The 1997 Forest Plan Revision indicates that both old growth and second growth stands are scheduled to begin contributing to the ASQ starting at about year 2047. After that, second growth will provide the

majority of future harvest. For the most part, substantial volumes from second growth stands are not projected for another several decades.

COMMENT: Many respondents were concerned with The Tongass National Forest using a 100-year rotation for timber management when it can take several hundred years for old growth stands to develop. They questioned the sustainability of the 100-year rotation. Similarly, some respondents felt the Tongass should develop a sustainable low impact logging program. Others expressed their belief that resource development is not profitable or sustainable in the long-term.

RESPONSE: One must look at the whole picture of old growth on the Tongass. Over 5 million acres of productive old growth occurs on the Tongass. Less than 10 percent of this old growth is available for timber management. The sustainability of the old growth ecosystem found on the Tongass, is assured by the Conservation Biology Strategy established by the 1997 Forest Plan. On areas where timber management is allowed, environmental safeguards included in the Plan provide for one of the most protective and sustainable timber management programs in the world. What rotation age is used on the Tongass National Forest is beyond the scope of the SEIS.

COMMENT: Some respondents felt the Tongass National Forest should encourage selective logging practices and logging without roads, or develop timber harvest methods that have no measurable ecosystem impacts.

RESPONSE: Alternative harvest methods continue to be analyzed and implemented in various projects across the Tongass. While uneven-aged management presents an opportunity to provide additional protective measures for some resources, it is not necessarily the best solution for every project. Concerns continue to be raised about the quality of timber and structure left behind in a partial harvest, as well as the future growth of the residual stand and regeneration within the stand. Selective logging is considerably more expensive to undertake, making it often uneconomical in periods of low timber markets. The 1997 Record of Decision indicated that 80 percent of the harvest on the Tongass would be through even-aged management, in which 65 percent would use clearcut harvest methods. Forest Plan monitoring since 1997 indicates that only 23 percent of harvest to date utilized clearcut harvest with the remaining 77 percent of the timber harvest using some alternative to clearcutting. The Forest Service continues to use a mix of silvicultural prescriptions and harvest systems to manage timber on the Tongass, and we continue to monitor the results of alternative harvest methods. However, analysis of what harvest method to use in a particular project area, is not appropriate for inclusion in this programmatic SEIS.

COMMENT: Many respondents stated that the Tongass National Forest should focus timber harvests in second-growth stands in previously roaded areas rather than harvesting old-growth. Others thought that the Tongass National Forest should use Research Natural Areas and Experimental Forests to move forward with commercial harvest of second growth. Similarly, they indicated the Tongass National Forest should thin previously logged areas.

RESPONSE: Several people voiced their support for harvesting second-growth stands accessible from the existing road system. While a few second-growth stands are approaching commercial size, most of these are located in areas that are not available for harvest under the current Forest Plan (such as in the beach fringe). The 1997 Forest Plan Final EIS (page 3-303, figure 3-11) predicted that the existing second growth will begin to come on-line in about 40 years, and by 70 years out, there would be very little timber harvest occurring in old-growth stands. The SEIS does present two alternatives (6 and 8) that would almost completely limit timber harvest to areas that are already roaded, while recommending all inventoried roadless areas for either wilderness or LUD II protection.

Research and studies in conjunction with local industry, the Pacific Northwest Experiment Station, and others are actively testing wood and potential products from second growth harvests in Southeast Alaska. A commercial second growth thinning project is currently being planned on Heceta Island. Most of the second-growth on the Tongass is still too small for commercial use. However, the ongoing study of

second growth should assure full utilization of best methods and practices as soon as it comes on line. Areas like the Maybeso Experimental Forest have potential to actively study second growth management, and work in that area is ongoing. Most Research Natural Areas do not contain second growth, so they would not make good experimental sites for second growth management testing. Much of the acres previously harvested on the Tongass have already been precommercially thinned and this program is ongoing.

COMMENT: Some respondents indicated the Final SEIS should include discussions of raw log exports and the Forest Service should not allow raw log export.

RESPONSE: Timber exports are addressed in the *Timber* and *Economic and Social Environment* sections of the SEIS. Unrestricted export of raw material from the Tongass is currently limited to Alaska yellow cedar since there is no established local manufacturing demand. If there is a demonstrated surplus of other species relative to local demand, the Regional Forester may grant export once these conditions are verified. Recently, with the closure of the pulp mills, defective logs suitable only for chipping have been authorized for round-log export on a case-by-case basis. Since these logs are part of the typical mix of timber harvested, purchasers would be forced to burn or find other means of disposal if the logs were not authorized for export. With the exception of surplus western redcedar, export permits allow purchasers to ship logs to domestic or foreign markets at their discretion. Through annual appropriations language, a certain portion of surplus western red cedar authorized for export must first be offered to the Pacific Northwest for processing before it can be exported to foreign markets.

COMMENT: Some respondents suggested the Final SEIS should measure, predict, and analyze the impacts of cedar logging.

RESPONSE: While an analysis of the impacts of perceived disproportionate logging of cedar stands is outside the scope of this analysis, the Region did a review of current harvest practices as they relate to cedar (Cedar Harvest on the Tongass National Forest 1997-2001, March 2002) and found activities were consistent with the 1997 Forest Plan. On review, cedar harvest was greater than projected for the Forest, but was generally proportional to occurrence where actual harvest is taking place. Concerns about disproportionate harvest of cedar would be better considered during project-level environmental analysis.

COMMENT: One respondent stated that the Final SEIS should not assume that the Forest Plan requires proportional logging of different volume or strata classes.

RESPONSE: Proportional logging of different volume classes was a requirement of the Tongass Timber Reform Act (TTRA) and applied specifically to the long-term contracts with Alaska Pulp Corporation (APC) and Ketchikan Pulp Company (KPC). (See 1997 FEIS, pages 3-298 to 3-299). The SEIS does not assume that the Forest Plan requires proportional logging by volume class or stratum. This subject is beyond the scope of the SEIS.

COMMENT: Some respondents were concerned about the potential effects of pre-roading that would be associated with timber sales under the proposed alternatives.

RESPONSE: Pre-roading is a process whereby roads are constructed into a NEPA cleared project area prior to and separate from a timber sale or other resource activity. The intent of pre-roading is to develop or expand the transportation network without requiring one resource to carry the entire burden of road construction costs. Pre-roading is an administrative decision that requires funding from Congress and is subject to the same environmental laws and regulations (NEPA, NFMA, etc.) as other Federal actions, and is best dealt with at the project level. It is outside the scope of this programmatic Supplemental EIS.

COMMENT: Some respondents expressed their belief that logging, especially clearcut logging, has negative effects on other multiple-use activities. Others felt the Forest should prohibit clearcut logging to protect undiscovered species in undisturbed areas. Many respondents want

clearcut logging banned altogether. Some want to ban all commercial resource extractive activities.

RESPONSE: Management of the National Forests under the Multiple Use Sustained Yield Act, National Forest Management Act, and other applicable laws and regulations is appropriate for the Tongass National Forest as well. The 1997 Tongass Forest Plan provides guidance on how all resources are to be managed on the Forest. Managing a relatively small portion of the Tongass for timber in support of the local economies of Southeast Alaska is also specifically consistent with the Tongass Timber Reform Act of 1990. The terrain in Southeast Alaska is often rugged or soils relatively wet. This requires logging systems that use cable or helicopter when timber harvest is to occur. These expensive logging systems become even more expensive as the number of leave trees and yarding distances increase. The use of clearcut harvest accessed by roads is the least expensive logging method, while helicopter logging is usually the most expensive. Clearcut harvest methods are still used on the Tongass where the harvest areas are not readily seen from sensitive viewing areas like cruise ship routes, or the scale of the harvest fits in with all the various resource objectives related to that particular area. Differing levels of individual trees or patches of trees are often strategically left in harvest areas to help meet long term resource objectives while emphasizing efficient and economic harvesting. The 1997 Forest Plan emphasizes a reduction in the use of clearcutting, but does not ban its use. According to Forest Plan monitoring since 1997, about 77 percent of timber harvest has been by methods other than clearcut harvest. The issues associated with clearcutting harvest methods and banning all commercial resource extractive activities are beyond the scope of the SEIS.

COMMENT: Some respondents were concerned that the Forest Service allowed logging companies to be environmentally irresponsible. Others thought the Forest Service should charge logging companies for all impacts to federal land.

RESPONSE: Timber sales on the Tongass National Forest are designed to be consistent with all the protections included in the 1997 Forest Plan. This ensures that each timber sale is designed to meet all appropriate laws and regulations. In addition, all timber sale proposals involve an intensive public process that further assures each sale is designed specific to the issues of a given area. When the timber sale is sold to a logging company, it is done using a very rigorous timber sale contract to assure that project designs meet resource objectives. Tongass National Forest resource professionals and contract specialists are used throughout the planning and implementation of each timber sale. How a timber sale is operated is beyond the scope of the SEIS.

COMMENT: Some respondents thought the Tongass National Forest should harvest the climax old-growth stands and replace them with vigorous growing stands, not make them a wilderness.

RESPONSE: Different people have divergent values and views of how the forest should be managed. The 1997 Forest Plan seeks to provide a mix of uses that include retention of large areas of old-growth habitat, as well as areas where intensive timber management can occur.

COMMENT: Some respondents wanted to know if the Forest Service is in a position to financially compensate businesses harmed by lack of timber.

RESPONSE: Whether or not financial compensation would be provided to businesses or communities is a matter for the Congress and is beyond the scope of the SEIS.

Minerals

COMMENT: Many respondents expressed a desire to restrict access for development of resource extractive industries, including timber and mining operations by recommending areas for wilderness or LUD II. Others expressed a desire to not see such access restricted. Some

respondents felt designation of an area as wilderness would affect existing mineral rights and explorations, while others claimed designation would not affect existing mineral rights.

RESPONSE: The 1997 Forest Plan provides guidance on access requirements through the allocation of lands to the various land use designations and through the use of standards and guidelines associated with each LUD. Mining operations on the Forest are also guided by the Forest Plan, but more explicitly allowed by the 1872 Mining laws. Mining claims can be filed in areas recommended for wilderness or LUD II designation. Current wilderness designations allow mining and reasonable access to occur on claims that were in effect (and kept current) prior to the area being designated by Congress, but no new mining claims would be valid. The SEIS would not affect any valid existing rights relative to mining, reasonable access to private property, or similar legal rights. It is reasonable to expect operations, especially exploration operations, to be more expensive in designated wilderness because of the heightened interest in the resource values there. It is also reasonable to expect costs to be higher in areas recommended for wilderness, however not as high as could be expected in designated wilderness. The Tongass Forest Plan has a Minerals LUD, which represents those areas with high mineral potential and good capability of being developed for mineral production. Some of these areas are included in SEIS alternatives that propose them for Recommended Wilderness or Recommended LUD II. Potential effects have been disclosed accordingly.

COMMENT: Some respondents were concerned about oil development on the Tongass National Forest and felt that it should not be permitted.

RESPONSE: Very little oil exploration has taken place on the Tongass. Some testing has occurred in the Yakutat area and that may continue. Appendix C of the SEIS includes appropriate discussion of oil and gas prospects pertinent to specific roadless areas. Recommendations for wilderness or LUD II would not forego the opportunity to explore for gas and oil resources. Designation of an area for wilderness could affect such opportunity. The SEIS does not include site-specific analysis for oil development on the Tongass. If oil development were proposed, it would require a project level site-specific environmental analysis.

Transportation and Public Utilities

COMMENT: Many respondents were concerned that Wilderness designation would have negative effects on the development of transportation and utility infrastructure. Several respondents stated that additional transportation and utility infrastructure is necessary for the future economic development of the region.

RESPONSE: The potential effects of the alternatives on regional transportation and utilities are addressed in the *Transportation and Utilities* section of the Draft and Final SEIS. Potential effects on the regional economy and specific communities are discussed qualitatively in the *Economic and Social Environment* section. In general, the SEIS concludes that areas recommended for wilderness would be more restrictive on potential transportation and utility projects than areas recommended for LUD II.

COMMENT: Some respondents were concerned that additional wilderness designation could make critical transportation and utility corridors unavailable for mining companies wishing to develop resources on Woewodski Island.

RESPONSE: The effects of the alternatives on mining activity are discussed in the Minerals section of the SEIS. The associated effects to the regional economy are discussed in the *Regional and National Economy* section of Chapter 3 of the SEIS. Allocating an area to Recommended Wilderness would not affect existing or proposed mining activities, but may make minerals more costly to develop. It may also affect future mining activities. This is discussed in more detail in the SEIS. National Forest System lands within the LUD II designation are open to mineral exploration and development. These management prescriptions are discussed in detail in the 1997 Forest Plan and in Appendix D of the SEIS.

The Wilderness Management Prescription in the 1997 Forest Plan indicates that new roads are not permitted except to access surrounded state and private land and valid mining claims subject to stipulations to protect the natural and other values of such lands. Routes and types of access shall be practical in an economic sense but do not necessarily have to be the most economically feasible. Under the 1997 Forest Plan, the Wilderness LUD represents a Transportation and Utility System (TUS) "Avoidance Area." Utility sites and corridors may only be located in this LUD after an analysis of potential TUS opportunities has been completed and no feasible alternatives exist outside this LUD. These management prescriptions suggest that new wilderness would not necessarily prevent the development of transportation and utility corridors necessary for mining operations but may make their development more expensive. The LUD II Management Prescription requires that the appropriate Transportation Forest-wide Standards and Guidelines be applied to the location and construction of mining roads.

COMMENT: Some respondents indicated that the effects analysis in the Final SEIS should address the environmental and socioeconomic effects associated with restricting or allowing future transportation developments, such as the construction of a road north from Juneau to Skagway or Haines.

RESPONSE: Some of the alternatives could potentially affect the development of transportation corridors. These potential effects are discussed in the *Transportation and Utilities* section of the SEIS. Assessing the potential site-specific, environmental impacts of future road projects that could be restricted under one or more alternatives is, however, beyond the scope of this programmatic analysis. Potential effects on the regional economy and specific communities are briefly noted in the *Economic and Social Environment* section.

COMMENT: Some respondents were concerned with the standard and guideline language included in the 1997 Forest Plan and suggested changes to that language. They were also concerned that LUD II designation would prevent future transportation and utility projects. Others pointed out that LUD II designation would not prevent construction of important transportation and utility facilities between communities in Southeast Alaska. Some respondents wanted the Final SEIS to specifically acknowledge community-specific alternatives, such as different connections that could be considered for Kake.

RESPONSE: The SEIS provides a full and fair discussion of the effects of the proposed alternatives on construction of roads and utility corridors across roadless areas. The SEIS indicates that such facilities would in most cases be incompatible with wilderness designation and that LUD II could more easily accommodate such facilities. There are various options for essential transportation and utility linkages that have been identified and these continue to evolve. The 1997 Forest Plan included such key linkages as Transportation and Utility System Land Use Designations. These have been brought forward into the SEIS and noted as part of each individual roadless area evaluation as appropriate. Additional potential projects, or corridor locations, identified in various proposals and public comment have also been included in the analyses for the SEIS. Revisiting the 1997 standards and guidelines for LUD II areas is beyond the scope of this SEIS.

COMMENT: One respondent pointed out the Draft SEIS incorrectly concludes that Alternatives 1 and 7 would have little effect on the implementation of the Southeast Alaska Transportation Plan.

RESPONSE: The section of the SEIS that addresses the effects of the proposed alternatives on the Southeast Alaska Transportation Plan has been revised to correct this typographical error (Alternative 7 was inadvertently listed instead of Alternative 4). In addition, a table that summarizes the potential effects of the alternatives by proposed transportation development has been added to the Final SEIS.

COMMENT: One respondent suggested the Final SEIS should include discussion of the potential transportation link across the Cleveland Peninsula near Spacious Bay as identified in the Southeast Alaska Transportation Plan.

RESPONSE: Although specific locations for the possible terminals and highway have not been identified, the proposed corridor (as identified in the Department of Transportation and Public Facilities) has been identified in the appropriate roadless area descriptions (Appendix C) and the affected environment discussion in the Transportation and Utilities section.

COMMENT: One respondent suggested that the use of 'proposals' rather than 'opportunities' was more fitting for discussions of potential transportation and utility discussions in the SEIS.

RESPONSE: The term "proposals" suggests some level of formal proposal. The level of analysis and the degree of support varies by potential project. Therefore, "opportunities" seems to be a more appropriate term. The Draft SEIS included all of the proposals identified in the 1997 Forest Plan in this section of the analysis. These proposals are also identified in the individual roadless area descriptions in the SEIS, as appropriate.

COMMENT: One respondent requested that the proposed extension of Revilla Road to the Shelter Cove road system and construction of a proposed highway to Rodman Bay be included in the SEIS. This respondent also asked for clarification of the location of the proposed road connecting Thorne Bay and Coffman Cove in the Final SEIS.

RESPONSE: The Revilla Road and Rodman Bay corridors are identified in the 1997 Forest Plan and on the Current Land Use Designations map, and have been included in the analysis in the Final SEIS as appropriate. Based on the information included in the 1997 Forest Plan, the route to Rodman Bay is not expected to cross Roadless Area 332-Sitka Sound. The Final SEIS notes that the possible road connecting Thorne Bay and Coffman Cove would follow a coastal alignment.

COMMENT: One respondent pointed out the Draft SEIS incorrectly states that the Alaska Marine Highway System provides access to Stewart (via Hyder).

RESPONSE: The text has been revised as appropriate in the Final SEIS.

COMMENT: One respondent pointed out that air service has been a major method of moving passengers for at least five decades not four decades as stated in the Draft SEIS.

RESPONSE: This reference has been changed from four to five in the Final SEIS.

COMMENT: One respondent offered clarification related to the Southeast Alaska Transportation Plan, which was updated by Addendum One, dated February 28, 2001. Discussions and references to the plan need to reflect the updates incorporated by Addendum One. South Mitkof and South Wrangell are not "Islands". They are "nametags" (i.e. name references) used to help identify the general location of new proposed terminals. Per the addendum, Angoon is no longer under consideration for a new ferry terminal (3rd paragraph).

RESPONSE: Discussions and references to the plan have been updated in the Final SEIS to include changes made in Addendum One. The text in the Final SEIS has been revised to say that road construction and improvements and new ferry terminal construction are planned on south Mitkof Island and south Wrangell Island. References to a new ferry terminal at Angoon and other references to the proposed Chatham Terminal have been deleted from the text.

COMMENT: One respondent indicated the discussion of Forest Highways in the 5th paragraph (Chapter 3 Transportation and Utilities) of the Affected Environment section in the Draft SEIS lacks a context. The use of "relinquished" and "would be given" indicates that the Forest Service may not consider the state an equal partner in providing transportation in and near the Tongass National Forest.

RESPONSE: The fifth paragraph is intended to provide some background on the affected environment. The use of "relinquished" and "would be given" refers to the ownership and management of Forest Highways that are transferred from the Forest Service to the State. The Forest Service certainly considers the State an equal partner in transportation matters associated with the Tongass National Forest. The text has been modified to better reflect this ongoing partnership.

COMMENT: One respondent was concerned with the use of passive language construction ("Several corridors have been considered for major transportation routes") in the 4th paragraph (Chapter 3 Transportation and Utilities) of the Affected Environment discussion of the Draft SEIS. What role do potential transportation corridors play in the decision-making process? How important is the likelihood and scheduling of future construction?

RESPONSE: Different transportation routes have been considered by a number of different groups. Rather than identify all of these groups, the text simply states that several corridors have been considered. The text has been revised to say that "A number of different groups have identified several corridors for consideration as major transportation routes." Potential transportation corridors have been identified for each roadless area and will be considered in the decision making process. The likelihood and scheduling of future construction has also been considered to the extent that this information is available.

COMMENT: One respondent asked, "if most or all roadless areas are closed to new road construction under Alternatives 6, 7, and 8, how is it possible that cumulative road miles would increase by at least 11 percent (see Table 3.3-15 in the Draft SEIS)?"

RESPONSE: Most new roads in Alternatives 6, 7, and 8 are associated with projected timber harvest in areas classified as unroaded or developed. The table includes all roads based on a ratio of new road per MMBF, including unclassified roads. Note that under these alternatives, most of the new roads are not likely to be needed for long term management of the Tongass, and will be decommissioned after the timber harvest is completed.

COMMENT: One respondent noted that the reference to "Travel plans" (last paragraph on p. 3-87) in the Draft SEIS is confusing. This respondent wanted to know who puts out these "Travel plans", and similarly, what does "use of motor vehicles in designated wilderness" mean?

RESPONSE: The travel plans referenced in this paragraph are those prepared by the Forest Service. This has been clarified in the Final SEIS text. The last sentence states that the use of motor vehicles is *limited* in designated wilderness. Transportation standards and guidelines for designated wilderness are identified in the Wilderness Management Prescription in the 1997 Tongass Land and Resource Management Plan. Transportation standard and guidelines for Wilderness are found in the 1997 Forest Plan (USDA Forest Service, 1997b).

COMMENT: Some respondents indicated the Draft SEIS does not sufficiently address the fact that marine and air are the dominant forms of transportation in Southeast Alaska and implicitly assumes that roads are the only way to improve access to communities. They note that marine transportation -- the Alaska Marine Highway and Inter-Island Ferry Systems -- provide a safe and reliable surface transportation system that meets a majority of the transportation needs of communities in Southeast Alaska.

RESPONSE: The Draft and Final SEIS documents state that: "(r)esidents of the region are dependent on air and water transportation for travel between communities, rather than roads or rail." The transportation analysis focuses on roads because that is the main form of transportation that could be potentially affected by the alternatives. The potential effects of the alternatives on proposed ferry terminals are also discussed, as appropriate.

COMMENT: Some respondents stated the Draft SEIS implicitly and incorrectly assumes that all power transmission corridors in Southeast Alaska must be carved across Tongass wildlands.

They indicated the Final SEIS should acknowledge the existence of alternative power transmission systems, such as underwater cable technology.

RESPONSE: The purpose of the Transportation and Utilities analysis presented in the Draft and Final SEIS is to assess the effects of the alternatives on proposed transportation and utility projects. This analysis focuses on utility projects that cross National Forest System lands because these are the projects that could be potentially affected by the alternatives. Evaluating other forms of technology or developing alternative proposals for existing utility projects is beyond the scope of the SEIS.

COMMENT: Some respondents were concerned about the amount of environmental harm that can be caused by logging roads. Others felt that logging roads do little environmental harm. Others pointed out that the Draft SEIS says that "…roads pose the greatest risk to fish.." and were concerned about this.

RESPONSE: About 5,000 miles of road, mostly to access timber harvest areas, have been constructed over the last 50 years on the Tongass. Many of these roads now provide public access to areas of the Forest and some have been upgraded to provide key linkages to local communities. Over the years, standards for construction and maintenance of roads, have changed significantly. Stream crossings planned today adhere to very high standards designed to protect fisheries, important wetlands, unstable soils, wildlife use and habitats, and other resource values. Older roads built under less stringent specifications are causing some resource problems on the Tongass. These problem areas include fish passage and some sedimentation sources. The Tongass has a very active program in place to address these issues. While the Draft SEIS does note that roads pose the greatest risk to fish, this statement is taken out of context in this comment. The SEIS also states that with the implementation of all appropriate Forest Plan LUDs and standards and guidelines when designing, constructing, and maintaining roads, no significant adverse affects are expected on fish or fish habitat

COMMENT: Several respondents noted that the Forest Service has reported significant problems with road culverts on the Tongass. One respondent requested that the Final SEIS factor existing and future culvert costs associated with logging roads into the decision making process.

RESPONSE: Road maintenance issues and funding on the Tongass are discussed in some detail in response to an earlier comment in the *General* section of this appendix. Existing culvert problems are part of an ongoing program that is discussed in the earlier comment response. Standards for construction and road maintenance have changed significantly over the years. Much is being learned today about fish passage and structure placement, design, and construction. New information is incorporated into ongoing projects as it becomes available. Culvert costs associated with future road construction for timber sales are included in the purchaser's contract requirements and reflected in the stumpage value received for the sale. These costs are assessed at the project level. It is not possible to project potential rates of failure and associated costs for culverts that would be installed in the future as these are unknown at this time. All new crossings will meet current fish passage requirements at the time of installation.

COMMENT: Some respondents indicated the Tongass National Forest should explain the assumption that 300 acres of land are roaded per mile of new road.

RESPONSE: Roadless areas on the Tongass are defined by placing 1,200-ft.buffers around roads. Therefore, if a new road is built entirely in a roadless area, it is reasonable to assume that an area 2,440 ft. by 5,280 ft. (or 291 acres) would become roaded. The assumption of 300 acres per mile is conservatively high, especially when one considers that many new roads will not be built in roadless areas. It is also reasonable to assume that the rate of loss of roadless areas with the development of new roads, will be less in the future than in the past, because more and more roads, or portions of roads, will be built in roaded areas (relative to the past).

Subsistence and Customary/Traditional Uses

COMMENT: Some respondents indicated the Tongass National Forest should ensure and protect Native Alaskan subsistence rights, including access to subsistence resources.

RESPONSE: In ANILCA, Congress recognized both Alaska Natives and non-Natives as subsistence users in rural areas. ANILCA provides for subsistence uses, described as "customary and traditional uses by rural Alaska residents of wild renewable resources." The 1997 Forest Plan is in compliance with ANILCA and provides guidance for management of subsistence resources, including within wilderness. Neither wilderness nor LUD II designations should restrict reasonable access to subsistence resources important to Alaska Natives. However, wilderness may be somewhat more restrictive if the means of access or proposed activities associated with subsistence, or other resources could adversely affect the wilderness character or attributes. This is the case currently and is not expected to be different for additional wildernesses if so designated. Additionally, as provided for in the Wilderness Act, ANILCA, and TTRA, access to private properties, valid claims, and other valid existing rights will continue as in current wilderness and LUD II areas. Newly designated areas most assuredly will provide for valid existing rights.

COMMENT: Some respondents indicated the Final SEIS should address the effects of the proposed alternatives on subsistence users' customary and traditional uses, and whether temporary structures like smokehouses and fish camps can be used in Recommended Wilderness.

RESPONSE: Anyone wanting to build a structure on National Forest System lands, including within wilderness or recommended wilderness needs to get a permit from the Forest Service. Section 1316 of ANILCA allows temporary structures to be built where the taking of fish and wildlife is permitted, thus temporary structures are allowed in national forest wilderness and would be allowed in recommended wilderness. The time it may take to get a permit is highly variable based on the type of permit sought, the status of environmental analysis to approve the permit, and the availability of personnel to issue the permits. As an example, a permit for a tent platform on a site that has had approved uses in the past could likely be issued the same day it is applied for. Conversely, it could take several months to conduct analysis, comply with NEPA, and issue a permit for a new fish camp with a smokehouse at a site that is not currently approved for such use. Overall, the customary and traditional uses for subsistence or related to Alaska Native uses should not be significantly affected by recommending wilderness or LUD II as indicated in the SEIS.

COMMENT: One respondent stated that the Environmental Justice discussion presented in the Draft SEIS failed to address the economic and cultural benefits associated with managing roadless areas adjacent or nearby low income or minority communities as Wilderness or LUD II. This respondent felt that the finding that the proposed alternatives are not expected to negatively affect subsistence was inconsistent with the discussion of the potential effects of the alternatives on deer harvest in the *Subsistence* section of the SEIS.

RESPONSE: The analysis presented in the Subsistence section of the SEIS notes that the possibility of a significant restriction in deer harvest resulting from a change in abundance or distribution would be the same as or less than the possibility under Alternative 11 of the 1997 Forest Plan FEIS (USDA Forest Service, 1997a). This possibility, at least in the short-term, is largely due to the continuation of reduced habitat capabilities resulting from past habitat alterations and would apply to all alternatives. In the long term, those alternatives that reduce areas available for future timber harvesting the most, would result in the largest reduction in risk. The potential effects to individual communities are discussed in the *Subregional Overview and Communities* section of the SEIS. It may also be noted that potential effects on subsistence are minimized under all alternatives by the existing Forest-wide standards and guidelines for subsistence, as well as related standards and guidelines for riparian areas, fish, and wildlife. This is discussed with respect to ANILCA in the 1997 Forest Plan Record of Decision.

COMMENT: It was not clear to some respondents how personal uses consistent with ANILCA and/or customary and traditional uses such as cutting of ceremonial totem poles could be affected by areas recommended for wilderness or LUD II.

RESPONSE: Appendix D of the SEIS provides new land use designation prescriptions for Recommended Wilderness and Recommended LUD II. The prescriptions are designed to acknowledge the "recommended status" of the lands while allowing some current and proposed activities to occur, Those activities allowed to occur must not preclude the option for future designation by Congress. Activities or uses that are more impacting may not be compatible with maintaining the values and attributes that make those areas eligible for subsequent designation. For example, cutting a tree for a totem pole for ceremonial purposes should be consistent with Recommended Wilderness. However, the location and the means of extracting the tree could cause potential effects that may not be allowed. Recommended LUD II lands will usually have more flexibility to grant requests than Recommended Wilderness. Each situation needs to be considered on a case-by-case basis.

COMMENT: Some respondents indicated the Tongass National Forest should not impose wilderness designations, which restrict access and customary and traditional use of Alaska Native lands. Others pointed out that wilderness designations would not restrict customary and traditional uses on these lands.

RESPONSE: It is the intention of the Forest Service that customary and traditional uses would be allowed to continue with new wilderness and certainly with new LUD II designations. As stated in the Forest Plan standards and guidelines, appropriate use of airplanes, snowmachines, motorboats, and other means of surface transportation shall be permitted, subject to reasonable regulation to protect wilderness values. However, minor limitations may occur under wilderness. The use of mechanical/motorized equipment, such as chainsaws, would be allowed by permit only.

COMMENT: Some respondents were concerned about non-National Forest System lands near roadless areas and how management of those roadless areas could affect customary and traditional uses of lands if they are allocated to Recommended Wilderness or Recommended LUD II with the Final SEIS.

RESPONSE: State and Native lands on Prince of Wales Island and other localized areas within or adjacent to the Tongass National Forest have resulted in a high degree of mixed ownership in these areas. The SEIS does not propose any changes to the current ownership of land, nor does it deal with potential land exchanges. As stated in Chapter 3 of the SEIS, allocating areas to Recommended Wilderness or LUD II would not prohibit people from using those areas, including Alaska Natives for customary and traditional uses. It could however influence the type of activities allowed to ensure they are compatible with the Recommended Wilderness or LUD II land use objectives.

COMMENT: The Draft SEIS does not identify a plan for any native economy. Either you're going to be logging or you're going to be enjoying the wilderness. Native communities have to fit in somewhere. What are the effects of these alternatives on Native communities?

RESPONSE: The SEIS evaluates the effects of the alternatives relative to subsistence at the programmatic level. It also discusses specific economic effects for 32 communities. The Forest Service held public hearings at 16 communities throughout Southeast Alaska, a hearing in Anchorage, and an internet hearing. Subsistence testimony was also accepted at these hearings. In addition, ongoing Government-to-Government consultation continues to take place between the Forest Service and potentially affected Federally Recognized Tribes and other tribal groups. Findings from these efforts have been incorporated as appropriate into the Final SEIS.

COMMENT: Additional Wilderness designation would have negative effects on subsistence use because it would restrict access to the land.

RESPONSE: Additional Recommended Wilderness or Recommended LUD II designations would be consistent with ANILCA and would not restrict customary and traditional harvest activities, including reasonable access.

COMMENT: The Final SEIS should more clearly emphasize that neither Recommended Wilderness nor Recommended LUD II designations would restrict customary and traditional harvest activities by referencing Section 1314 of ANILCA, which allows for the taking of fish and game within Alaska wildernesses in accordance with Title VIII and other applicable state and federal laws.

RESPONSE: Wilderness exceptions associated with ANILCA are discussed in a number of locations in the SEIS, including the *Wilderness* section. The subsistence analysis presented in then SEIS incorporates all of the exceptions written into ANILCA.

COMMENT: Some respondents feel permanent protection of the Tongass National Forest is necessary to preserve subsistence resources. This issue relates to both short-term increases in harvest opportunities resulting from road construction related to timber sales, and to the long-term expected decrease in fish production due to loss of habitat quality related to timber harvest. Recent proposals to the Federal Subsistence Board, if adopted, would have precluded non-rural hunters, primarily from Ketchikan, from hunting on Prince of Wales Island. In addition, over the past decade, numerous timber sale EIS documents (e.g., Polk Inlet, Central Prince of Wales, Lab Bay, Control Lake, Revilla, and Gravina Island) have concluded that the proposed projects may result in a significant possibility of a significant restriction on subsistence hunting of deer within the project area. Given this recognition of the problems caused by their actions, it is incumbent on the Forest Service to use the opportunity presented by the SEIS to protect valuable habitat. They also thought the Final SEIS should be clear that continued logging will have negative effects on the availability of deer and ultimately result in hunting restrictions.

RESPONSE: The findings in the various timber sale EISs have usually verified findings included in the Forest Plan Final EIS which indicates in combination with other past, present and reasonably foreseeable future actions, one or more of the alternatives, if implemented through project-level decisions and actions, may result in a significant restriction of subsistence uses of deer, and possibly other land mammals, due to potential effects on abundance and distribution, and on competition.. Past timber harvest done in valley bottoms included high value deer winter range, which could create a high mortality situation in extreme winter weather conditions. Many of the EISs mentioned have avoided or minimized the amount of harvest on high value deer winter range. This often leads to a subsistence finding of no significant possibility of a significant restriction for the project, but that the result of cumulative effects of past harvest (as found in the Forest Plan Final EIS) could result in a significant possibility of a significant restriction. The current Forest Plan protects high value habitats important for subsistence. As noted on page 21 of the 1997 Forest Plan ROD, significant attention and appropriate protections were applied to the highest value community use areas for fish and wildlife. All of these protections are still in place and none will be affected by the SEIS except where an area may receive a LUD change to Recommended Wilderness or Recommended LUD II.

As for the proposal put before the Federal Subsistence Board to restrict Ketchikan hunters, this was dismissed because the health of the deer population on Prince of Wales Island did not merit such restrictions. Deer bag limits on Prince of Wales Island allow 4 (or more) deer, including females, per hunter during a 5 month hunting season. It should also be noted that each hunter can take 5 wolves on Prince of Wales Island. Similar seasons and bag limits can be found throughout much of Southeast Alaska. Potential conflicts are not unexpected in Southeast Alaska with more and more visitors coming to Alaska and inter-island travel being improved in areas where road access is available. The SEIS considers the potential conflicts associated with increased demands for fish and wildlife resources.

Additional levels of protection of habitats already protected by the Forest Plan and changing development LUDs to non-development LUDs is not likely to sufficiently address this problem. As demands increase, changes in seasons, bag limits, or other restrictive measures may be necessary to adequately manage these resources.

COMMENT: Some respondents felt the conclusion in the Subsistence section of the Draft SEIS that there may be some impacts to fish habitat from land management activities but the magnitude of these effects could not be calculated is inconsistent with earlier findings, specifically the results of the panel analysis presented in the 1997 Forest Plan FEIS.

RESPONSE: The results of panel assessments described in part on page 3-64 of the 1997 Forest Plan Final EIS has been used out of context. As noted on page 3-56 of the Final EIS, the panel did not have available to them Alternative 11, which is most reflective of the Forest Plan. Alternative 11 was designed to address the results/findings of the panel assessments. Additional panel assessment work was done on Alternative 11. As noted in the 1997 Record of Decision, the Forest Plan requirements meet or exceed those recommended by the various assessments.

COMMENT: Some respondents felt the Final SEIS should address the effects of blocked culverts on subsistence fishing.

RESPONSE: The Forest Service does not expect fish passage concerns being addressed on existing National Forest System roads to have any noticeable effect on subsistence fishing. Please refer to the 2001 Forest Monitoring and Evaluation Report for more information.

COMMENT: Some respondents indicated subsistence is not a reason to recommend additional wilderness. The Final SEIS should take a realistic look at the coexistence of timber management and subsistence. They further indicated Congress already addressed the subsistence concerns and the need to avoid logging in certain areas near communities in the 1990 TTRA. Further, they contend managed second-growth stands can provide wildlife habitat as well as economic timber.

RESPONSE: The current Forest Plan provides an appropriate balance between timber management and subsistence. As noted on page 21 of the 1997 Forest Plan ROD, significant attention and appropriate protections were applied to the highest value community use areas for fish and wildlife. All of these protections are still in place and none will be affected by the SEIS except where an area may receive a LUD change to Recommended Wilderness or Recommended LUD II. Management of second growth to enhance wildlife appears to have good potential. Of most concern for wildlife habitats associated with subsistence is related to important deer winter range where stands of timber need to sufficiently intercept heavy snowfalls to allow for deer movement and forage.

COMMENT: Several tribal representatives and others expressed concern for safeguarding the subsistence rights and opportunities in traditional tribal use areas, including Hoonah, Sitka, Admiralty Island, Berners Bay, Kake, Kuiu, and others. Some respondents questioned the adequacy of information included in the SEIS regarding subsistence resources and uses, particularly the economic benefits relative to subsistence and the customary and traditional uses related to subsistence.

RESPONSE: It is the policy of the Tongass National Forest to provide for the continuation of the opportunity for subsistence uses by rural Alaskan residents, both Native and non-Native.. The policy also includes maintaining reasonable access to subsistence resources as required by ANILCA. The SEIS addresses subsistence in sufficient detail to aid the Deciding Official in making an informed decision regarding recommendations for wilderness or LUD II. Additionally and as noted in Chapter 3 of the SEIS, potential effects on subsistence and other resources have been disclosed in the 1997 Forest Plan Final EIS and have been incorporated by reference rather than being extensively repeated in the SEIS. The SEIS includes alternatives that provide varying levels of long-term protection to traditional use areas on the Tongass.

Recreation and Tourism

COMMENT: One respondent noted that the Draft SEIS stated "supply is projected to continue to exceed demand for ROS 1 (P and SPNM)." A few pages later, the Draft SEIS included the statement "many businesses provide boat or aircraft access for wildlife viewing and other activities have a low tolerance for the presence of other groups in the same area." They concluded that these statements mean that designating more Wilderness or LUD II areas on the Tongass would increase the opportunity for many businesses to meet client expectations. The Final SEIS, they stated, should consider how the proposed alternatives would respond to this stated need and integrate this information into its analysis of the economic and social effects of the alternatives.

RESPONSE: The conclusion drawn in this comment that certain outfitter/guide businesses have a low tolerance for the presence of other groups and that designating more Wilderness or LUD II areas will help businesses meet client expectations is not necessarily true. Designating areas Wilderness or LUD II would not create any more undeveloped areas. In most cases it would simply represent a change from a non-development LUD classification. In some cases it would prevent future development, but these areas represent a relatively small portion of the Tongass. In addition, designating additional Wilderness could negatively affect other types of outfitter/guide businesses that would be constrained by limits on group size. This is discussed in both the Draft and Final SEIS documents.

The recreation and tourism analysis presented in the *Economic and Social Environment* section of the SEIS assesses how the LUD designations in identified recreation places would be affected over a 150 year planning horizon under each alternative, and this is compared with projected demand for different types of recreation. The short-term recreation and tourism effects analysis provides the same type of analysis for recreation places over the next decade. The analysis presented in the *Recreation and Tourism* section assesses long-term Forest-wide changes to ROS settings.

COMMENT: One respondent noted that data presented in the Draft SEIS suggest that not all existing Wilderness, LUD II, and Inventoried Roadless Areas are assigned to the Primitive (P), Semi-Primitive Non-Motorized (SPNM), or Semi-Primitive Motorized (SPM) ROS settings. The Draft SEIS identified a combined total of 16.2 million acres of existing Wilderness (5.8 million), LUD II (0.7 million), and Inventoried Roadless Areas (9.7 million), compared to a combined total of 14.8 million acres for P (10.3 million), SPNM (3.1 million), and SPM (1.4 million). This, they state, suggests that not all Inventoried Roadless Areas would be assigned to the Primitive ROS even if they were designated Wilderness or LUD II. Please explain.

RESPONSE: There are two main reasons why the current combined Wilderness, LUD II, and Inventoried Roadless Area acreage does not equal the combined P, SPNM, and SPM acreage. First, the LUD II acres are also included in the Inventoried Roadless Area total, which accounts for over half of the perceived discrepancy (0.7 million acres). Second, there are differences in how the boundaries of the Inventoried Roadless Areas and the different ROS settings are calculated, with respect to distance from roads. Inventoried Roadless Area boundaries are 1,200 feet from roads. This distance varies for the different ROS settings, but is typically greater, reducing the corresponding number of acres.

COMMENT: One respondent was unclear why designating an inventoried roadless area wilderness or LUD II would not increase the amount of acres allocated to the Semi-Primitive Motorized (SPM) ROS. The primary means of access to existing Tongass Wilderness and LUD II areas is via motorized watercraft or floatplane. Why would increases in the protection for inventoried roadless areas or shorelines not increase the amount of SPM ROS?

RESPONSE: ROS settings are not directly related to LUD classifications. Designating an inventoried roadless area wilderness or LUD II would not increase the amount of acres allocated to the SPM ROS because the portions of this area that may be accessed by motorized watercraft or floatplane, for example, would not change with a change in land use designation. Wilderness or LUD II designation would, however, prevent future development in some areas that are currently inventoried as SPM. This is

reflected in the Forest-wide ROS analysis presented in the recreation and tourism analysis, which projects a relative decrease in SPM acres under the No Action alternative (see Table 3.3-32).

The projections presented in Table 3.3-32 are based on a number of simplifying assumptions (see Table 3.3-32, footnote 2). There are two additional points that should be noted here. First, the objectives of the Forest-wide Beach and Estuary Fringe standards and guidelines include maintenance of an approximate 1,000-foot wide beach and estuary fringe of mostly unmodified forest. This standard and guideline would protect an important portion of shoreline SPM areas in development LUDs. Second, the ROS system is designed to help identify, quantify, and describe recreation settings, not provide management direction. Shoreline areas or other areas accessible by floatplane or helicopter that are presently allocated to P or SPNM settings could, for example, be reallocated to the SPM setting in the future if patterns of use or other factors change.

COMMENT: One respondent stated that the Forest Service should modify the recreation and tourism analysis in the Draft SEIS by redefining the SPM definition to exclude off-road vehicles and helicopters, and explaining how increases in Primitive ROS settings would not restrict traditional access to shorelines or suitable lakes in those areas by motorboat or floatplane.

RESPONSE: The ROS system is designed to assist in inventorying recreation settings. Allocating an area to a particular ROS setting does not provide management direction for that area, it simply describes the existing recreation setting. All areas on the Tongass are allocated to a Land Use Designation (LUD) and managed in accordance with the management prescriptions associated with that LUD. Although ROS settings do not provide management direction per se, the LUD management prescriptions do identify ROS settings that particular areas should be managed to meet. In the case of the existing Wilderness prescription, the Forest Service is directed to manage these areas for Primitive and Semi-Primitive ROS settings, while recognizing exceptions due to ANILCA authorizations. Approximately 61 percent of the Tongass National Forest is presently inventoried in the Primitive ROS setting. This total is not projected to increase under any of the alternatives. The analysis presented in the *Recreation and Tourism* section of the SEIS assumes that additional wilderness or LUD II designation would not reduce the supply of SPM ROS settings (see Table 3.3-32).

Changing the standards and guidelines of the SPM ROS class would be inconsistent with nationwide forest recreation planning efforts and would not affect the results of the analysis presented in the SEIS.

COMMENT: Several respondents were concerned that the recreation analyses presented in the SEIS project future recreation use based on actual use data compiled for the Tongass from 1984 through 1995. One respondent suggested that the Forest Service purchase data from the 2001 Alaska Travelers Survey conducted by the McDowell Group. In addition, the Forest Service could use the preliminary results from the National Visitor Use Monitoring (NVUM) survey conducted on the north third of the Forest in 2000 to project future Forest-wide use. The Draft SEIS notes a nine-fold increase in outfitter/guide use in shoreline areas on the north third of the Forest, why doesn't the Forest Service use these data to project future Forest-wide use?

RESPONSE: As stated in the SEIS, Forest-wide recreation use statistics were last compiled for the Tongass in 1996 and in the absence of more recent detailed information, the analyses presented in the SEIS use RVD data compiled from 1984 through 1995 to assess future conditions. The affected environment portion of the *Recreation and Tourism* section of the SEIS summarizes the most recent publicly available data on recreation and tourism use on the Tongass.

Data collected by the McDowell Group provide a snapshot of visitors to the State of Alaska in 2001. The McDowell Group compiled detailed information on visitors to Southeast Alaska, such as information on communities visited, length of visit, time spent in Southeast Alaska, and tour activities undertaken by cruise ship passengers. This information is not sufficient to project future recreation and tourism on the Tongass because it does not address total recreation use, just visitors, and it provides a one-time snapshot only.

The preliminary results of the NVUM survey, based on surveys of one-third of the Tongass, indicated that there were between 6 million and 10.5 million visits (an estimated 8.2 million visits with an error rate of plus or minus 27.5 percent) to the Tongass in 2000. This is a large margin of error that is expected to be reduced as the study continues. The SEIS notes that these data should be treated with caution. As noted in the *Economic and Social Environment* section of the SEIS, these data are not compatible with the RVD estimates developed through 1996 and, as a result, provide only a partial, one-time snapshot with a large margin of error that is not suitable to project future use.

The outfitter/guide use data referred to in the comment are for outfitter/guide use in shoreline areas on the north third of the Forest. These data are from a database of outfitter/guide use compiled by the Forest Service for the Shoreline Outfitter/Guide EIS. The Forest Service is in the process of compiling outfitter/guide use data for the rest of the Forest, but these data are presently incomplete. As a result, it is presently unclear how representative the shoreline data for the north third of the Forest are for outfitter/guide use on the rest of the Forest. In addition, these data only pertain to outfitter/guide use and do not address non-guided use, which comprises a large share of total use. It is unknown how representative trends in outfitter/guide use are of total use. These data provide only a limited perspective on recreation use trends on the Tongass and are not sufficient to project future levels of recreation and tourism.

COMMENT: One respondent noted that Appendix B of the 1997 Forest Plan identified a number of additional information needs for recreation, including:

1. **further develop and apply methods for determining rates of recreation use stratified by activity and for specific locations on the Forest**
2. **evaluate the long-range demand for recreation activities, opportunities, and setting preferences**
3. **update information on benefits realized by recreationists and the values of recreation to local and regional economies**

What steps has the Forest Service taken to collect this information and why isn't it used in the SEIS analysis? How much would it cost to collect the appropriate information? Why doesn't the Forest Plan monitoring and evaluation plan require the Forest Service to collect data regarding the number of annual visitors to Tongass wilderness areas and the number of guided recreational/tourism users on the Forest for each ROS class?

RESPONSE: Appendix B of the 1997 Forest Plan identifies priority research important for further plan amendment and lists additional data and information needs that will help implement the plan. The three items noted in the above comment were included in the information needs identified by resource specialists on the Tongass, considering input from within the Forest Service, other Federal agencies, state and local governments and universities, and public comment. As noted in Appendix B, this information may considerably improve the knowledge base on which the next revision is developed and on which this plan is implemented.

As discussed in the Tongass Monitoring and Evaluation 2001 Report (USDA Forest Service, 2002h), which is available on the Tongass National Forest web site, the Forest Service is presently pursuing the high priority needs identified in Appendix B of the Forest Plan. Ongoing research is discussed on pages 2-89 and 2-90 of the monitoring report. This includes efforts that are underway to develop recreation/tourism planning and research goals for the Alaska Region. Initial research directions include: (1) demand for forest-based recreation/tourism, (2) role of recreation/tourism in local economic development, and (3) allocation and pricing of recreation/tourism opportunities. In addition, the Forest Service is also examining recreation and tourism as an economic sector and the impacts of recreation and tourism on local economies. The Forest Service has participated in interagency steering committee meetings associated with drafting and conducting surveys of (1) Southeast Alaska outfitter/guides, (2) visitors to Southeast Alaska, and (3) Alaska resident in-state travel patterns and recreation use of public lands. The available results of these surveys are incorporated in the SEIS, as appropriate.

Appendix B identified the costs associated with the identified priority research items. It did not identify costs for the items identified as additional data and information needs. The cost of collecting this information is not expected to have any bearing on the current decision.

As noted in the SEIS, the Alaska Region of the Forest is currently participating in the NVUM project. This is a four year project, with surveys scheduled on the Tongass for 2000, 2002, and 2003. The preliminary results of this study are included in the SEIS. Annual wilderness visitation data and outfitter/guide data by ROS setting were not identified as monitoring and evaluation items in the Forest Plan (see Chapter 6 of the Forest Plan). Wilderness visitation data is, however, being collected as part of the NVUM study and the Forest Service is presently developing a Forest-wide GIS database that displays the locations of outfitter/guide use on the Tongass. Outfitter/guide data for 2000 for the north third of the Forest (Juneau, Sitka, and Hoonah ranger districts and Admiralty National Monument) are now available and have been added to the *Recreation and Tourism* section of the Final SEIS.

COMMENT: One respondent commented that the Draft SEIS failed to adequately distinguish between the effects of Alternative 6 and 8 on recreation and tourism because it did not specifically recognize the difference between the potential effects of Recommended Wilderness and Recommended LUD II, with respect to facility development and group size.

RESPONSE: The portions of the Draft and Final SEIS that address the potential effects of the alternatives on recreation facilities and group sizes distinguish between Recommended Wilderness and Recommended LUD II designations, as appropriate. The *Recreation and Tourism* effects discussion has, however, been revised in the Final SEIS to distinguish more explicitly between alternatives 6 and 8, by stating that potential restrictions would be different under Recommended LUD II than under Recommended Wilderness.

COMMENT: One respondent felt that the SEIS mis-characterized the impacts to recreation and tourism of additional wilderness designation in the Tongass. The SEIS summary (page S-5), they stated, leads the public and decision-makers to believe that limiting new road construction by designating additional wilderness will have a negative impact on employment and income within the recreation and tourism industries. Many people will only read as far as the summary text of this document. This section leaves the impression that new Wilderness or LUD II recommendations would have negative effects on tourism-related employment and income, when the analysis shows the opposite.

RESPONSE: This comment appears to be confusing the brief descriptions of the key issues that begin the summary with the effects analysis. The text that the respondent quotes introduces the issue and is intended to succinctly present both sides of the issue. It is not a summary of the results of the analysis. The summary of results is presented on page S-18 of the Draft SEIS. A sentence noting that this section of the Executive Summary does not present the results of the analysis has been added to the Final SEIS.

The analysis presented in the Draft SEIS assesses the effects of the alternatives on future recreation and tourism-related employment and income over the next decade. The findings of this analysis indicate that there would be very little difference between the alternatives in terms of employment over the first decade, with Alternatives 6 and 8 showing very minor annual job increases (less than 10 jobs) over the other alternatives. As stated in the Summary of the Draft SEIS (page S-20), the differences between the alternatives are small because the Semi-Primitive Motorized ROS setting is the only one where supply exceeds demand in the first decade and the effects related to harvest activity have had little time to accumulate.

COMMENT: One respondent noted that the Draft SEIS (p.S-5) focuses on the potential use restrictions related to locations for tourism and recreation developments and the size of groups using the Tongass. Other users are mentioned in the analysis, but not as key components of the underlying values and concerns. Framing the issue in this way, they believe, excludes potential

added values perceived by commercial users such as guides and outfitters, wilderness adventures, and the watchable wildlife aspects of even the largest cruise ship tours.

RESPONSE: The current Forest Plan provides numerous wilderness and other wildland areas with natural resource attractions and recreation opportunities, with 88 percent of the Forest presently inventoried in Primitive and Semi-Primitive ROS settings. The recreation and tourism analysis presented in the SEIS assesses the potential effects of the alternatives on recreation and tourism. This analysis assesses the long-term Forest-wide changes (up to 150 years into the future) in ROS settings that would occur under each alternative. The percentage of the Forest projected to be in Primitive and Semi-primitive ROS settings after 150 years would range from 77 percent under Alternatives 1, 2, and 4 to 87 percent under Alternatives 6 and 8.

The existing wilderness and other wildland areas, along with the current protections in place, which would remain under all alternatives, are expected to continue to offer a wide range of opportunities for commercial recreation businesses under all alternatives.

COMMENT: One respondent stated that the Final SEIS must conduct a more balanced analysis of the impacts of the various alternatives on recreation and tourism. The recreation analysis, they argue, fails to clearly explain that additional logging and road building will exacerbate a current shortage of opportunities for semi-primitive motorized (SPM) recreation on the Tongass. Instead, it makes it seem as though there is a shortage of roaded recreation opportunities and that additional wilderness would only make this situation worse. Since boat and floatplane access do not generally require use of roads, this analysis cannot be used to support the claim that prohibitions on roads and/or logging in roadless areas would likely reduce future recreation development opportunities. Indeed, logging will, for many years, transform the "natural appearing shorelines, lakes and rivers" that constitute the attraction for SPM recreationists.

RESPONSE: The effects of the alternatives on ROS settings after 150 years of implementation are presented in Table 3.3-32 and discussed in the text of the Draft and Final SEIS documents. The assumptions used to project changes in these settings are summarized in the footnotes to Table 3.3-32. This table shows that there would be more acres in SPM under Alternatives 6 and 8 than under the other alternatives and this is stated in the text in both the Draft and Final SEIS documents. This is also stated in the Comparison of Alternatives portion of the Executive Summary. A sentence noting that the reductions in SPM settings would be the result of development activities has been added to the *Executive Summary* and *Recreation and Tourism* sections of the Final SEIS.

The SEIS notes in several locations that the supply of roaded recreation opportunities in identified recreation places presently exceeds demand. Inventoried SPM settings in recreation places on the Tongass are primarily located in areas that are accessed via motorized watercraft. This statement has been added in several locations in the Final SEIS to help further clarify that existing SPM settings would not be negatively affected by reductions in projected road construction. It may also be noted that the current Forest Plan generally does not allow the shorelines, lakes and rivers to be transformed by logging because of the protections built into the Plan.

The recreation and tourism analysis is not used to support claims that prohibitions on roads and/or logging would reduce future recreation development opportunities. Designating areas Wilderness would, however, reduce the possibility of certain types of recreation development, as discussed in the *Recreation and Tourism* section. These restrictions are not a function of the absence of logging or road building, rather they are the result of management guidelines for Wilderness. This is explained in the SEIS.

COMMENT: One respondent commented that the Draft SEIS states that current data is not available on the number of visitors to Wilderness on the Tongass. Why isn't this data available? Doesn't the agency keep records from commercial operators who take clients to wilderness areas? Doesn't the Forest Service have data on cabin use, visits to Pack Creek, etc?

RESPONSE: The Forest Service does maintain records on outfitter/guide use on the Tongass. As stated on page 3-101 of the Draft SEIS, "Forest Service records indicated that commercial guides

reported 4,400 client service days in wilderness during the sample year (2000)." Data is not, however, currently available on the total number of visitors, which would include those visitors who do not use outfitter/guide services.

The Forest Service is presently compiling a Forest-wide outfitter/guide use database. Data are currently available for 2000 for the north third of the Forest (Juneau, Sitka, and Hoonah ranger districts and Admiralty National Monument). These data are presented by LUD group (including wilderness) and activity in the *Recreation and Tourism* section of the Final SEIS.

COMMENT: One respondent noted the following statement in the Draft SEIS "None of the interviewed wilderness visitors used the services of a commercial guide" and asked what the implications of this statement are for the SEIS analysis.

RESPONSE: This comment refers to the National Visitor Use Monitoring (NVUM) survey, which sampled 31 individuals. Given that this is a small sample at one location on a Forest with 5.7 million acres of wilderness, it is unwise to try and extrapolate these findings to all wilderness or to the Tongass as a whole. The results of the first year of the NVUM program should be regarded as preliminary as stated throughout the SEIS.

COMMENT: One respondent stated that the Final SEIS should acknowledge the positive effects that the timber and mining industries have on tourism. Much of the infrastructure used to support visitors was made possible through the year round economy created by the timber industry. Many of the facilities that are used today are in towns that were once logging camps. Hiding timber management from view, this respondent argued, is a disservice to the public. Part of Tongass management is timber harvest. As such, it is part of what the visitor and the public should view and understand. Mining activities provide similar opportunities.

RESPONSE: The wood products industry has played an important role in the development of Southeast Alaska . The infrastructure it created provides access to many of today's popular recreation areas. Some visitors may be interested in seeing the effects of commercial forestry on the landscape. However, surveys of visitors suggest that the main attraction for visitors to the region is the opportunity to see and experience vast, awe-inspiring, untamed land, and its wildlife (see the Recreation and Tourism section of the SEIS). The Scenery standards and guidelines in the 1997 Forest Plan are designed to protect the scenic resources of the Tongass National Forest for visitors and residents while providing for timber management activities. Opportunities for the public to learn about past and ongoing harvest activities are readily available on the Tongass, and visible from cruise ships and communities in a number of locations.

Mining activities on the Tongass might be used to provide recreation and tourism opportunities if mine operators are interested in pursuing this type of activity.

COMMENT: Some respondents indicated that wilderness designation would have negative economic effects on local communities because it would limit the types of development that would be necessary to foster growth in recreation and tourism.

RESPONSE: The potential effects of wilderness or LUD II designation on recreation developments are assessed in the *Recreation and Tourism* section of the SEIS. The *Recreation and Tourism* analysis also assesses the effects of the alternatives on recreation-related capital improvement costs proposed for the period 2003 to 2006. This analysis suggests that only one project would need to be scaled back if the area it were proposed for were recommended Wilderness.

COMMENT: One respondent noted that the statement that, "Wilderness designation *could* limit the development of commercial recreation facilities and restrict use by outfitter/guides that serve large group clients" (emphasis added) on page 2-56 of the Draft SEIS is incorrect. The 1997 Forest Plan specifically states that the installation of major or minor facilities is prohibited in areas designated Wilderness and that group sizes will be restricted to a maximum of 12 people.

There is no reason to be evasive on these issues when there is clear direction specific in the prescriptions currently being implemented.

RESPONSE: The text referenced on page 2-56 of the Draft SEIS is a brief discussion of the issues and is intended to provide a balanced overview of concerns about recreation. The analysis of the effects of wilderness on recreation facilities and use is presented in the *Recreation and Tourism* section of Chapter 3 of the SEIS. This analysis provides an assessment of the potential effects of wilderness designation based on the prescriptions provided in the 1997 Forest Plan. This includes an assessment of the effects of wilderness designation on facilities by alternative and the effects on group sizes. It may also be noted that the exact wording in the Forest Plan with regard to group sizes is as follows:

"Generally consider a party size of no more than 12 persons for any one site or activity. Allow for case-by-case exceptions with District Ranger approval, for special circumstances such as safety concerns, youth groups, one time only guided tours, and resource protection."

Heritage Resources

COMMENT: Some respondents expressed concern for safeguarding the cultural diversity of Southeast Alaska. They do not feel that the current Forest Plan provides extensive protection for heritage resources. Similarly, some respondents were concerned about protection of customary and traditional use areas. Some respondents thought the SEIS overstated the potential effects of wilderness designation on customary and traditional uses.

RESPONSE: The Tongass Forest Plan maintains a heritage resource management program that identifies, evaluates, preserves, and protects heritage resources on a Forest-wide and project scale. This program ensures compliance with the National Historic Preservation Act, American Indian Religious Freedom Act, the Archaeological Resources Act, the Native American Graves Protection and Repatriation Act, and other pertinent laws and regulations designed to assure protection of these resources. The Forest Plan also directs coordination of the management of heritage resources with the State Historic Preservation Office and the Advisory Council on Historic Preservation. Similarly, the Forest Plan encourages coordination of the management, access, and use of forest products to perpetuate Alaska Native culture and art forms. Collectively, heritage resources are managed to assure their protection while also promoting customary and traditional uses and practices. Areas recommended for wilderness or LUD II would in general provide for a higher level of protection of heritage resources found within them because less development activities are likely to occur. Customary and traditional uses generally would not be restricted in recommended wilderness or LUD II areas. If these lands are designated by Congress as wilderness or LUD II, it is expected that they would be consistent with similar areas already designated in Southeast Alaska by ANILCA and TTRA, which specifically provide for continuation of customary and traditional uses. However, wilderness may be somewhat more restrictive if the means of access or proposed activities associated with heritage, or other resources, could adversely affect the wilderness character or attributes. This is the case currently and is not expected to be different for additional wildernesses if so designated.

COMMENT: Some respondents were uncertain as to how the SEIS could affect the rights and land claims of Alaska Natives, including outstanding Native Allotment claims. At least one respondent wanted to know if the proposed alternatives in the SEIS precluded any future land claims by Alaska Native veterans.

RESPONSE: The Alaska Native Claims Settlement Act (ANCSA) was enacted to settle native aboriginal land claims in the State of Alaska. The Alaska Statehood Act affected issues relative to native land claims, but did not purport to resolve them. The primary purpose of the Alaska National Interest Lands Conservation Act (ANILCA) was to complete the allocation of federal land in Alaska, a process begun with the Statehood Act in 1958 and continued in 1971 in the Alaska Native Claims Settlement Act. The 1997 Forest Plan and the SEIS are not in conflict with any of the laws pertaining to protection and land claims of Alaska Natives. Additionally, as provided for in the Wilderness Act, ANILCA, and TTRA, access to private properties, valid claims, and other valid existing rights will continue as in current wilderness and

LUD II areas. Newly designated areas most assuredly would provide for valid existing rights. None of the alternatives considered in the SEIS would preclude eligible Alaska Native Veterans from pursuing land claims as provided in the 1998 Native Veterans Allotment Act. However, if Congress designates wilderness, all land claims that have not been awarded within the proposed wilderness, including inactive mining claims or Native land claims, may be deemed invalid by the Act or at some specified time in the future. Resolution of particular land claims is outside the scope of the SEIS.

COMMENT: Some respondents suggested that areas rich in cultural resources be designated as wilderness or LUD II to protect the heritage resources found there. Some also questioned the distinction between the management prescriptions in Appendix D applicable to Recommended Wilderness and Recommended LUD II areas for heritage resources.

RESPONSE: Each Roadless Area Description in Appendix C of the SEIS includes a section, which summarizes the social, cultural and historic values within the area. The Wilderness Attribute Rating System also recognizes which roadless areas have rich heritage resources. This information is available to the Deciding Official to aid in making informed decisions regarding whether or not to recommend a specific roadless area for wilderness or LUD II. Appendix D in the SEIS includes sections for Heritage Resources and includes appropriate linkages to the Forest Plan Heritage Resource management and protection requirements. Note that the standards and guidelines in Appendix D for Recommended Wilderness and Recommended LUD II are similar, except the Recommended LUD II requirements provide for more flexibility than Recommended Wilderness. For example, under Heritage Resource Activities in Recommended Wilderness, it encourages interpretation of heritage resources of a given area, provided that such interpretation is done outside the area. Recommended LUD II does not restrict interpretation within a given area so long as the activity does not preclude the area's eligibility to be designated LUD II by Congress.

COMMENT: Some respondents were concerned with the accuracy of information in the Draft SEIS relative to the early development of the village of Kake.

RESPONSE: The text of the Individual Community Assessment section of the Final SEIS has been revised to reflect the villages and fishing camps in the Kake area pre-date non-Alaska Native explorations of Southeast Alaska.

Economic and Social Environment

Regional Economy

General

COMMENT: One respondent stated that the Draft SEIS presents a biased picture of the regional economy because it only considers trends over the last decade and compares Southeast Alaska with the United States. This, they argue, suggests that the regional economy is performing more poorly than it actually is. Longer-term trends for Southeast Alaska (1980 – 2000), they noted, are comparable with trends for Alaska as a whole, with income, employment, and population growing at healthy rates.

RESPONSE: The choice of end points for this type of comparison invariably has some influence on the results. The intent of the regional economic overview presented in the SEIS is to provide an overview of recent trends in Southeast Alaska. Tracking these changes over a decade and comparing them to national trends is a standard approach to this type of analysis. Table 3.4-1—Southeast Alaska Economic Overview has been expanded in the Final SEIS. The revised Table 3.4-1 presents selected economic data for Southeast Alaska for 1980, 1990, and 2000 and provides the corresponding data for the State of Alaska and the United States for comparison purposes.

COMMENT: Some respondents said the Forest Service needs to recognize that the economy of Southeast Alaska has undergone significant transition in recent years. Recreation and tourism and fishing represent the future of the regional economy and this should be reflected in management of the Tongass. Logging and road building, they stated, negatively affect employment in the recreation and tourism and commercial fishing industries and also have negative effects on subsistence. Wilderness designation would reduce logging and road building and have positive effects on recreation and tourism, commercial fishing, and subsistence.

RESPONSE: The SEIS highlights the importance of recreation and tourism to the regional economy, as well as local communities and provides an overview of recent trends in this industry. A new section titled *Alaska in Transition* has been added to the Final SEIS. This section draws upon and consolidates information presented elsewhere in the document to help establish the context for the SEIS. The SEIS assesses the potential effects of the alternatives on recreation and tourism and subsistence. The effects on commercial fishing are not expected to differ significantly between alternatives.

The 1997 Forest Plan represents a balanced approach to management of the Tongass. The Plan includes land use designations and standards and guidelines designed to protect the natural environment and the recreation and tourism and fishing industries that depend upon it, while allowing some areas to be available for timber management.

COMMENT: Some respondents indicated the economic analysis in the Final SEIS should address the negative effects that logging and road building would have on the commercial fishing and fish processing industries.

RESPONSE: While it is recognized that alternatives 6 and 8 pose less risk to fish habitat than the other alternatives, there is not expected to be any significant change to the commercial fishing or fish processing industries as a result of National Forest activities under any alternative. This is explained more fully in the Final SEIS. Future timber management activities would be conducted in accordance with the Riparian Management standards and guidelines established in the 1997 Forest Plan, which greatly reduce the risk of negative effects on fish in development LUDs. A detailed analysis of the commercial fishing or fish processing industries is not provided in the SEIS because there would be very little variation between alternatives. This approach is consistent with NEPA, Forest Service planning guidance, and the analysis provided in the 1997 Tongass Land Management Plan Revision Final EIS.

COMMENT: One respondent stated that contrary to statements made in the Draft SEIS, the Southeast Alaska fishing industry is largely resident. The troll fleet is 85% resident and the largest salmon fleet in the state. Most troll permit holders live in Southeast Alaska. The gillnet fleet has a high level of residency and about half the seine fleet is resident. Statewide, the harvesting sector is about 70 percent resident.

RESPONSE: The Draft SEIS states that the commercial fishing and seafood processing industries are generally characterized by high degrees of nonresident participation. Figure 3.4-3 in the SEIS indicates that residents accounted for approximately 66 percent of fish harvesting employment in Southeast Alaska in 1994, which is comparable to the 70 percent estimate in the comment. Residents comprised a much smaller share of the fish processing industry in Southeast Alaska in 1994, accounting for approximately 24 percent of total employment (Figure 3.4-3). Statewide, nonresidents accounted for 73.3 percent of seafood processing workers and 58.3 percent of fishers and related fishing workers in 2001 (Alaska Department of Labor [DOL], 2003). The text in the Affected Environment section that discusses the commercial fishing and seafood processing industries has been revised in the Final SEIS and is more specific about the degree of nonresident participation.

COMMENT: Respondents stated the Final SEIS should address dive fisheries and their contribution to long-term economic stability.

RESPONSE: A brief note on dive fisheries has been added to the commercial fishing and seafood processing discussion in the Final SEIS. This note is brief because dive fisheries are not expected to be significantly affected under any of the alternatives.

COMMENT: Some respondents stated that the Final SEIS should address the impacts that log transfer facilities (LTFs) and associated activities would have on the shrimp industry.

RESPONSE: The Final SEIS does not address the potential environmental effects of log transfer facilities (LTFs) because the analysis presented in this document is programmatic rather than site specific. It is, however, important to note that under the 1997 Forest Plan there are guidelines that must be followed during the siting, construction, and operation of LTFs. These guidelines are designed to protect the natural environment and resources, including the shrimp fishery. These guidelines are presented in Appendix G of the 1997 Forest Plan.

COMMENT: Some respondents noted that while tourism is a growing industry, it fluctuates with the national economy and in many cases does not provide year-round employment. According to these respondents, the Tongass National Forest should allow continued logging and fishing to provide for a viable economic future.

RESPONSE: The SEIS provides a regional economic overview that identifies the relative contributions that different economic sectors make to the economy of Southeast Alaska, as well as providing more detailed discussions of the recreation and tourism, wood products, and commercial fishing industries. The effects of the proposed alternatives on the wood products industry are assessed in the *Timber* and *Economic and Social Environment* sections of the SEIS. None of the alternatives are expected to have significant effects on commercial, recreational, or subsistence fishing.

COMMENT: One respondent said the Draft SEIS overstates timber employment and understates recreation employment by presenting data for 1999 rather than 2002 data from the Alaska Department of Labor, which are readily available.

RESPONSE: The employment data that this comment refers to are used to characterize employment in Southeast Alaska with particular emphasis placed on natural resource-based employment. Data were presented for 1999 rather than 2002 because 1999 was the most recent year that data were available at a sufficient level of detail to estimate employment in the recreation and tourism sector. Timber employment data for 2000 were presented on pages 3-204 and 3-205 of the Draft SEIS. Detailed ADOL employment information is now available for 2001 and these data are used to estimate natural resource-based employment in the Final SEIS. The Wood Products industry description in the *Economic and Social Environment* section has been updated to include 2001 data and also references the data for 2002 that were available when the document was prepared.

COMMENT: One respondent noted that Sitka is often identified as one of the survival stories of the downturn in the wood products sector because there continues to be a demand for housing. They suggest that much of this demand is for second homes or housing for seasonal workers. The Final SEIS, they argue, should reserve judgement on how well Sitka and other Southeast Alaska communities have survived the wood products downturn.

RESPONSE: The SEIS provides summary demographic and economic information for 32 communities located in Southeast Alaska. Data is also provided at the community group, borough/census area, and regional levels. Trends in employment and per capita income in the City and Borough of Sitka are summarized in the Subregional Overview and Communities portion of the *Economic and Social Environment* section of the SEIS. These data indicate that total employment increased by 3 percent in Sitka between 1990 and 2000, while per capita income declined by 1 percent over the same period. The

population in Sitka also increased by 3 percent over this period, increasing from 8,588 in 1990 to 8,835 in 2000. Summarizing the changes in Sitka from 1993, the year that the APC pulp mill closed, to 2001, Gilbertson (2003a) noted that the population in Sitka has declined since its historical peak in 2003, total employment has increased slightly, and average real wages have fallen. Gilbertson concluded that Sitka appears to have "survived" the downturn in its economy caused by the pulp mill closure with its economy regaining much of its former prosperity. He suggests that Sitka has been more resilient than most communities, in large part because it has a relatively diversified economy (Gilbertson, 2003b).

While the community of Sitka does not appear to have been as negatively affected by the closure of the pulp mill as some predicted, the effects have been felt by the workers who lost their jobs. By 2001, 57 percent of the former pulp mill labor force were no longer employed in Alaska, 43 percent had left the state and 14 percent were in the state but had left the workforce, most likely retired. Only 25 percent of the former pulp mill workers were still living and working in Sitka (Gilbertson, 2003b).

Timber

COMMENT: One respondent stated that the Forest Service should be "honest and forthright" in the SEIS regarding timber industry restructuring in the Southeast Alaskan and global forest products industry, and describe how this relates to its economic analysis.

RESPONSE: Current timber industry restructuring is discussed in detail in the *Economic and Social Environment* section of the SEIS. This discussion characterizes the current status of the Southeast Alaska timber industry based on available reports and other published information. This information is incorporated in the wood products industry effects analysis presented in the Environmental Consequences portion of the *Economic and Social Environment* section of the SEIS.

COMMENT: One respondent thought that the Draft SEIS overestimates the contribution that the wood products sector makes to the regional economy of Southeast Alaska and stated that Figure 3.4-2 in the Draft SEIS incorrectly indicates that the wood products sector accounts for 13 percent of total regional employment.

RESPONSE: Figure 3.4-2 in the Draft SEIS shows the distribution of natural resource-based industry by sector. This figure illustrated that in 1999 wood products comprised 13 percent of natural resource-based employment in Southeast Alaska, *not* 13 percent of total employment in Southeast Alaska. As shown in Table 3.4-3 in the Draft SEIS, wood products comprised 3 percent of total employment in Southeast Alaska in 1999 and accounted for 5 percent of total earnings. These figures have been updated in the Final SEIS using 2001 data. Wood products comprised 9 percent of natural resource-based employment in Southeast Alaska in 2001, and 2 percent and 3 percent of total regional employment and income, respectively.

COMMENT: One respondent noted that while the economic and social environment section in the Draft SEIS discussed the change in employment over time as timber harvests declined, the community impacts section seemed to measure the impacts from the current employment levels. Employment and income effects, they suggested, should be based on an annual harvest of 300 MMBF, which would be necessary to restore the viability of the industry.

RESPONSE: The community-level discussions address current employment levels in the wood products and other industries, as appropriate, to provide some indication of the effects that the alternatives could potentially have on these communities. The long-term and short-term effects analysis evaluates the potential impacts of the alternatives using several different measures. The maximum short- and long-term estimates are based on the projected annual harvest of the NIC I component of the Allowable Sale Quantity (ASQ) and not on current levels. Under the current Forest Plan, the average annual ASQ over the next decade is 267 MMBF. The scheduled yield from Alternative 1 (No Action) in the SEIS analysis is estimated to be 259 MMBF, slightly less than 267 MMBF. This difference is a result of changes in small old-growth reserves and land ownership, as well as revised mapping of the vegetation layer and

differences in the methodology used to calculate the ASQ. Alternatives 2 and 4 would also have ASQs of 259 MMBF. This number would be reduced under the other alternatives. None of the scenarios evaluated in the SEIS would allow an average annual harvest of 300 MMBF.

COMMENT: Several respondents felt that the Final SEIS should analyze the role of second-growth forests and its relationship to meeting the ASQ on the Tongass. They also stated that the Final SEIS should address the potential for local communities and small-scale regional or community-based forest products companies to benefit from thinning second-growth forests, restoring degraded habitat, and modernizing inefficient mills for processing of smaller diameter saw logs.

RESPONSE: Most of the second growth on the Tongass is still too small for commercial use and will take several decades to reach maturity. Second-growth forests are, however, included in the ASQ projections that were developed for the 1997 Forest Plan and form the basis of the projections in the Draft and Final SEIS, because these projections span 16 decades. The contribution made by second growth forests to the ASQ is expected to increase over time as they mature and become available for harvest, including thinning.

Ongoing research and studies, conducted in conjunction with local industry, the Pacific Northwest Experiment Station, and others, are actively testing wood and potential products from second growth harvests in Southeast Alaska. A commercial second growth thinning project is currently being planned on Heceta Island. The Forest Service operates an ongoing program of pre-commercial thinning and much of the acreage previously harvested on the Tongass has already been pre-commercially thinned. The alternatives are not expected to affect this program.

COMMENT: Some respondents stated that the Tongass National Forest should provide an adequate supply of timber to support the Southeast Alaska timber industry, which is an important part of a diversified regional economy. Several respondents noted that this supply needs to be stable and predictable.

RESPONSE: A primary goal of the existing Forest Plan is to provide for the sustainability of the resources of the Tongass National Forest, while directing the coordination of multiple uses, such as outdoor recreation, timber, wildlife, fish, watershed, and wilderness. Providing a mix of goods and services that maximize net public benefit consistent with multiple-use and the sustained yield of all renewable forest resources is important.

COMMENT: Some respondents stated that the timber industry is the economic backbone of Southeast Alaska providing relatively high paying year round jobs. Without a fully integrated forest products industry, local operators are at a competitive disadvantage. The continued uncertainty surrounding Federal land use policy in Southeast Alaska has effectively stopped new capital investment in any timber-related operation and stifled investment in non-timber operations.

RESPONSE: The relative contribution of the wood products industry to the regional economy, specific boroughs and census areas, and individual communities is discussed in detail in the SEIS. The potential effects of uncertainty on investment in the wood products industry is noted in the affected environment portion of the *Regional Economy* section of the Final SEIS that discusses the wood products industry.

COMMENT: One respondent stated that the Final SEIS should analyze and disclose the significance of a body of highly regarded, empirical research that has found a correlation between timber dependency and rural poverty in its community-level social impact assessments.

RESPONSE: The findings of research linking timber dependency with rural poverty have limited relevance to the issues addressed in the SEIS and would not affect the results of the analysis. Researchers have found that negative aspects of timber dependency include a lack of economic diversity and limited employment options. Dependence on a single economic sector, such as timber, can result in

some communities being vulnerable to changing market conditions. As discussed in the SEIS, employment in the wood products sector in Southeast Alaska has declined dramatically over the past decade and this has had negative effects on local communities. The wood products sector does, however, continue to play an important role in a number of Southeast Alaska communities.

Recreation

COMMENT: Some respondents felt the Draft SEIS incorrectly excludes resident recreation activities from the regional economic analysis. One respondent pointed out that if there were no recreational opportunities in Southeast Alaska, then residents' demand for recreation would be unmet and residents would have to travel outside the region for recreation, resulting in a leak of dollars from the regional economy. They noted that from an economic development perspective, keeping dollars within the economy has the same effect as bringing in new dollars through commodity or other exports.

RESPONSE: The regional economic analysis assesses recreation and tourism over the next decade based on projected demand and variations in supply by alternative. Table 3.4-20 in the Final SEIS provides the results of this analysis for both resident and non-resident recreation. The final summary only includes the non-resident recreation component, which is estimated to be 44 percent. This approach is consistent with traditional economic base approaches to modeling the role of recreation in the regional economy. It is also consistent with the approach taken in the 1997 Tongass Land and Resource Management Plan. Multipliers are used to analyze the effect of “new” money coming into the regional economy. Expenditures by local residents represent a recirculation of money that is already present in the regional economy and are, therefore, not typically identified as “new” money. However, as the comment notes, if residents are substituting local recreation for non-local recreation then their money can be considered to be money that would otherwise not be present in the local economy. The extent to which this is the case can only be identified by surveying local residents and asking detailed questions about their substitution decisions with respect to Tongass-based recreation (Rudzitis and Johnson, 2000). This type of information is not available for the Tongass and, more importantly, inclusion of resident recreation-related employment in the final summary table would have very little effect on these results, which show very little difference across the alternatives under either scenario.

COMMENT: Some respondents thought the Final SEIS should quantify recreation activities that are dependent on passive use of the Forest and include estimates of the associated employment and income in the environmental effects analysis. One respondent suggested that the findings of the Alaska Division of Community and Business Development study referenced in the Draft SEIS could form the basis for an estimate of the portion of cruise ship passengers who are attracted to the scenic and recreational amenities of the Tongass National Forest.

RESPONSE: The regional economic overview presented in the Draft SEIS identifies recreation and tourism-related employment and earnings in 1999 for all recreationists and tourists visiting Southeast Alaska (see Table 3.4-3). The recreation and tourism economic impact analysis, in contrast, focuses specifically on the effects of the alternatives on visitors to recreation places on the Forest, measured in Recreation Visitor Days (RVDs). Cruise ship passengers that visit the Forest are included in this assessment. The argument may be made that an assessment based on recreation visitation measured in RVDs does not account for the entire economic impact that visitors to the region have. As noted in the SEIS, cruise ship clients primarily use the Tongass National Forest as a scenic resource, with much of their land-based activities centered around communities. Half-day and day excursions into the Forest are increasing in popularity, but are mostly oriented around boat trips and flightseeing, using the Forest as a backdrop. The portion of these activities that do not actually involve visiting the Forest is not included in the RVD-based assessment.

The number of jobs associated with this type of recreation was, however, estimated in the Draft SEIS (see Footnote 3 to Table 3.4-17). This estimate was developed by subtracting estimated direct nonresident Tongass recreation-related employment in 2000 (997) from total estimated nonresident

recreation and tourism-related employment in 1999 (4,185; see Table 3.4-3). The resulting estimate (3,188) was projected to increase by 20 percent by 2005. These numbers have been updated in the Final SEIS to reflect 2001 employment levels. This estimate is assumed to remain constant across all of the alternatives because the Scenery Standards and Guidelines established in the 1997 Forest Plan are designed to protect the visual priority routes and use areas throughout the Forest. Appendix F of the 1997 Forest Plan identifies all the cruise ship routes in Southeast Alaska as Visual Priority Routes and all Southeast Alaska communities as Visual Priority Use Areas. Recreation and tourist activities that do not actually involve visiting the Forest are, therefore, not expected to be affected under any of the alternatives.

The survey referred to in the comment is a survey of commercial recreation businesses conducted throughout Southeast Alaska in 2000 by the Alaska Division of Community and Business Development (DCBD) (Alaska DCBD, 2001). The results of this survey provide information on the size of commercial recreation businesses, the primary activities they engage in, and the percentage of their clients that are cruise ship passengers. This is important and useful information that is discussed in a number of places in the SEIS. It is possible that this information could be used to develop a rough estimate of the percentage of cruise ship passengers who are attracted by the scenic and recreation resources of the Tongass. This type of estimate would, however, contribute little to the analysis presented in the SEIS, which essentially assumes that all visits to the region are Tongass-related.

COMMENT: Several respondents disagreed with the finding of the Draft SEIS that recreation and tourism-related employment would remain fairly constant across all of the alternatives over the next decade. A number of respondents commented that growth in the guiding industry is putting pressure on existing wilderness and other primitive areas. These respondents felt that permanent protection for primitive areas that are not presently designated wilderness or LUD II would provide for this growing industry, as well as other affected businesses, such as fishing lodges. This protection, they felt, would have positive effects on employment over the next decade. One respondent specifically noted that the number of hunting guides is being severely restricted. Another respondent was concerned that eco-tourism was not addressed sufficiently in the Draft SEIS.

RESPONSE: The recreation and tourism component of the economic impact analysis presented in the SEIS is based on projected future demand and changes to Recreation Opportunity Spectrum (ROS) settings in recreation places by alternative. As noted in the SEIS, differences in protected levels of recreation use between alternatives are small because the Semi Primitive Motorized (SPM) ROS setting (referred to as ROS 2 in the economic analysis) is the only setting where demand exceeds supply in recreation places in the first decade of the analysis and the effects related to harvest activity have had little time to accumulate. Designating additional wilderness would not create any more undeveloped areas. It would, however, have the effect of restricting future development and this is reflected in the long-term, Forest-wide analysis of changes in ROS settings presented in the SEIS (see Table 3.3-32).

This analysis indicates that Wilderness or LUD II designation would protect Primitive, Semi-Primitive Non-Motorized, and Semi-Primitive Motorized ROS settings from development in the future. Designating additional wilderness could, however, negatively affect other types of outfitter/guide businesses that could be constrained by limits on group size, as well as affecting helicopter landing tours. These potential effects are not quantified in the ROS-based employment analysis presented in the SEIS, but they are discussed qualitatively.

Designating areas wilderness or LUD II would be unlikely to sufficiently address the restrictions on hunting guides that may be necessary as that industry grows. As demands increase, changes in seasons, bag limits, or other restrictive measures may be necessary to manage these resources.

While there are a number of possible definitions of eco-tourism, it is generally associated with natural areas and local flora and fauna and often includes some type of learning experience. Most of the recreation and tourism in and around the Tongass National Forest fits under the general mantle of eco-tourism. As noted above, differences in protected levels of recreation use between alternatives are small over the next decade. This is explained briefly above and in more detail in the SEIS.

COMMENT: Some respondents suggested that the Final SEIS should more positively acknowledge the economic contribution that recreation and tourism-related businesses make to the regional economy. One respondent pointed out that visitors to the region spend large sums of money in lodging, restaurants, shops/art galleries, airlines, etc. and contribute more to the regional economy than timber sales. Another respondent noted that some visitors spend large sums of money on guided expeditions, such as guided bear hunting and fly fishing trips, and stated that these values should be identified as a benefit associated with additional wilderness and LUD II lands.

RESPONSE: The *Recreation and Tourism* and *Economic and Social Environment* sections in the Draft and Final SEIS explicitly recognize the important role that recreation and tourism play in the regional economy of Southeast Alaska. Table 3.4-3 in the Final SEIS, for example, shows that recreation and tourism accounted for an estimated 11 percent of direct employment and 8 percent of direct income in Southeast Alaska in 2001. These estimates include employment and income generated by expenditures by tourists and other visitors to the region. Table 3.4-3 also shows that wood products accounted for 2 percent of direct employment and 3 percent of direct income in the same year.

The contribution of commercial businesses to the regional economy is also included in the employment and income estimates for recreation and tourism provided in Table 3.4-3. Outfitter/guide businesses range from mid-sized, nature-viewing tour boats, with relatively large group sizes (from 12 to 70 people) to guided bear hunting that consists of one or two people. A survey of commercial recreation businesses conducted throughout Southeast Alaska in 2000 (Alaska Division of Community and Business Development [DCBD], 2001) found 86 percent of commercial recreation businesses had an average revenue of less than $100,000 in 1999. Six firms reported revenues over $1 million, including one firm with revenues exceeding $10 million. A similar distribution is evident in terms of clients served, with the majority of firms serving less than 100 clients, a smaller number of firms serving considerably larger numbers, and one firm serving more than 100,000 clients in 1999. This information, included in the *Recreation and Tourism* section of the Draft SEIS, has also been added to the *Economic and Social Environment* section of the Final SEIS.

The existing wilderness and other wildland areas on the Tongass, along with the current protections in place, which would remain under all alternatives, are expected to continue to offer a wide range of opportunities for commercial recreation businesses under all alternatives.

COMMENT: One respondent stated that most of the conclusions drawn in the Draft SEIS regarding future recreation and tourism demand, supply, and employment seem to be speculative at best. Other, just as plausible assumptions, could have resulted in conclusions that additional wilderness designation would provide significantly more employment and income in southeast Alaskan communities.

RESPONSE: The analysis presented in the Draft SEIS assesses recreation and tourism supply and demand over the next decade. The key assumptions used in this analysis include the use of a linear projection based on 1984 to 1995 data collected for recreation places to project future demand and a series of assumptions about the effects that timber harvest would have on ROS settings. The job/RVD ratio employed in the analysis was developed for the 1997 Tongass Land and Resource Management Plan FEIS analysis. Potential effects that are not captured in this analysis, such as possible restrictions on recreation developments, helicopter landing tours, and outfitter/guides serving large group sizes, are discussed qualitatively.

COMMENT: The Final SEIS must be more specific in disclosing the impacts that recommending Wilderness would have on recreation resources. Specific uses, like helicopter tours in the Spires Roadless Area, would have to cease and those economic benefits would be lost to the company and the community. If Anan is recommended as wilderness, outfitting and guiding use would have to be significantly reduced and the existing facilities removed and replaced by something more in keeping with the "wilderness" character. Communities need to see a full disclosure of these economic and social impacts in the analysis.

RESPONSE: The effects of the alternatives on outfitter/guide use are discussed on pages *Recreation and Tourism* and *Economic and Social Environment* sections of the SEIS. The potential effects of Wilderness designation on helicopter tours are specifically addressed with respect to the Spires Roadless Area, among others. It is, however, important to recognize that the analysis presented in the SEIS is programmatic rather than site specific. The SEIS identifies the potential effects of Wilderness on recreation and provides key examples where these types of effects might occur. Based on the currently available data, there appear to be relatively few places on the Tongass that receive use by outfitter/guides with groups of 12 or more. Much of the concern surrounding restrictions on recreation use under Wilderness is associated with potential future use. The programmatic analysis provided in the SEIS provides an overview of projected future demand for recreation places but it is not possible to assign this projected demand to specific locations or activities.

Wilderness

COMMENT: Some respondents thought that the Draft SEIS inadequately evaluates the preservation and creation of jobs related to wilderness additions.

RESPONSE: Potential direct employment that could be preserved or created by wilderness additions includes recreation and tourism-related employment and wilderness management employment in the Forest Service. None of the proposed alternatives are expected to have significant effects on fishing. The effects of wilderness designation on recreation and tourism employment are assessed based on estimated changes in Recreation Visitor Days over the next decade by alternative. The results of this analysis are presented in the *Regional Economy* section of the Final SEIS. With respect to wilderness-related employment within the Forest Service, Recommended Wilderness or LUD II designation is not expected to result in the hiring of a significant number of new wilderness management staff.

COMMENT: Some respondents felt that the Final SEIS should address the role that quality of life and amenity values play in the regional economy. Several respondents suggested that the increases in non-labor income and population in the region and some communities may be the result of quality of life and amenity values associated with wilderness and roadless areas. If this is the case, designating additional wilderness or LUD II areas would attract and retain residents and businesses of all types. One respondent noted that the Final SEIS should consider long-term trends in income, employment, and population in relation to past wilderness designations in Southeast Alaska.

RESPONSE: Long-term trends in income, employment, and population are typically the result of many different factors. The effect of past wilderness designation in Southeast Alaska on these types of trends is unknown. Natural amenities have increasingly been recognized as important factors determining the economic prospects of many rural communities in the American West and elsewhere, but it is difficult to directly measure the importance of natural amenities in attracting and keeping residents. Further, while proximity to natural environments and the recreational activities they support are undeniably a benefit enjoyed by residents, it is unclear how these benefits would vary between areas designated wilderness and other undeveloped areas, if at all. A section that discusses natural amenities and quality of life issues has been added to the *Economic and Social Environment* section of the Final SEIS.

COMMENT: One respondent stated that the SEIS should assume that given the importance of recreation opportunities to local residents, a portion of existing residents would choose to

relocate from the region if no additional Wilderness were designated. This, they argued, would result in a reduction in recreation-related and other jobs and income that should be considered a cost associated with not designating additional Wilderness. They also suggested that the recreation-related jobs and income that would be associated with potential new residents who would be attracted to the region by Wilderness designation should be included as part of this cost.

RESPONSE: While a loss of recreation opportunities could potentially affect a person's choice of residence, this type of effect would be very difficult to try and measure. Given the vast and undeveloped nature of much of the Tongass National Forest, it is unclear that there would be a significant loss of recreation opportunities for local residents under any of the alternatives.

COMMENT: Some respondents commented that the Final SEIS should consider the negative effects that further land use restrictions would have on the quality of life and values of Southeast Alaska communities. Respondents stated that designating additional wilderness would restrict resource access and have negative effects on local communities, the regional economy, and individuals and businesses employed in extractive resource-based industries, including commercial fishing, tourism, and mining. Others noted that additional wilderness designation could have negative effects on adjacent private properties by jeopardizing their use and potential resale. One respondent stated that additional wilderness designation would have negative effects on Native Corporations and Southeast Alaska communities by affecting their ability to have clean drinking water, affordable power, and economic opportunity.

RESPONSE: The analysis presented in the *Economic and Social Environment* section of the SEIS evaluates the potential effect of each alternative on the timber, recreation and tourism, and mining industries. The potential effects of the alternatives on recreation and tourism are also addressed in the *Recreation and Tourism* section. Potential effects on commercial fishing are not expected to differ significantly between alternatives. The economic and social analysis also provides an overview of recent changes in the regional economy and assesses the potential effects of the alternatives for 32 Southeast Alaska communities.

Wilderness designation is not generally expected to affect adjacent private property, with the possible exception of indirect effects associated with potential restrictions on the development of transportation and utility infrastructure. Potential restrictions in this type of development are discussed in the *Transportation and Utilities* section of the SEIS. The possible negative effects of wilderness designation on adjacent private property are noted in the Natural Amenities and Quality of Life discussion that has been added to the *Economic and Social Environment* section of the Final SEIS.

The effects of the proposed alternatives on regional transportation and utilities and regional and local economies are discussed in the SEIS. Designating additional wilderness is not expected to affect the abilities of local communities to have clean drinking water.

Impact Analysis

COMMENT: Several respondents questioned the use of economic impact multipliers, derived from the IMPLAN economic model, to estimate indirect and induced employment and income impacts in the Draft SEIS. They cite several studies, both empirical and theoretical, to support their claim that impact multipliers in general, and input-output models in particular, do not provide accurate estimates of total economic impact. One respondent requested that a more detailed discussion of the limitations of these models be presented in the Final SEIS.

RESPONSE: Some professional economists disagree on the utility of static impact multipliers of the type produced by IMPLAN and similar input-output models. These models are, however, a standard tool for a broad range of regional analyses conducted by government agencies, academics, and other entities interested in estimating the economic impacts of different policy options. IMPLAN in particular has been used in numerous and various policy analyses and research settings. This SEIS is not an appropriate

forum for debating the utility of input-output models. The economic impact analysis presented in the SEIS follows standard analysis procedures by using the IMPLAN model. The analysis in the SEIS is accompanied by an explicit caveat recognizing that some economists may have reservations about the validity of this methodology. In addition, the SEIS is careful to distinguish between direct effects on one hand and indirect and induced effects on the other.

COMMENT: One respondent stated that the employment multiplier of 1.95 for logging jobs is inflated because approximately 35 percent of the work force is non-resident.

RESPONSE: The employment multipliers used for this analysis were estimated using IMPLAN, an input-output model commonly used in this sort of application. IMPLAN adjusts national level data to account for regional leakage, part of which would come from non-resident workers spending their income elsewhere.

COMMENT: Some respondents were concerned that the Draft SEIS overestimated timber employment and income effects by assuming that the entire NIC I timber component would be harvested, when elsewhere the Draft SEIS states that 70 percent of NIC I would realistically be harvested. In addition, they noted, as little as 20 percent of the NIC I component was actually harvested in 2000.

RESPONSE: The resource analyses presented in the Draft and Final SEIS are based on the assumption that 100 percent of the NIC I component would be harvested. The economic and social analysis uses the same assumption to be consistent, but cautions the reader in the text and table footnotes, where appropriate, that realistically a maximum of 70 percent would be harvested.

COMMENT: Some respondents stated that the Draft SEIS overestimated the employment effects associated with reductions in timber harvest by failing to distinguish between domestic and export components of projected future harvest on the Tongass.

RESPONSE: The average jobs/MMBF ratios used to estimate changes in wood products employment that occur with changes in harvest levels are based on average levels of employment for the 1990 to 1994 period. These ratios, calculated for the 1997 Forest Plan Final EIS (USDA Forest Service, 1997a), are based on annual harvest of all species. A review of data for 2000 suggests that, despite the significant structural change that has occurred in the Southeast Alaska wood products industry in recent years, this ratio is still representative of current conditions.

COMMENT: Some respondents felt the Draft SEIS overestimated the effects of reductions in timber supply by assuming a one-to-one relationship for timber supply reductions and jobs lost.

RESPONSE: The Draft SEIS explicitly recognized that a number of factors suggest that the linear relationship assumed by this analysis rarely exists. Mill closures or openings can cause abrupt changes in employment. In other cases, there may be a time lag between reductions in harvest and job loss. However, the one-to-one assumption employed in the SEIS analysis is a reasonable assumption for the purposes of this analysis and is consistent with the approach taken in the 1997 Forest Plan Final EIS analysis (USDA Forest Service, 1997a).

COMMENT: One respondent thought that the economic analysis presented in the Draft SEIS failed to adequately distinguish between "value" and "impact". Value, they explained, is used to calculate Present Net Value (PNV) or cash flow analysis and utilizes a discount rate. Impact involves employment and income multipliers (e.g. indirect and induced) and measures the extent to which economic activity would be reduced, or eliminated, in a region if a certain sector were to be negatively impacted.

RESPONSE: The Environmental Consequences portion of the *Economic and Social Environment* section of the SEIS presents the results of the regional impact and economic efficiency analyses conducted for this project in separate sections titled Economic Impact Analysis and Economic Efficiency

Analysis, respectively. The economic impact analysis section presents the results of the regional impact analysis, which assesses the impacts of the proposed alternatives on regional economic activity. Impacts are expressed in terms of projected changes in regional and local employment and income. The economic efficiency analysis, conducted in accordance with Forest Service planning guidance and the Forest Service Handbook, measures the costs and benefits associated with a given alternative. These costs and benefits are expressed as monetary values, where possible.

Economic Efficiency Analysis

General

COMMENT: Some respondents felt that the Draft SEIS failed to conduct a net public benefit analysis, which is required under Forest Service planning regulations. This type of analysis, they noted, should include a present net value analysis of goods and services that can be assigned monetary values and qualitative assessments of goods and services that cannot be assigned monetary values.

RESPONSE: The net public benefits analysis conducted for this SEIS is presented in the Economic Efficiency portion of the *Economic and Social Environment* section of the SEIS. This analysis has been expanded in the Final SEIS and presents a present net value for those goods and services that can be assigned monetary values. Other goods and services that cannot be accurately quantified are discussed in qualitative terms. The fact that monetary values are not assigned to certain goods and services does not lessen their importance in the decision making process.

COMMENT: One respondent was concerned that the economic analysis presented in the Draft SEIS is restricted to the Southeast Alaska region and fails to take a national accounting perspective, as required by Forest Service regulations and Judge Singleton's March 30, 2002 order.

RESPONSE: The geographic scope of the economic analysis presented in the SEIS is not limited to Southeast Alaska. The economic efficiency analysis provides a national accounting perspective. This analysis has been revised and expanded in the Final SEIS. The introduction to the *Economic and Social Environment* section has been revised to more clearly explain the structure of the analysis, which includes the economic efficiency analysis, as well as the regional and community-level analyses. The analysis presented in both the Draft and Final SEIS is comprehensive in geographic scope, ranging from the national accounting perspective of the economic efficiency analysis to the community-level assessments for 32 Southeast Alaska communities.

COMMENT: Some respondents suggested that the Final SEIS should include a comparative economic analysis of the short- and long-term economic impacts of logging unprotected roadless areas versus designating them wilderness.

RESPONSE: The analysis presented in the *Economic and Social Environment* section of the SEIS evaluates the effects of the eight alternatives, which involve varying degrees of wilderness protection and timber harvest. This programmatic analysis compares the Forest-wide economic values associated with logging particular roadless areas versus recommending them for wilderness or LUD II designation.

COMMENT: One respondent stated that the economic efficiency analysis presented in the SEIS should disclose that the difference between the Present Net Values (PNVs) calculated for timber and recreation and tourism increased between the analysis presented in the 1997 Forest Plan Final EIS and the analysis presented in the Draft SEIS.

RESPONSE: The economic efficiency analysis has been revised and expanded for the Final SEIS. The revised efficiency analysis presents a Present Net Value for Recreation/Tourism, Timber Receipts, and Variable Program Costs and is not directly comparable with the analysis presented in the 1997 Forest Plan Final EIS.

Timber

COMMENT: Some respondents stated that the Final SEIS should include a present net value for timber in the economic efficiency analysis. The economic efficiency analysis presented in the Draft SEIS, they noted, calculated the discounted value of projected timber harvests but did not subtract the costs associated with timber management and planning. Respondents requested that these costs, as well as estimated values for negative externalities, be subtracted from projected harvest revenues and discounted to the present. One respondent recommended that the timber sale costs used in the NPV calculation include the costs associated with: (a) protection and enhancement of the timber resource; (b) planning, implementing, and administering timber sales; (c) mitigating adverse impacts of timber sales; (d) restoring damage from timber sales; and (e) monitoring timber sale impacts.

RESPONSE: The economic efficiency analysis has been revised and expanded in the Final SEIS. This revised analysis presents a Present Net Value for Recreation/Tourism, Timber Receipts, and Variable Program Costs, rather than separate PNV calculations by resource. Projected timber sale values and the projected costs of planning, preparing, and administering the sale are included in this calculation. Projected costs include NEPA preparation, sale preparation, sale administration, and engineering support.

Negative externalities identified by some respondents were related to potential effects on fish-bearing watersheds and associated effects on sport, commercial, and subsistence fisheries. Others identified potential effects to other ecosystem services as costs that should be subtracted from the timber PNV. These issues are addressed in responses to other comments in this section, as well as discussed in qualitative terms in the expanded economic efficiency analysis presented in the Final SEIS.

The costs associated with planning, implementing, and administrating timber sales, as well as associated mitigation activities are included in the projected costs used in the revised PNV analysis. These costs include sale preparation, environmental assessments, and cultural resource surveys among others. A second group of costs related to the actual harvest of the timber are included in the purchaser's contract requirements and are reflected in the stumpage value received and used in the PNV analysis. These costs include the costs of reforestation, road obliteration, and culvert removal among others. A third group of costs are largely fixed costs associated with long-term forest management and Forest Plan implementation and monitoring are not expected to vary significantly by alternative.

COMMENT: Some respondents stated that the Tongass National Forest's timber program operates at a financial loss (costs exceed revenues). More taxpayer money, they state, is spent building roads for logging contractors than is received from logging sales. Additional wilderness (and correspondingly less timber harvest) will, therefore, provide an immediate economic benefit for the citizens of Southeast Alaska and the entire nation. Respondents also noted that in addition to losing money, timber sales have negative impacts on the environment and other aspects of the regional economy.

RESPONSE: The issue of whether the Federal government is subsidizing the timber industry is outside the scope of the Roadless Area Evaluation for Wilderness Recommendations SEIS. The Forest Service does not operate in a manner designed to maximize profits. National Forests are managed to meet a number of goals, including the coordination of multiple uses, such as outdoor recreation, timber, wildlife,

fish, watershed, and wilderness. During low timber market conditions, the costs of planning, preparing and administering timber sales are often higher than the stumpage paid for the timber. One of the Forest Service's objectives for the Tongass National Forest under the Tongass Timber Reform Act is to promote community stability by seeking to provide a supply of timber from the Forest that meets annual market demand in an environmentally sound manner. The regional and local impacts of the Forest's management actions, measured in terms of jobs and income, are not included in PNV calculations or in comparisons of costs versus revenues for timber, recreation and tourism, wilderness, and other resource areas.

COMMENT: Some respondents suggested the Tongass National Forest should consider innovative management policies to make better use of federal subsidies. Rather than subsidizing the timber industry, they suggest that these same federal funds should be used for habitat restoration and to protect old-growth forests. These funds, they argue, would be much better used dealing with road and culvert maintenance backlogs and thinning second growth stands that represent impaired habitat for wildlife and human recreation.

RESPONSE: The use of Federal funds to address road and culvert maintenance and second growth thinning is outside the scope of this programmatic Supplemental SEIS. It may, however, be noted that the items suggested are parts of other ongoing programs on the Tongass and funded from various sources.

COMMENT: One respondent felt that the value of timber stumpage receipts annually returned to the treasury from the timber program is critical information that must be disclosed and considered in the Final SEIS for a meaningful calculation of Present Net Value.

RESPONSE: Present Net Value is defined by the Forest Service Handbook as the present benefit value of the stream of benefits less the present cost value of the schedule of costs (FSH 1909.17.15.1). The revised economic efficiency analysis presents a Present Net Value for Recreation/Tourism, Timber Receipts, and Variable Program Costs, rather than separate NPV calculations by resource. Average costs and values from the past five years are used in the Final SEIS to calculate the timber-related components of this PNV. The annual value of timber receipts returned to the treasury is not part of this calculation.

COMMENT: Some respondents said that the Final SEIS should base present net values and net public benefit estimate calculations on current real world demand, not the Forest Plan or the 1997 projections prepared by Brooks and Haynes, which are based on data from 1992 to 1996.

RESPONSE: As discussed in the text, the demand estimates developed by Brooks and Haynes (1997) describe possible levels of activity given certain assumptions. Recent data suggest a number of differences between Brooks and Haynes' (1997) assumptions and actual conditions. These differences are discussed in the *Economic and Social Environment* section of the SEIS. It may be noted that Brooks and Haynes' estimates are used as part of the 2002 demand analysis developed by the Forest Service to comply with Section 101 of TTRA and ensure that annual timber sale offerings are consistent with market demand. The timber and variable program components of the economic efficiency analysis presented in the Final SEIS are based on the NIC I component of the ASQ. Brooks and Haynes' (1997) demand projections are not used in this analysis.

Recreation

COMMENT: One respondent stated that the recreational benefits of wilderness designation presented in the economic efficiency analysis are underestimated because: (1) recreational values are homogenized and, therefore, ignore the fact that on a per acre basis, primitive recreation settings generate as much as three times the value of developed settings (Swanson and Loomis, 1996); and (2) wilderness designation itself stimulates recreation use, perhaps as much as one additional RVD for each acre of newly designated wilderness (Loomis, 1999).

RESPONSE: Using an average recreation value per RVD and in effect treating all RVDs as equivalent is a simplified representation of reality. As stated in the SEIS, it is likely that net willingness to pay varies for different ROS classes, as well as a host of other factors that may be impacted differently by the different alternatives. Swanson and Loomis (1996; 20) found that on an individual visit basis primitive ROS settings in western Oregon, western Washington, and northern California were approximately three times as valuable as semi-primitive motorized, roaded natural, and roaded modified settings. The findings of this analysis are based on aggregated data for Oregon, Washington, and California, and it is not clear how applicable these findings are to Southeast Alaska. The analysis presented in the SEIS uses the average net willingness to pay value used in the 1997 Final EIS adjusted for inflation. This value was originally developed based on survey research conducted at the national level and then adapted for the Tongass. It is the best currently available information for the Tongass.

The results of Loomis' (1999) broad regional scale analysis found that designating additional wilderness acres resulted in an increase in *wilderness* recreation use, not recreation use per se. This is an important distinction. The study addresses whether there is a statistically significant relationship between increased wilderness acres and trends in wilderness use. It is not clear from Loomis' study that designating wilderness actually increases recreation use as the above comment suggests. His point is that designating new wilderness results in increased wilderness use and does not simply attract users from other existing wilderness areas with a resulting reduction in visitation to those areas. The type of increase that he tentatively identifies could occur as a result of visitors to an area being reclassified as wilderness visitors when the area was designated wilderness with no net increase in actual recreation use. Although not directly addressed in Loomis' study, it is possible that designating an area wilderness could increase use of that area in absolute terms. This would, however, seem less likely to be the case in Southeast Alaska than elsewhere in the lower 48 states, given the predominantly wild and undeveloped nature of the region and the major role it presently plays in attracting visitors and residents.

Commercial Fishing

COMMENT: Several respondents stated that the Final SEIS should include commercial fishing in the economic efficiency analysis. This analysis should account for the net tradeoffs between land allocated for fish production and timber harvest.

RESPONSE: As noted in the Draft SEIS (page 3-18), and in response to comments in the Water and Fish section of this appendix, the effects of the alternatives on fish resources are expected to be at or below the level predicted for Alternative 11 in the 1997 Forest Plan Revision Final EIS (1997 Final EIS pages 3-46 through 3-73). The analysis of effects on fish habitat included in the Forest Plan Final EIS is incorporated into the SEIS by reference. This is also the case with the commercial fishing portion of the economic efficiency analysis presented in the 1997 Final EIS (pages 3-490 and 3-491). This section of the 1997 Final EIS explains why there are not expected to be any significant changes to commercial fisheries employment as a result of National Forest activities. A section that briefly explains this has been added to the economic efficiency analysis in the Final SEIS.

Non-Market Values

COMMENT: Some respondents commented that the Draft SEIS did not adequately address non-use values, which they think should be assigned monetary values and treated on a par with market timber values. These respondents suggested that the Forest Service should develop estimates of passive use values by initiating a contingent valuation survey or by applying values from recent existing studies. One respondent indicated that these estimates should include a "scarcity value" that would increase over time as other areas were developed. This respondent also stated that the effects analysis should consider non-use values associated with wildlands as irreplaceable resources that would be foregone under timber harvest.

RESPONSE: Non-use values are discussed in the Economic Efficiency Analysis presented in the *Economic and Social Environment* section of the SEIS. This discussion acknowledges that the non-use values for the Tongass as a whole are considerable, but points out that they are difficult to accurately measure, particularly on a per acre basis. Some researchers and groups accept the use of contingent valuation for this type of analysis, but others have important reservations about its applicability. This and other available techniques for valuing non-market costs and benefits remain largely the subject of academic enquiry with academic studies looking at slightly different problems and employing new variations of the technique. The results may be indicative of an underlying value, but they need to be interpreted in light of the particular analytical innovations used in the study. Many researchers include various caveats in their work to provide readers with an understanding of these issues. The results from existing contingent valuation surveys conducted in other areas are, however, presented in the SEIS to provide some insight into potential non-use values that might be associated with the proposed alternatives. Relevant surveys were identified from two recent literature reviews that specifically address non-use values in Alaska and wilderness, respectively (Colt, 2001; Loomis, 2000).

While the SEIS does not attempt to assign monetary values to the non-use values potentially associated with each alternative, the text does acknowledges that the non-use values associated with designating new wilderness on the Tongass are likely to be high, especially given the national importance of this issue. The fact that no monetary value is attached to non-use values does not lessen their importance in the decision making process and managers routinely choose alternatives that do not maximize PNV. Many forest benefits are incorporated into forest planning decisions in a qualitative fashion. Also, a large proportion of the Draft and Final SEIS documents are devoted to revealing impacts to the forest resource that cannot be readily expressed in monetary terms. The Forest Service Manual states that decision makers must "[c]onsider economic efficiency, *along with other factors* (emphasis added), in making decisions and in implementing and reviewing projects, programs, and budgets" (FSM 1970.3(3)).

COMMENT: Some respondents indicated the Final SEIS should provide a complete economic accounting of ecosystem service benefits for each of the alternatives and include the externalized costs of foregone ecosystem services and other costs, such as sedimentation and contamination of freshwater and marine ecosystems, in the analysis of each alternative.

RESPONSE: The economic efficiency analysis portion of the *Economic and Social Environment* section of the Final SEIS has been expanded to include a discussion of ecosystem services. Definitions of ecosystem services can be broad, including both use and non-use values. The definition used in the assessment presented in the SEIS applies to the group of services that is sometimes referred to as "life-support services." Examples of these types of services that are often associated with forests include watershed services, soil stabilization and erosion control, improved air quality, climate regulation and carbon sequestration, and biological diversity.

Some respondents have expressed concerns that ecosystem service values are not adequately considered in decision-making processes because they are not valued on a par with goods and services that are traded in commercial markets. As noted with respect to non-use values, while ecosystem service values undoubtedly exist, they are very difficult to accurately quantify in monetary terms. A number of methods have been used to assign monetary values to these types of services. These methods include

travel cost, hedonic pricing, and defensive expenditure approaches that use observed behavior to estimate values, as well as contingent valuation approaches that ask people what they would be willing to pay for an ecosystem service.

While ongoing research on ecosystem service values provides important insight into the values that could be assigned to these types of services (see a recent literature review on forest ecosystem services by Krieger, 2001, for example), the resulting estimates are generally unsuitable for a detailed comparison of planning alternatives at the Forest-level.

In addition to difficulties associated with identifying estimated marginal ecosystem service values, it is also very difficult to quantify the effects of the alternatives on physical and biological resources in unit values. However, the fact that no monetary value is assigned to ecosystem services in this document does not lessen their importance in the decision making process. A large proportion of this document is devoted to assessing impacts to the forest resource that cannot be readily expressed in monetary terms.

COMMENT: Some respondents disagreed with the Forest Service's rationale for not assigning monetary values to non-use values. The Draft SEIS provided a qualitative discussion of these values with examples from other studies, but stated that these types of values are extremely difficult to measure and that the methods used to derive estimates are controversial. These respondents countered that TSPIRS data and input-output models are equally or more controversial. One respondent suggested that the Final SEIS should either exclude estimates based on input-output-derived multipliers or include estimates of non-use values to provide a more balanced and unbiased analysis of alternatives.

RESPONSE: Non-use values are discussed above and input-output analysis is discussed in responses to comments presented in the Regional Economy section of this appendix.

Subsistence

COMMENT: Several respondents stated that the Final SEIS should include an economic value for subsistence in the economic efficiency analysis. The economic effects of the alternatives on subsistence, they noted, should be estimated based on the weight of total subsistence harvest that would be foregone under each alternative.

RESPONSE: Subsistence activities have significant economic, as well as cultural and spiritual value for many Southeast Alaska residents. However, there are a number of difficulties involved in trying to quantify these values in monetary terms. A recent study that attempted to quantify the economic importance of Alaska's ecosystems used three different standard methods to estimate the statewide net economic benefits associated with subsistence (Colt, 2001). This study concluded that "(i)n summary, it remains quite difficult to measure the net economic value of subsistence in economic terms. Using standard techniques, one can come up with estimates that range from zero (using a $4.00/lb replacement value less the cost of cash and labor input) to more than $1.7 billion (upper bound on net willingness to accept compensation for lost subsistence opportunities)" (Colt, 2001; 37). Assigning an accurate economic value to subsistence is one significant problem in trying to calculate a PNV for subsistence. A second major problem involves quantifying the potential effects of the alternatives in terms of pounds of subsistence harvest foregone. This type of information is not available, as discussed in the *Subsistence* section of the SEIS.

It is important to recognize that while it is not possible to assign subsistence a net economic value for the economic efficiency analysis, this does not mean that the potential effects of the alternatives on subsistence are not important. Subsistence testimony was taken during the 18 public hearings held as part of this project. The potential effects of the alternatives on subsistence are addressed programmatically in the *Subsistence* section of this document. They are also discussed on a community basis in the *Communities* portion of the *Economic and Social Environment* section. The analysis presented in the Subsistence section assesses the potential effects of the alternatives in terms of

abundance and distribution, access, and competition. None of the alternatives are expected to have more effects on subsistence related resources than is represented in the current Forest Plan.

Quality of Life

COMMENT: One respondent stated that off-site benefits related to quality of life should be included in the Net Public Benefit analysis presented in the Final SEIS. They requested that this analysis include the effects of wilderness and clearcuts on property values and suggested that Hedonic Pricing methodologies and land transfer transaction could be used.

RESPONSE: The type of study proposed in the comment would require site-specific analysis that is beyond the scope of this programmatic Supplemental EIS.

In general, it is possible that proximity to wilderness might result in higher property values, primarily due to increased demand associated with the perceived and actual benefits of locating near this type of environment. There has, however, been little empirical research on this issue (Phillips, 2000). One exception is Phillips' (2000) case study of land transfers in Vermont, which found that land parcels in towns that contain wilderness had per-acre sales prices that were 13 percent higher than towns without wilderness. The applicability of these findings to Southeast Alaska is unknown.

Given the predominantly undeveloped and wild nature of the area as a whole, it is not clear that designating an area wilderness in Southeast Alaska would affect a person's decision to relocate to the area or have any noticeable effect on their quality of life or property values. In addition, it is not anticipated that future harvest activities would have detrimental effects on property values. Forest-wide standards and guidelines for Scenery are intended to ensure that harvest areas will not be visible from Visual Priority Routes and Use Areas. Appendix F of the 1997 Forest Plan identifies all of the communities in Southeast Alaska as Visual Priority Use Areas. The possibility that wilderness designation could affect property values is noted in the Quality of Life discussion that has been added to the *Economic and Social Environment* section of the Final SEIS.

C. Comments About Specific Inventoried Roadless Areas

Introduction

This section summarizes the area-specific comments that were received on the Draft SEIS. They are organized by roadless area. Roadless area-specific comments are also captured in the individual roadless area evaluations in Appendix C. Although numerous general comments were received that were either pro or against new wilderness recommendations or strongly supported specific alternatives, many of those comments did not refer to specific areas or specific roadless area values. The comments summarized here represent only those where area-specific preferences or values were identified. Many comments identified a list of areas of importance to the commenter. These comments are summarized by individual roadless area in this section, but less emphasis is given to them in the descriptions unless preferences or values specific to individual areas or small groups of areas were provided.

The following agencies, groups, and individuals provided comments on individual roadless areas:

- U.S. Department of the Interior
- Governor of Alaska
- Alaska Department of Transportation and Public Facilities
- Alaska Department of Fish and Game
- City of Pelican
- City of Petersburg

- City of Tenakee Springs
- City of Kupreanof
- City of Craig
- Wrangell Resource Council
- Gustavus Community Association
- Metlakatla Indian Community
- Organized Village of Kake
- The Yakutat Tlingit Tribe
- Ketchikan Indian Community
- Southeast Alaska Conservation Council
- Audubon Alaska
- Alaska Rainforest Campaign
- The Tongass Conservation Society
- Landmark Trees Project
- Selected individual responses

Individual Roadless Area Comments

201 – Fanshaw

The U.S. Department of the Interior identified this roadless area as having outstanding fish and wildlife values. It is one of two areas in the central mainland considered outstanding. They indicated that protecting this area, in combination with the Windham-Port Houghton Roadless Area (#308), would protect some of the most valuable remaining undisturbed forested habitats on the mainland of Southeast Alaska.

The Alaska Department of Fish and Game rated the Fanshaw roadless area as the eighth highest priority for protection in the Stikine Area. This rating is based on the VCUs with the highest value fish and wildlife resources needing additional protection. VCUs are prioritized for their very high productivity, essential role in connectivity, and/or very high value as community use areas.

The city of Pelican passed a resolution stating that the important watersheds identified as areas of special interest in the 1999 ROD and HR 987 should given long-term protection.

The city of Petersburg said they were opposed to designation of this area as wilderness because of the potential long-term economic impacts on the city. However, they encouraged the Forest Service not to log or build logging roads in watersheds that are primary salmon producing watersheds or other community use areas important to Petersburg residents including Cape Fanshaw.

The city of Kupreanof recommended the entire Port Houghton drainage, Cape Fanshaw, Farragut Bay and the shoreline from Farrugut Bay to Thomas Bay for designation as wilderness.

The Organized Village of Kake passed a resolution requesting that “customary and traditional areas such as … Cape Fanshaw/Farragut Bay (VCUs 860-900), Port Houghton (VCUs 790-840)… be recommended for long-term protection”.

Audubon Alaska recommended that Cape Fanshaw be protected from logging and road building.

The Alaska Rainforest Campaign (a coalition of national and Alaska conservation groups) identified Roadless Areas 201, 202, 203, and 308 as a contiguous complex of roadless areas that should be considered one roadless area and recommended it for permanent protection as wilderness. SEACC identified the Fanshaw roadless area as part of the Port Houghton/Cape Fanshaw complex (RAs 201, 202, and 308), which should be considered one contiguous roadless area recommended for permanent protection as wilderness. They indicated that if this complex were designated, it would create a contiguous wilderness along the central mainland coast of nearly 2 million acres, making it the second largest Forest Service Wilderness in the nation.

A number of individuals identified Cape Fanshaw as an area that needed permanent protection.

202 – Spires

The city of Petersburg said they were opposed to designation of this area as wilderness because of the potential long-term economic impacts on the city.

The city of Kupreanof recommended the entire Port Houghton drainage, Cape Fanshaw, Farrugut Bay and the shoreline from Farrugut Bay to Thomas Bay for designation as wilderness.

The Organized Village of Kake passed a resolution requesting that “customary and traditional areas such as … Cape Fanshaw/Farragut Bay (VCUs 860-900), Port Houghton (VCUs 790-840)… be recommended for long-term protection”.

The Alaska Rainforest Campaign (a coalition of national and Alaska conservation groups) identified Roadless Areas 201, 202, 203, and 308 as a contiguous complex of roadless areas that should be considered one roadless area and recommended it for permanent protection as wilderness. SEACC identified the Spires roadless area as part of the Port Houghton/Cape Fanshaw complex (RAs 201, 202, and 308), which should be considered one contiguous roadless area and recommended it for permanent protection as wilderness. They indicated that if this complex were designated, it would create a contiguous wilderness along the central mainland coast of nearly 2 million acres, making it the second largest Forest Service wilderness in the nation.

A number of cave/karst experts and other individuals stated that the Spires Roadless Area contains approximately 2,800 acres of karst in unforested, alpine or icefield locations, which is unique for the Tongass and should be protected.

Some individuals felt that Spires was deserving of long-term protection. Some recommended it because of world-class scenery, abundant wildlife and habitat, and almost unilateral support for wilderness protection. Some individuals recommended protection for the area from Cape Fanshaw to Thomas Bay.

203 – Thomas

The city of Petersburg said they were opposed to designation of this area as wilderness because of the potential long-term economic impacts on the city.

The Alaska Rainforest Campaign (a coalition of national and Alaska conservation groups) identified Roadless Areas 201, 202, 203, and 308 as a contiguous complex of roadless areas that should be considered one roadless area and recommended it for permanent protection as wilderness. SEACC included this area in their comments on the Cape Fanshaw/Port Houghton area.

204 – Madan

The U.S. Department of the Interior identified this roadless area as having important fish and wildlife habitat and populations. Although not a top priority for protection, it ranked in their top third among all roadless areas. They indicated that protection of this area, which adjoins the Stikine-LeConte Wilderness Area, would conserve valuable remaining undisturbed, forested habitats on the mainland.

The Alaska Department of Fish and Game rated the Madan roadless area as the fourth highest priority for protection in the Stikine Area. This rating is based on the VCUs with the highest value fish and wildlife resources needing additional protection. VCUs are prioritized for their very high productivity, essential role in connectivity, and/or very high value as community use areas.

The city of Petersburg said they were opposed to designation of this area as wilderness because of the potential long-term economic impacts on the city.

The Wrangell Resource Council recommended this area (from Crittenden Creek south to Berg Bay) for LUD II protection.

The Alaska Rainforest Campaign (a coalition of national and Alaska conservation groups) identified Roadless Areas 204, 205, 206, 207, 208, 209, 210, 528, and 529 as a contiguous complex of roadless areas that should be considered one roadless area and recommended it for permanent protection as LUD II. SEACC recommended that the Madan, Aaron, Cone, Harding, and Bradfield complex should be considered one roadless area and recommended it for permanent protection as LUD II.

A number of cave/karst experts and other individuals stated that the Madan Roadless Area represents karstlands in the Central Coast Range Province that is uncommon on the mainland; while limited in area, the karst and caves found so far are important for their rarity and for the paleontological and biological discoveries that have been made. The commenters noted that the area should be protected along with their drainages.

A number of individual commenters identified Madan Bay and one individual identified Virginia Lake and Garnet Mountain as areas in need of protection. Some individuals recommended this area for permanent protection as wilderness.

205 - Aaron

The U.S. Department of the Interior identified this roadless area as having important fish and wildlife habitat and populations. Although not a top priority for protection, it ranked in their top third among all roadless areas. They indicated that protection of this area, in combination with the Madan (#204) and Harding (#207) Roadless Areas, would conserve valuable remaining undisturbed forested habitats on the mainland of southeast Alaska

The Alaska Department of Fish and Game rated the Aaron roadless area as the fifth highest priority for protection in the Stikine Area. This rating is based on the VCUs with the highest value fish and wildlife resources needing additional protection. VCUs are prioritized for their very high productivity, essential role in connectivity, and/or very high value as community use areas.

The city of Petersburg said they were opposed to designation of this area as wilderness because of the potential long-term economic impacts on the city.

The Alaska Rainforest Campaign (a coalition of national and Alaska conservation groups) identified Roadless Areas 204, 205, 206, 207, 208, 209, 210, 528, and 529 as a contiguous complex of roadless areas that should be considered one roadless area and recommended it for permanent protection as LUD II. SEACC recommended that the Madan, Aaron, Cone, Harding, and Bradfield complex should be considered one roadless area and recommended it for permanent protection as LUD II.

The Wrangell Resource Council recommended the portion of this area around Berg Bay be included with the Madan Roadless Area under LUD II protection.

Some individuals recommended this area for permanent protection as wilderness.

206 – Cone

The city of Petersburg said they were opposed to designation of this area as wilderness because of the potential long-term economic impacts on the city.

SEACC recommended that the Madan, Aaron, Cone, Harding, and Bradfield complex should be considered one roadless area and recommended it for permanent protection as LUD II. The Alaska Rainforest Campaign (a coalition of national and Alaska conservation groups) identified Roadless Areas 204, 205, 206, 207, 208, 209, 210, 528, and 529 as a contiguous complex of roadless areas that should be considered one roadless area and recommended it for permanent protection as LUD II.

The mayor of Wrangell noted that the Cone area should not be recommended for wilderness because two of the road corridor routes to Canada would be precluded (i.e., the Bradfield and Craig rivers). He

indicated that designation as wilderness would require the Stikine and Unuk Rivers be the best option for a route to tidewater from Canada, and these areas should be avoided. The highway connection is very important for Wrangell.

207 – Harding

The U.S. Department of the Interior identified this roadless area as one of the 13 roadless areas they considered to have outstanding fish and wildlife values. Along with three other roadless areas that form the Cleveland Peninsula, the southern lobe of this roadless area contributes to the corridor for many mainland species to colonize the archipelago of Southeast Alaska. They indicated that protection of this area, in combination with the Aaron (#205) and North Cleveland (#529) Roadless Areas, would conserve valuable remaining undisturbed forested habitats on the mainland of southeast Alaska. They indicated that the important wildlife values provided by this area warrant management that ensures the long-term integrity of its habitats, ecosystem processes, and ecological functions.

The city of Petersburg said they were opposed to designation of this area as wilderness because of the potential long-term economic impacts on the city.

The Alaska Rainforest Campaign (a coalition of national and Alaska conservation groups) identified Roadless Areas 204, 205, 206, 207, 208, 209, 210, 528, and 529 as a contiguous complex of roadless areas that should be considered one roadless area and recommended it for permanent protection as LUD II. SEACC recommended that the Madan, Aaron, Cone, Harding, and Bradfield complex should be considered one roadless area and recommended it for permanent protection as LUD II.

Some individuals recommended this area for permanent protection as wilderness.

208 – Bradfield

The city of Petersburg said they were opposed to designation of this area as wilderness because of the potential long-term economic impacts on the city.

The Alaska Rainforest Campaign (a coalition of national and Alaska conservation groups) identified Roadless Areas 204, 205, 206, 207, 208, 209, 210, 528, and 529 as a contiguous complex of roadless areas that should be considered one roadless area and recommended it for permanent protection as LUD II. SEACC recommended that the Madan, Aaron, Cone, Harding, and Bradfield complex should be considered one roadless area and recommended it for permanent protection as LUD II.

One individual called for long-term protection of this area.

209 – Anan

The U.S. Department of the Interior identified this roadless area as one of the 13 roadless areas they considered to have outstanding fish and wildlife values. They indicated that, along with three other roadless areas that form the Cleveland Peninsula, it serves as a corridor for many mainland species to colonize the archipelago of Southeast Alaska. They also indicated that protection of this area, in combination with the Harding (#207) and North Cleveland (#529) Roadless Areas, would conserve valuable remaining undisturbed forested habitats on the mainland of southeast Alaska. Large tracts of undisturbed wilderness are necessary to support the bear densities in the region because there is a hierarchy amongst bears, and between species of bears. They commented that the important wildlife values provided by this area warrant management that ensures the long-term integrity of its habitats, ecosystem processes, and ecological functions.

In comments relative to the 1997 Forest Plan, the Governor of Alaska recommended that logging and construction of logging roads be avoided in important public interest areas such as the Cleveland Peninsula (most of RA# 528, 529, 209, and 210). This comment was reiterated by the Governor in scoping comments regarding the SEIS and in comments by the Division of Governmental Coordination on the Draft SEIS.

Alaska Department of Fish and Game recommended permanent roadless status for the Cleveland Peninsula in their comments on the Draft SEIS.

The city of Petersburg said they were opposed to designation of this area as wilderness because of the potential long-term economic impacts on the city.

The city of Pelican passed a resolution stating that the important watersheds identified as areas of special interest in the 1999 ROD and HR 987 should given long-term protection.

The Alaska Rainforest Campaign (a coalition of national and Alaska conservation groups) identified Roadless Areas 204, 205, 206, 207, 208, 209, 210, 528, and 529 as a contiguous complex of roadless areas that should be considered one roadless area and recommended it for permanent protection as LUD II. SEACC identified the Anan roadless area as part of the Cleveland Peninsula, which includes Roadless Areas 209, 210, 528, and 529. They recommend this entire area as LUD II.

Many individual commenters identified the Cleveland Peninsula as an area in need of protection. Some individuals recommended this area for permanent protection as wilderness.

210 – Frosty

In comments relative to the 1997 Forest Plan, the Governor of Alaska recommended that logging and construction of logging roads be avoided in important public interest areas such as the Cleveland Peninsula (most of RA# 528, 529, 209, and 210). This comment was reiterated by the Governor in scoping comments regarding the SEIS and in comments by the Division of Governmental Coordination on the Draft SEIS.

Alaska Department of Fish and Game recommended permanent roadless status for the Cleveland Peninsula in their comments on the Draft SEIS.

The Department of Transportation and Public Facilities noted that there is a corridor across Cleveland Peninsula that passes through this roadless area; it was identified in the Southeast Alaska Transportation Plan under Long Term Actions and was not included in the SEIS. They commented that this corridor is for a proposed highway that would link new ferry terminals on Spacious Bay and Santa Anna Inlet and would be a component of the Inside Passage Highway.

The city of Petersburg said they were opposed to designation of this area as wilderness because of the potential long-term economic impacts on the city.

The Alaska Rainforest Campaign (a coalition of national and Alaska conservation groups) identified Roadless Areas 204, 205, 206, 207, 208, 209, 210, 528, and 529 as a contiguous complex of roadless areas that should be considered one roadless area and recommended it for permanent protection as LUD II. SEACC identified the Frosty roadless area as part of the Cleveland Peninsula, which includes Roadless Areas 209, 210, 528, and 529. They recommend this entire area as LUD II.

Many individual commenters identified the Cleveland Peninsula as an area in need of protection.

211 – North Kupreanof

The city of Petersburg said they were opposed to designation of this area as wilderness because of the potential long-term economic impacts on the city.

SEACC recommended that the remaining unlogged portions of northern Kupreanof Island (Roadless Areas 211, 212, and 213) be designated LUD II to safeguard their valuable fish and wildlife habitat important for subsistence, fishing, and hunting for residents of Kake and Petersburg. The Alaska Rainforest Campaign (a coalition of national and Alaska conservation groups) recommended Roadless Area 211 for permanent protection as LUD II.

212 – Missionary

The city of Petersburg said they were opposed to designation of this area as wilderness because of the potential long-term economic impacts on the city.

The Alaska Rainforest Campaign (a coalition of national and Alaska conservation groups) recommended Roadless Area 212 for permanent protection as LUD II. SEACC recommended that the remaining unlogged portions of northern Kupreanof Island (Roadless Areas 211, 212, and 213) be designated LUD

II to safeguard their valuable fish and wildlife habitat important for subsistence, fishing, and hunting for residents of Kake and Petersburg.

213 – Five Mile

The city of Petersburg said they were opposed to designation of this area as wilderness because of the potential long-term economic impacts on the city.

The city of Kupreanof said they would like this area added to the Petersburg-Duncan Salt Chuck Wilderness. They are interested in developing a loop trail that connects with the Kupreanof waterfront trail and with Petersburg Creek. They indicated that this trail would take 2-3 days to hike and would be unique in Southeast Alaska; it would be a lengthy hiking loop and would be easily accessible by tourists.

The mayor of Wrangell is opposed to wilderness designation of this area because it would preclude cost-effective transportation and electrical intertie connection to Kake and Sitka.

SEACC recommended that the remaining unlogged portions of northern Kupreanof Island (Roadless Areas 211, 212, and 213) be designated LUD II. The Alaska Rainforest Campaign (a coalition of national and Alaska conservation groups) recommended Roadless Area 213 for permanent protection as LUD II.

214 – South Kupreanof

The city of Kupreanof recommended the entire Castle River drainage for designation as wilderness.

The city of Petersburg said they were opposed to designation of this area as wilderness because of the potential long-term economic impacts on the city. However, they encouraged the Forest Service not to log or build logging roads in watersheds that are primary salmon producing watersheds or otherwise community use areas important to Petersburg residents including the Castle River.

The Organized Village of Kake passed a resolution requesting that “customary and traditional areas such as … Totem and Douglas Bays (VCUs 132,433), Kushneahin Lake/stream (VCU 431)… be recommended for long-term protection”.

SEACC recommended that the South Kupreanof Roadless Area be designated as wilderness to protect valuable fish and wildlife habitat. They indicated that the Douglas and Totem Bay areas, along the southern boundary, contain extremely valuable fish habitat and are heavily utilized by residents of Kake, Port Protection, and Point Baker. Residents of these communities gave testimony asking for the protection of the high quality hunting opportunities on South Kupreanof. The Alaska Rainforest Campaign (a coalition of national and Alaska conservation groups) recommended Roadless Area 214 for long-term protection.

Individuals noted the high subsistence value of the southern portion of this area to the residents of Point Baker. Others noted that the timber is so sparse on South Kupreanof, that it should be left alone and that the area has very high fish and wildlife values. Some individuals recommended South Kupreanof for protection.

215 – Castle

The U.S. Department of the Interior identified this roadless area as one of the 13 roadless areas they considered to have outstanding fish and wildlife values. They indicated that this is one of the few places that humans regularly penetrate inland from the shoreline, following the Castle River upstream.

The Alaska Department of Fish and Game rated the Castle roadless area as the highest priority for protection in the Stikine Area. This rating is based on the VCUs with the highest value fish and wildlife resources needing additional protection. VCUs are prioritized for their very high productivity, essential role in connectivity, and/or very high value as community use areas.

The city of Pelican passed a resolution stating that the important watersheds identified as areas of special interest in the 1999 ROD and HR 987 should given long-term protection.

The city of Petersburg said they were opposed to designation of this area as wilderness because of the potential long-term economic impacts on the city. However, they encouraged the Forest Service not to

log or build logging roads in watersheds that are primary salmon producing watersheds or otherwise community use areas important to Petersburg residents including the Castle River

The city of Kupreanof recommended the entire Castle River drainage for designation as wilderness.

The Alaska Rainforest Campaign (a coalition of national and Alaska conservation groups) recommended Roadless Area 215 for long-term protection. SEACC placed this roadless area in a high priority for wilderness protection category.

Many individuals identified the Castle River as an area that needed protection. Some individuals recommended the entire area for permanent protection as wilderness, especially because of its high fish and wildlife and recreation values

216 – Lindenberg

The city of Petersburg said they were opposed to designation of this area as wilderness because of the potential long-term economic impacts on the city.

The Alaska Rainforest Campaign (a coalition of national and Alaska conservation groups) recommended Roadless Area 216 for permanent protection as LUD II. SEACC recommended that the remaining unlogged portions of the Lindenberg Peninsula of Kupreanof Island be designated LUD II to safeguard the area's valuable fish and wildlife habitat. They indicated that the northern portion of the Lindenberg Roadless Area should be designated wilderness and added to the adjoining Petersburg Creek/Duncan Salt Chuck Wilderness.

217 – Green Rocks

The city of Petersburg said they were opposed to designation of this area as wilderness because of the potential long-term economic impacts on the city.

SEACC recommended that the remaining unlogged portions of the Lindenberg Peninsula of Kupreanof Island be designated LUD II to safeguard the area's valuable fish and wildlife habitat. The Alaska Rainforest Campaign (a coalition of national and Alaska conservation groups) recommended Roadless Area 217 for permanent protection as LUD II.

218 – Woewodski

The U.S. Department of the Interior identified this roadless area as having important fish and wildlife habitat and populations; although not a top priority for protection, it ranked in their top third among all roadless areas.

The Alaska Department of Fish and Game rated the Woewodski roadless area as the second highest priority for protection in the Stikine Area. This rating is based on the VCUs with the highest value fish and wildlife resources needing additional protection. VCUs are prioritized for their very high productivity, essential role in connectivity, and/or very high value as community use areas.

The city of Petersburg said they were opposed to designation of this area as wilderness because of the potential long-term economic impacts on the city.

The city of Kupreanof recommended Woewodski for designation as wilderness.

The Alaska Rainforest Campaign (a coalition of national and Alaska conservation groups) recommended Roadless Area 218 for permanent protection as wilderness. SEACC recommended that the Woewodski Roadless Area be designated as wilderness to protect valuable fish and wildlife habitat.

Some individuals recommended this area for permanent protection as wilderness.

219 – North Mitkof

The city of Petersburg said they were opposed to designation of this area as wilderness because of the potential long-term economic impacts on the city.

SEACC recommended that the remaining roadless areas on heavily logged Mitkof Island be designated LUD II. The Alaska Rainforest Campaign (a coalition of national and Alaska conservation groups) recommended Roadless Area 219 for permanent protection as LUD II.

220 – East Mitkof

The city of Petersburg said they were opposed to designation of this area as wilderness because of the potential long-term economic impacts on the city.

SEACC recommended that the remaining roadless areas on heavily logged Mitkof Island be designated LUD II. The Alaska Rainforest Campaign (a coalition of national and Alaska conservation groups) recommended Roadless Area 220 for permanent protection as LUD II.

222 – Central Mitkof

The city of Petersburg said they were opposed to designation of this area as wilderness because of the potential long-term economic impacts on the city.

SEACC recommended that the remaining roadless areas on heavily logged Mitkof Island be designated LUD II. The Alaska Rainforest Campaign (a coalition of national and Alaska conservation groups) recommended Roadless Area 222 for permanent protection as LUD II.

223 – Manzanita

The city of Petersburg said they were opposed to designation of this area as wilderness because of the potential long-term economic impacts on the city.

The city of Pelican passed a resolution stating that the important watersheds identified as areas of special interest in the 1999 ROD and HR 987 should given long-term protection.

The Alaska Rainforest Campaign (a coalition of national and Alaska conservation groups) recommended Roadless Area 223 for permanent protection as LUD II. SEACC recommended that the remaining roadless areas on heavily logged Mitkof Island be designated LUD II.

A number of commenters identified Southeast Mitkof Island as an area that needed protection.

224 – Crystal

The city of Petersburg said they were opposed to designation of this area as wilderness because of the potential long-term economic impacts on the city.

SEACC recommended that the remaining roadless areas on heavily logged Mitkof Island be designated LUD II. The Alaska Rainforest Campaign (a coalition of national and Alaska conservation groups) recommended Roadless Area 224 for permanent protection as LUD II.

225 – Kadin

The U.S. Department of the Interior identified this roadless area as having important fish and wildlife habitat and populations; although not a top priority for protection, it ranked in their top third among all roadless areas. They recommend additional conservation measures be integrated into the area's management to ensure the long-term protection of this island's bald eagle population.

The city of Petersburg said they were opposed to designation of this area as wilderness because of the potential long-term economic impacts on the city.

The Alaska Rainforest Campaign (a coalition of national and Alaska conservation groups) recommended Roadless Area 225 for permanent protection as LUD II.

227 – North Wrangell

The Alaska Rainforest Campaign (a coalition of national and Alaska conservation groups) recommended Roadless Area 227 for permanent protection as LUD II. SEACC recommended the remaining roadless areas on Wrangell Island be designated LUD II.

229 – South Wrangell

SEACC recommended the remaining roadless areas on Wrangell Island be designated LUD II. The Alaska Rainforest Campaign (a coalition of national and Alaska conservation groups) recommended Roadless Area 229 for permanent protection as LUD II.

231 – Woronkofski

The city of Petersburg said they were opposed to designation of this area as wilderness because of the potential long-term economic impacts on the city.

SEACC recommended the remaining unlogged portions of Woronkofski, Zarembo, and North Etolin Islands be safeguarded through LUD II protection. The Alaska Rainforest Campaign (a coalition of national and Alaska conservation groups) recommended Roadless Area 231 for permanent protection as LUD II.

232 – North Etolin

The city of Petersburg said they were opposed to designation of this area as wilderness because of the potential long-term economic impacts on the city.

The Alaska Rainforest Campaign (a coalition of national and Alaska conservation groups) recommended Roadless Area 232 for permanent protection as LUD II. SEACC recommended the remaining unlogged portions of Woronkofski, Zarembo, and North Etolin Islands be safeguarded through LUD II protection.

233 – Mosman

The U.S. Department of the Interior identified this roadless area as having important fish and wildlife habitat and populations; although not a top priority for protection, it ranked in their top third among all roadless areas. They indicated that protection of this area, in combination with the South Etolin (#234) Roadless Area and South Etolin Wilderness Area, would conserve valuable remaining undisturbed forested habitats on the island.

The city of Petersburg said they were opposed to designation of this area as wilderness because of the potential long-term economic impacts on the city.

SEACC recommended the Mosman and South Etolin roadless areas for wilderness designation and to be added to the South Etolin Wilderness.

Some individuals recommended this area for permanent protection as wilderness.

234 – South Etolin

The U.S. Department of the Interior identified this roadless area as having important fish and wildlife habitat and populations; although not a top priority for protection, it ranked in their top third among all roadless areas. They indicated that protection of this area, in combination with the Mosman (#233) Roadless Area and South Etolin Wilderness Area, would conserve valuable remaining undisturbed forested habitats on the island.

The city of Petersburg said they were opposed to designation of this area as wilderness because of the potential long-term economic impacts on the city.

SEACC recommended the Mosman and South Etolin roadless areas for wilderness designation and to be added to the South Etolin Wilderness.

The Wrangell Resource Council recommended this area as an addition to the South Etolin Wilderness.

Some individuals recommended this area for permanent protection as wilderness.

235 – West Zarembo

The city of Petersburg said they were opposed to designation of this area as wilderness because of the potential long-term economic impacts on the city.

The Alaska Rainforest Campaign (a coalition of national and Alaska conservation groups) recommended Roadless Area 235 for permanent protection as LUD II. SEACC recommended the remaining unlogged portions of Woronkofski, Zarembo, and North Etolin Islands be safeguarded through LUD II protection.

236 – East Zarembo

The city of Petersburg said they were opposed to designation of this area as wilderness because of the potential long-term economic impacts on the city.

SEACC recommended the remaining unlogged portions of Woronkofski, Zarembo, and North Etolin Islands be safeguarded through LUD II protection. The Alaska Rainforest Campaign (a coalition of national and Alaska conservation groups) recommended Roadless Area 236 for permanent protection as LUD II.

237 – South Zarembo

The city of Petersburg said they were opposed to designation of this area as wilderness because of the potential long-term economic impacts on the city.

The Alaska Rainforest Campaign (a coalition of national and Alaska conservation groups) recommended Roadless Area 237 for permanent protection as LUD II. SEACC recommended the remaining unlogged portions of Woronkofski, Zarembo, and North Etolin Islands be safeguarded through LUD II protection.

238 – Kashevarof Islands

The city of Petersburg said they were opposed to designation of this area as wilderness because of the potential long-term economic impacts on the city.

SEACC recommended these islands be designated LUD II

Some individuals called for permanent protection of this area.

239 – Keku

The city of Petersburg said they were opposed to designation of this area as wilderness because of the potential long-term economic impacts on the city.

SEACC recommended the remaining unlogged portions of northern Kuiu Island should be protected by LUD II designation. The Alaska Rainforest Campaign (a coalition of national and Alaska conservation groups) recommended Roadless Area 239 for permanent protection as LUD II.

A number of cave/karst experts and other individuals stated that this area contains approximately 2,400 acres of karst that extends from alpine to sea level and includes a wide range of development. The Keku Islets Special Interest Area also includes numerous interesting formations including arches, small caves, sea stacks, and cliffs, along with many fossils. The commenters noted that this area and adjacent developed karstlands should be protected as wilderness.

Some individuals recommended protection of Threemile Arm and Port Camden.

240 – Security

The U.S. Department of the Interior identified this roadless area as having important fish and wildlife habitat and populations; although not a top priority for protection, it ranked in their top third among all roadless areas.

The city of Petersburg said they were opposed to designation of this area as wilderness because of the potential long-term economic impacts on the city.

The Alaska Rainforest Campaign (a coalition of national and Alaska conservation groups) recommended Roadless Area 240 for permanent protection as LUD II. SEACC recommended the remaining unlogged portions of northern Kuiu Island should be protected by LUD II designation.

Some individuals wanted protection for Washington Bay. Some individuals recommended the entire area for permanent protection as wilderness.

241 – North Kuiu

The city of Petersburg said they were opposed to designation of this area as wilderness because of the potential long-term economic impacts on the city.

SEACC recommended the remaining unlogged portions of northern Kuiu Island should be protected by LUD II designation. The Alaska Rainforest Campaign (a coalition of national and Alaska conservation groups) recommended Roadless Area 241 for permanent protection as LUD II.

A number of cave/karst experts and other individuals stated that this area contains moderately to highly developed karst that should be protected along with their drainage basins.

Some individuals recommended protection of Threemile Arm and Port Camden.

242 – Camden

The U.S. Department of the Interior identified this roadless area as one of the 13 roadless areas they considered to have outstanding fish and wildlife values. They indicated that among the remaining, undeveloped areas left on Kuiu Island, three areas offer outstanding fish and wildlife habitat that should be protected. These include Bay of Pillars, Camden, and East Kuiu. Protection of this area, particularly in combination with the Rocky Pass (#243) Roadless Area, would conserve valuable remaining undisturbed, forested habitats on the island. They indicated that the important wildlife values provided by this area warrant management that ensures the long-term integrity of its habitats, ecosystem processes, and ecological functions

The Alaska Department of Fish and Game rated the Camden roadless area as the third highest priority for protection in the Stikine Area. This rating is based on the VCUs with the highest value fish and wildlife resources needing additional protection. VCUs are prioritized for their very high productivity, essential role in connectivity, and/or very high value as community use areas.

The city of Petersburg said they were opposed to designation of this area as wilderness because of the potential long-term economic impacts on the city.

The Organized Village of Kake passed a resolution requesting that “customary and traditional areas such as … Port Camden (VCU 420)… be recommended for long-term protection”.

The city of Pelican passed a resolution stating that the important watersheds identified as areas of special interest in the 1999 ROD and HR 987 should given long-term protection.

The Alaska Rainforest Campaign (a coalition of national and Alaska conservation groups) recommended Roadless Area 242 for permanent protection as LUD II. SEACC recommended the remaining unlogged portions of northern Kuiu Island should be protected by LUD II designation.

A number of individuals identified East Port Camden as an area that needed protection. Some individuals recommended the entire area for permanent protection as wilderness.

243 – Rocky Pass

The U.S. Department of the Interior identified this roadless area as having important fish and wildlife habitat and populations; although not a top priority for protection, it ranked in their top third among all roadless areas. They communicated that protection of this area, particularly in combination with the Camden (#242) and South Kupreanof (#214) Roadless Area, would conserve valuable remaining undisturbed forested habitats on the island.

The city of Petersburg said they were opposed to designation of this area as wilderness because of the potential long-term economic impacts on the city.

The city of Pelican passed a resolution stating that the important watersheds identified as areas of special interest in the 1999 ROD and HR 987 should given long-term protection.

The city of Kupreanof recommended Rocky Pass for designation as wilderness.

The Organized Village of Kake passed a resolution requesting that “customary and traditional areas such as … Rocky Pass (VCU 428)… be recommended for long-term protection”.

The Alaska Rainforest Campaign (a coalition of national and Alaska conservation groups) recommended Roadless Area 243 for permanent protection as LUD II. SEACC recommended the Rocky Pass roadless area for LUD II designation.

A number of individual commenters identified southeast Rocky Pass as an area that needed protection. This area is of special concern to residents of Point Baker.

244 – Bay of Pillars

The U.S. Department of the Interior identified this roadless area as one of the 13 roadless areas they considered to have outstanding fish and wildlife values. They indicated that among the remaining, undeveloped areas left on Kuiu Island, three areas offer outstanding fish and wildlife habitat that should be protected. These include Bay of Pillars, Camden, and East Kuiu. Protection of this area, particularly in combination with the East Kuiu (#245) and Tebenkof Bay Wilderness Area, would conserve valuable remaining undisturbed, forested habitats on the island. They expressed that the important wildlife values provided by this area warrant management that ensures the long-term integrity of its habitats, ecosystem processes, and ecological functions.

The city of Petersburg said they were opposed to designation of this area as wilderness because of the potential long-term economic impacts on the city.

The city of Pelican passed a resolution stating that the important watersheds identified as areas of special interest in the 1999 ROD and HR 987 should given long-term protection.

The City of Kupreanof recommended the Bay of Pillars for permanent protection as wilderness.

The Alaska Rainforest Campaign (a coalition of national and Alaska conservation groups) identified Roadless Areas 244, 245, and 246 as adjacent to the existing Tebenkof Bay Wilderness and Kuiu Wilderness and recommended them for permanent protection as wilderness. They indicated that this combination would create a contiguous wilderness area of approximately 265,000 acres. SEACC also recommended that the Bay of Pillars, East Kuiu, and South Kuiu roadless areas be designated wilderness and added to the existing Tebenkof Bay and Kuiu Wilderness.

245 – East Kuiu

The U.S. Department of the Interior identified this roadless area as one of the 13 roadless areas they considered to have outstanding fish and wildlife values. They indicated that among the remaining, undeveloped areas left on Kuiu Island, three areas offer outstanding fish and wildlife habitat that should be protected. These include Bay of Pillars, Camden, and East Kuiu. Protection of this area, particularly in combination with the Bay of Pillars (#244) and Tebenkof Bay Wilderness Area, would conserve valuable remaining undisturbed, forested habitats on the island. They expressed that the important wildlife values provided by this area warrant management that ensures the long-term integrity of its habitats, ecosystem processes, and ecological functions.

In comments relative to the 1997 Forest Plan, the Governor of Alaska recommended that logging and construction of logging roads be avoided in important public interest areas such as East Kuiu Island (RA# 245). This comment was reiterated by the Governor in scoping comments regarding the SEIS and in comments by the Division of Governmental Coordination on the Draft SEIS.

Alaska Department of Fish and Game recommended permanent roadless status for East Kuiu Island in their comments on the Draft SEIS. They rated the East Kuiu roadless area as the sixth highest priority for protection in the Stikine Area. This rating is based on the VCUs with the highest value fish and wildlife resources needing additional protection. VCUs are prioritized for their very high productivity, essential role in connectivity, and/or very high value as community use areas.

The city of Petersburg said they were opposed to designation of this area as wilderness because of the potential long-term economic impacts on the city.

The city of Pelican passed a resolution stating that the important watersheds identified as areas of special interest in the 1999 ROD and HR 987 should given long-term protection.

The City of Kupreanof recommended East Kuiu for permanent protection as wilderness.

The Organized Village of Kake passed a resolution requesting that “customary and traditional areas such as … East Kuiu (VCUs 416-418, 4051)… be recommended for long-term protection”.

Audubon Alaska recommended that East Kuiu Island should be protected from logging and road building.

SEACC recommended that the Bay of Pillars, East Kuiu, and South Kuiu roadless areas be designated wilderness and added to the existing Tebenkof Bay and Kuiu Wilderness. They indicated that this combination would create a contiguous wilderness of approximately 265,000 acres. The Alaska Rainforest Campaign (a coalition of national and Alaska conservation groups) identified Roadless Areas 244, 245, and 246 as adjacent to the existing Tebenkof Bay Wilderness and Kuiu Wilderness and recommended them for permanent protection as wilderness.

One commenter recommended Seclusion Bay should be protected. Many individual commenters recommended protection for all of East Kuiu.

246 – South Kuiu

The U.S. Department of the Interior identified this roadless area as having important fish and wildlife habitat and populations; although not a top priority for protection, it ranked in their top third among all roadless areas. They indicated that protection of this area, particularly since it adjoins Tebenkof Bay Wilderness Area, would conserve valuable remaining undisturbed forested habitats on the island.

The city of Petersburg said they were opposed to designation of this area as wilderness because of the potential long-term economic impacts on the city.

The city of Pelican passed a resolution stating that the important watersheds identified as areas of special interest in the 1999 ROD and HR 987 should given long-term protection.

The Alaska Rainforest Campaign (a coalition of national and Alaska conservation groups) identified Roadless Areas 244, 245, and 246 as adjacent to the existing Tebenkof Bay Wilderness and Kuiu Wilderness and recommended them for permanent protection as wilderness. They indicated that this combination would create a contiguous wilderness area of approximately 265,000 acres. SEACC recommended that the Bay of Pillars, East Kuiu, and South Kuiu roadless areas be designated wilderness and added to the existing Tebenkof Bay and Kuiu Wilderness. This combination would create a contiguous wilderness of approximately 265,000 acres.

Many individuals commented in favor of permanent protection for this area

247 – East Wrangell

SEACC recommended the remaining roadless areas on Wrangell Island be designated LUD II. The Alaska Rainforest Campaign (a coalition of national and Alaska conservation groups) recommended Roadless Area 247 for permanent protection as LUD II..

288 – West Wrangell

SEACC recommended the remaining roadless areas on Wrangell Island be designated LUD II. Rainforest Campaign (a coalition of national and Alaska conservation groups) recommended Roadless Area 288 for permanent protection as LUD II.

289 – Central Wrangell

SEACC recommended the remaining roadless areas on Wrangell Island be designated LUD II. The Alaska Rainforest Campaign (a coalition of national and Alaska conservation groups) recommended Roadless Area 289 for permanent protection as LUD II.

290 – Southeast Wrangell

SEACC recommended the remaining roadless areas on Wrangell Island be designated LUD II. The Alaska Rainforest Campaign (a coalition of national and Alaska conservation groups) recommended Roadless Area 290 for permanent protection as LUD II.

301 – Skagway-Juneau Icefield

The U.S. Department of the Interior identified this roadless area as having important fish and wildlife habitat and populations; although not a top priority for protection, it ranked in their top third among all roadless areas. They indicated that the Berners Bay watershed is one of the most important fish and wildlife habitats in this roadless area. Berners Bay is also the most vulnerable to development. Although

linked peripherally to the Juneau road system, most of Berners Bay is only accessible by boat. The head of the bay is very shallow because of the silt load that has been deposited by three glacial river systems, and thus is only accessible by kayak, jet or airboat. They commented that Berners Bay still has a great deal of wilderness character because of this limited access. They indicated that they do not think the LUD II status for this high value habitat would protect the many important fish, wildlife, and wilderness values of this area.

The city of Pelican passed a resolution stating that the important watersheds identified as areas of special interest in the 1999 ROD and HR 987 should given long-term protection.

SEACC recommended that Roadless Areas 301, 302, 305, and 313, which are largely contiguous, should be treated as one roadless area and recommended it for wilderness and LUD II protection, as described in Alternative 6. They commented that the area surrounding the population center should be protected by LUD II as these are important for recreation, subsistence, and tourism. The Alaska Rainforest Campaign (a coalition of national and Alaska conservation groups) identified Roadless Areas 301, 302, 305, and 313 as a contiguous complex of roadless areas that should be considered one roadless area and recommended it for permanent protection in a combination of wilderness and LUD II, as described in Alternative 6.

A Juneau Area Assemblyman recommended Berners Bay for designation as wilderness.

An individual of the Auk Kwaans commented that the lands around Berners Bay contain sites that are important to the Auk Kwaans for food, medicine, and a burial site. The individual requested that the lands be protected as wilderness.

Many individuals called for protection of Berners Bay and others commented that the area around Berners Bay should be protected from mining. Some wanted the north side of the bay, from Pt. St. Mary's to Johnson Creek to be protected from timber harvesting (they are partially open now). A few individuals commented that the entire area was deserving of long-term protection. Some recommended it because of world-class scenery, abundant wildlife and habitat, and gave almost unilateral support for wilderness protection. Another individual commented that the Katzehin River watershed should be considered for wilderness protection; there are no other wildernesses that are readily accessible to Haines and Skagway. One individual commented that there was a sawmill and mining in Berners Bay and portions of the area have been logged and these disturbances were relatively indiscernible now. However, many individuals recommended that Berners Bay be designated wilderness.

302 – Taku-Snettisham

The U.S. Department of the Interior identified this roadless area as having important fish and wildlife habitat and populations; although not a top priority for protection, it ranked in their top third among all roadless areas. They commented that the addition of the Taku, Speel, and Whiting River watersheds, and the Snettisham Peninsula would enhance the fish, wildlife, recreational, and wilderness values of the Tracy Arm/Ford's Terror Wilderness.

The city of Pelican passed a resolution stating that the important watersheds identified as areas of special interest in the 1999 ROD and HR 987 should given long-term protection.

The Alaska Rainforest Campaign (a coalition of national and Alaska conservation groups) identified Roadless Areas 301, 302, 305, and 313 as a contiguous complex of roadless areas that should be considered one roadless area and recommended it for permanent protection in a combination of wilderness and LUD II, as described in Alternative 6. SEACC recommended that Roadless Areas 301, 302, 305, and 313, which are largely contiguous, should be treated as one roadless area and recommended it for wilderness and LUD II protection, as described in Alternative 6. They indicated that the area surrounding the population center should be protected by LUD II; these are important for recreation, subsistence, and tourism.

A number of individual commenters identified Taku Harbor as an area in need of protection and some recommended the entire roadless area. Some recommended it because of world-class scenery, abundant wildlife and habitat, and almost unilateral support for wilderness protection.

303 - Sullivan

The U.S. Department of the Interior identified this roadless area as having important fish and wildlife habitat and populations; although not a top priority for protection, it ranked in their top third among all roadless areas. They indicated that protection of this area, particularly because it adjoins the Endicott River Wilderness and Glacier Bay National Park, would conserve valuable remaining undisturbed forested habitats on the mainland.

The Alaska Rainforest Campaign (a coalition of national and Alaska conservation groups) identified Roadless Areas 303 and 304 as adjacent to the existing Endicott River Wilderness and to Glacier Bay National Park. They recommended the two roadless areas for permanent protection as wilderness and as an addition to Endicott River Wilderness to create a contiguous wilderness area of just over 3.1 million acres. SEACC recommended the Sullivan and Chikat-West Lynn roadless areas, which are adjacent to the existing Endicott River Wilderness and Glacier National Park, for permanent protection through expansion of the Endicott River Wilderness. They also indicated that this combination would create a contiguous wilderness of over 3.1 million acres.

Sullivan Island was recommended for wilderness or other protection by a number individuals.

304 – Chilkat-West Lynn Canal

The U.S. Department of the Interior identified this roadless area as having important fish and wildlife habitat and populations; although not a top priority for protection, it ranked in their top third among all roadless areas. They indicated that protection of this area, particularly because it adjoins the Endicott River Wilderness and Glacier Bay National Park, would conserve valuable remaining undisturbed forested habitats on the mainland.

The Gustavus Community Association recommended increased protection for Roadless Area 304 because the current Forest Plan fails to adequately protect areas of particular concern to the community of Gustavus, such as Pt. Couverden.

SEACC recommended the Sullivan and Chikat-West Lynn roadless areas, which are adjacent to the existing Endicott River Wilderness and to Glacier National Park, for permanent protection through expansion of the Endicott River Wilderness. They indicated that this combination would create a contiguous wilderness of over 3.1 million acres. The Alaska Rainforest Campaign (a coalition of national and Alaska conservation groups) also identified Roadless Areas 303 and 304 as adjacent to the existing Endicott River Wilderness and to Glacier Bay National Park. They recommended the two roadless areas for permanent protection as wilderness and as an addition to Endicott River Wilderness to create a contiguous wilderness area of just over 3.1 million acres.

A number of individual commenters identified Point Couverden, Homeshore, and St. James Bay as areas in need of protection and some recommended the entire roadless area

305 – Juneau Urban

The Landmark Trees Project noted that there is an example of streamside Landmark Forest on Cowee Creek, north of Juneau. They commented that the 1-acre stand contains 5 spruces between 180 and 200 ft. tall and most are greater than 150 ft and that there were tracks of sow and cub brown bear. It is the finest forest they have found on the northern Tongass.

SEACC recommended that Roadless Areas 301, 302, 305, and 313, which are largely contiguous, should be treated as one roadless area and recommended it for wilderness and LUD II protection, as described in Alternative 6. They indicated that the area surrounding the population center should be protected by LUD II; these areas are important for recreation, subsistence, and tourism. The Alaska Rainforest Campaign (a coalition of national and Alaska conservation groups) identified Roadless Areas 301, 302, 305, and 313 as a contiguous complex of roadless areas that should be considered one roadless area and recommended it for permanent protection in a combination of wilderness and LUD II, as described in Alternative 6.

A Juneau Area Assemblyman recommended Cowee and Davies Creeks watersheds for designation as wilderness. He also recommended Benjamin Island for designation as wilderness. Benjamin Island is not included in any of the roadless areas but is close to Roadless Area 305.

Many individuals wanted the Cowee and Davies Creek drainages on the south side of Berners Bay to be protected from timber harvesting (the areas are partially open now). Some also identified Yankee Basin, Windfall Lake, Peterson Lake, Herbert River, and upper Montana Creek as being important fish and wildlife corridors worthy of protection. Some individuals wanted Cowee and Davies Creeks drainages to be protected as LUD II or wilderness.

306 – Mansfield Peninsula

The U.S. Department of the Interior identified this roadless area as having important fish and wildlife habitat and populations; although not a top priority for protection, it ranked in their top third among all roadless areas.

SEACC recommended the Mansfield Peninsula and Greens Creek areas, which are adjacent to the existing Admiralty Island National Monument and Wilderness, for protection through designation as wilderness. These additions would create a contiguous wilderness of just under 1 million acres. The Alaska Rainforest Campaign (a coalition of national and Alaska conservation groups) recommended Roadless Areas 306 and 307 for permanent protection as wilderness and as an addition to the Admiralty Island National Monument and Wilderness to create a contiguous Wilderness of just under one million acres.

A Juneau Area Assemblyman recommended Mansfield Peninsula for designation as wilderness and addition to the National Monument.

An individual of the Auk Kwaans asked that their traditional lands on Admiralty, including Mansfield Peninsula and Hawk Inlet, become Wilderness National Monument.

An individual noted that the Mansfield Peninsula is premiere grizzly bear habitat and should be protected. A number of individual commenters identified the Mansfield Peninsula as an area in need of protection.

307 – Greens Creek

The U.S. Department of the Interior identified this roadless area as having important fish and wildlife habitat and populations; although not a top priority for protection, it ranked in their top third among all roadless areas. They indicated that protection of this area would conserve valuable remaining undisturbed forested habitats on the island, particularly since it adjoins the Kootznoowoo Wilderness and Mansfield Peninsula Roadless Area (#306).

The Alaska Rainforest Campaign (a coalition of national and Alaska conservation groups) recommended Roadless Areas 306 and 307 for permanent protection as wilderness and as an addition to the Admiralty Island National Monument and Wilderness to create a contiguous Wilderness of just under one million acres. SEACC recommended the Mansfield Peninsula and Greens Creek areas, which are adjacent to the existing Admiralty Island National Monument and Wilderness, for protection through designation as wilderness. They also commented that these additions would create a contiguous wilderness of just less than one million acres.

An individual of the Auk Kwaans asked that their traditional lands on Admiralty, including Mansfield Peninsula and Hawk Inlet, become Wilderness National Monument. Some individuals recommended the area for permanent protection.

308 – Windham-Port Houghton

The U.S. Department of the Interior identified this roadless area as having outstanding fish and wildlife values. They consider it to have the most important habitat on the central mainland.

In comments relative to the 1997 Forest Plan, the Governor of Alaska recommended that logging and construction of logging roads be avoided in important public interest areas such as Port Houghton (the southern portion of RA# 308). This comment was reiterated by the Governor in scoping comments regarding the SEIS and in comments by the Division of Governmental Coordination on the Draft SEIS.

The Alaska Department of Fish and Game recommended permanent roadless status for Port Houghton in their comments on the Draft SEIS. They rated the Windham-Port Houghton roadless area as the seventh highest priority for protection in the Stikine Area. This rating is based on the VCUs with the highest value

fish and wildlife resources needing additional protection. VCUs are prioritized for their very high productivity, essential role in connectivity, and/or very high value as community use areas.

The city of Pelican passed a resolution stating that the important watersheds identified as areas of special interest in the 1999 ROD and HR 987 should given long-term protection.

The city of Petersburg said they were opposed to designation of this area as wilderness because of the potential long-term economic impacts on the city. However, they encouraged the Forest Service not to log or build logging roads in watersheds that are primary salmon producing watersheds or otherwise community use areas important to Petersburg residents including Port Houghton.

The city of Kupreanof recommended the entire Port Houghton drainage, Cape Fanshaw, Farrugut Bay and the shoreline from Farrugut Bay to Thomas Bay for designation as wilderness.

The Organized Village of Kake passed a resolution requesting that "customary and traditional areas such as … Cape Fanshaw/Farragut Bay (VCUs 860-900), Port Houghton (VCUs 790-840)… be recommended for long-term protection".

Audubon Alaska recommended that Port Houghton should be protected from logging and road building.

SEACC identified the Windham-Port Houghton roadless area as part of the Port Houghton/Cape Fanshaw complex (RAs 201, 202, and 308), which should be considered one contiguous roadless area and recommended it for permanent protection as wilderness. They commented that if this complex were designated, it would create a contiguous wilderness along the central mainland coast of nearly two million acres, making it the second largest Forest Service Wilderness in the nation. The Alaska Rainforest Campaign (a coalition of national and Alaska conservation groups) identified Roadless Areas 201, 202, 203, and 308 as a contiguous complex of roadless areas that should be considered one roadless area and recommended it for permanent protection as wilderness.

Many individuals identified Port Houghton as an area that needed protection and some included Sandborn Canal. One individual noted the area north of Wyndham Bay should be protected to preserve a large segment of forest in this area (instead of mostly icefields and barren rock in Tracy Arm-Fords Terror).

309 – Juneau Islands

SEACC recommended this area, which is adjacent to the Shelter Island State Marine Park, be designated as LUD II. The Alaska Rainforest Campaign (a coalition of national and Alaska conservation groups) recommended Roadless Area 309 for permanent protection as LUD II. They noted that it is adjacent to the Shelter Island State Marine Park and is heavily used for recreation and subsistence.

310 – Douglas Island

SEACC recommended this area, which is adjacent to the largest population center in Southeast Alaska, be designated LUD II. The Alaska Rainforest Campaign (a coalition of national and Alaska conservation groups) recommended Roadless Area 310 for permanent protection as LUD II.

311 – Chichagof

The U.S. Department of the Interior identified this roadless area as one of the 13 roadless areas they considered to have outstanding fish and wildlife values. They indicated there is high local and national support for managing this area in an unroaded condition, and local and national support for designating at least portions of this roadless area as wilderness. They recommend including the Pt. Adolphus/Mud Bay LUD II area within this conservation unit. They also indicated that the important wildlife values provided by this area warrant management that ensures the long-term integrity of its habitats, ecosystem processes, and ecological functions.

The Alaska Department of Fish and Game rated the Chichagof Roadless Area as the highest priority for protection in northern Southeast Alaska. This rating is based on the VCUs with the highest value fish and wildlife resources needing additional protection. VCUs are prioritized for their very high productivity, essential role in connectivity, and/or very high value as community use areas.

The city of Tenakee Springs passed a resolution recommending wilderness or LUD II protection for Crab Bay (VCUs 231-234), Seal Bay (VCUs 229-230), Long Bay (VCU 228), Upper Tenakee Inlet (VCUs 223-227), and Finn Cove (VCU 236).

The city of Pelican passed a resolution stating that the important watersheds identified as areas of special interest in the 1999 ROD and HR 987 should given long-term protection.

The Alaska Rainforest Campaign (a coalition of national and Alaska conservation groups) recommended Roadless Area 311 for permanent protection as LUD II. SEACC recommended the remaining unlogged portions of Chichagof Island for a LUD II designation.

Audubon Alaska recommended that Upper Tenakee Inlet should be protected from logging and road building.

Some members of the Southeast Alaska Federal Subsistence Regional Advisory Council identified the need for further protection of this area because of its importance for subsistence.

The president of the Hoonah Indian Association asked for the protection, conservation, and responsible management of this roadless area because of its special interest to the Huna People.

A number of cave/karst experts and other individuals noted that karst in the eastern portion of this area deserves more protection than it has now.

Many individuals recommended that upper Tenakee Inlet be protected because of the fish and wildlife (including brown bear) it produces and its beautiful, scenic natural areas. Seal Bay, Long Bay, Fat Lady Flats, and the end of the inlet were cited as prime examples. Some thought that upper Tenakee Inlet had valuable low elevation forest that should be protected. Some identified Crab Bay and Kadashan valley as important and some recommended the entire area for protection. Some individuals supported wilderness protection for the area around Point Adolphus and Mud Bay. Some individuals recommended it because of world-class scenery, abundant wildlife and habitat, and almost unilateral support for wilderness protection. Some individuals requested protection for Broad Finger and Broad Creeks.

312 – Trap Bay

The Alaska Department of Fish and Game rated the Trap Bay roadless area as the ninth highest priority for protection in northern Southeast Alaska. This rating is based on the VCUs with the highest value fish and wildlife resources needing additional protection. VCUs are prioritized for their very high productivity, essential role in connectivity, and/or very high value as community use areas.

SEACC recommended Trap Bay for wilderness.

Some members of the Southeast Alaska Federal Subsistence Regional Advisory Council identified the need for further protection of this area because of its importance for subsistence

A number of cave/karst experts and other individuals noted that karst in this area deserves more protection than it has now.

313 – Rhine

SEACC recommended that Roadless Areas 301, 302, 305, and 313, which are largely contiguous, should be treated as one roadless area and recommended it for wilderness and LUD II protection, as described in Alternative 6. They indicated that the area surrounding the population center should be protected by LUD II; these are important for recreation, subsistence, and tourism. The Alaska Rainforest Campaign (a coalition of national and Alaska conservation groups) identified Roadless Areas 301, 302, 305, and 313 as a contiguous complex of roadless areas that should be considered one roadless area and recommended it for permanent protection in a combination of wilderness and LUD II, as described in Alternative 6.

Some individuals requested long-term protection for Taku Harbor.

314 – Point Craven

The Alaska Rainforest Campaign (a coalition of national and Alaska conservation groups) recommended Roadless Area 314 for permanent protection as LUD II. SEACC recommended Point Craven for LUD II designation.

317 – Point Augusta

The president of the Hoonah Indian Association asked for the protection, conservation, and responsible management of this roadless area because of its special interest to the Huna People.

SEACC recommended Roadless Areas 317, 318, 319, 321, 323, and 325 for LUD II protection. They indicated that it is more critical now than ever before that these remaining wild areas on Chichagof are protected. The Alaska Rainforest Campaign (a coalition of national and Alaska conservation groups) recommended Roadless Area 317 for permanent protection as LUD II.

Some members of the Southeast Alaska Federal Subsistence Regional Advisory Council identified the need for further protection of this area because of its importance for subsistence.

318 – Whitestone

SEACC recommended Roadless Areas 317, 318, 319, 321, 323, and 325 for LUD II protection. They indicated it is more critical now than ever before that these remaining wild areas on Chichagof are protected. The Alaska Rainforest Campaign (a coalition of national and Alaska conservation groups) recommended Roadless Area 318 for permanent protection as LUD II.

Some members of the Southeast Alaska Federal Subsistence Regional Advisory Council identified the need for further protection of this area because of its importance for subsistence.

319 – Pavlof-East Point

The president of the Hoonah Indian Association asked for the protection, conservation, and responsible management of this roadless area because of its special interest to the Huna People.

SEACC recommended Roadless Areas 317, 318, 319, 321, 323, and 325 for LUD II protection. They indicated it is more critical now than ever before that these remaining wild areas on Chichagof are protected. The Alaska Rainforest Campaign (a coalition of national and Alaska conservation groups) recommended Roadless Area 319 for permanent protection as LUD II.

Some members of the Southeast Alaska Federal Subsistence Regional Advisory Council identified the need for further protection of this area because of its importance for subsistence.

A number of cave/karst experts and other individuals stated that East Chichagof and the North Central Prince of Wales Biogeographic Provinces contain some of the most highly developed karst lands in the Tongass. It was noted that protection of a combination of Freshwater Bay (#325), Game Creek (#323), Tenakee Ridge (#321), and Pavlov/East Point (#319) Roadless Areas would create a truly world class karst reserve for the East Chichagof Biogeographic Province.

321 – Tenakee Ridge

The president of the Hoonah Indian Association asked for the protection, conservation, and responsible management of this roadless area because of its special interest to the Huna People.

The Alaska Rainforest Campaign (a coalition of national and Alaska conservation groups) recommended Roadless Area 321 for permanent protection as LUD II. SEACC recommended Roadless Areas 317, 318, 319, 321, 323, and 325 for LUD II protection. They indicated it is more critical now than ever before that these remaining wild areas on Chichagof are protected.

Some members of the Southeast Alaska Federal Subsistence Regional Advisory Council identified the need for further protection of this area because of its importance for subsistence

A number of cave/karst experts and other individuals stated that East Chichagof and the North Central Prince of Wales Biogeographic Provinces contain some of the most highly developed karst lands in the Tongass. It was noted that protection of a combination of Freshwater Bay (#325), Game Creek (#323), Tenakee Ridge (#321), and Pavlov/East Point (#319) Roadless Areas would create a truly world class karst reserve for the East Chichagof Biogeographic Province.

323 – Game Creek

Alaska Department of Fish and Game noted that this roadless area is "ecologically roaded" from a brown bear perspective because virtually all brown bear home ranges in this area intersect roads (based on extensive brown bear radiotelemetry).

The president of the Hoonah Indian Association asked for the protection, conservation, and responsible management of this roadless area because of its special interest to the Huna People.

SEACC recommended Roadless Areas 317, 318, 319, 321, 323, and 325 for LUD II protection. They indicated it is more critical now than ever before that these remaining wild areas on Chichagof are protected. The Alaska Rainforest Campaign (a coalition of national and Alaska conservation groups) recommended Roadless Area 323 for permanent protection as LUD II.

Some members of the Southeast Alaska Federal Subsistence Regional Advisory Council identified the need for further protection of this area because of its importance for subsistence

A number of cave/karst experts and other individuals stated that East Chichagof and the North Central Prince of Wales Biogeographic Provinces contain some of the most highly developed karst lands in the Tongass. It was noted that protection of a combination of Freshwater Bay (#325), Game Creek (#323), Tenakee Ridge (#321), and Pavlov/East Point (#319) Roadless Areas would create a truly world class karst reserve for the East Chichagof Biogeographic Province. Freshwater Bay and Game Creek are the two most critical components of this province because of their size and amount of remaining forested karst.

Some individuals requested protection for Upper Tenakee Inlet.

325 – Freshwater Bay

Alaska Department of Fish and Game noted that this roadless area is "ecologically roaded" from a brown bear perspective because virtually all brown bear home ranges in this area intersect roads (based on extensive brown bear radiotelemetry).

The president of the Hoonah Indian Association asked for the protection, conservation, and responsible management of this roadless area because of its special interest to the Huna People

The Alaska Rainforest Campaign (a coalition of national and Alaska conservation groups) recommended Roadless Area 325 for permanent protection as LUD II. SEACC recommended Roadless Areas 317, 318, 319, 321, 323, and 325 for LUD II protection. It is more critical now than ever before that these remaining wild areas on Chichagof are protected.

A number of cave/karst experts and other individuals stated that East Chichagof and the North Central Prince of Wales Biogeographic Provinces contain some of the most highly developed karst lands in the Tongass. It was noted that protection of a combination of Freshwater Bay (#325), Game Creek (#323), Tenakee Ridge (#321), and Pavlov/East Point (#319) Roadless Areas would create a truly world class karst reserve for the East Chichagof Biogeographic Province. These areas include massive limestone from ridge-top to shoreline, including Freshwater Bay's Sonyakay Ridge and the unique Iyoukeen Peninsula karst, along with significant remnants of representative high-volume old growth. Freshwater Bay and Game Creek are the two most critical components of this province because of their size and amount of remaining forested karst.

326 – North Kruzof

The U.S. Department of the Interior identified this roadless area as having important fish and wildlife habitat and populations; although not a top priority for protection, it ranked in their top third among all roadless areas.

SEACC recommended Roadless Areas 326, 327, and 329 on Kruzof Island for permanently protection through designation as LUD II. The Alaska Rainforest Campaign (a coalition of national and Alaska conservation groups) recommended Roadless Area 326 for permanent protection as LUD II.

Some members of the Southeast Alaska Federal Subsistence Regional Advisory Council identified the need for further protection of this area because of its importance for subsistence

Some thought the island contains valuable low elevation forest that should be protected. A number of individuals felt this area should be protected, especially because it has little timber and is heavily used by Sitkans.

327 – Middle Kruzof

The Alaska Rainforest Campaign (a coalition of national and Alaska conservation groups) recommended Roadless Area 327 for permanent protection as LUD II. SEACC recommended Roadless Areas 326, 327, and 329 on Kruzof Island for permanent protection through designation as LUD II.

Some members of the Southeast Alaska Federal Subsistence Regional Advisory Council identified the need for further protection of this area because of its importance for subsistence

Some thought the island contains valuable low elevation forest that should be protected.

328 – Hoonah Sound

The U.S. Department of the Interior identified this roadless area as one of the 13 roadless areas they considered to have outstanding fish and wildlife values. They supported the designation of Deep Bay Creek as a Wild and Scenic River. They recommended including the Pt. Adolphus/Mud Bay LUD II area within this conservation unit. They indicated that the important wildlife values provided by this area warrant management that ensures the long-term integrity of its habitats, ecosystem processes, and ecological functions.

In comments relative to the 1997 Forest Plan, the Governor of Alaska recommended that logging and construction of logging roads be avoided in important public interest areas such as Poison Cove/Ushk Bay (the southern portion of RA# 328). This comment was reiterated by the Governor in scoping comments regarding the SEIS and in comments by the Division of Governmental Coordination on the Draft SEIS.

Alaska Department of Fish and Game recommended permanent roadless status for the Poison Cove/Ushk Bay area. The Alaska Department of Fish and Game rated the Hoonah Sound roadless area as the second highest priority for protection in northern Southeast Alaska. This rating is based on the VCUs with the highest value fish and wildlife resources needing additional protection. VCUs are prioritized for their very high productivity, essential role in connectivity, and/or very high value as community use areas.

The city of Pelican passed a resolution stating that the important watersheds identified as areas of special interest in the 1999 ROD and HR 987 should given long-term protection.

The Sitka Tribe of Alaska supported Alternative 3 Wilderness Land Use Designation for the Ushk Bay, Poison Cove, and Deep Bay area.

The Alaska Rainforest Campaign (a coalition of national and Alaska conservation groups) identified Roadless Area 328 as adjacent to the West Chichagof Wilderness and recommended it for permanent protection in a combination of wilderness and LUD II, as described in Alternative 6. SEACC recommended this area for permanent protection as a combination of wilderness and LUD II as outlined in Alternative 6.

Audubon Alaska recommended that Poison Cove/Ushk Bay should be protected from logging and road building.

Some members of the Southeast Alaska Federal Subsistence Regional Advisory Council identified the need for further protection of this area because of its importance for subsistence.

Many commenters recommended protection for the Poison Cove, Ushk Bay, and Deep Bay areas or for the entire area. One wanted progressive logging to take place in the area because of the planning investment.

329 – South Kruzof

The Alaska Rainforest Campaign (a coalition of national and Alaska conservation groups) recommended Roadless Area 329 for permanent protection as LUD II. SEACC recommended Roadless Areas 326, 327, and 329 on Kruzof Island for permanent protection through designation as LUD II.

Some members of the Southeast Alaska Federal Subsistence Regional Advisory Council identified the need for further protection of this area because of its importance for subsistence.

Some thought the island contains valuable low-elevation forest that should be protected. A number of individuals felt this area should be protected.

330 – North Baranof

The U.S. Department of the Interior identified this roadless area as having important fish and wildlife habitat and populations; although not a top priority for protection, it ranked in their top third among all roadless areas.

The Alaska Department of Fish and Game rated the North Baranof roadless area as the third highest priority for protection in northern Southeast Alaska. This rating is based on the VCUs with the highest value fish and wildlife resources needing additional protection. VCUs are prioritized for their very high productivity, essential role in connectivity, and/or very high value as community use areas.

The city of Pelican passed a resolution stating that the important watersheds identified as areas of special interest in the 1999 ROD and HR 987 should given long-term protection.

SEACC included this area in a contiguous complex of roadless areas consisting of Roadless Areas 330, 331, 332, and 333. They recommended this complex of just over 500,000 acres for permanent protection as LUD II. The Alaska Rainforest Campaign (a coalition of national and Alaska conservation groups) identified Roadless Areas 330, 331, 332, and 333 as a contiguous complex of roadless areas that should be considered one roadless area and recommended it for permanent protection as LUD II.

The Natural Resources Defense Council requested that Saook Bay be accorded protected status.

Some members of the Southeast Alaska Federal Subsistence Regional Advisory Council identified the need for further protection of this area because of its importance for subsistence.

Some individuals identified East Saook Bay as an area that needed protection. Others recommended the roadless area for protection. One individual noted that Saook Bay is no longer under contract and this should be changed on the maps and for the analysis.

331 – Sitka Urban

SEACC included this area in a contiguous complex of roadless areas consisting of Roadless Areas 330, 331, 332, and 333. They recommend this complex of just over 500,000 acres for permanent protection as LUD II. The Alaska Rainforest Campaign (a coalition of national and Alaska conservation groups) identified Roadless Areas 330, 331, 332, and 333 as a contiguous complex of roadless areas that should be considered one roadless area and recommended it for permanent protection as LUD II.

Some members of the Southeast Alaska Federal Subsistence Regional Advisory Council identified the need for further protection of this area because of its importance for subsistence.

332 – Sitka Sound

SEACC included this area in a contiguous complex of roadless areas consisting of Roadless Areas 330, 331, 332, and 333. They recommended this complex of just over 500,000 acres for permanent protection as LUD II. The Alaska Rainforest Campaign (a coalition of national and Alaska conservation groups) identified Roadless Areas 330, 331, 332, and 333 as a contiguous complex of roadless areas that should be considered one roadless area and recommended it for permanent protection as LUD II.

Some members of the Southeast Alaska Federal Subsistence Regional Advisory Council identified the need for further protection of this area because of its importance for subsistence

A number of individuals recommended permanent protection for this area.

333 – Redoubt

The Alaska Rainforest Campaign (a coalition of national and Alaska conservation groups) identified Roadless Areas 330, 331, 332, and 333 as a contiguous complex of roadless areas that should be considered one roadless area and recommended it for permanent protection as LUD II. SEACC included Roadless Area 333 in a contiguous complex of roadless areas consisting of Roadless Areas 330, 331, 332, and 333. They recommended this complex of just over 500,000 acres for permanent protection as LUD II.

Some members of the Southeast Alaska Federal Subsistence Regional Advisory Council identified the need for further protection of this area because of its importance for subsistence

The Alaska Department of Fish and Game rated the Redoubt roadless area as the fifth highest priority for protection in northern Southeast Alaska (for the Redoubt Lake sockeye). This rating is based on the VCUs with the highest value fish and wildlife resources needing additional protection. VCUs are prioritized for their very high productivity, essential role in connectivity, and/or very high value as community use areas.

A number of individuals recommended this area for protection.

334 – Port Alexander

The Alaska Department of Fish and Game rated the Port Alexander roadless area as the sixth highest priority for protection in northern Southeast Alaska. This rating is based on the VCUs with the highest value fish and wildlife resources needing additional protection. VCUs are prioritized for their very high productivity, essential role in connectivity, and/or very high value as community use areas.

The Alaska Rainforest Campaign (a coalition of national and Alaska conservation groups) recommended Roadless Area 328 for permanent protection in a combination of wilderness and LUD II, as described in Alternative 6. The area is adjacent to the South Baranof Wilderness. SEACC recommended the roadless area for permanent protection through a combination of wilderness and LUD II as outlined in Alternative 6.

Some members of the Southeast Alaska Federal Subsistence Regional Advisory Council identified the need for further protection of this area because of its importance for subsistence.

Some individuals recommended this area for permanent protection as wilderness.

338 – Brabazon Addition

The Alaska Department of Fish and Game rated the Brabazon Addition roadless area as the seventh highest priority for protection in northern Southeast Alaska. This rating is based on the VCUs with the highest value fish and wildlife resources needing additional protection. VCUs are prioritized for their very high productivity, essential role in connectivity, and/or very high value as community use areas.

The Yakutat Tlingit Tribe supported "…the present land management scheme." and stated that it did not want to see "…changes in the Wilderness designation…"

SEACC recommended that the remaining unlogged portions of the Yakutat area, including Roadless Areas 338, 339, and 341, be protected through a combination of LUD II and wilderness designations as in Alternative 6.

Some individuals recommended this area for permanent protection because of world-class scenery, abundant wildlife and habitat, and gave almost unilateral support for wilderness protection.

339 – Yakutat Forelands

The U.S. Department of the Interior identified this roadless area as having important fish and wildlife habitat and populations; although not a top priority for protection, it ranked in their top third among all roadless areas. The area adjoins Glacier Bay National Park, and the Russell Fiord Wilderness Area.

The Alaska Department of Fish and Game rated the Yakutat Forelands roadless area (Italio, Akwe, Tanis Mesa, and Alsek Rivers) as the fourth highest priority for protection in northern Southeast Alaska. This rating is based on the VCUs with the highest value fish and wildlife resources needing additional

protection. VCUs are prioritized for their very high productivity, essential role in connectivity, and/or very high value as community use areas.

The Yakutat Tlingit Tribe supported "…the present land management scheme." and stated that it did not want to see "…changes in the Wilderness designation…"

SEACC recommended that the remaining unlogged portions of the Yakutat area, including Roadless Areas 338, 339, and 341, should be protected through a combination of LUD II and wilderness designations as in Alternative 6.

Some individuals recommended permanent protection for the entire area.

341 – Upper Situk

The Alaska Department of Fish and Game rated the Upper Situk roadless area as the ninth highest priority for protection in northern Southeast Alaska. This rating is based on the VCUs with the highest value fish and wildlife resources needing additional protection. VCUs are prioritized for their very high productivity, essential role in connectivity, and/or very high value as community use areas.

The Yakutat Tlingit Tribe supported "…the present land management scheme." and stated that it did not want to see "…changes in the Wilderness designation…".

SEACC recommended the remaining unlogged portions of the Yakutat area, including Roadless Areas 338, 339, and 341, should be protected through a combination of LUD II and wilderness designations as in Alternative 6.

The Department of Transportation and Public Facilities said that the depiction of land status along the south shore of Yakutat Bay shows land as developed and as two or more small roadless areas that are no longer part of the Tongass National Forest.

342 – Neka Mountain

The Alaska Department of Fish and Game rated the Neka Mountain roadless area as the eighth highest priority for protection in northern Southeast Alaska. This rating is based on the VCUs with the highest value fish and wildlife resources needing additional protection. VCUs are prioritized for their very high productivity, essential role in connectivity, and/or very high value as community use areas.

The city of Pelican passed a resolution stating that the important watersheds identified as areas of special interest in the 1999 ROD and HR 987 should given long-term protection.

The Gustavus Community Association recommended increased protection for Roadless Area 342 because the current Forest Plan failed to adequately protect areas of particular concern to the community of Gustavus, particularly Chicken Creek.

The Hoonah Indian Association emphasized the need for "additional, long-term, protective measures that would prevent any further road building or clear-cut logging above and around Neka Bay including measures that would prevent the proposed Otter Lake Timber Sale".

SEACC recommended the Neka Bay and Neka Mountain areas be designated as LUD II and added to the existing Mud Bay/Point Adolphus LUD II area. The Alaska Rainforest Campaign (a coalition of national and Alaska conservation groups) recommended Roadless Area 342 for permanent protection as LUD II

Some members of the Southeast Alaska Federal Subsistence Regional Advisory Council identified the need for further protection of this area because of its importance for subsistence.

A number of cave/karst experts and other individuals stated that this area contains unexplored karstlands that are almost completely intact and are unique among the larger blocks of karst in Southeast Alaska. They noted that this area should be combined with Roadless Area 343 and protected.

Some individuals supported wilderness protection for this area including Chicken Creek and Gallagher Creek. Some individuals requested protection for Neka Bay and Mountain.

343 – Neka Bay

The Hoonah Indian Association emphasized the need for "additional, long-term, protective measures that would prevent any further road building or clear-cut logging above and around Neka Bay including measures that would prevent the proposed Otter Lake Timber Sale."

The Alaska Rainforest Campaign (a coalition of national and Alaska conservation groups) recommended Roadless Area 343 for permanent protection as LUD II. SEACC recommended the Neka Bay and Neka Mountain areas be designated as LUD II and added to the existing Mud Bay/Point Adolphus LUD II area.

Some members of the Southeast Alaska Federal Subsistence Regional Advisory Council identified the need for further protection of this area because of its importance for subsistence.

A resident of Hoonah noted that Neka Bay is priceless to the Hoonah residents and to charter customers. It is very popular for recreation, fishing, hunting and plant gathering.

A number of cave/karst experts and other individuals stated that this area contains less developed karstlands that are representative of the biogeographic province. They noted that the area should be combined with Roadless Area 342 and protected.

Some individuals requested protection for Neka Bay and Mountain

501 – Dall Island

The President of the Hydaburg Cooperative Association spoke "against the wilderness plans for the south end of Prince of Wales Island" during the Craig Hearing and in a letter stressed the importance of Cordova Bay.

The city of Pelican passed a resolution stating that the important watersheds identified as areas of special interest in the 1999 ROD and HR 987 should given long-term protection.

SEACC recommended that western Dall Island be designated as LUD II. The Alaska Rainforest Campaign (a coalition of national and Alaska conservation groups) recommended Roadless Area 501 for permanent protection as LUD II.

A number of cave/karst experts and other individuals stated that the Dall Island Biogeographic Province contains numerous blocks of highly developed karst, but that relatively little work has been done by cavers and cave scientists in the Dall Island Roadless Area. Nevertheless, caves discovered within these blocks include nationally significant depths, as well as important cultural, geological, and paleontological components. The commenters indicated that because there has been no timber harvest or road building on Forest Service lands on Dall Island, this area is especially important for protection; combining protection of Forest Serve land with a plan to protect karstlands on private land, would make this a more significant karst reserve.

A Hydaburg resident recommended Dall Island for LUD II, but not wilderness. A number of individual commenters identified Northwest Dall Island as an area in need of protection. Some recommended the entire area for LUD II, especially the fiords on the outside. Some individuals recommended Dall Island for protection.

502 – Suemez Island

The Alaska Rainforest Campaign (a coalition of national and Alaska conservation groups) recommended Roadless Area 502 for permanent protection as LUD II. SEACC recommended the unlogged portion of Suemez Island be designated as LUD II.

The President of the Hydaburg Cooperative Association spoke "against the wilderness plans for the south end of Prince of Wales Island" during the Craig Hearing. At the same hearing, the president of the Craig Community Association stated "they really can't support any of the alternatives".

503 – Outer Islands

The city of Pelican passed a resolution stating that the important watersheds identified as areas of special interest in the 1999 ROD and HR 987 should given long-term protection.

Some members of the Southeast Alaska Federal Subsistence Regional Advisory Council identified the need for further protection of this area because of its importance for subsistence.

At the Craig Hearing, the President of the Craig Community Association stated “they really can’t support any of the alternatives”.

An individual commented that it did not make any sense to convert this area from LUD II to wilderness; it should be left as LUD II. One individual wanted San Fernando Island added to permanent protection status.

504 – Sukkwan

The city of Pelican passed a resolution stating that the important watersheds identified as areas of special interest in the 1999 ROD and HR 987 should given long-term protection.

The President of the Hydaburg Cooperative Association spoke “against the wilderness plans for the south end of Prince of Wales Island” during the Craig Hearing.

SEACC recommended the Sukkwan Island complex for long-term protection. The Alaska Rainforest Campaign (a coalition of national and Alaska conservation groups) recommended Roadless Area 504 for permanent protection as LUD II.

A number of individual commenters identified Sukkwan Island as an area in need of protection. Some individuals recommended this area for permanent protection as wilderness.

505 – Soda Bay

The Alaska Rainforest Campaign (a coalition of national and Alaska conservation groups) recommended Roadless Area 505 for permanent protection as LUD II. SEACC recommended this area for permanent protection through LUD II designation.

The President of the Hydaburg Cooperative Association spoke “against the wilderness plans for the south end of Prince of Wales Island” during the Craig Hearing. At the same hearing, the President of the Craig Community Association stated “they really can’t support any of the alternatives”.

507 – Eudora

The U.S. Department of the Interior identified this roadless area as one of 13 roadless areas considered to have outstanding fish and wildlife values. They indicated that the area they recommend for protection contains a mix of productive habitats, and would dramatically increase the long-term functional value of the existing, adjacent South Prince of Wales Wilderness. The area has great connectivity to the South Prince of Wales Wilderness Area. They stated that Eudora is one of the most pristine roadless areas left on Prince of Wales Island. They indicated that the important wildlife values provided by this area warrant management that ensures the long-term integrity of its habitats, ecosystem processes, and ecological functions

The Alaska Department of Fish and Game rated the Eudora roadless area (VCUs 682, 683, 684, 691, 692, 693, 694, 695, 699, 700, 701, 702, 703, and 704) as the fourth highest priority for protection on Prince of Wales Island and Adjacent Islands. This rating is based on the VCUs with the highest value fish and wildlife resources needing additional protection. VCUs are prioritized for their very high productivity, essential role in connectivity, and/or very high value as community use areas.

SEACC recommended the Eudora area as Wilderness to be added to the South Prince of Wales Wilderness, which would create a contiguous Wilderness of approximately 300,000 acres. The Alaska Rainforest Campaign (a coalition of national and Alaska conservation groups) identified Roadless Areas 507 and 531 as adjacent to the existing South Prince of Wales Wilderness and recommended them for permanent protection as wilderness. They indicated that this combination would create a contiguous wilderness area of approximately 350,000 acres.

A number of cave/karst experts and other individuals stated that this area contains extensive karst, especially in the northern portions. They indicated that known karst areas around Eudora Mountain and Cholmondeley, as well as those near Green Monster and Billie Mountain should be protected along with adjacent developed karstlands. This would amount to about 4,500 acres of karst.

An individual thought that Moira Sound had valuable low elevation forest that should be protected. A number of individual commenters identified Moira Sound and Johnson Lake as areas in need of protection. Some individuals recommended the entire area for permanent protection as wilderness and some for LUD II.

508 – Christoval

SEACC recommended this area for permanent protection through LUD II designation.

One individual wanted permanent protection for the roadless area around Mount Baldy.

509 – Kogish

The Alaska Department of Fish and Game rated the Kogish roadless area (VCUs 589, 591, 592, 593, and 594) as the seventh highest priority for protection on Prince of Wales Island and Adjacent Islands. This rating is based on the VCUs with the highest value fish and wildlife resources needing additional protection. VCUs are prioritized for their very high productivity, essential role in connectivity, and/or very high value as community use areas.

The Alaska Rainforest Campaign (a coalition of national and Alaska conservation groups) recommended Roadless Area 509 for permanent protection as LUD II. SEACC recommended this area for permanent protection through LUD II designation.

At the Craig Hearing, the President of the Craig Community Association stated “they really can’t support any of the alternatives”

Some individuals commented in favor of wilderness protection for Eleven Mile.

510 – Karta

SEACC recommended this area for permanent protection through LUD II designation.

The Alaska Rainforest Campaign (a coalition of national and Alaska conservation groups) recommended Roadless Area 510 for permanent protection as LUD II.

At the June 26 hearing in Thorne Bay, the President of the Organized Village of Kasaan stated that “…Alternative 1 is going to be the best right now”. Later, in an August 15 Tribal Resolution, Kasaan requested that “…all customary and traditional use areas within the Tongass National Forest be recommended for long-term protection”.

511 – Thorne River

In comments relative to the 1997 Forest Plan, the Governor of Alaska recommended that logging and construction of logging roads be avoided in important public interest areas such as Honker Divide (most of RA# 511). This comment was reiterated by the Governor in scoping comments regarding the SEIS and in comments by the Division of Governmental Coordination on the Draft SEIS.

Alaska Department of Fish and Game recommended permanent roadless status for the Honker Divide area in their comments on the Draft SEIS.

Alaska Department of Fish and Game rated the Thorne River roadless area (VCUs 574, 575, 576, 577, 578, and 597.1) as the highest priority for protection on Prince of Wales Island and Adjacent Islands. This rating is based on the VCUs with the highest value fish and wildlife resources needing additional protection. VCUs are prioritized for their very high productivity, essential role in connectivity, and/or very high value as community use areas.

The city of Pelican passed a resolution stating that the important watersheds identified as areas of special interest in the 1999 ROD and HR 987 should given long-term protection.

Audubon Alaska recommended that Honker Divide should be protected from logging and road building.

The Tongass Conservation Society indicated that protection of Honker and other areas on Prince of Wales Island was important to the survival of recreation and tourism on the island.

The Alaska Rainforest Campaign (a coalition of national and Alaska conservation groups) recommended Roadless Area 511 for permanent protection as LUD II. SEACC recommended this area for LUD II designation.

Many individuals commented that Honker Divide was a special place and needed to be protected because of its importance as a biological corridor, its recreation opportunities, and other values.

512 – Ratz

The Alaska Rainforest Campaign (a coalition of national and Alaska conservation groups) recommended Roadless Area 512 for permanent protection as LUD II. SEACC recommended this area for permanent protection through LUD II designation.

513 – Sweetwater

SEACC recommended this area for permanent protection through LUD II designation. The Alaska Rainforest Campaign (a coalition of national and Alaska conservation groups) recommended Roadless Area 514 for permanent protection as LUD II. SEACC also recommended this area be designated as LUD II.

514 – Sarkar

The Department of Transportation and Public Facilities noted that the discussion should cover the proposed road connecting Whale Pass and Coffman Cove.

Alaska Department of Fish and Game recommended permanent roadless status for the Honker Divide area in their comments on the Draft SEIS. Alaska Department of Fish and Game rated the Sarkar roadless area (VCUs 554.1, 553, 551, 552, and 573) as the second highest priority for protection on Prince of Wales Island and Adjacent Islands. This rating is based on the VCUs with the highest value fish and wildlife resources needing additional protection. VCUs are prioritized for their very high productivity, essential role in connectivity, and/or very high value as community use areas.

The city of Pelican passed a resolution stating that the important watersheds identified as areas of special interest in the 1999 ROD and HR 987 should given long-term protection.

The Alaska Rainforest Campaign (a coalition of national and Alaska conservation groups) recommended Roadless Area 514 for permanent protection as LUD II. SEACC also recommended this area be designated as LUD II.

A number of cave/karst experts and other individuals stated that the Sarkar Roadless Area contains a relatively small, but mostly intact karst basin, once considered for a Research Natural Area. They indicated that inclusion of this area would be a small but useful addition to karst protection on the Tongass.

At least one individual recommended Sarkar for protection.

515 – Kosciusko

The U.S. Department of the Interior identified this roadless area as having important fish and wildlife habitat and populations; although not a top priority for protection, it ranked in their top third among all roadless areas.

The Alaska Department of Fish and Game rated the Kosciusko roadless area (VCUs 536, 541, 542, 548, and 549) as the sixth highest priority for protection on Prince of Wales Island and Adjacent Islands. This rating is based on the VCUs with the highest value fish and wildlife resources needing additional protection. VCUs are prioritized for their very high productivity, essential role in connectivity, and/or very high value as community use areas.

The city of Pelican passed a resolution stating that the important watersheds identified as areas of special interest in the 1999 ROD and HR 987 should given long-term protection.

SEACC recommended this area be designated as LUD II.

A number of cave/karst experts and other individuals stated that the North Central Prince of Wales Biogeographic Province contains the most celebrated and explored caves and karstlands in the Tongass; Kosciusko and Calder Roadless Areas include spectacular limestone massifs and caves as well as remnants of high volume old growth karstland forest. The Karst Waters Institute considers Kosciusko Island Karst to be one of the 10 most endangered karst areas worldwide. The commenters indicated that these Roadless Areas, 515, 516, and 517, together with contiguous karstlands in Roadless Area 518, could be combined to create a karst reserve/wilderness that would be renowned throughout the world.

One individual noted how impacted the karst of Koscisusko Island is, but noted that, in 1998, a team documented nearly 50 new caves, many with relatively horizontal passages – an unusual feature among Southeast Alaskan caves. He stated that Koscisusko Island will be critical for its karst biology and will shelter numerous unique and possible new species of cave-adapted invertebrates.

A number of individuals identified the 1999 additions to the Calder Holbrook area as needing protection. Some commented on the need for protection of Shakan Bay and Shipley Bay. Some individuals recommended this area for permanent protection as wilderness and some for LUD II.

516 – Calder

SEACC recommended this area be designated as LUD II. The Alaska Rainforest Campaign (a coalition of national and Alaska conservation groups) recommended Roadless Area 516 for permanent protection as LUD II.

A number of cave/karst experts and other individuals stated that the North Central Prince of Wales Biogeographic Province contains the most celebrated and explored caves and karstlands in the Tongass. Kosciusko and Calder Roadless Areas include spectacular limestone massifs and caves as well as remnants of high volume old growth karstland forest. Calder and El Capitan Roadless Areas and adjacent to developed lands contain internationally significant caves, including the deepest limestone pit in the United States, and spectacular karstlands that have been the site of important paleontological and archaeological discoveries. The commenters indicated that these Roadless Areas, 515, 516, and 517, together with contiguous karstlands in Roadless Area 518, could be combined to create a karst reserve/wilderness that would be renowned throughout the world.

A number of individuals identified the 1999 additions to the Calder Holbrook area as needing protection. Some commented on the need for protection for Shakan Bay. Some wanted the entire area protected as LUD II.

517 – El Capitan

The city of Petersburg said they were opposed to designation of this area as wilderness because of the potential long-term economic impacts on the city.

The Alaska Rainforest Campaign (a coalition of national and Alaska conservation groups) recommended Roadless Area 517 for permanent protection as LUD II. SEACC also recommended this area be designated as LUD II.

A number of cave/karst experts and other individuals stated that the North Central Prince of Wales Biogeographic Province contains the most celebrated and explored caves and karstlands in the Tongass. Calder and El Capitan Roadless Areas and adjacent developed lands contain internationally significant caves, including the deepest limestone pit in the United States, and spectacular karstlands that have been the site of important paleontological and archaeological discoveries. The commenters indicated that these Roadless Areas, 515, 516, and 517, together with contiguous karstlands in Roadless Area 518, could be combined to create a karst reserve/wilderness that would be renowned throughout the world.

One individual wanted protection for the 17,000 acres of ridges and alpine that link Red Mountain to Peru Peak.

518 – Salmon Bay

The city of Petersburg said they were opposed to designation of this area as wilderness because of the potential long-term economic impacts on the city.

The city of Pelican passed a resolution stating that the important watersheds identified as areas of special interest in the 1999 ROD and HR 987 should given long-term protection.

The Alaska Rainforest Campaign (a coalition of national and Alaska conservation groups) recommended Roadless Area 518 for permanent protection as LUD II. SEACC also recommended this area be designated as LUD II.

A number of cave/karst experts and other individuals stated that the North Central Prince of Wales Biogeographic Province contains the most celebrated and explored caves and karstlands in the Tongass. The Salmon Bay Roadless Area contains karstlands that are contiguous with those in the El Capitan area. The commenters indicated that these karstlands could be combined with Roadless Areas 515 and 516 to create a karst reserve/wilderness that would be renowned throughout the world.

A number of individuals identified the 1999 additions to the Salmon Bay Lake area as needing protection. One commented on the need for permanent protection for Red Bay and Salmon Bay Lake. One wanted permanent protection of the entire area as LUD II.

519 – McKenzie

The U.S. Department of the Interior identified this roadless area as having important fish and wildlife habitat and populations; although not a top priority for protection, it ranked in their top third among all roadless areas.

The Alaska Department of Fish and Game rated the McKenzie roadless area (VCUs 615, 616, 617, 675, and 676) as the fifth highest priority for protection on Prince of Wales Island and Adjacent Islands. This rating is based on the VCUs with the highest value fish and wildlife resources needing additional protection. VCUs are prioritized for their very high productivity, essential role in connectivity, and/or very high value as community use areas.

The communities of Saltery Cove, Sunny Cove, West Arm Cannery, and Sportsman's Cove Lodge and Clover Bay Lodge passed a joint resolution calling for LUD II designation of VCU 519 and supporting Alternative 6 in general.

The Alaska Rainforest Campaign (a coalition of national and Alaska conservation groups) recommended Roadless Area 519 for permanent protection as LUD II. SEACC recommended this area be designated as LUD II.

Audubon Alaska recommended that Cholmondeley should be protected from logging and road building.

The owners of the Clover Bay Lodge recommended that the Cholmondeley area be designated as LUD II. A number of other individual commenters identified the Cholmondeley area as an area in need of protection.

520 – Kasaan

In an August 15 Tribal Resolution, the Organized Village of Kasaan requested that "…all customary and traditional use areas within the Tongass National Forest be recommended for long term protection".

SEACC recommended this area for permanent protection through LUD II designation. The Alaska Rainforest Campaign (a coalition of national and Alaska conservation groups) recommended Roadless Area 520 for permanent protection as LUD II.

521 – Duke

SEACC recommended that the Duke Island roadless area be designated as LUD II.

At the Ketchikan hearing, the Metlakatla Indian Community expressed general support for logging except on small Islands and used Annette Island as an example of small (Duke is smaller).

Some individuals recommended this area for permanent protection as wilderness.

522 – Gravina

The Alaska Department of Fish and Game rated the Gravina roadless area as the third highest priority for protection in the Ketchikan Area (outside of POW Island). This rating is based on the VCUs with the highest value fish and wildlife resources needing additional protection. VCUs are prioritized for their very high productivity, essential role in connectivity, and/or very high value as community use areas.

Ketchikan Indian Community passed a tribal resolution endorsing "…the congressionally designated roadless area on Gravina Island for wilderness." At the Ketchikan hearing, the Metlakatla Indian Community stated "…don't log Gravina." And, "Small islands can't take logging."

SEACC recommended that the Gravina Island roadless area be designated as LUD II. The Alaska Rainforest Campaign (a coalition of national and Alaska conservation groups) recommended the Gravina Island roadless area for permanent protection as LUD II. The Tongass Conservation Society recommended the Gravina Island roadless area for permanent protection as LUD II. Audubon Alaska recommended that Gravina should be protected from logging and road building.

Some members of the Southeast Alaska Federal Subsistence Regional Advisory Council identified the need for further protection of this area because of its importance for subsistence.

Many other commenters also recommended Gravina Island for protection, especially Bostwick Inlet. Some individuals recommended this area for permanent protection as wilderness.

523 – South Revilla

The Alaska Department of Fish and Game rated the South Revilla roadless area as the fourth highest priority for protection in the Ketchikan Area (outside of POW Island). This rating is based on the VCUs with the highest value fish and wildlife resources needing additional protection. VCUs are prioritized for their very high productivity, essential role in connectivity, and/or very high value as community use areas.

The Tongass Conservation Society recommended North and South Revilla roadless area for long-term protection from logging and development. SEACC recommended this roadless area for LUD II designation. The Alaska Rainforest Campaign (a coalition of national and Alaska conservation groups) recommended Roadless Area 523 for permanent protection as LUD II.

A number of cave/karst experts and other individuals stated both the North Revilla and South Revilla Roadless Areas contain significant karstlands. They indicated that karstlands, approximately 900 acres, are adjacent to heavily logged areas in North Revilla Roadless Area; the karstlands, together with karstlands in the adjacent roaded areas, should be protected.

524 – Revilla

SEACC recommended this roadless area for LUD II designation. The Alaska Rainforest Campaign (a coalition of national and Alaska conservation groups) also recommended Roadless Area 524 for permanent protection as LUD II.

At least one individual recommended the area between Moser Bay and Naha for protection.

525 – Behm Islands

The Alaska Rainforest Campaign (a coalition of national and Alaska conservation groups) recommended Roadless Area 525 for permanent protection as LUD II. SEACC also recommended this area for LUD II designation.

One individual called for long-term protection of this area.

526 – North Revilla

The Alaska Department of Fish and Game rated the North Revilla roadless area (VCU 743) as the second highest priority for protection in the Ketchikan Area (outside of POW Island). This rating is based on the VCUs with the highest value fish and wildlife resources needing additional protection. VCUs are prioritized for their very high productivity, essential role in connectivity, and/or very high value as community use areas.

The city of Pelican passed a resolution stating that the important watersheds identified as areas of special interest in the 1999 ROD and HR 987 should given long-term protection.

The Tongass Conservation Society recommended North and South Revilla roadless area for long-term protection from logging and development. The Alaska Rainforest Campaign (a coalition of national and Alaska conservation groups) recommended Roadless Area 526 for permanent protection as LUD II. SEACC also recommended this area for LUD II designation.

A number of cave/karst experts and other individuals stated both the North Revilla and South Revilla Roadless Areas contain significant karstlands. They indicated that significant karstlands, approximately 1,100 acres, bracket a logged and roaded area in South Revilla Roadless Area; the karstlands, together with karstlands in the adjacent roaded areas, should be protected.

At least one individual called for long-term protection of this area. At least one individual recommended the area between Moser Bay and Naha for protection.

528 – Cleveland

The U.S. Department of the Interior identified this roadless area as one of the 13 roadless areas they considered to have outstanding fish and wildlife values. They noted that along with three other roadless areas that form the Cleveland Peninsula, it serves as a corridor for many mainland species to colonize the archipelago of Southeast Alaska. Wildlife habitat on the Cleveland Peninsula is naturally fragmented by large bays penetrating the peninsula from both sides, which create a number of “pinch points.” Some interior areas of the peninsula are connected by low elevation passes that are migration corridors for many wildlife species. They indicated that development in these areas is likely to inhibit movement of animals and restrict immigration and emigration, effectively isolating the peninsula from the mainland. The Peninsula is thought to serve as an important source of natural colonization of the southern and central islands of the Alexander Archipelago by mainland species such as moose and wolves. This is largely because the peninsula penetrates the archipelago much further than any other mainland peninsula in southeast Alaska. They indicated that there has been strong local and national support for managing these areas in a roadless condition. They stated that the important wildlife values provided by this area warrant management that ensures the long-term integrity of its habitats, ecosystem processes, and ecological functions.

In comments relative to the 1997 Forest Plan, the Governor of Alaska recommended that logging and construction of logging roads be avoided in important public interest areas such as the Cleveland Peninsula (most of RA# 528, 529, 209, and 210). This comment was reiterated by the Governor in scoping comments regarding the SEIS and in comments by the Division of Governmental Coordination on the Draft SEIS.

Alaska Department of Fish and Game recommended permanent roadless status for the Cleveland Peninsula in their comments on the Draft SEIS.

The Alaska Department of Fish and Game rated the Cleveland and North Cleveland roadless areas (VCUs 719, 710, 717, 718, 720, 721, 722, and 723) as the highest priorities for protection in the Ketchikan Area (outside of POW Island). This rating is based on the VCUs with the highest value fish and wildlife resources needing additional protection. VCUs are prioritized for their very high productivity, essential role in connectivity, and/or very high value as community use areas.

The Department of Transportation and Public Facilities noted that there is a corridor across Cleveland Peninsula that passes through this roadless area; it is identified in the Southeast Alaska Transportation Plan under Long Term Actions and was not included in the SEIS. They indicated that this corridor is for a proposed highway that would link new ferry terminals on Spacious Bay and Santa Anna Inlet and would be a component of the Inside Passage Highway.

The city of Pelican passed a resolution stating that the important watersheds identified as areas of special interest in the 1999 ROD and HR 987 should given long-term protection.

The Alaska Rainforest Campaign (a coalition of national and Alaska conservation groups) identified Roadless Areas 204, 205, 206, 207, 208, 209, 210, 528, and 529 as a contiguous complex of roadless

areas that should be considered one roadless area and recommended it for permanent protection as LUD II. SEACC identified the Cleveland roadless area as part of the Cleveland Peninsula, which includes Roadless Areas 209, 210, 528, and 529. They recommend this entire area, a 200,000-acre arm of the mainland, as LUD II.

The Tongass Conservation Society indicated that the Cleveland Peninsula has high wildlife, subsistence, and biodiversity and was especially important for brown bears.

Audubon Alaska recommended that Cleveland Peninsula should be protected from logging and road building.

Many individual commenters identified the Cleveland Peninsula as an area in need of protection. Some individuals recommended this area for permanent protection as wilderness. Port Stewart and Helm Bay were identified as areas important for small boats from Ketchikan for deer hunting. It is considered by some to be the only intact area within easy skiff distance from Ketchikan for hunting deer and contains an important and somewhat unique mountain goat population.

529 – North Cleveland

The U.S. Department of the Interior identified this roadless area as one of the 13 roadless areas they considered to have outstanding fish and wildlife values. They commented that along with three other roadless areas that form the Cleveland Peninsula, it serves as a corridor for many mainland species to colonize the archipelago of Southeast Alaska. The Peninsula is thought to serve as an important source of natural colonization of the southern and central islands of the Alexander Archipelago by mainland species such as moose and wolves. This is largely because the peninsula penetrates the archipelago much further than any other mainland peninsula in southeast Alaska. They indicated that the important wildlife values provided by this area warrant management that ensures the long-term integrity of its habitats, ecosystem processes, and ecological functions.

In comments relative to the 1997 Forest Plan, the Governor of Alaska recommended that logging and construction of logging roads be avoided in important public interest areas such as the Cleveland Peninsula (most of RA# 528, 529, 209, and 210). This comment was reiterated by the Governor in scoping comments regarding the SEIS and in comments by the Division of Governmental Coordination on the Draft SEIS.

Alaska Department of Fish and Game recommended permanent roadless status for the Cleveland Peninsula in their comments on the Draft SEIS. The Alaska Department of Fish and Game rated the Cleveland and North Cleveland roadless areas (VCUs 719, 710, 717, 718, 720, 721, 722, and 723) as the highest priorities for protection in the Ketchikan Area (outside of POW Island). This rating is based on the VCUs with the highest value fish and wildlife resources needing additional protection. VCUs are prioritized for their very high productivity, essential role in connectivity, and/or very high value as community use areas.

The Department of Transportation and Public Facilities noted that there is a corridor across Cleveland Peninsula that might cross a small portion of this roadless area; it is identified in the Southeast Alaska Transportation Plan under Long Term Actions and was not included in the SEIS. They commented that this corridor is for a proposed highway that would link new ferry terminals on Spacious Bay and Santa Anna Inlet and would be a component of the Inside Passage Highway.

The city of Petersburg said they were opposed to designation of this area as wilderness because of the potential long-term economic impacts on the city.

SEACC identified the Anan roadless area as part of the Cleveland Peninsula, which includes Roadless Areas 209, 210, 528, and 529. They recommend this entire area, a 200,000-acre arm of the mainland, as LUD II. The Alaska Rainforest Campaign (a coalition of national and Alaska conservation groups) identified Roadless Areas 204, 205, 206, 207, 208, 209, 210, 528, and 529 as a contiguous complex of roadless areas that should be considered one roadless area and recommended it for permanent protection as LUD II.

The Tongass Conservation Society recommended North Cleveland roadless area for long-term protection from logging and development.

Many individual commenters identified the Cleveland Peninsula as an area in need of protection. Some individuals recommended this area for permanent protection as wilderness.

530 – Hyder

The U.S. Department of the Interior identified this roadless area as having important fish and wildlife habitat and populations; although not a top priority for protection, it ranked in their top third among all roadless areas. They indicated that protection of this area would conserve valuable remaining undisturbed forested habitats on the mainland.

The Alaska Department of Fish and Game rated the Hyder roadless area as the seventh highest priority for protection in the Ketchikan Area (outside of POW Island). This rating is based on the VCUs with the highest value fish and wildlife resources needing additional protection. VCUs are prioritized for their very high productivity, essential role in connectivity, and/or very high value as community use areas.

SEACC recommended the Hyder area should be designated as LUD II. The Alaska Rainforest Campaign (a coalition of national and Alaska conservation groups) recommended Roadless Area 309 for permanent protection as LUD II.

Others recommended the area for LUD II because of its spectacular scenery and importance for salmon, tourism, and recreation.

531 – Nutkwa

The U.S. Department of the Interior identified this roadless area as having important fish and wildlife habitat and populations; although not a top priority for protection, it ranked in their top third among all roadless areas.

Alaska Department of Fish and Game recommended permanent roadless status for the Honker Divide area in their comments on the Draft SEIS. Alaska Department of Fish and Game rated the Nutkwa roadless area (VCUs 685, 686, and 689) as the third highest priority for protection on Prince of Wales Island and Adjacent Islands. This rating is based on the VCUs with the highest value fish and wildlife resources needing additional protection. VCUs are prioritized for their very high productivity, essential role in connectivity, and/or very high value as community use areas.

The city of Pelican passed a resolution stating that the important watersheds identified as areas of special interest in the 1999 ROD and HR 987 should given long-term protection.

The Alaska Rainforest Campaign (a coalition of national and Alaska conservation groups) identified Roadless Areas 507 and 531 as adjacent to the existing South Prince of Wales Wilderness and recommended them for permanent protection as wilderness. They indicated that this combination would create a contiguous wilderness area of approximately 350,000 acres. SEACC recommended that this roadless area be designated as LUD II and added to the existing Nutkwa LUD II. Note that the SEACC recommendation is different than Alternative 6

A number of individual commenters identified the Keete and Kassa Inlets and Mabel Bay as areas in need of protection.

532 – Fake Pass

SEACC recommended this area be designated as LUD II.

533 – Hydaburg

The Alaska Rainforest Campaign (a coalition of national and Alaska conservation groups) recommended Roadless Area 533 for permanent protection as LUD II. SEACC recommended this area for permanent protection through LUD II designation.

534 – Twelvemile

SEACC recommended this roadless area for permanent protection through LUD II designation. The Alaska Rainforest Campaign (a coalition of national and Alaska conservation groups) recommended Roadless Area 534 for permanent protection as LUD II.

535 – Carroll

The Alaska Department of Fish and Game rated the Carroll roadless area as the fifth highest priority for protection in the Ketchikan Area (outside of POW Island). This rating is based on the VCUs with the highest value fish and wildlife resources needing additional protection. VCUs are prioritized for their very high productivity, essential role in connectivity, and/or very high value as community use areas.

The Alaska Rainforest Campaign (a coalition of national and Alaska conservation groups) recommended Roadless Area 535 for permanent protection as LUD II. SEACC recommended this area for LUD II designation.

536 – Kasaan Bay

SEACC recommended this area for permanent protection through LUD II designation. The Alaska Rainforest Campaign (a coalition of national and Alaska conservation groups) recommended Roadless Area 534 for permanent protection as LUD II.

577 – Quartz

The U.S. Department of the Interior identified this roadless area as having important fish and wildlife habitat and populations; although not a top priority for protection, it ranked in their top third among all roadless areas.

The Alaska Department of Fish and Game rated the Quartz roadless area as the sixth highest priority for protection in the Ketchikan Area (outside of POW Island). This rating is based on the VCUs with the highest value fish and wildlife resources needing additional protection. VCUs are prioritized for their very high productivity, essential role in connectivity, and/or very high value as community use areas.

The Alaska Rainforest Campaign (a coalition of national and Alaska conservation groups) noted that Roadless Area 577 is surrounded entirely by national monument wilderness and recommended it for permanent protection as wilderness.

Some individuals recommended this area for permanent protection as wilderness.

D. References

The references cited in this Appendix are included in the reference section presented in Volume 1, Chapter 6 of this SEIS.

ATTACHMENT A

LETTERS FROM AGENCIES, ELECTED OFFICIALS, AND TRIBAL GOVERNMENTS

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1719 City of Port Alexander F-A61
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2182 City of Thorne Bay F-A62
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566 Prince of Wales Community Advisory Council F-A65
1002 Saltery Cove Community F-A65
1524 Saltery Cove Community, etal. F-A66
1708 Prince of Wales Community Advisory Council F-A67

T-259

Congress of the United States
Washington, DC 20510

June 20, 2002

USDA Forest Service
Tongass National Forest
Content Analysis Team
PO Box 9079
Missoula, MT 59807

Re: Draft Supplemental Environmental Impact Statement

Dear Mr. Purchlerz:

This is to comment on the Draft Supplemental Environmental Impact Statement (DSEIS) for the Tongass National Forest Plan Revision. Your choice of the No-Action Alternative as the preferred alternative is the correct choice for a number of reasons.

Congress is the appropriate body to raise the issue of new Wilderness designations on the Tongass National Forest (TNF). In the Alaska National Interest Lands Conservation Act (ANILCA), Congress designated approximately 5.4 million acres of the TNF as Wilderness. At that time environmental groups (the Alaska Coalition) claimed that they were seeking to "protect" large ecosystems such as Admiralty Island, Misty Fiords and West Chichagof with such Wilderness designations. Congress also made the finding that the Wilderness and other conservation designations in the bill achieved the proper balance between setting aside public lands and making lands available for multiple uses (See Section 101(d) of ANILCA). Accordingly, Congress instructed the Forest Service to conduct no further review of roadless areas in the TNF for Wilderness designation recommendations (See Section 708(b)(4) of ANILCA).

ANILCA was adjusted by Congress in the Tongass Timber Reform Act of 1990 (TTRA) by designating an additional 1.2 million acres of Wilderness and legislated Land Use Designation II (LUD II) areas. The purpose stated by the environmental community in justifying this legislation was to "protect" smaller, but important, areas missed during the ANILCA large Wilderness area designations. Given this history and the Congressional policy imbedded in the "no more" clause referenced above, recommendations for Wilderness designation of roadless areas in the TNF should continue to be the exclusive province of Congress, not that of the Forest Service.

The DEIS correctly points out that the 6.6 million acres of the TNF already designated as Wilderness and legislated LUD IIs represent all of the different land types found on the TNF. Each of these areas experiences visitor usage rates far below their carrying capacity. Thus, there is no current need for a third round of Wilderness designation on the TNF. We have a supply of Wilderness that far exceeds the demand and is out of balance with the supply of suitable and available timberland.

In deciding on the preferred alternative for the Final SEIS, the Forest Service should also consider how much of the TNF and suitable forest land was made unavailable as Old Growth Reserves (previously referred to as Habitat Conservation Areas) in the 1997 Tongass Land Management Plan (TLMP) Record of Decision (ROD). Prior to the 1997 TLMP ROD there were 2.4 million acres of suitable forest land on the TNF. Of this only 676,000 acres were actually scheduled for timber harvest (an area equal to only about 10% of the Wilderness/LUD II acres) by the 1997 TLMP ROD. From those 676,000 acres must come the timber to maintain the industry and to protect jobs in timber dependent communities consistent with the Forest Service's statutory obligation in TTRA to seek to meet market demand. We have dropped from approximately 3,400 timber jobs in 1990 to approximately 700 today. We cannot afford to further erode the timber base.

Given the findings in the DEIS that there is no need for more Wilderness designations, but there is a need to maintain the suitable timber land base, selecting the "no action" alternative is the right decision. The political efforts of environmental organizations to force the Forest Service to recommend Wilderness are not consistent with actions taken by Congress in ANILCA and TTRA. In fact, in ANILCA Congress prohibited any study of new Wilderness in Alaska without prior Congressional approval.

Very truly yours,

Frank H. Murkowski
Ranking Member
Senate Energy & Natural Resources

Ted Stevens
Ranking Member
Senate Appropriations

Don Young
Congressman for All Alaska

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PRIORITY

Congress of the United States
House of Representatives
Washington, DC 20515

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August 8, 2002

Mr. Dale Bosworth
Chief
U.S. Forest Service
201 14th Street, S.W.
Washington, D.C. 20250

Dear Chief Bosworth:

We are writing to voice our strong opposition to the preferred alternative chosen by the Forest Service in the recently released Wilderness Plan for Alaska's Tongass National Forest. In recommending the "no action" option, the Forest Service has chosen to abrogate its duty to the American public to protect our nation's wild and pristine forests and keep them accessible to all for generations to come. This plan, combined with the distressingly inadequate Revised Chugach Forest Plan, represents a significant rollback of wilderness protection, in the face of overwhelming nationwide public support for greater wilderness protection for the forests.

The roadless areas your agency evaluated consist of over 9 million acres of wild, pristine forest. The Forest Service has determined that not even one acre of these areas within the Tongass deserve permanent protection as Wilderness. This decision not only flouts the public will, but also directly undercuts protections supported by Congress in past legislative initiatives. In June of 2000, 150 Members of Congress signed a letter asking then President Clinton to include the Tongass in the national roadless policy. At present, 118 Members of the House are sponsoring legislation, H.R. 2908 - the Alaska Rainforest Conservation Act, to permanently safeguard areas of unparalleled ecological value in the Tongass and the Chugach National Forests, and as such we stand in opposition to any measure allowing these lands to be further exploited and desecrated.

The Tongass Draft Supplemental Environmental Impact Statement, conducted in response to a Federal court order mandating wilderness review, recommends no new wilderness protection for the 9.7 million acres of roadless lands. Adopting this recommended alternative would leave these areas open to road building and logging, despite Secretary Veneman's pledge to uphold the Roadless Area Conservation Rule; in fact, 30 timber sales are presently planned for the Tongass' roadless areas.

The "no action" alternative is scientifically indefensible. In 2000, a group of 330 eminent scientists recommended inclusion of the Tongass in the roadless policy, noting, "In the Tongass there are two million acres of roadless areas left open to development, including 450,000 acres of roadless old-growth. These roadless reserves are especially critical because only four percent of the Tongass land

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Chief Bosworth
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base encompasses the low elevation large old-growth most important to fish and wildlife, and much of this rare forest has already been clearcut. The ecological risks associated with developing these [remaining roadless] areas are extremely high and may jeopardize fishing, hunting, tourism, recreation and subsistence in Southeast Alaska."

Additionally, the "no action" alternative would actually impose a significant financial burden on American taxpayers. The timber program in the Tongass National Forest lost $33.7 million in 1998, according to a recently released Forest Service report. Since 1992, the U.S. government has spent over $500 million on logging and related activities in the Tongass.

We urge you to choose Alternative #6, the Alaska Rainforest Conservation Wilderness proposal. This is a balanced proposal that provides room for a sustainable timber industry in Southeast Alaska by allowing logging to continue in areas that already have logging roads and infrastructure, and leaves more than 10 billion board feet of timber unaffected for small-scale, sustainable timber operations. This alternative is based on H.R. 2908 and safeguards, for this and future generations, magnificent wilderness areas in the Tongass National Forest.

Please accept these as official comments on the Tongass Land Management Plan Revision Draft Supplemental Environmental Impact Statement.

Sincerely,

Rosa L. DeLauro
Richard A. Gephardt
Nancy Pelosi
Nita Lowey
George Miller
Frank Pallone Jr.
Jim McGovern
Michael McNulty
Harold Ford
Rod R. Blagojevich

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Jay Inslee
John Baldacci
Lynn Rivers
Rick Hill
Grace F. Napolitano
Jim Maloney
Earl Blumenauer
Karen McCarthy
Lois Capps
Tammy Baldwin
Barney Frank
Tom Allen
Dennis J. Kucinich
Steven R. Rothman
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Diane DeGette
Tony P. Hall
Julia Carson
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Jim McDermott
Ed Markey
Lynn Woolsey
Jim McGovern
Barbara Lee
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Cynthia McKinney
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Maria Cantwell
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Eliot L. Engel
Gary L. Ackerman
Sherrod Brown
Bill Pascrell Jr.
Carolyn McCarthy
Maurice Hinchey
Corrine Brown
Bob Filner
Jerry Kleczka
Lisa M. Clayton
Eugene W. Meehan

T-2893

United States Department of the Interior

OFFICE OF THE SECRETARY
Washington, D.C. 20240

U.S. Department of the Interior 1849•1999

AUG 26 2002

ER02/0479

USDA, Forest Service
Tongass National Forest
Content Analysis Team
P.O. Box 9079
Missoula, Montana 59807

Dear Content Analysis Team:

In response to your May 2002 request, the U.S. Department of the Interior (DOI) has reviewed the May 2002, *Tongass Land Management Plan Revision, Draft Supplemental Environmental Impact Statement (SEIS), Roadless Area Evaluation for Wilderness Recommendations.* This Draft SEIS evaluated 115 inventoried roadless areas found throughout the Tongass National Forest for possible wilderness designation.

DOI reviewed the information provided in the SEIS for the 115 inventoried roadless areas together with other available information in our files relative to the ecology and ecosystems of Southeast Alaska. This included information from Fish and Wildlife Service biologists who have conducted on-the-ground and/or aerial visits to each area, and subsequently ranked the quality and importance of each area's habitats.

As a result of this work, we have identified 13 inventoried roadless areas that we believe have outstanding fish and wildlife values (see Attachment A). We have also identified 23 inventoried roadless areas that we believe contain important fish and wildlife habitats and populations (see Appendix B).

If DOI may provide expertise and assistance to the Forest Service in gathering and evaluating information on the areas identified in Attachment A, please do not hesitate to contact us. If you have questions concerning this letter or Tongass National Forest issues, please contact Steve Brockmann at the Fish and Wildlife Service Juneau, Alaska, Field Office at 907-586-7240.

Sincerely,

Willie R. Taylor
Director, Office of Environmental
Policy and Compliance

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Attachment A

Roadless Areas with Outstanding Fish and Wildlife Values

201 Fanshaw
207 Harding
209 Anan
215 Castle
242 Camden
244 Bay of Pillars
245 East Kuiu
308 Windham-Port Houghton
311 Chichagof
328 Hoonah Sound
507 Eudora
528 Cleveland
529 North Cleveland

Attachment B

Roadless Areas with Important Fish and Wildlife Habitat and Populations

204 Madan
205 Aaron
218 Woewodski
225 Kadin
233 Mosman
234 South Etolin
240 Security
243 Rocky Pass
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301 Skagway-Juneau Icefield
302 Taku-Snettisham
303 Sullivan
304 Chilkat-West Lynn Canal
306 Mansfield Peninsula
307 Greens Creek
326 North Kruzof
330 North Baranof
339 Yakutat Forelands
515 Kosciusko
519 McKenzie
530 Hyder
531 Nutkwa
577 Quartz

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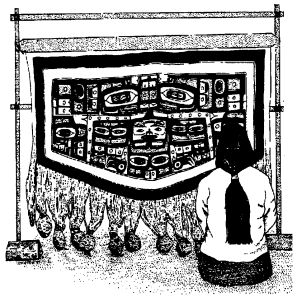

Southeast Alaska Federal Subsistence Regional Advisory Council

William C. Thomas, Chairman
P. O. Box 5196, Ketchikan, AK 99901
907 225 4833, fax 907 247 4833,
yuatah@aptalaska.net
Robert Schroeder, Subsistence Management
Coordinator, U. S. Forest Service, Alaska Region
Box 21628, Juneau, AK 99802-1628
1 800 586 7895, fax 907 586 7860
rschroeder@fs.fed.us

August 14, 2002

Tomas Puchlerz, Forest Supervisor
Tongass National Forest
Federal Building
648 Mission Street
Ketchikan, AK 99901-6591

Dear Tom,

As you are aware, the Southeast Alaska Subsistence Regional Advisory Council has had a long-standing, strong interest in forest management. Future land management actions in Tongass National Forest will have strong impacts on the subsistence activities of rural residents in our region as well as on the overall economic health of Southeast Alaska communities. At a number of points in the development of the Tongass Land Management Plan our Council has heard presentations from Forest Service staff, reviewed planning documents, and submitted comments representing the views of the Council.

The Wilderness EIS had not been released when we held our spring meeting in Juneau, March 12 through 14 of this year. Since our March meeting, Council members have reviewed planning materials and discussed the implications of the various alternatives with subsistence users in their areas. A number of Council members attended Sec. 810 hearings held in their communities during June and July. On July 24, the Council had a teleconference concerning this EIS. Seven of our sitting 12 Council members were present for the teleconference: Bill Thomas, chair from Ketchikan, Bert Adams, Yakutat, Mike Douville, Craig, Dolly Garza, Ketchikan, Floyd Kookesh, Angoon, John Littlefield, Sitka, and Dick Stokes, Wrangell. Randy Fairbanks provided a review of the EIS, and Jan Lerum was also available to answer questions. Tom Pulcherz was present at the close to the teleconference to answer questions concerning comment submission deadlines. The following summarizes the views of Council members that were expressed. These are our preliminary comments on the EIS.

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The Council members strongly felt that the EIS deserved more complete discussion than could take place in a teleconference. They wanted the EIS to be discussed at the coming Regional Advisory Council meeting to be held in Hoonah, Sept. 30 through Oct. 3. This will allow the full Council to review the EIS, and for the Council to submit any formal comments that may be developed at this noticed meeting. The Council appreciates that Tom Pulcherz, Tongass National Forest Supervisor, said he would consider comments from the Council that would be submitted after their scheduled meeting and that he would encourage someone from Forest Service to be present in Hoonah to answer questions concerning the EIS. Because of his assurance that Council comments will be considered in his decision making, the Council sees no need to request a formal extension of the comment period at this time.

The Council believed that its recommendations concerning the EIS should carry special weight in the decision making process. The Alaska National Interest Lands Conservation Act (ANILCA) sets the guidelines for the operation of the Council. Providing review and comments on land use actions is part of the set of responsibilities intended for Regional Advisory Councils as outlined in ANILCA. Further, the Council operates under strict Federal Advisory Committee Act (FACA) standards and guidelines. It is the only FACA body established to provide public input on subsistence issues in the Southeast Alaska area.

Overall, the Council members present tended to support alt. 6. Four members, Douville, Garza, Littlefield, and Thomas, spoke of the need for further protection of areas near their home communities of Craig, Ketchikan, and Sitka. They specifically noted the need for further environmental protection for Gravina Island, Baker Island and other islands near Craig, and numerous areas that are important for subsistence near Sitka (for Sitka these include units 311, 312, 317, 318, 319, 321, 323, 326, 327, 328, 329, 332, 330, 331, 333, 334, 342, 343.)

These four members also spoke of more regional concerns. Regulatory issues that have come before the Council over the past decade point to conflicts over use of subsistence resources in parts of the Tongass National Forest. These conflicts are exacerbated by any land management actions that might reduce the fish and wildlife available for subsistence, sport, and commercial harvesting. The Council notes the continuing problem with the forest management induced declining deer population on Prince of Wales Island. For this reason, these Council members favored alternative 6 as the alternative that would have the least impact on subsistence and be most friendly to subsistence uses. These four Council members were supported by Stokes, Council member from Wrangell.

Two Council members strongly supported alternative 1 for their communities. Adams and Kookesh thought that the current plan was working well for Yakutat and Angoon respectively and that no further wilderness protection was desired. Much of the traditionally used subsistence areas for these two communities is presently in protected status.

The Council indicated that its final, more complete comments might both identify a Council preferred alternative as well as indicate particular areas among the 115 inventoried roadless areas that the Council believes need protected status.

Thank you for the opportunity to provide preliminary comments on this document.

Yours truly,

Bill Thomas (by AK Sch)

William C. Thomas

T-2892

STATE OF ALASKA

OFFICE OF THE GOVERNOR

TONY KNOWLES, GOVERNOR

OFFICE OF MANAGEMENT AND BUDGET
DIVISION OF GOVERNMENTAL COORDINATION

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August 17, 2002

Mr. Tom Puchlerz, Forest Supervisor
U.S. Forest Service, Tongass National Forest
648 Mission Street
Ketchikan, AK 99901

SUBJECT: Draft SEIS – Roadless Area Evaluation for Wilderness Recommendations

Dear Mr. Puchlerz:

The State of Alaska has reviewed the Draft Supplemental Environmental Impact Statement (SEIS) for the Roadless Area Evaluation for Wilderness Recommendations and its appendices. We are encouraged that the USFS has chosen to attempt resolution of the roadless area and wilderness issues in the context of the forest planning process, rather than through the application of the prior national roadless rule. The State of Alaska's objective is to ensure that the management decisions made by the USFS meet the current and, as nearly as possible, the future needs of Southeast Alaskans, their jobs, their families, and their quality of life.

The Tongass Land Management Plan (TLMP) process -- not the national roadless area rule -- is the appropriate means to address the management of roadless lands on the Tongass. TLMP should chart the long-term management of the Tongass National Forest, reflecting not only national mandates, but also the concerns and needs of Alaska communities. Alaska communities and families deserve to know how their forest will be managed, and have repeatedly called for a balance among resource uses and values. To provide balance and certainty the State has consistently endorsed adherence to several key principles: application of current scientific understanding and tools, sustainable management of forest resources, and an open public process that provides a seat at the table for Alaska stakeholders. These same principles should guide the current SEIS process.

This SEIS, required by a federal district court decision, addresses the question of which Tongass roadless areas should be recommended for designation as Wilderness Areas by

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Congress. Posing this question has renewed public debate over the allocation of Tongass wildlands, in particular those roadless areas presently allocated to land use designations allowing road construction, logging, and some other development activities. This debate has reaffirmed that residents of Southeast Alaska hold diverse views, ranging from those who emphasize the importance of the timber land base to those who support significant forest conservation designations. TLMP has thus far not provided a resolution.

The balance between timberland and wood products businesses and the protection of areas of particular value to local communities for fish, wildlife and subsistence was a central issue throughout the TLMP process. From initial scoping to the 1997 record of decision in effect today, to the 1999 record of decision now revoked by the courts, to the current SEIS under consideration, this balance remains elusive. The current "Wilderness or status quo" approach in the SEIS preferred alternative omits some potential options for a more finely tuned and durable allocation of Tongass wildlands that do not require formal wilderness designation but would strengthen the 1997 TLMP.

There is a strong interest in a stable, reliable, and predictable timber supply in support of Alaska wood product manufacturing businesses. Timber supply remains vital to a number of Southeast Alaska communities, and is an important part of a diversified regional economy. A sustainable timber industry requires a predictable, reliable timber supply and the Tongass is a cornerstone of that supply. Although private and state lands continue to harvest timber, many wood products businesses rely on national forest timber and deserve to know what they can expect from the Forest Service.

The 1997 TLMP Record of Decision incorporated a wildlife and fish habitat conservation strategy. However, a number of high value community fish and wildlife use areas identified by the Department of Fish and Game received only limited protection. While the existing old growth reserve system responds to the national mandate to protect fish and wildlife viability, it does not fully address the need for community use of fish and wildlife. High value community use areas need special attention to assure their conservation and availability to local communities, and the USFS should include appropriate measures to do so in the Final SEIS.

Some areas, whether they are defined as "roadless" or not, are so important to Alaska communities as local use areas that new logging roads and timber harvest should be avoided. In previous correspondence the Governor has recommended specifically that logging and the construction of logging roads be avoided in important public interest areas such as Honker Divide, Cleveland Peninsula, East Kuiu Island, Port Houghton, and the Poison Cove/Ushk Bay area. Communities that do not directly benefit from the timber industry are often opposed to harvesting in their use areas. Even communities that directly benefit from timber harvest have their favorite locations they want protected. This often results in individual sales being delayed, deferred, or substantially modified due to appeals and litigation. Providing additional protection for important wildland areas, in a thoughtful and practical manner, can reduce conflicts and provide stability to forest management.

Bringing the latest and best scientific information about the resources to bear, including new technologies and local knowledge, can help significantly in the resolution of conflicting public values over allocation and use of roadless lands. The state is concerned that recently available resource information tools have not been used to develop and analyze alternatives in the current roadless SEIS or in the ongoing TLMP timber sale planning. Information such as the new geographic information system maps of forest habitat and timber stands would be extremely useful for USFS actions that apply across the entire landscape, as well as for determining relocation of Old Growth Reserves. Such tools could help identify ways to ensure additional fish and wildlife habitat protection while also providing for a more practical, operable timber supply. This potential applies to the recommendations regarding roadless areas as well as the timber sale planning process, where there is a tendency by the USFS to adjust small Old Growth Reserve boundaries to achieve minimum requirements rather than to adequately protect habitats.

Salmon fisheries are a fundamental part of the Southeast Alaska economy, and important salmon producing watersheds deserve special attention in all aspects on Tongass planning and management. There are over one thousand miles of anadromous streams on the Tongass, which accounts for over 80% of the salmon produced in Southeast Alaska. Real progress has been made in terms of riparian habitat protection under TLMP guidelines, and in restoring and providing fish passage in the forest road transportation system. Protection of important watersheds is another component of salmon conservation. Researchers at the Forest Service research station in Alaska note that the retention of existing intact watersheds is a key element of sustainable salmon management. Such research information supports additional protection, whether it be through Wilderness designation or via some alternate conservation land use allocations, for top salmon producing and fishing watersheds.

The USFS should continue to strive for a sustainable balance between all the uses and values of the Tongass National Forest, in this SEIS and in all aspects of forest management. Commercial and sport fishing, fish processing, hunting, logging and wood product manufacturing, mining, tourism, subsistence, marine and overland transportation, recreation, and personal use of renewable resources are all important to Alaska residents. Conservation of forest resources--fish, wildlife, habitat, water, air, trees, and wildland recreation opportunities--is a fundamental aspect of sustaining the jobs, business opportunities, subsistence cultural and sustenance values, and the rich recreation and tourism experiences that make the Tongass a critical part of Alaskan life.

The USFS needs to fully consider the needs of all users, with attention to local governments and the public. Southeast Alaskan communities are diverse - some will favor the no action alternative and some will request consideration of additional areas for Wilderness status protection. The USFS can ensure responsive, meaningful public involvement by including stakeholders, communities, and citizens in its ongoing public review. Whether it is a timber sale, a roadless area evaluation, a forest highway construction proposal, or any other project, a sound public process should be employed. Residents, stakeholders and communities deserve to have input into the decisions that

affect their businesses and their environment. We urge you to take the comments made by Alaskans during this process seriously.

The attached documents provide additional, more detailed comments from the State Department of Fish & Game and the Department of Transportation and Public Facilities. The November 14, 2001 scoping letter from Governor Knowles to Forest Supervisor Puchlerz is also attached. We request that all three attachments, along with this letter, be made part of the record of public comment on the SEIS. Thank you very much for your consideration.

Sincerely,

Ms. Kerry Howard
Acting Director

Attachments

Cc:
Bill Hanson, DFG, Juneau
Andy Hughes, DOT/PF, Juneau
Bruce Johnson, DNR/DOF
Odin Brudie, DCED, Juneau
Kevin Hanley, DEC, Juneau

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November 14, 2001

Mr. Tom Puchlerz, Forest Supervisor
Tongass National Forest
Attn: Forest Plan SEIS
648 Mission Street
Ketchikan, AK 99901

Dear Mr. Puchlerz:

In light of the recent announcement of intent to prepare a Tongass Land Management Plan (TLMP) Supplemental Environmental Impact Statement (SEIS) addressing roadless areas and wilderness recommendations, the State of Alaska urges the Forest Service to affirm the central role and importance of public participation in the forest planning process on Alaska's national forests. Specifically, I urge the Forest Service to make decisions regarding management of Alaska roadless areas through the TLMP forest planning process rather than the national roadless area rule. The State of Alaska made this request consistently over the last several years. Unfortunately, those calls were not heeded and in January of this year the State of Alaska filed suit in federal court seeking to stop the application of the national roadless rule in Alaska.

The recent federal court decisions present a unique situation concerning the Tongass National Forest. The TLMP was completed in 1997 after one of the most comprehensive public reviews and most comprehensive planning processes ever undertaken on a national forest. The State of Alaska's comments on the draft plan called for adherence to my principles of "doing it right," which include sound science, prudent and sustainable management, and an open public process that brings all stakeholders to the table.

In addition, the state's TLMP comments called for an approach that would provide a stable, reliable, and predictable timber supply in support of Alaska wood product manufacturing businesses, with an eye toward the manufacture of high value added products. After many years of uncertainty with regard to timber supply, the TLMP promised to bring stability so that Alaska businesses could make practical plans based on knowledge of how the Tongass will be managed. Even in the face of very weak markets for Alaska wood products, timber supply remains vital to a number of Southeast Alaska communities, and is an important part of a diversified regional economy.

The state also identified fish and wildlife use areas important for one or more Southeast Alaska communities. Data on resource values--salmon production, recreational fishing efforts, important watersheds for production of salmon for commercial and sport harvest, subsistence use, deer harvest, and bear harvest--were compiled, analyzed, and ranked. Important wildlife and fish areas were identified based on resource values, extent of past timber harvest, and local knowledge of habitat quality and community use patterns. The list of high value community use areas was included in the state's 1996 comments to the Revised Supplemental Draft Tongass Land Management Plan. In subsequent correspondence I recommended specifically that logging and road building be avoided in important public interest areas such as Honker Divide, Cleveland Peninsula, East Kuiu Island, Port Houghton, and the Poison Cove/Ushk Bay area.

The Regional Forester's 1997 TLMP Record of Decision (ROD) marked a significant milestone toward balanced, sustainable management of the multiple resource values of the Tongass. The ROD provided for a significant supply of old growth timber for harvest, and incorporated a wildlife and fish habitat conservation strategy. However, a number of the high value community fish and wildlife use areas received only limited protection. In addition, the Forest Service did not follow its inventory of roadless areas with any specific recommendations for wilderness area designation, or any explanation of how other land use designations addressed roadless area issues.

In 1999, the Undersecretary of Agriculture, in his decision on administrative appeals of the 1997 TLMP decision, removed eighteen additional areas from the timber base in order to provide increased protection for key wildlife and fish areas, and specific wildlife populations. That action strengthened significantly the TLMP's responsiveness to the state's interest in fish and wildlife areas of concern to communities. Its impact on the timber supply was also significant, and the decision process employed by the undersecretary was controversial.

I wrote at that time to Secretary of Agriculture Dan Glickman to express my concerns with the process utilized by the undersecretary to finalize the TLMP. I noted that questions about the process inevitably led to questions about the content of the final plan. Alaska timber businesses were understandably concerned over further reductions in the timber land base. They were also concerned that there could be a very real gap between timber volume promised on paper and sales made available for bid. I noted that a faulty process can often lead to unpredictable results, and called on the Forest Service to adopt a new and forward looking approach, based on adaptive management, to seek to minimize the uncertainties of the past and maximize the commercial use of each board foot of timber harvested from the Tongass.

Legal challenges to the Agriculture Department's forest plan decision led to a federal district court decision that the undersecretary's decision process was indeed flawed. The court rule invalidated the 1999 decision, and directed that the 1997 TLMP decision be supplemented to address the allocation of inventoried roadless areas to wilderness recommendations to Congress, or to other land use designations.

Given the importance of certain game and fish areas to local residents, the TLMP supplemental environmental impact statement (SEIS) should entail additional measures to protect key fish and wildlife habitats and local use areas, considering both wilderness designation and alternate land use designations. Those watersheds that are exceptional salmon producers or offer outstanding recreational fishing opportunities deserve careful attention. The SEIS should entail a commitment to the reliable, predictable timber supply that is so necessary for the local Alaska sawmills that provide jobs and stability in Alaska's communities. The supplement should also examine and be responsive to the growing importance of recreation opportunities: trails, anchorages, campgrounds, pristine backcountry, public use cabins, canoe portages, wildlife observation areas, day use facilities, and scenic areas. For Alaska residents, as well as for visitors and the visitor industry, recreation is an invaluable natural, social, and economic resource.

It is my firm conviction that this forest plan supplement must ensure that the Tongass will sustain the diverse uses and values that are so important to Alaskans from all walks of life. It can provide the stability desired by all users of the forest, by resolving the roadless area and wilderness issues in the context of the forest planning process.

Sincerely,

Tony Knowles
Governor

ENCLOSURE I

HIGHEST VALUE COMMUNITY USE AREAS

VCU* areas identified as having the highest values for community use of fish and wildlife. These areas represent the most important 20% of community subsistence use areas in the region, approximately 20% of the brown bear harvest and urban deer harvest, 40% of the black bear harvest and 30% of the pink production, coho capability and sport fishing use areas. VCU areas are grouped into three categories within these "highest value" areas.

The Department of Fish and Game has on file the specific data that supports each of these value ratings and helps identify the most productive areas within each VCU listed. The department will work with the Forest Service to integrate this information into final management strategies for these areas.

VCUs with highest community fish and wildlife values

230 240 550 840 1200 2010 2020 2030 2040 2150 2170 2180 2220 2230 2240 2250 2260 2280 2290 2390 2440 2790 2970 2990 3000 3010 3020 3030 3090 3100 3120 3130 3980 3990 4000 4020 4200 4210 4250 4260 4290 4320 4330 4340 4350 4360 4470 4500 4510 4520 4540 5020 5140 5270 5290 5320 5440 5460 5542 5710 5730 5740 5750 5760 5770 5780 5871 5880 5890 5920 5930 5971 6210 6240 6320 6740 6750 6790 6920 7150 7160 7180 7190 7220 7530 8060

VCUs with next highest community fish and wildlife values

790 1960 2100 2430 2450 2460 2800 2810 4160 4570 4580 4680 4890 5380 5490 5610 5830 6180 6310 6340 7470

VCUs with next highest community fish and wildlife values

2360 2920 2940 4670 5810 5910 5960 6200 6250 7200 4240 5940 5950 6220 7390 2400 7130 7140

*Value Comparison Unit - land-based units into which the Forest Service divides the Tongass National Forest. Resource data is frequently analyzed by VCU.

F-A11

Comments on the TLMP Revision Draft SDEIS
Prepared by the Department of Transportation and Public Facilities
Southeast Region Planning
August 5, 2002

From the perspective of state transportation, two areas of concern are not analyzed. The first concerns a proposed highway crossing the Cleveland Peninsula and the second involves future construction of state highways (and possibly ferry terminals and airports) through areas with a LUD II designation. In addition, the analysis of alternatives is misleading and there are other deficiencies in the Draft SDEIS.

Analysis that is MISSING from the Draft SDEIS - Cleveland Peninsula

One of three corridors identified in the Southeast Alaska Transportation Plan under Long Term Actions (p. 60) was not included in either the general discussions or the specific analysis for each roadless area. This corridor crosses the Cleveland Peninsula and would be a component of the Inside Passage Highway. The pertinent language (under Long Term Actions on p. 60) reads "future possible road improvements be reserved as highway corridors in the planning process for the Tongass National Forest".

The corridor that is not included in the analysis crosses the Cleveland Peninsula. It consists of a proposed highway that would link new ferry terminals on Spacious Bay and Santa Anna Inlet. Specific locations for the terminals and highway have not been determined. This transportation link would be constructed across roadless areas 528 (Cleveland) and 210 (Frosty). The highway segment might also cross a small portion of area 529 (North Cleveland).

Analysis that is MISSING from the Draft SDEIS - LUD II designations

The second omission involves new construction through LUD II designations of transportation needs (roads) determined by the State of Alaska. The concern here is not that these roads are prohibited per se; instead, it is that the standard for approval of an individual proposal is set so high that a decision to approve construction will never be made. For example, we are not aware of a single decision that has been made to construct a new transportation facility in an area that currently carries a LUD II designation.

In this regard, the most troubling language is found in the 1997 Forest Plan, which is incorporated into the Draft SDEIS by reference on page D-13. If a decision is made to designate new areas as Recommended LUD II, we request that a new Forest-Wide Standard and/or Guideline be

established directing expeditious approval of a state transportation proposal that relies on the state decision-making process. In addition, we ask the Forest Service to revisit the 1997 Standards and Guidelines with respect to existing Congressionally-designated LUD II areas as part of the SDEIS.

Along these lines, the following revision to the Standard and Guideline for Transportation Improvement Planning: TRAN212 (Incorporated into the Draft SDEIS on p. D-13) is needed - Add a new subsection that reads "Support initiatives by the State of Alaska to complete an integrated transportation system for Southeast Alaska. Identify and address forest-related concerns (as identified in TRAN214) as part of the environmental approval process required by the Federal Highway Administration. Fund proposed segments that cross forest lands through the Forest Highway Program." Drop the language in existing subsection C. that states "Make no road connections between communities or emerging communities without the participation and collaboration of state and local governments, communities and affected individuals."

Misleading Analysis in the Draft SDEIS

Our assessment of overall impacts is that "Alternatives 1 and 4 would have little effect on the implementation of the Southeast Alaska Transportation Plan (Updated by addendum in 2001) because roadless areas crossed by proposed transportation facilities are not recommended for wilderness designation. Alternatives 2, 3, 5, 6 and 7 would prevent development of some proposed elements of the regional transportation system through wilderness designations. In addition, Alternative 6 could restrict development if recommended LUD II designations are interpreted by either the public and/or agencies to preclude the completion of surface transportation links. Alternative 8 would prevent the completion of surface transportation links between Juneau and Skagway, Petersburg and Kake, Wrangell and Fools Inlet and across the Cleveland Peninsula." In contrast, the current Draft SDEIS text finds that "Alternatives 1 through 7 would have little effect".

DOT&PF synopsis of impacts of each alternative (with respect to the Southeast Alaska Transportation Plan)

Alternative 1 is the No Action alternative. The LUD II land use designation for the Berners Bay area may be interpreted by the public

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Prepared by the Department of Transportation and Public Facilities
Southeast Region Planning
August 5, 2002

and some agencies as precluding construction of the preferred alternative for the Juneau Access project, because congressional intent is not clearly defined and the short description of the designation states "congressionally-designated unroaded areas" .

Alternative 2 would preclude approval and construction of the preferred alternative for the Juneau Access project, because the East Lynn Canal alternative crosses a LUD II area (Berners Bay) that would be recommended for wilderness designation.

Alternative 3 would limit routing options for long term plans to cross Cleveland Peninsula with a highway connecting ferry terminals on both sides, and prevent location of the southern terminal at the recommended location along the north shore of Spacious Bay.

Alternative 4 would have little effect on the implementation of the Southeast Alaska Transportation Plan (Updated by addendum in 2001).

Alternative 5 would limit routing options for long term plans to cross Cleveland Peninsula with a highway connecting ferry terminals on both sides, and prevent location of the southern terminal at the recommended location along the north shore of Spacious Bay.

Alternative 6 would preclude approval of a highway construction alternative for the Juneau Access project, because each alternative under consideration involves construction along Lynn Canal, with most lands on both sides recommended for wilderness designation. It would also mean other proposed highway construction would need to cross newly-designated LUD II areas west of Petersburg, on Wrangell Island and on the Cleveland Peninsula.

Alternative 7 would preclude approval of a highway construction alternative for the Juneau Access project, because each alternative under consideration involves construction along Lynn Canal, with most lands on both sides recommended for wilderness designation. It would also limit routing options for long term plans to cross Cleveland Peninsula with a highway connecting ferry terminals on both sides, and prevent location of the southern terminal at the recommended location along the north shore of Spacious Bay.

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Alternative 8 would preclude approval of new highway construction under the Southeast Alaska Transportation Plan (Updated by addendum in 2001).

Comment on Current Land Use Designations Map

Revise the short description of LUD II by adding ", while approving the construction of new state transportation facilities" to the end of the first sentence.

Comments on Maps of Alternatives 1 through 8

Add the following depictions of Proposed State Road Corridors –

A highway corridor across the Cleveland Peninsula from the north shore of Spacious Bay to the west shore of Santa Anna Inlet. As noted previously, this corridor potentially crosses three roadless areas.

A highway corridor from the east shore of Fools Inlet to the Existing State Road Corridor (Zimovia Highway) south of the community of Wrangell. In general, this corridor traverses developed areas but it would need to enter roadless area 290 (Southeast Wrangell).

A highway corridor from the general vicinity of the city of Kupreanof across Kupreanof Island to the Existing State Road Corridor east of the community of Kake. In general, this corridor traverses developed areas but it would need to cross roadless area 213 (Five Mile).

The depiction of land status along the south shore of Yakutat Bay shows land as developed area and as two or more smaller roadless areas that is no longer part of the Tongass National Forest.

Comments on the Affected Environment discussion (pp. 3-84 through 86)

Air service has been a major method of moving passengers for at least five decades (1rst paragraph).

Per the Southeast Alaska Transportation Plan, the Alaska Marine Highway System no longer sails to either Stewart or Hyder (2nd paragraph).

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Prepared by the Department of Transportation and Public Facilities
Southeast Region Planning
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The Southeast Alaska Transportation Plan was updated and clarified by Addendum One, dated February 28, 2001. Discussions and references to the plan need to reflect the updates incorporated by Addendum One. South Mitkof and South Wrangell are not "Islands". They are "nametags" (i.e. name references) used to help in identifying the general location of new proposed terminals. Per the addendum, Angoon is no longer under consideration for a new ferry terminal (3rd paragraph).

The use of passive language construction ("have been considered") in the 4th paragraph begs the question. What role do potential transportation corridors play in the decision-making process? How important is the likelihood and scheduling of future construction?

The discussion of Forest Highways in the 5th paragraph lacks a context. Does the Forest Service support the construction of new Forest Highways across areas that are currently roadless? The use of "relinquished" and "would be given" indicates that the Forest Service does not consider the state an equal partner in providing transportation in and near the Tongass National Forest.

The remainder of the Affected Environment discussion on p. 3-85 does not appear pertinent to the Draft SDEIS.

Comments on the Environmental Consequences discussion (pp. 3-86 through 88)

Some explanation is required for the figures in Table 3.3-15 with respect to Alternatives 6, 7 and 8. If most or all roadless areas are closed to new road construction, how is it possible that cumulative road miles would increase by at least 11 percent?

The reference to "Travel plans" (last paragraph on p. 3-87) is confusing. Who puts out these "Travel plans"? Similarly, what does "use of motor vehicles in designated wilderness" mean?

Effects on Southeast Alaska Transportation Plan – see previous comments.

Effects on Other Regional Transportation Opportunities – This discussion needs to be revised because it includes proposals included in the Southeast Alaska Transportation Plan, as updated by Addendum One.

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Southeast Region Planning
August 5, 2002

The use of the word "Proposals" fits the discussion better than the word "Opportunities", because many of these proposals have not been seriously considered for funding. What is the threshold needed before a specific proposal is included in the SDEIS analysis? Does the Forest Service intend to include any conceivable highway alignment in the area-by-area analysis in Appendix C?

At a minimum, this discussion needs to cover "a road to Canada along Taku Inlet, the East Bradfield River corridor, and other routes near Wrangell; a road from Sitka to the east side of Baranof Island; a road connecting Whale Pass and Coffman Cove; a road connecting Thorne Bay and Coffman Cove; a road to the southeast tip of the Kasaan Peninsula; and a road from Carroll Inlet to Shrimp Bay and the northern end of Revillagigedo Island" as identified in the existing text and at least two additional proposals. There is some prospect that the proposed extension of Revilla Road to the Shelter Cove road system will cross area 526 (North Revilla). North of Sitka, construction of a proposed highway to Rodman Bay could cross area 331 (Sitka Urban) and would cross 332 (Sitka Sound). These two corridors need to be added to the analysis.

With respect to a road connecting Thorne Bay and Coffman Cove, this reference is confusing because these two communities are already connected by road. A reference specific to a coastal alignment, about six miles in length, through roadless area 512 (Ratz) is needed.

Request for a meeting with the Forest Service

Given the complexity of the SDEIS, it would be highly beneficial for state transportation planners to meet and discuss these comments with Forest Service personnel revising the Draft SDEIS. When can such a meeting be scheduled?

STATE OF ALASKA
TONY KNOWLES, GOVERNOR

DEPARTMENT OF FISH AND GAME
HABITAT AND RESTORATION DIVISION
SOUTHEAST REGIONAL OFFICE

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MEMORANDUM

TO: Frank Rue
Commissioner

THRU: Division Directors

FROM: Bill Hanson, H&R, Regional Supervisor
Kim Titus, DWC, Regional Supervisor
Rocky Holmes, SF, Regional Supervisor
Mike Turek, Subsistence, Regional Supervisor
Andy McGregor, CFMD, Regional Supervisor

DATE: August 16, 2002

SUBJECT: Tongass Draft SEIS for Roadless Area Evaluation for Wilderness Recommendations

We have reviewed the Tongass National Forest Draft SEIS Roadless Area Evaluation for Wilderness Recommendations. Our comments are framed on analysis of the SEIS in light of the long history of participation by ADF&G in forest planning and in relation to legal, informational and social changes since 1997. The importance of this SEIS goes well beyond the decision whether to add new wilderness areas on the Tongass. It represents the first formal opportunity for the public to examine and discuss the overall land allocations, community values, conservation strategy and application of adaptive management on the Tongass since the 1997 Forest Plan was adopted.[1] Our comments reflect this broader context with the expectation that these considerations will be useful not only in evaluating this SEIS, but also in future actions such as the upcoming review of the Tongass conservation strategy, reviews of timber sales and science-based monitoring of the implementation and effectiveness of TLMP.

ADF&G has a constitutional and legal role, in the context of Alaska's managing diverse natural resources, to assure the sustainability of fish and wildlife for the benefit of Alaskans. In terms of Tongass management, this typically involves a focus on wildlife and fish habitat and the protection, management and restoration of habitat to provide for population viability as well as a harvestable surplus that meets the needs of communities and users throughout Southeast Alaska.

ADF&G also has a longstanding role in the management of the Tongass National Forest, having participated in development of the original Tongass Land and Resource Management Plan (TLMP or Forest Plan), the TLMP'

[1] Additional land allocations were made unilaterally by the Department of Agriculture in 1999, but subsequently rescinded.

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Revision, cooperative and independent research, and the myriad day-to-day and year-to-year management actions pertaining to fish and wildlife habitat on the Tongass.

The primary issue behind the "roadless" analysis is the concern of many forest stakeholders, including ADF&G, for the long-term character, conservation biology, ecology, and biodiversity of the forest. The most effective approach to address this concern is to maintain large, representative blocks of forest containing strong components of coarse-canopy habitat in the most important geographic positions (generally below 800 feet, and especially in association with riparian habitats), interconnected by wildlife travel and migration corridors.

The principal concern is that the continued construction and extension of roads into watersheds throughout the forest will inevitably lead to loss or fragmentation of strategically located large blocks of habitat and natural travel corridors upon which brown bears, deer, and other species depend. Protecting the integrity and connectivity of these critical habitat components in an adequate, representative system across the Tongass is essential to ensuring: (1) the long-term sustainability of healthy populations of these keystone species; (2) their roles and relationships with other species as part of the larger forest ecosystem; and (3) the continued enjoyment and use of wildlife by Alaskans in communities throughout the Tongass.

Unfortunately, this SEIS focuses almost exclusively on the size of the 115 roadless areas, with little or no consideration or analysis of the location and character of habitats within the roadless areas or in subunits of the roadless areas, or the equally critical issue of connectivity between such areas, or between individual roadless areas and other important habitats and environments (i.e., riparian or coastal corridors).

While this EIS is focused on one land allocation tool (Wilderness), the analysis is founded on the underlying requirements of TLMP and the National Forest Management Act to ensure the conservation, viability, and sustainability of fish and wildlife resources. Although recommendation of land areas as Wilderness may be one way to accomplish this, the full answer to fish and wildlife viability, sustainability, and conservation must be achieved through successful implementation and monitoring of all components of the Tongass conservation strategy.

The SEIS should consider recommending not only Wilderness, but also alternative designations that preserve the roadless character of land units, yet provide limited management options. Designation of lands as LUD II, for example, which allows limited critical development activities while providing strong protection, could be an acceptable alternative as a land use designation to protect fish and wildlife. While alternative designations may not fully address other "wilderness" values, they may fit the needs of Southeast Alaska communities and resource managers.

The best approach for both fish and wildlife and for human uses of fish and wildlife is a *combination* of the following:

- Protection of key roadless areas;
- Use of the best data and interagency biological team analysis of reserve areas as a basis for all forest management actions and timber harvest on all non-wilderness, non-roadless lands;
- Consolidated review, as required by law and the TLMP conservation strategy;
- Adequate implementation and, particularly, effectiveness monitoring, followed by adaptive management in response to identified deficiencies.

Summary

ADF&G's concerns related to TLMP and this SEIS focus on five issues:

I. Neither TLMP nor this SEIS fully consider or protect several of the highest value fish and wildlife use areas important to one or more Southeast communities. ADF&G identifies the highest value areas needing further protection in Appendixes B and C;

II. The Tongass wildlife conservation strategy, a keystone in the 1997 Forest Plan, must be fully and meaningfully implemented. The effectiveness of the conservation strategy must be monitored and evaluated.

III. The roadless area boundaries and the SEIS alternatives are not meaningful at the habitat unit, VCU or landscape scale, and are therefore not sufficiently linked to TLMP from an ecological perspective.

IV. Adaptive Management in response to changing legal, biological, and social conditions, as well as in response to more complete information and new tools, should be used to determine the most appropriate land use designations on the Tongass NF, including Wilderness, LUD II, and others that adequately protect fish and wildlife populations and provide for their use.

V. Whatever formal land use designation is ultimately selected, permanent roadless status should be put in place now for at least a few critical areas. These include the five important public interest areas identified previously by Governor Knowles: Honker Divide, Cleveland Peninsula, East Kuiu Island, Port Houghton, and the Poison Cove/Ushk Bay area.

I. Concerns for Community Values Related to Fish and Wildlife

Throughout the development, adoption and implementation of the Tongass Land Management Plan, the state has emphasized the exceptional importance of fish and wildlife and their habitats to the people of Southeast Alaska and their unique status as components of the largest temperate rainforest on earth. In a November 14, 2001 letter to Tom Puchlerz, Tongass Forest Supervisor, regarding this SEIS (see attached copy for full text), Governor Knowles stated:

> ...the State of Alaska urges the Forest Service to affirm the central role and importance of public participation in the forest planning process on Alaska's national forests.

Governor Knowles recommended:

> ... that logging and road building be avoided in important public interest areas such Honker Divide, Cleveland Peninsula, East Kuiu Island, Port Houghton, and the Poison Cove/Ushk Bay area.

He also reiterated the state's concern for other high value community fish and wildlife use areas:

> The Regional Forester's 1997 TLMP Record of Decision (ROD) marked a significant milestone toward balanced, sustainable management of the multiple resource values of the Tongass. The ROD provided for a significant supply of old growth timber for harvest, and incorporated a wildlife and fish habitat conservation strategy. However, a number of the high value community fish and wildlife use areas received only limited protection.

ADF&G is pleased to see that the FS has made extensive use of the Tongass Fish and Wildlife Resource

Assessment (Flanders *et al.*, 1998)[2] in describing community use values. This analysis and report remains a viable expression of community values. Unfortunately, because the SEIS uses the arbitrary roadless area boundaries as the units of analysis, and does not use VCUs other than to mention the number of VCUs in each roadless area, ADF&G's information and almost all other information related to the Tongass is not used effectively.

The VCUs with highest community use values are shown in Appendix A of these comments. For detailed descriptions and maps, refer to Flanders *et al.* (1998). Also, despite the limitations of the SEIS, we have identified the SEIS "roadless areas" with highest value fish and wildlife resources needing additional protection. These are shown in Appendix B.

We are concerned that in TLMP and this SEIS the FS fails to recognize the need to fully protect the highest value community use areas for fish and wildlife. The SEIS describes the increasing conflicts and competition between various users of fish and wildlife, but offers no potential options or solutions to these problems. Instead it looks to the state and the Federal Subsistence Board to limit the allocations of these resources between user groups. Use of the Federal Subsistence Board system may not result in allocations that accommodate all current users. By protecting important community use areas for fish and wildlife, these conflicts can be minimized.

Conflicts between rural and non-rural users of Sitka black-tailed deer have intensified and are expected to become more difficult. Recent proposals to the Federal Subsistence Board, if adopted, would have precluded non-rural hunters, primarily from Ketchikan, from hunting on Prince of Wales Island. This is one current example where protection of key areas would avoid further loss of important deer habitat over the long-term.

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Similarly, conflicts between rural and non-rural users of steelhead, coho salmon, sockeye salmon, and trout have intensified as evidenced by actions taken by the Federal Subsistence Board to restrict use by non-rural users at several locations and by increasing numbers of proposals to take similar actions in other areas and for other species. This issue relates to both short-term increases in harvest opportunities resulting from road construction related to timber sales, and to the long-term expected decrease in fish production due to loss of habitat quality related to timber harvest. Again, the FS looks to the state and the Federal Subsistence Board to limit the allocations of these resources between user groups, whereas protecting important community use areas for fish and wildlife can minimize these conflicts.

The number of hunting guides, primarily related to hunting of brown bears, black bears, and goats, continues to grow, expanding into portions of Southeast Alaska that historically were not subject to this pressure, particularly on the mainland, and further increasing the need to protect key habitats.

This SEIS and all planning and project actions on the Tongass need to address these problems more directly by looking for additional opportunities to protect habitats.

II. Implementation and Effectiveness of the Conservation Strategy and Full Documentation of the Effects on Fish and Wildlife

Effective fish and wildlife management on the Tongass National Forest as a whole depends on integrated habitat conservation and management at four levels.

[2] Flanders, Lana et al (1998) Tongass Fish and Wildlife Resource Assessment 1998. Alaska Department of Fish and Game, Technical Bulletin No. 98-4

1. Protection of important watersheds or groups of watersheds through allocation to land use designations (LUDs) that preclude loss of habitat to development, such as the LUDs Wilderness, LUD II, Old–growth Habitat, Remote Recreation, and Semi-Remote Recreation.
2. Implementation of a system of old-growth habitat conservation featuring reserves within watersheds allocated to LUDs that allow development and extraction activities, so that wildlife and fish resources and values are conserved across a multi-resource forest, not only in protected watersheds;
3. Effective implementation of resource activity standards and guidelines that protect basic fish and wildlife habitat requirements, such as measures protecting salmon streamside vegetation (buffer strips) in areas where logging occurs.
4. Initiation and continuation of biological research on species of concern for their utilitarian or management value, as well as the habitats necessary to sustain them. The scientific research must also be complemented by a monitoring program that tracks the status of wildlife and fish populations and habitats, and the effectiveness of conservation management efforts.

The SEIS relies very heavily on assessment of the system of reserves, no doubt partly because wilderness designations would become part of these reserves. It also should examine options related to access and travel management issues on the existing road system. For example, although some areas might not be fully roadless, it is possible that closure of some roads, such as the 3016 road that enters Honker Divide, might be critically important to establishment and maintenance of core wildlife habitats.

We are concerned that the wildlife conservation strategy, a keystone of the 1997 Forest Plan and fish and wildlife management on the Tongass, remains largely untested and may be at risk. Any reduction in protection levels on various LUDs or standards and guidelines would seriously jeopardize the conservation strategy.

1. The 1997 TLMP level of risk to Fish and Wildlife Population Viability is not in compliance with the National Forest Management Act (NFMA), which requires forest management plans to ensure a **high likelihood** that the ecological conditions created by the plan are capable of supporting over time the viability of native and desired non-native species well distributed throughout their ranges in the planning area. The selected alternative under TLMP is projected to achieve only a **moderately high likelihood** (FEIS page 3-429; emphasis added) of maintaining a minimum number of reproductive individuals. This leaves little margin for error or adaptive management, and seriously jeopardizes the ability of ADF&G to achieve its mandate to "ensure that Alaska's renewable fish and wildlife resources and their habitats are conserved and managed on the sustained yield principle, and the use and development of these resources are in the best interest of the economy and well being of the people of the state."
2. Forest-wide distribution of highest value old-growth habitat is not achieved. The Forest Service's 1997 Forest Plan decision to combine the rare highest volume timber classes (VC 6 and VC 7) with non-rare less productive Volume Class 5 into a "high volume" old growth category hides the rare stands from analysis. The SEIS does not consistently or comprehensively use the high volume old growth category or geographic position to evaluate the habitat values within or between the roadless areas, which makes it impossible to identify these ecologically significant stands that should be considered as part of the wilderness review.
3. TLMP requires a five-year review of the Conservation Strategy for the Tongass. ADF&G and the U.S. Fish and Wildlife Service (USFWS) worked closely with the FS in developing the conservation strategy, and should be directly involved in planning the conservation strategy review, analyzing the results, and crafting any modifications. As a plan amendment, the SEIS may significantly affect the structure and success of the Tongass conservation strategy.
4. Unresolved questions and concerns about the Conservation Strategy relate to the effective and appropriate implementation of old-growth reserves and adjustment of boundaries as required under Appendix K of the 1997 Forest Plan. When Small OGRs have undergone thorough interagency biological reviews conducted by

the FS, ADF&G and USFWS biological teams (as required by TLMP), and when the recommendations have been used as a foundation for developing the full range of alternatives in timber sales, the results have been successful. When alternatives have not used the biological recommendation as a foundation, however, or when the biological recommendation has been relegated to a single alternative, the end results have been far less satisfactory.

5. If designation as Wilderness is not recommended to ensure protection of fish and wildlife, then the implementation and effectiveness of other components of the conservation strategy (OGRs, standards and guidelines, other protective LUDs) become even more essential. A well-funded and scientifically credible monitoring program is critical to demonstrate that these components are implemented and effective.

The SEIS provides very little information related to the potential effects on fish, pointing out that risks still exist from large-scale timber harvest and up to 2800 miles of new road construction. Without significant analysis, however, the SEIS assumes that the alternatives would not provide significant additional protection or mitigation of risk.

III. Landscape Scale of Alternatives and Biological Links to TLMP.

The SEIS does not use all currently available information and tools related to fish and wildlife and users to formulate alternatives, nor does it effectively analyze alternatives in relation to the fish and wildlife aspects of key issues. As in the conservation strategy, the need to analyze information at a fine scale is critical along with the ability to aggregate this information hierarchically. Otherwise, it is impossible to discern differences between areas and alternatives, especially in an island archipelago like Southeast Alaska with naturally fragmented habitats, further fragmented by road construction and timber harvest. This "islands of habitat within islands" landscape demands more creative and discriminating thought. Appropriate analyses such as those of Caouette and Degayner (draft 9/2000)[3] and Nowacki *et al.* (2001)[4] are available and should be used for this purpose. Unfortunately, the SEIS does not take advantage of these tools. The analysis within the SEIS fails at three levels:

1. The SEIS does not evaluate the most important wildlife habitats or use the best available information related to specific habitats and key species to create or compare alternatives, especially related to coarse- canopy vegetation. Use of this information would help counteract the 1997 Forest Plan decision to combine the rare highest volume timber classes (VC 6 and VC 7) with non-rare less productive Volume Class 5 into a "high volume" old growth category, which hides the rare stands from analysis.
2. Value Comparison Units (VCUs) are the geographic "language" spoken by most people who have dealt with the Tongass since 1979. By analyzing alternatives in terms of the roadless areas as separate blocks without incorporating the VCU analysis, the SEIS precludes the opportunity to develop alternatives that focus on the *highest values within each roadless area and values that cross roadless area boundaries.* From a fish and wildlife perspective, the individual 115 roadless areas are not meaningful. This precludes opportunities to locate and evaluate the highest value areas and potentially combine them into logical LUDs. Large units, some of which are greater than one million acres, will almost certainly contain smaller areas of very high value that need protection, but would not require designation of huge acreages as wilderness. Similarly, roadless areas with high degrees of development and harvest may appear to have low wilderness value, yet contain smaller areas that could be very important from a biodiversity standpoint. The values of these smaller areas are masked by their inclusion in the larger units. To the extent that the roadless blocks are

[3] Caouette, J. P. and G. DeQayner (draft 9/2000). Mapping components of forest structure in the temperate rainforest of southeast Alaska. In: C. G. Shaw (ed.) Conservation and Resource Assessments for the Tongass Land Management Plan Revision. USDA Forest Service, PNW Research Station, General Technical Report PNW-GTR- . Portland, OR.

[4] Nowacki, Greg et al (2001), Ecological Subsections of Southeast Alaska and Neighboring Areas of Canada. USDA Forest Service, Alaska Region, Technical Publication No. R10-TP-75.

used exclusively, the FS passes up the opportunity to identify much smaller, more critical, areas that would protect key habitats and still qualify for wilderness.

3. The units used by the SEIS to evaluate biodiversity are too coarse. The SEIS divides the entire Tongass into two ecoregions (essentially "forest" and "tundra and ice fields"), which have very little meaning in the context of forest diversity, old growth, and different forest types. The SEIS also briefly discusses the 21 biogeographic provinces used in the TLMP revision process. These are far less useful than the Nowacki *et al.* (2001) comprehensive description of 84 ecological subregions, which consider landscape position, lithology and surficial geology, resulting in units that are meaningful to both fish and wildlife habitats and their distribution across the landscape.

In addition, the SEIS analysis of brown bear habitat inaccurately characterizes the roadless quality of that habitat, as well as the minimum patch sizes required by brown bears.

IV. Adaptive Management in Response to Changing Conditions and New Information Tools.

The SEIS does not fully address key legal, biological, technical and social changes since adoption of the 1997 ROD.

Legal and Policy Changes

New legal and policy direction represent the most significant changes since 1997.

- Assumption by the Forest Service of subsistence management related to fish under ANILCA;
- Changes in the regulations promulgated under the National Forest Management Act requiring forest management plans to ensure a **high likelihood** that the ecological conditions created by the plan are capable of supporting over time the viability of native and desired non-native species well distributed throughout their ranges in the planning area;
- Court-ordered wilderness and roadless review as implemented by this SEIS;
- Adoption of State of Alaska regulations to implement the Sustainable Salmon Fisheries policy (5 AAC 39.222);

Changes in Tools and Information

Additional information and improved analytical tools are available to biologists and decision-makers.

- Mapping and potential analysis of coarse- canopy large tree habitat exist, but are not being used by the FS to develop timber sale alternatives or develop and analyze alternatives in this SEIS. Similarly, the most current and comprehensive biogeographic information is not used.

Social Changes

- Conflicts between rural and non-rural users of Sitka black-tailed deer, steelhead, coho salmon, sockeye salmon, and trout have intensified.
- The SEIS recognizes the increase in cruise-ship tourism, but does not discuss other types of tourism in much detail, and assumes no effect of the SEIS on tourism and recreation employment.

In a December 20, 1999 letter to the FS regarding the National Forest System roadless policy Notice of Intent (NOI), Governor Tony Knowles described the use of adaptive management to address roadless areas:

> Adaptive management is a sound process for evaluating the success of the forest plan in addressing roadless areas and related issues...

Adaptive management can be applied in a variety of ways and at a variety of scales. In considering the use of wilderness on the Tongass, we can again look to Governor Knowles' letter of November 14, 2001:

> The Regional Forester's 1997 TLMP Record of Decision (ROD) marked a significant milestone toward balanced, sustainable management of the multiple resource values of the Tongass. The ROD provided for a significant supply of old growth timber for harvest, and incorporated a wildlife and fish habitat conservation strategy. However, a number of the high value community fish and wildlife use areas received only limited protection. In addition, the Forest Service did not follow its inventory of roadless areas with any specific recommendations for wilderness area designation, or any explanation of how other land use designations addressed roadless area issues.
>
> In 1999, the Undersecretary of Agriculture, in his decision on administrative appeals of the 1997 TLMP decision, removed eighteen additional areas from the timber base in order to provide increased protection for key wildlife and fish areas, and specific wildlife populations. That action strengthened significantly the TLMP's responsiveness to the state's interest in fish and wildlife areas of concern to communities.

(and continuing later)

> The court rule invalidated the 1999 decision, and directed that the 1997 TLMP decision be supplemented to address the allocation of inventoried roadless areas to wilderness recommendations to Congress, or to other land use designations.
>
> Given the importance of certain game and fish areas to local residents, the TLMP supplemental environmental impact statement (SEIS) should entail additional measures to protect key fish and wildlife habitats and local use areas, considering both wilderness designation and alternate land use designations. Those watersheds that are exceptional salmon producers or offer outstanding recreational, fishing opportunities deserve careful attention. The SEIS should entail a commitment to the reliable, predictable timber supply that is so necessary for the local Alaska sawmills that provide jobs and stability in Alaska's communities. The supplement should also examine and be responsive to the growing importance of recreation opportunities: trails, anchorages, campgrounds, pristine backcountry, public use cabins, canoe portages wildlife observation areas, day use facilities, and scenic areas. For Alaska residents, as well as for visitors and the visitor industry, recreation is an invaluable natural, social, and economic resource.

As the Governor points out, the options are *not* limited to wilderness designation. The SEIS takes an unnecessarily narrow point of view in this respect. For example, the LUD II designations on the Tongass provide substantial protection to fish and wildlife and their habitats on the Tongass. At the same time, they provide opportunities for limited essential development activities and management activities while protecting high-value habitats. Conversion of LUD II to wilderness does not seem to serve much purpose. Rather it would be useful to determine if additional limited areas of critical habitat or high community interest might be placed into the equivalent of LUD II or even a similar new LUD designed to meet both national and Alaskan needs. This would be adaptive management at its best.

This land area designation will only achieve the goals of sustainability and conservation if it is matched by *full* implementation of the Forest Plan Conservation Strategy, including protection of small, medium,

and large old-growth habitat reserves, along with maintenance of important travel corridors. The key to achieving the fundamental purpose and question behind this SEIS is the consistent use of the best available data to most accurately identify these critical habitat components. Finally, adequate monitoring, followed by adaptive management in response to identified deficiencies, is absolutely critical to achieve sustainability.

General Comments on the Roadless SEIS

I. Concerns for Community Values Related to Fish and Wildlife

Under Management Prescriptions for Wilderness LUD (TLMP, page 3-7), the first Goal is:

> To manage all designated Wilderness to maintain an enduring wilderness resource while providing for public access and uses consistent with the Wilderness Act of 1964 and the Alaska National Lands Conservation Act of 1980 (ANILCA).

Clearly, wilderness is to be managed in a manner that provides for compatible uses, many of them related to fish and wildlife, including the needs of subsistence users, hunters, fishers and others. In addition, Key Issue 2 of the SEIS is: "Additional wilderness designation will affect the social and economic well being of the communities of Southeast Alaska."

Throughout the development, adoption and implementation of the Tongass Land Management Plan (TLMP), the state has emphasized the exceptional importance of fish and wildlife and their habitats to the people of Southeast Alaska and their unique status as components of the largest temperate rainforest on Earth. At the same time, the state has repeatedly expressed the central importance of public participation and stakeholder support in forest planning processes. Most recently, Governor Knowles addressed these issues in his November 14, 2001 letter to Tom Puchlerz, Tongass Forest Supervisor, regarding this SEIS:

> ...the State of Alaska urges the Forest Service to affirm the central role and importance of public participation in the forest planning process on Alaska's national forests. Specifically, I urge the Forest Service to make decisions regarding management of Alaska roadless areas through the TLMP forest planning process rather than the national roadless area rule. The State of Alaska made this request consistently over the last several years... The State of Alaska's comments on the draft plan called for adherence to my principles of "doing it right" which include sound science, prudent and sustainable management, and an open public process that brings all stakeholders to the table.

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Harvest Opportunities for Local Communities

In our August 26, 1996 comments on the Tongass Plan Revision, ADF&G expressed concern about increasing "risk to subsistence uses and the likelihood that hunters from non-rural communities will be excluded from hunting opportunities in portions of the Tongass" (page 3). In *Attachment One: Deer Harvest Evaluation*, the ADF&G comments observed that "ADF&G has requested that the Forest Service provide sufficient deer habitat to provide a harvestable surplus of deer to residents of the region" and noted that although the Forest Plan indicates that a high percentage of existing deer habitat capability would be maintained, the FS "did not consider...that logging related impacts will not be spread uniformly across the forest. Residents of many communities will experience much greater deer declines in the areas they traditionally hunt." Similar concerns were expressed about brown and black bear populations, as well as for sockeye, coho, steelhead, and trout.

Since 1997, the conflicts between rural and non-rural users of Sitka black-tailed deer have intensified and are expected to become more difficult. This issue relates to both the short-term increase in harvest opportunities resulting from road construction related to timber sales, and to the long-term expected decrease in total deer production related to loss of habitat due to timber harvest. Recent proposals to the Federal Subsistence Board, if

adopted, would have precluded non-rural hunters, primarily from Ketchikan, from hunting on Prince of Wales Island. In addition, over the past decade, numerous EISs for timber sales in southern Southeast Alaska (e.g., Polk Inlet, Central Prince of Wales, Lab Bay, Control Lake, North Revilla, and Gravina Island) have concluded that the proposed timber harvest may result in a significant possibility of a significant restriction on subsistence hunting of deer within the project area. Given this recognition of an existing problem meeting subsistence needs as a result of their actions, it is incumbent upon the FS to take a more conservative approach, and use the opportunity presented by this SEIS to protect additional valuable habitat.

Similarly, conflicts between rural and non-rural users of steelhead, coho salmon, sockeye salmon, and trout have intensified as evidenced by actions taken by the Federal Subsistence Board to restrict use by non-rural users at several locations and by increasing numbers of proposals to take similar actions in other areas and for other species. This issue relates to both short-term increases in harvest opportunities resulting from road construction related to timber sales, and to the long-term expected decrease in fish production due to loss of habitat quality due to timber harvest.

The FS looks to the state and the Federal Subsistence Board to limit the allocations of these resources between user groups. Use of the Federal Subsistence Board system may not result in allocations that accommodate all current users. By protecting important community use areas for fish and wildlife, these conflicts can be minimized. This SEIS and all planning and project actions on the Tongass need to address this problem more directly by looking for additional opportunities to protect habitats.

The number of hunting guides, primarily related to hunting of brown bears, black bears, and goats, has reached the maximum allowable limits in traditional guiding areas such as Admiralty, Baranof, Chichagof, and Kuiu Islands. At the same time, the guiding industry continues to grow. The net result is the expansion of guiding activities into portions of Southeast Alaska that historically were not subject to this pressure, particularly on the mainland. Protection of additional areas to provide for these uses should be considered.

The issues analysis completely ignores the largest employer in Southeast Alaska, the commercial fishing and processing industry.

Recreation and Tourism

The SEIS recognizes the increase in cruise-ship tourism, but does not discuss other types of tourism in much detail, despite increases in independent service and tour businesses. It concludes that the SEIS will not affect total employment in the tourism industry. With the rapidly expanding nature of this industry in Southeast Alaska, we question whether this is a valid conclusion, but do not have the means necessary to analyze the issue

The SEIS (p. S-5) focuses on the potential use restrictions related to locations for tourism and recreation developments and the size of groups using the Tongass. Other users are mentioned in the analysis, but not as key components of the underlying values and concerns. Framing the issue in this way excludes potential added values perceived by commercial users such as guides and outfitters, wilderness adventures, and the watchable wildlife aspects of even the largest cruise ship tours.

Watersheds of Particular Importance to Fish, Wildlife, and Community Values

In his November 14, 2001 letter, Governor Knowles reiterated his call to protect high value wildlife and fish habitats and community use areas, and specifically requested avoidance of logging and road construction in five key areas. In Governor Knowles' words:

> The state also identified fish and wildlife use areas important for one or more Southeast

Alaska communities. Data on resource values--salmon production, recreational fishing efforts, important watersheds for production of salmon for commercial and sport harvest, subsistence use, deer harvest, and bear harvest--were compiled, analyzed, and ranked.

Important wildlife and fish areas were identified based on resource values, extent of past timber harvest, and local knowledge of habitat quality and community use patterns. The list of high value community use areas was included in the state's 1996 comments to the Revised Supplemental Draft Tongass Land Management Plan. In subsequent correspondence I recommended specifically that logging and road building be avoided in important public interest areas such Honker Divide, Cleveland Peninsula, East Kuiu Island, Port Houghton, and the Poison Cove/Ushk Day area.

ADF&G is pleased to see that the FS made extensive use of the Tongass Fish and Wildlife Resource Assessment (Flanders *et al.*, 1998) in describing community use values. This analysis and report remains a viable expression of community values. Unfortunately, because the SEIS uses the arbitrary roadless area boundaries as the units of analysis, and does not use VCUs other than to mention the number of VCUs in each roadless area, ADF&G's information and almost all other information related to the Tongass are not used effectively.

II. Implementation and Effectiveness of the Conservation Strategy

Effective fish and wildlife management on the Tongass National Forest as a whole depends on integrated habitat conservation and management at four levels.

1. Protection of important watersheds or groups of watersheds through allocation to LUDs that preclude loss of habitat to development, such as Wilderness, LUD II, Old–growth Habitat, Remote Recreation, and Semi-Remote Recreation.
2. Implementation of a system of old-growth habitat conservation featuring reserves within watersheds allocated to LUDs that allow development and extraction activities, so that wildlife and fish resources and values are conserved across a multi-resource forest, not only in protected watersheds;
3. Effective implementation of resource activity standards and guidelines that protect basic fish and wildlife habitat requirements, such as measures protecting salmon streamside vegetation (buffer strips) in areas where logging occurs.
4. Initiation and continuation of biological research on species of concern for their utilitarian or management value, as well as the habitats necessary to sustain them. The scientific research must also be complemented by a monitoring program that tracks the status of wildlife and fish populations and habitats, and the effectiveness of conservation management efforts.

No one of these four aspects of habitat conservation -- watershed protection, old growth habitat conservation, standards & guidelines, and research & monitoring -- can do the job by itself; all four tools need to be integrated forest-wide, while addressing site-specific needs within a landscape perspective.

We suggest that additional reviews and cooperative analyses regarding the Tongass Land Management Plan are needed. TLMP requires a five-year review of the Conservation Strategy for the Tongass. This five-year review should be initiated immediately, because the five-year anniversary of the plan has passed. ADF&G and the U.S. Fish and Wildlife Service (USFWS) worked in close cooperation with the FS in developing the conservation strategy, and should be directly involved in planning the conservation strategy review, analyzing the results and crafting any modifications. As a plan amendment, the SEIS may significantly affect the structure and success of the Tongass conservation strategy.

The analysis of the conservation strategy as prescribed in the 1997 Record of Decision (ROD) and final relocation of small Old -Growth Reserves is especially important. The FS, USFWS and ADF&G have worked closely to review small OGRs with mixed results. When small OGRs have undergone thorough interagency biological reviews conducted by the interagency biological teams (as required by TLMP), and when the recommendations have been used as a foundation for developing the full range of alternatives in timber sales, the results have been successful. When alternatives have ignored the biological recommendation, however, or when the biological recommendation has been relegated to a single alternative, the end results have been far less satisfactory.

Key Issue 1 under the SEIS is: "Additional wilderness designation will provide greater long-term protection of roadless areas on the Tongass National Forest than is provided by the 1997 Tongass Forest plan." Under this issue, the SEIS (p. S-3) identifies protection of wildlife viability, biodiversity, and fish populations as key ecological values of concern. It goes on to say (p. S-4): "Wildlife population viability is addressed on the Tongass by a conservation strategy consisting of two key components of the 1997 Tongass Forest Plan: the Forest-wide system of reserves (including all non-development LUDs), and the standards and guidelines that apply in development LUDs."

This discussion expresses a general theme within the SEIS that focuses almost exclusively on wildlife and wildlife habitat. Fish and fish habitats are only given minimal consideration, despite being identified as a key ecological value of concern.

In focusing on wildlife, the SEIS discusses viability primarily as a function of biodiversity and the Tongass conservation strategy. The SEIS assumes that standards and guidelines to protect wildlife will be effective, although the monitoring committed to under TLMP has not been fully implemented, so there is no way to determine whether the standards and guidelines will work.

The SEIS relies very heavily on assessment of the system of reserves, no doubt partly because wilderness designations would become part of these reserves. The difference between additional wilderness designations and the current situation, and the essential decision-making criteria as implemented in the SEIS, therefore come down to a few key questions:

- *What additional level of protection and risk is offered by including an area in the reserve system compared to depending on the standards and guidelines?*
  - The FS does not address this question in any real detail. Standards and guidelines are assumed to achieve their original goals.
  - The FS assumes that the same level of risk of failure used in the 1997 Forest Plan is still the appropriate level of risk. However, the National Forest Management Act (NMFA) regulations were revised in 2000, further specifying the level of risk associated with population viability in forest plans. The TLMP level of risk does not achieve this level of protection.
- *How might addition of units to the reserve system affect the likelihood of achieving reserve system goals (and are they likely to be met under the current situation)?*
  - For the most part, the SEIS assumes that the number of acres of broadly defined categories of old-growth, or even total acres of old growth, are sufficient to evaluate the relative values of various alternatives. This analysis does not adequately address spatial and temporal aspects of the conservation strategy. Spatial aspects related to fish and fish habitats are completely missing. Some spatial aspects of wildlife habitat such as the topographic position of high -volume productive old growth are incompletely analyzed or presented in a way that precludes meaningful comparisons between biogeographic provinces and SEIS alternatives.

- Connectivity of conservation units is a key requirement of a successful strategy. The SEIS should assess how different alternatives and the combination of possible conservation units in each alternative might change connectivity within the reserve system. This issue is largely unaddressed.
- The SEIS should examine how changes in the size of large unfragmented blocks of habitat might be created or precluded by different alternatives. This requires analysis of various combinations of roadless areas in relation to key habitats and other conservation units.

The SEIS should examine options related to access and travel management issues on the existing road system. For example, although some areas might not be fully roadless, it is possible that closure of some roads might be critically important to establishment and maintenance of core wildlife habitats. The best example would be the 3016 road on the Thorne Bay Ranger District, which accesses a portion of Honker Divide, included as an addition to the ROD for a timber sale after significant opposition and no previous review, and recommended for closure in several past NEPA documents.

The SEIS also should consider alternatives to official wilderness designations. Designations that preserve the roadless character of land units, yet provide limited management options may well provide many values similar to wilderness. While these may not be fully comparable to wilderness, they may fit the needs of Southeast Alaska communities and resource managers.

Forest Plan Viability Analyses

The 1997 TLMP level of risk to Fish and Wildlife Population Viability is not in compliance with the National Forest Management Act (NFMA). The National Forest Management Act (NFMA) Regulations in effect at the time of publication of the 1997 Tongass Land Management Plan (TLMP) required that "Fish and wildlife habitat shall be managed to maintain viable populations of existing native and desired non-native vertebrate species…well distributed in the planning area. In order to insure that viable populations will be maintained, habitat must be provided to support, at least, a minimum number of reproductive individuals and that habitat must be well distributed so that those individuals can interact with others in the planning area." [36 CFR 219.19 Fish and wildlife resource].

In addition, section (a)(3) requires that "Biologists from State fish and wildlife agencies and other Federal agencies shall be consulted in order to coordinate planning for fish and wildlife, including opportunities for the reintroduction of extirpated species."

The NFMA Regulations were revised in 2000. The new language [36 CFR 219.20(b)(2)(i)] directs that "Plan decisions affecting species diversity must provide for ecological conditions that the responsible official determines provide a **high likelihood** [emphasis added] that those conditions are capable of supporting over time the viability of native and desired non-native species well distributed throughout their ranges in the planning area…When a plan area encompasses one or more naturally disjunct and self-sustaining populations of a species, these decisions must provide ecological conditions capable of supporting over time viability of each population…"

According to the Tongass Land Management Plan Revision Final Environmental Impact Statement (TLMP FEIS; page 3-247), "The wildlife viability challenge to planning was first addressed in 1990 when the Interagency Viable Population Committee (V-POP) systematically crafted a landscape conservation strategy based upon habitat conservation areas [HCAs] to maintain viable well-distributed populations of old growth associated species on the Tongass National Forest (Suring *et al.* 1993)." The interagency group consisted of biologists from the FS, ADF&G, and the U.S. Fish and Wildlife Service (FWS).

The V-POP strategy was peer-reviewed by a group of 18 nationally recognized scientists, who concluded that the V-POP approach "represents a solid attempt to integrate species viability concerns with the Habitat Conservation Area approach. It demonstrates a good awareness of modern concepts of wildlife management and conservation biology. However, it…will not ensure viability of all species" (Keister and Eckhardt 1994).

The V-POP Committee responded to limitations in the strategy identified by the peer review by recommending measures to strengthen the strategy (Suring *et al.* 1994). The Forest Plan Revision Interdisciplinary Team (IDT) and the FS Pacific Northwest Research Station (PNW) then conducted a Viability Synthesis Workshop in which the V-POP reports and reviews were evaluated and integrated with the findings of several Wildlife Assessments (wolf, goshawk, and marbled murrelet) that were commissioned for the plan revision process. In addition, a series of Wildlife Viability Panel Assessments were held that solicited the opinions of prominent biologists to evaluate the relative risk among management alternatives developed during the revision process.

In addition to the NFMA mandate to maintain well-distributed viable populations, one of the motivations for developing a landscape level conservation strategy in the revised plan was the need to address "emerging federal policy for preventing the need to list taxa under the Endangered Species Act (TLMP FEIS, p. 3-428). During the revision process, petitions were submitted to FWS by conservation groups that proposed listing of the Alexander Archipelago wolf as "threatened" and the Queen Charlotte goshawk as "endangered" under the Endangered Species Act. Neither species was listed, but in their decision document regarding the goshawk, FWS stated, "it is clear that without significant changes to the existing Tongass National Forest Land and Resource Management Plan, the long-term viability of the Queen Charlotte goshawk may be seriously imperiled" (FWS 1995).

The FS ultimately selected Alternative 11 in the FEIS for the Forest Plan. According to the FS, this alternative "builds upon a foundation of the V-POP conservation strategy of large and medium reserves and in combination with other alternative-specific natural settings LUDs provides substantial reserve strategy protection for old growth associated species well-distributed across the forest at multiple spatial scales (watersheds to biogeographic provinces)…Small reserves recommended by V-POP have been explicitly mapped to provide for enhanced landscape connectivity and a finer-scale, watershed-specific component of a multi-scale landscape conservation strategy of blocks of old growth habitat for less mobile species" (FEIS, p. 3-429).

Nevertheless, the FEIS states (page 3-429), "overall, Alternative 11 is projected to have a **moderately high likelihood** [emphasis added] of maintaining viable well-distributed populations of old-growth associated species across the Tongass National Forest." The FS appears to have accepted a higher risk to viability for the Tongass than the level called for by the original NFMA language, which mandates that "habitat shall be managed to **maintain** viable populations," without specifying an acceptable level of risk. The level of acceptable risk is clarified in the more recent 2000 NFMA language, which clearly states that ecological conditions must be maintained that provide a **"high likelihood"** of supporting viability over time.

The TLMP selected alternative (i.e., the current Forest Plan) does not meet this threshold of risk. Although the plan developed with the FEIS could not be expected to meet a threshold that had not yet been specified (i.e., the 2000 NFMA revision), subsequent planning actions must be consistent with current law. Both this EIS and other TLMP-related planning actions such as the five-year review of the conservation strategy must consider and adapt to clarifications or changes in the standard for risk.

In fact, adaptive management is a keystone of the TLMP and the forest planning process. This is precisely why the five-year review of the conservation strategy was mandated in the original plan. The risk accepted by the FS

is compounded by the fact that the NFMA mandate they were expected to meet was only to "support, at least, a **minimum** number of reproductive individuals." That one of the objectives of the Forest Plan is to "provide sufficient habitat to preclude the need for listing species under the Endangered Species Act [ESA] due to National Forest habitat conditions" is additional evidence that the threshold the FS is attempting to meet is truly minimal. This appears to create a conflict for the FS as it attempts to meet its stated goals: if it merely meets the NFMA minimum for viability or to prevent listing under the ESA, it is unlikely to meet the additional FS goal of "Maintain[ing] habitat capability sufficient to produce wildlife populations that support the use of wildlife resources for sport, subsistence, and recreational activities," or the desired future condition that "World class wildlife resources such as brown bears, wolves and eagles, considered threatened or endangered in the lower 48 states, are relatively abundant and available for human use and enjoyment."

Even the mandate to maintain a minimum number of reproductive individuals may be difficult to meet in a landscape like the Tongass, which consists of thousands of islands that are further fragmented by geology, topography, and vegetation, as well as previous land management activities. This is particularly true for several areas in the Tongass such as Prince of Wales Island, which have been heavily harvested to date and that contain "naturally disjunct and self-sustaining populations of [a] species," such as the Alexander Archipelago wolf, for which NFMA now mandates that [land management] "decisions must provide ecological conditions capable of supporting over time viability of **each** population…" [emphasis added].

If the Forest Plan has only a "moderately high" likelihood of maintaining a minimum number of reproductive individuals, with little margin for error or adaptive management, it seriously jeopardizes the ability of ADF&G to achieve its mandate to "ensure that Alaska's renewable fish and wildlife resources and their habitats are conserved and managed on the sustained yield principle, and the use and development of these resources are in the best interest of the economy and well being of the people of the state." The level of risk accepted by the FS for the Tongass reinforces the need to protect important fish and wildlife habitat in reserves that are located in the best possible position in the landscape to truly accomplish that objective; that is, by protecting not just any old-growth habitat, ***but rather by protecting the most important habitat***, as identified by a knowledgeable group of interagency biologists using the best available information.

ADF&G raised the issue of risk in our August 26, 1996 comments on the Tongass Plan Revision. Our comments expressed concern about increasing "risk to subsistence uses and the likelihood that hunters from non-rural communities will be excluded from hunting opportunities in portions of the Tongass" (page 3). The ADF&G comments observed that "ADF&G has requested that the Forest Service provide sufficient deer habitat to provide a harvestable surplus of deer to residents of the region" and noted that although the Forest Plan indicates that a high percentage of existing deer habitat capability would be maintained, the FS "did not consider…that logging related impacts will not be spread uniformly across the forest. Residents of many communities will experience much greater deer declines in the areas they traditionally hunt." Similar concerns are expressed about brown and black bear populations.

The State of Alaska TLMP revision comment letter observes (page 7), "While the existing Forest Service reserve system responds to the national mandate to protect fish and wildlife viability, it does not fully address the need for community use of fish and wildlife." The letter included a list of high value community use areas compiled by ADF&G, and commented that "avoiding or minimizing timber harvest in areas of high community use will increase the predictability and reliability of the timber supply and ensure the viability of all forest dependent industries."

Biodiversity

Under Management Prescriptions for Wilderness LUD (TLMP, page 3-7), the second Goal is: "To protect and perpetuate natural biophysical and ecological conditions and processes."

This ties in with the Forest-wide Multiple-use Goals and Objectives (TLMP page 2-2) for Biodiversity, which is to: "Maintain healthy forest ecosystems; maintain a mix of habitats at different spatial scales (i.e., site, watershed, island, province and forest) capable of supporting the full range of naturally occurring flora, fauna, and ecological processes native to Southeast Alaska."

High-Medium-Low Volume Old-Growth Forest

The 1997 Forest Plan used high-, medium- and low- volume old-growth forest to characterize old growth values on the Tongass. ADF&G has repeatedly pointed out that the decision to combine the previous more specific division of three classes of high volume into a single class hides the ecological significance of the more rare highest -volume forest plant communities as well as their disproportionate harvest through 1997.

The problem is in many ways related to the use of "volume" as a description. Volume is a timber harvest concern, not a habitat measure. Prior to 1997, it was recognized that the FS GIS system could be used to conduct a much more valid analysis of valuable coarse-canopy large-tree habitats. Despite repeated requests, most recently by ADF&G Commissioner Frank Rue to Tom Puchlerz (see attached letter dated April 24, 2002), the FS has not used this analysis in this SEIS or any other NEPA document to date, nor have they replied to the letter. In part, the letter states:

> Prior to adoption of the 1997 Forest Plan, the "highest volume timber stands" were classified in forest inventories as Volume Class (VC) 7 and VC 6 stands. Although the Volume Class maps provided reasonably accurate summaries at the forest-wide level, they became progressively less reliable at smaller spatial scales, and were judged by the FS to be unusable for identifying individual stands of high-volume old growth on the ground. The revised Forest Plan depicts productive forestlands by Volume Strata, an approach that groups together the former Volume Classes 5, 6, and 7. Although possibly a more useful depiction of timber volume for silviculturists, mapping by Volume Strata combines discrete habitat types into broader categories and makes it more difficult to distinguish rare forest features important to old-growth-associated species.
>
> Looking just at forest-wide statistics (average volume per acre logged), it is clear that past logging has resulted in disproportionate harvest of VC6 and VC7 stands. In fact, for purposes of modeling the effects of past timber harvest on deer, the 1990 TLMP Revision assumed that 100 percent of the prior logging occurred in VC6 and VC7 stands, even though these stands represent only 12 percent of the remaining productive forestland. Subsequent landscape analyses by the FS (e.g., the southeast Chichagof landscape analysis) have identified similar disproportionate logging of relatively rare riparian, alluvial, and higher-volume forestland. Because of this previous pattern of harvest, TLMP planners recognized that including some of these stands within the boundaries of old-growth habitat reserves will "help meet biodiversity or wildlife habitat objectives," as directed in Appendix K.

Forest-wide Distribution of Old Growth

Old-growth forest and productive old-growth forest (POG) are imperfect measures of the values of habitat. Yet they are all that is offered by the FS. The SEIS accurately explains that the elevational distribution of old growth, its "geographic position", is an important component of biodiversity. The SEIS recognizes both that

both high -volume old growth and low-elevation old growth have been disproportionately harvested relative to in excess of their actual occurrence since the Tongass National Forest was created.

The SEIS analysis and description of the distribution of acres of POG, High Volume POG, and Harvested area across the Tongass shown in Table 3.2-9 is useful, but fails to fully describe a number of relevant distribution concerns. It mixes three different measures without analyzing any of them fully. This table should be split into separate tables showing the following information by geographic province:

- Total POG: Preharvest acres, Percent and Acres Remaining in 2002, Percent and Acres Remaining at end of rotation
- High Volume POG: Percent and Preharvest acres, Percent and Acres Remaining in 2002, Percent and Acres Remaining at end of rotation
- High Volume POG <800 feet: Percent and Preharvest acres, Percent and Acres Remaining in 2002, Percent and Acres Remaining at end of rotation
- High Volume POG 800 to 1500 feet: Percent and Preharvest acres, Percent and Acres Remaining in 2002, Percent and Acres Remaining at end of rotation

This would more accurately display the POG of real concern for wildlife diversity and viability. Similar measures using 500 feet as the cutoff would illustrate the same kind of concerns from a fisheries standpoint.

Table 3.2-10, "Summary of Acreage Changes in Old-Growth LUDs" illustrates concerns that have been repeatedly raised by ADF&G about perceptions related to adjustments in Old Growth Reserves to meet the commitments made in the 1997 Forest Plan. The table and the associated narrative on p. 3-27 improperly and inaccurately imply that substantial additional acreage has been taken out of development LUDs and placed into OGRs. In fact, a simple review of Table 3.2-10 shows that of the 12,441 acres added to Old Growth Habitat LUDs, almost all of the acreage (11,724 acres) was related to six timber sales. The net acres of POG suitable for timber harvest for the same six sales only decreased by only 318 acres. In other words, 11,724 acres were added to the Old Growth Reserves, but this only resulted in 318 fewer acres of potentially harvestable timber.

The above discussion is offered simply to illustrate how skewed the discussion and perceptions about adjustments to OGRs can become. In reality, most changes related to POG in OGRs are related to the need to meet the minimums made in the 1997 Forest Plan. These are not reallocations of additional POG to OGRs so much as fulfillment of the allocations made under TLMP. Where the POG in an OGR exceeds the minimums, it is often because the boundaries of the OGR have been extended to easily recognizable natural landscape features. In other cases, additional POG has been included where it would be isolated or where it would be very difficult or marginal from a harvest perspective.

Tables 3.2-12 and 3.2-13 attempt to use the very general measure of total POG to illustrate the differences between alternatives. Unfortunately, they suffer from the same limitations and concerns expressed for Tables 3.2-9 and 3.2-11. The same breakouts by high volume, total and high volume at different geographic positions need to be made before any meaningful analysis can be conducted.

The current analyses in the SEIS fail to illustrate much difference between alternatives, a very predictable result, as they do not use the appropriate comparisons or measures. The best way to examine the actual differences between alternatives would be to apply the Couette coarse- canopy analysis and report the same years and categories by biogeographic province.

Effects of Land Transfers on Old-Growth Habitats in Southeast Alaska

The SEIS subsistence analysis provides a discussion of the conflicts and competition between rural subsistence deer hunters and non-rural deer hunters. It explains that timber harvest on non-federal lands is increasing pressure on federal lands. The fish, wildlife and biodiversity sections should also address the changes in POG related to private land harvests. These effects represent landscape-scale analyses that should be completed across all ownerships. The rapid harvest of significant quantities of high volume POG on adjacent private lands (approximately 50% of all harvest between 1980 and 1995 and 70-80% of all harvest from 1995 to 2001) must be accounted for.

Lands that may yet be conveyed to private or state ownership have further reduced the acreage of protected old-growth habitat in the Tongass. According to the TPIT Policy Clarification document (page 3), "approximately 640,000 acres of the Tongass have been "overselected", primarily by Native Corporations and the State of Alaska, but have not yet been conveyed. About 46,000 of these acres will eventually be conveyed to private ownership…a total of 1.1 million acres [was] allocated to the Old-growth Habitat LUD. Of this, 92,000 acres of this LUD occur within the "overselected" category. If some of these acres are conveyed into other ownerships in the future, they may no longer contribute to the old-growth habitat conservation strategy."

The FS remedy for this situation, described in TPIT, is to "document the environmental effects and risks" to reserves for which the size, spacing, or composition requirements would be jeopardized. Once land selections are submitted to the Bureau of Land Management for conveyance, the FS is to cooperatively evaluate, with ADF&G and FWS, the functionality of the remaining viability strategy. If a change is deemed necessary to achieve old growth standards and guidelines, "the Forest Plan will be amended to ensure the old growth conservation strategy is maintained."

Conveyance of approximately 23,000 acres has already occurred in the Sitkoh Bay and Hoonah areas. Other examples include areas around Cholmondeley Sound and Soda Bay, on Prince of Wales Island. The problem with the prescribed remedy is that for all of these areas, adjacent lands are already heavily logged, both on FS and Native ownerships, leaving no options for alternative old-growth reserves. The reserve spacing strategy cannot then be met (i.e., "Large reserves shall not be greater than 20 miles apart, edge to edge, across the entire forest…Medium reserves shall not be greater than 8 miles from the nearest Large or Medium reserve across the entire forest;" Appendix K page K-1). The landscape in these areas consists almost entirely of contiguous second-growth timber. On Prince of Wales Island, north-south connectivity of old-growth habitat is completely severed in two places: by FS harvest in the Neck Lake area, and by Native Corporation and FS harvest in the center of the island, stretching from Twelvemile Arm, Trocadero Bay, and Polk Inlet in the north down to Soda Bay and Sulzer Portage in the south.

Small Old-Growth Reserves: Minimums as Maximums

Recent timber sale reviews demonstrate a tendency by the FS to consider minimum requirements for size and composition elements for old-growth reserves as the maximum acceptable for implementation, rather than to design reserves to adequately protect important habitats. Monitoring reports and NEPA planning documents, such as this SEIS, contain tables showing cumulative acres "changed to Old-growth Habitat LUD and other non-development LUDs." These summaries give the erroneous impression that large additional acreages are being removed from development LUDs and allocated to Old Growth habitat LUDs. This places pressure on the FS and interagency biologist teams to keep adjusted reserve acreages as close as possible to the minimum size required, regardless of site-specific biological concerns or logical watershed boundaries.

In reality, these suitable timber acres were allocated by TLMP to Old Growth Reserves, not to timber harvest. The FS was simply unable to provide final detailed locations of these allocated acres when the 1997 ROD was signed, and the modifications required to achieve full implementation of the OGR conservation strategy were considered **minor** modifications to the plan.

The interagency biological teams attempt to include only the acreage necessary to protect blocks of old growth and low-elevation corridors, as the TLMP reserve guidelines direct, within boundaries that will remain identifiable in the long term. Divergences from the minimum acreages are documented and explained in the written recommendations, as are instances in which the acreage of TLMP-mapped reserves was reduced to comply with TLMP guidelines.

The effects of maintaining only minimum acreages in reserves in order to maintain minimum viable populations are compounded by additional losses of FS-designated old-growth habitat to over-selection by other ownerships, as discussed in the Overselected Lands section.

From a biological standpoint, given that the alternative selected for the Forest Plan is projected to have only "a **moderately high likelihood** [emphasis added] of maintaining viable well-distributed populations of old-growth associated species across the Tongass National Forest" (FEIS, page 3-429), maintaining minimum acreages of old-growth habitat as maximums does not leave any room for errors. In essence, the TLMP old-growth habitat reserve strategy is a landscape-scale experiment in maintaining viable populations of wildlife--with no experimental control. If the Forest Plan hypothesis is wrong, the cost could be the permanent loss of at least some populations of wildlife on the Tongass. If the old-growth reserve strategy fails, there is no opportunity to go back a second time to "do things right." ADF&G is vested in trying to make sure things are done right the first time.

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The SEIS does not use the best tools and information available to analyze habitat values and opportunities for protection. Additional resource information and information tools exist, particularly the mapping and potential analysis of coarse-canopy large tree habitat, but are not being used by the FS to develop timber sale alternatives or develop and analyze alternatives in this SEIS. ADF&G has repeatedly asked the FS to provide maps that display the best available information on coarse-canopy stands. More recently, we have requested existing vegetative structure maps of the Tongass. These maps use existing forest inventory GIS layers to display vegetation structure in a way that provides the highest probability of identifying rare forest features and habitat types. (See attached letter from Rue to Puchlerz, April 24, 2002). The FS should use this information in development of all timber sale alternatives as well as analysis of Old Growth Reserve relocations. Analyses at this level would be especially useful for actions that apply across the entire landscape, such as this SEIS.

Rule D of TLMP Appendix K lists site-specific factors to consider in placing old-growth reserves, including "the largest remaining blocks of contiguous old growth within a watershed" and "rare features such as underrepresented forest plant associations or stands with some of the Forest's highest volume timber stands." In addition, the TPIT Policy Clarification on the Small OGR evaluation process states "the review should make use of both quantitative (e.g., GIS outputs of **acres of productive old growth by elevation and volume class**, HSI model outputs, etc.) and qualitative (e.g., local site knowledge) information [emphasis added]. **Thus, the FS has not complied with TPIT direction in evaluation of small old-growth reserves.**

The SEIS recognizes that in the past these rare, ecologically different stands have been harvested at a rate disproportionate to their occurrence on the Tongass, and that further harvest of these stands raises questions about whether biodiversity and the important wildlife habitat provided by these stands is being adequately maintained in the Tongass.

Summary of Concerns about Old-Growth Reserves

The importance of functional old-growth habitat to terrestrial and aquatic species in Southeast Alaska is well documented in the scientific literature, based in part on years of cooperative research conducted by the state and federal resource agencies. The 1997 Forest Plan revision proposed to build on existing conservation biology knowledge to create a conservation strategy consisting of old-growth habitat reserves that, together with standards and guidelines and land use designations applied to the matrix between reserves, is designed to maintain viable populations across the Forest. ADF&G remains concerned, however, that the "minimums as maximums" approach of the FS does not provide enough security to maintain truly sustainable populations that accommodate human uses.

As a principal stakeholder with responsibility for managing the wildlife populations of the state, ADF&G seeks to work within the framework developed by TLMP to maintain the biological integrity of the forest: to create a reserve strategy that maintains a critical mass of representative, intact, and functional forested systems. Old-growth habitat maintained in reserves should be selected on the basis of **location**, not acreages, and **function**, not age. Reserves should be centered not on high-elevation old trees, but on truly important old-growth habitat, including functional riparian habitats and other corridors that provide for deer, bears, marten, otters, and other terrestrial species.

These important habitats also provide for sustainable salmon populations and sustenance for people, addressing clear mandates for ADF&G. Concerns raised by ADF&G during the Forest Plan revision regarding limitations on certain user groups are no longer hypothetical, as evidenced by recent proposals before the Federal Subsistence Board to limit non-rural deer hunters on Prince of Wales Island. Because the FS manages most of the landscape in Southeast Alaska, the future of wildlife populations for subsistence, personal use, and tourism, as well as biodiversity, depends on the cumulative effects of individual decisions on issues such as the location of small old-growth reserves, as well as landscape-level decision opportunities such as this SEIS.

TLMP developed a framework to create a system of functional old-growth reserves by making adjustments to ensure that certain criteria are met. ADF&G seeks to work within this framework while ensuring that we are "doing things right." Staff from the FS and ADF&G as well as the FWS have expended considerable energy and effort, using objective means and sound science, to create the best possible reserve system, only to be blocked by actions by the FS that minimize the most effective implementation of the reserve strategy.

ADF&G is committed to achieving meaning before mechanics. We request that the FS use interagency biologists' recommended reserve configurations, developed using the best available information with adequate technical support, as the foundation around which economically viable timber sales are designed. Although we have serious concerns about the limitations of the overall reserve strategy, within the existing framework of the Forest Plan (e.g., LUDs, standards and guidelines, and other direction), we believe this is the only approach that has any chance to result in the provision of sufficient allowance for important fish and wildlife habitat while providing for the continuation of businesses and lifestyles that depend on sustainable forest resources, as required by the Alaska Forest Resources and Practices Act.

Wildlife Sections in SEIS

Sitka Black-tailed Deer. On pages 3-39 and 3-45, the SEIS mentions sport hunting of deer, but it is unclear what this is referencing. Neither the state nor the federal government have sport hunting regulations. State hunting regulations govern "general, subsistence, and commercial uses of Alaska's wildlife." We suggest that the reference to sport hunting be eliminated from this and future related documents, as we have previously recommended to FS staff.

Brown Bears. The determination (page 3-40) that 7.5 of the 7.9 million acres of brown bear habitat on the Tongass being roadless is an inappropriate interpretation for several reasons. First, the term "roadless" is not well defined in the EIS and the glossary section exacerbates this confusion. There needs to be a tractable and objective definition of roadless and related term that reviewers can understand. Second, many of the roadless areas are "ecologically roaded," from the perspective of a brown bear. Examples include Roadless Areas 323 (Game Creek) and 325 (Freshwater Bay). The department has extensive brown bear radiotelemetry data from these areas and virtually all of the brown bear home ranges in these areas intersect roads.

The SEIS indicates that brown bears have not been identified as a species requiring minimum patch sizes of a particular habitat type. This is an inappropriate interpretation of the Forest Service's expert panels from TLMP and from the scientific literature. Brown bears are a landscape species, and results from the expert panels strongly recommended large patches of unroaded areas for brown bears, as acknowledged on page 3-53. These unroaded areas are designed to serve as a foundation for the old-growth reserve system. The SEIS should account for the large patch size required by brown bears in the final analysis of a preferred alternative. To do this for brown bears, patches of roaded and unroaded landscapes (along with the road types; open, closed, etc.) should be evaluated across the range of the species. Admiralty, Baranof, and Chichagof Islands should be analyzed separately from the mainland.

The SEIS indicates that brown bears would benefit from adoption of any of the SEIS action alternatives. This is undoubtedly true, but a more comprehensive analysis will provide some understanding of how the alternatives increase brown bear conservation in some nonlinear manner. As described above, for example, some of the roaded areas are "ecologically roaded" at the landscape scale of a brown bear home range, and this is not accounted for in the SEIS fine filter analysis.

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Fish Habitat Concerns

Affected Environment. The SEIS does not acknowledge any changes in users since 1997. This may be true with respect to commercial fishing, but fails to recognize the increase in guided sport fishing. The FS has substantial information about changes in guided sport fishing and should present them in the SEIS.

Roads. The SEIS states: "Roads pose the greatest risk to fish resources on the Tongass." This statement is strongly supported by the results of a cooperative FS and ADF&G effort to evaluate fish passage problems and erosion risks related to fish habitat across the Tongass. This five-year effort determined that approximately 80% of the resident fish stream culverts and 60% of the anadromous fish stream culverts on the Tongass did not appear to provide efficient fish passage (Tongass Road Condition Survey Report, Flanders and Cariello, 2000). ADF&G continues to work closely with the FS to prioritize and design restoration of fish passage, and our expectation is that future road-building techniques will better accomplish fish passage.

Nevertheless, road construction poses an inherent risk to fish habitat, and the SEIS fails to address this concern in a meaningful fashion. The analysis only looks at the total mileage of existing and potential roads across the entire Tongass for each alternative. This is a very skewed view of the landscape, which lumps together all landforms, elevations and channel types. The FS has a sophisticated and detailed Geographic Information System (GIS) that could easily be used to provide far more useful spatial information related to the potential effects on fish habitat. In fact, the FS has conducted such analyses for all watersheds in the Tongass and could repeat them here. A preliminary (and very coarse) query of FS GIS road and fish information for central SE Alaska in 2000 indicated that 60% of all roads were located below 500 feet in elevation. Ninety percent of all fish crossing structures were below 500 feet in elevation. In other words, *where the roads are located is at least as important as how much road is constructed.* A similar type of analysis would very likely identify differences

in sedimentation risks to fish habitat based on elevation (higher elevation areas are likely to be near steeper slopes).

Table 3.2-5 shows the road density per square mile for each alternative. As with most measures that are indiscriminately applied across the entire Tongass, it is relatively meaningless because it:

- Includes vast acreages that do not include any roads or fish habitat
- Fails to relate roads in any way to fish habitat.

The FS has conducted a "watersheds at risk" assessment in the past that identified and used a number of more valuable measures of the effects of roads on fish habitat. A few of the many useful measures that could be derived from existing information examples include:

- Number of class I and Class II fish stream crossings per mile of road
- Number of existing "red" culverts (not efficiently passing fish) per mile of road
- Number of miles of road below 500 feet in elevation
- Number of miles of road between 500 and 1000 feet in elevation
- Number of highest use sport fishing streams by alternative

Timber Harvest. The SEIS states: "Although Forest Plan standards and guidelines…are expected to protect fish resources from significant impacts associated with timber harvest, there is still some level of risk. The risk is related to the level of harvest associated with each alternative."

This is certainly a true statement, but it again provides almost no analysis of the actual risk other than to explain the total harvest acres under each alternative. **Again, *where the harvest is located is at least as important as how much harvest occurs.*** A small number of trees within a riparian corridor can be more important than many acres of harvest in an area without fish habitat. The examples used in the potential analysis of roads have direct parallels for timber harvest, and are only a few of the many useful measures that could be derived from existing information:

- Linear miles and acres of class I and Class II fish stream riparian areas previously harvested
- Linear miles and acres of class I and Class II fish stream riparian areas to be protected by buffers in future
- Acres of harvest below 500 feet in elevation
- Acres of harvest between 500 and 1000 feet in elevation

Fish Habitat Enhancement. The SEIS explains that some of 158 potential fish enhancement projects proposed in the 1997 ROD are located within roadless areas and states that "the Individual Roadless Area Descriptions in Appendix C address some of these potential projects." This analysis and the descriptions of Section C make it very difficult to identify the specific enhancement projects that would be affected. Not all are addressed. The SEIS should specifically identify the projects and the potential effects in a single table.

Many of the largest fish enhancement projects on the Tongass have already been constructed. While these may appear to provide significant theoretical benefits, the FS has not analyzed the existing enhancement projects sufficiently to demonstrate that expected benefits were actually realized in many cases. In addition, concerns over effects on resident fish populations have increased in recent years and remain largely unknown. It is these resident fish populations that are most likely to be affected by fish enhancement projects designed to increase productivity of anadromous species.

III. The SEIS alternatives are not meaningful at habitat unit, VCU or landscape scale, and are therefore not easily linked to TLMP from a biological perspective.

The SEIS provides an excellent *general* description of each of the 115 roadless areas on the Tongass. Similarly, much valuable information is provided in the Individual Community Assessments. The SEIS does not, however, use all information and tools currently available related to fish and wildlife and users, nor does it effectively analyze the various alternatives in relation to the key issues.

For example, the SEIS uses only one measure, the total acres of timber harvest across the entire Tongass, to describe the effects of timber harvest on fish for each alternative. This lumps together the total harvest across all biogeographic provinces, across all vegetation types (including rock and ice), and does not consider any past, present, or future harvest in relation to riparian corridors. Far more meaningful analysis is possible through general use of existing information and the FS Geographic Information System. (See our detailed comments related to Chapter 3 of the SEIS).

As another example, the SEIS relies solely on general measures (again with many deficiencies; see Biodiversity Section Comments) to look at biodiversity across biogeographic units in Southeast. While there is some merit to this approach, the analysis does not adequately consider the internal key habitats of the biogeographic units. Both in TLMP and in this SEIS, the FS identifies high-volume old-growth habitats as the key to biodiversity. ADF&G and the USFWS have consistently expressed concern that the FS has failed to fully consider the rarity and exceptional value of large-tree coarse- canopy habitats, particularly at low elevations, best represented in Volume Classes VI and VII prior to the 1997 TLMP. The FS used a much broader description of "high volume" old-growth in the 1997 TLMP, which as ADF&G and the USFWS have repeatedly explained, is a much less discriminating indication of high -value habitat.

As described previously, the meaning and definition of Wilderness encompasses a set of social, economic and environmental values and concerns that go well beyond fish and wildlife concerns, and that are outside the scope of ADF&G's mission. Of the four key values in the definition of wilderness (SEIS p. S-2), ADF&G is most concerned with two:

- Wilderness has at least five thousand acres of land or is of sufficient size as to make practicable its preservation and use in an unimpaired condition;
- Wilderness may also contain ecological, geological, or other features of scientific, educational, scenic, or historical value.

The SEIS focuses almost exclusively on the quantitative measures of resources and impacts: acres of old-growth habitat, for example, and miles and density of roads. This analysis misses key features of both the values of various habitats and their use by fish and wildlife. In particular, it does not consider the spatial and temporal aspects of habitat and use.

In addition, the SEIS focuses primarily on biodiversity issues rather than on the full range of values and consequences related to habitats and populations of fish and wildlife. From this standpoint, almost all analyses are directed at the Tongass conservation strategy.

Spatial Considerations

The SEIS discusses spatial considerations related to wildlife and old-growth dependent terrestrial species in the biodiversity section, but does not analyze the importance of spatial distribution of habitats outside of the biodiversity question or environmental consequences of different levels of development activity. While an

analysis by biogeographic province could be useful if fully developed, this is not exclusively a biodiversity question.

Similarly, neither the biodiversity discussion nor the fish section discusses spatial concerns related to fish and fish habitats, or their effects on fishing communities. Unfortunately, the SEIS simply concludes that none of the alternatives are likely to affect fish or fishing, without conducting a complete analysis. If fully analyzed in the SEIS, the effects on individual communities might very well differentiate between alternatives.

The SEIS does not use all currently available information and tools related to fish and wildlife and users to formulate alternatives, nor does it effectively analyze alternatives in relation to the fish and wildlife aspects of key issues. As in the conservation strategy, the need to analyze information at a fine scale is critical along with the ability to aggregate this information hierarchically. Otherwise, it is impossible to discern differences between areas and alternatives, especially in an island archipelago like Southeast Alaska with naturally fragmented habitats, further fragmented by road construction and timber harvest. This "islands of habitat within islands" landscape demands more creative and discriminating thought. Creative analyses such as those of Caouette and Degayner (draft 9/2000)[5] and Nowacki et al (2001)[6] are available and could be used for this purpose.

Unfortunately, the SEIS does not take advantage of these tools. The SEIS does not evaluate the most important wildlife habitats or use the best available information related to specific habitats and key species to create or compare alternatives, especially related to coarse- canopy vegetation. Use of this information would help counteract the 1997 Forest Planning decision to combine the rare highest volume timber classes (VC 6 and VC 7) with non-rare less productive Volume Class 5 into a "High" productivity old growth category, which hides the rare stands from analysis. The information and analysis technique are readily available using the FS GIS, yet are not used in this SEIS or other planning and project applications on the Tongass NF. This would provide detailed locations and assessments that could be used to develop and implement habitat management strategies for individual watersheds, VCUs or roadless areas with a landscape perspective. The SEIS does not even use the High Productive Old Growth to compare alternatives, opting rather to use the total of all productive old growth, regardless of actual habitat value or landscape position, although it mentions the importance of these factors.

Use of VCUs as the Base Unit for Analysis to Tier the SEIS to the 1997 Forest Plan.

Use of Value Comparison Units (VCUs) as the basis for analysis, rather than exclusive use of the roadless blocks, would provide more meaningful value and effects analyses and more useful alternatives. The SEIS uses each of the 115 roadless areas as a unit of analysis and recommends wilderness options based on the full area. Some of these areas are very large, and include widely variable values related to fish and wildlife and no doubt other wilderness characteristics. The identification of areas seems driven mostly by political issues (e.g., previous legislation and appeals) and land status (LUD II), rather than any grouping related to wilderness values, fish and wildlife values, or human uses. This also departs from the TLMP planning efforts, which essentially looked at VCUs across the Tongass. The VCUs are the geographic "language" spoken by most people who have dealt with the Tongass since 1979. Although VCUs are not a perfect match to watersheds, they are linked to every action activity, planning effort, and timber sale on the Tongass, yet they are not used in the SEIS. **By analyzing alternatives in terms of the roadless areas as separate blocks without incorporating the VCU**

[5] Caouette, J. P. and G. DeQayner (draft 9/2000). Mapping components of forest structure in the temperate rainforest of southeast Alaska. In: C. G. Shaw (ed.) Conservation and Resource Assessments for the Tongass Land Management Plan Revision. USDA Forest Service, PNW Research Station, General Technical Report PNW-GTR-. Portland, OR.

[6] Nowacki, Greg et al (2001). Ecological Subsections of Southeast Alaska and Neighboring Areas of Canada. USDA Forest Service, Alaska Region, Technical Publication No. R10-TP-75.

analysis, the SEIS precludes the opportunity to develop alternatives that focus on the highest values within each roadless area and values that cross roadless area boundaries.

For example, North Revilla (FS # 526) has undergone extensive harvest and road construction, and is consequently rated low in wilderness values. However, VCU # 743 within Area 526 is still untouched. It would be significantly more important to protect the habitat and wilderness values in such remnant blocks of habitat than in many of the higher-ranked unroaded areas on the mainland and elsewhere. This results in an all-or-none strategy with respect to each of the roadless areas, when in reality smaller units down to 5000 acres, which is well below the size of many VCUs, could be important from a roadless standpoint and be large enough to qualify for wilderness.

Similarly, some roadless areas are adjacent to one another, for example 528-Cleveland, 210-Frosty and 529-North Cleveland. Fish and wildlife values, human uses, and the eventual analysis of wilderness reach across these boundaries, which are essentially mapping artifacts rather than meaningful units on the ground.

The net result of using the roadless blocks, without considering possible internal or across-block combinations of values, is that the analysis and alternatives address large, internally diverse blocks of land that tend to blur the key values and differences, and that preclude many more meaningful management options. The same problem makes meaningful analysis related to old-growth, fisheries and other resources very difficult, and homogenizes the alternatives as they have been crafted by the FS, when very distinct and more meaningful alternatives could be developed if the landscape attributes, rather than unrelated boundaries, were used to develop the analysis blocks.

F-A27

Similarly, the units used by the SEIS to evaluate biodiversity are too coarse. The SEIS divides the entire Tongass into two ecoregions (essentially "forest" and "tundra and ice fields"), which have very little meaning. The SEIS also briefly discusses the twenty-one biogeographic provinces used in the TLMP revision process. These are far less useful than the Nowacki *et al.* (2001) comprehensive description of 84 ecological subregions, which consider landscape position, lithology and surficial geology, resulting in units that are meaningful to both fish and wildlife habitats and their distribution across the landscape.

IV. Adaptive Management in response to changing legal, biological, and social conditions as well as in response to more complete information and new tools.

The SEIS identifies some of the legal and administrative changes and some of the questions raised during the first five years of TLMP implementation since the 1997 ROD, but does not specifically address changes in resources or resource users other than some of the changes in the timber industry.

Legal and Policy Changes

New legal and policy direction represent the most significant changes since 1997. Although not all of these legal and policy changes are specifically addressed in our comments, we believe it is relevant to identify them here to provide a complete framework for our analysis of the SEIS.

At the Federal level, these include:

- 1999 ROD issuance to settle appeals of the 1997 ROD; and subsequent voiding of the 1999 ROD.
- Assumption by the Forest Service of subsistence management related to fish under ANILCA.
- Changes in the regulations promulgated under the National Forest Management Act requiring forest management plans to ensure a **high likelihood** that the ecological conditions created by the plan are

capable of supporting over time the viability of native and desired non-native species well distributed throughout their ranges in the planning area.

- Court-ordered wilderness and roadless review as implemented by this SEIS.
- FS implementation of access and travel management analyses with substantial input from local communities and users as well as a variety of agencies including ADFG. These efforts relate to the preferred routes for transportation and closure of roads. None of these ATM efforts appear to be mentioned or used substantially in the SEIS although they relate to the current and future goals for roads.
- Changes in FS direction and management of key road systems away from timber management and toward management as Forest Highways, recognizing the importance of these roads for non-timber harvest purposes. These changes reflect both the changing mix of uses on the Forest and the substantial increases in the importance of tourism and recreation on the forest.

At the State of Alaska level, legal and policy changes include:

- Adoption of new regulations to implement the Sustainable Salmon Fisheries policy (5 AAC 39.222)

Changes in Tools and Information

Additional information and improved analytical tools are available to biologists and decision-makers.

- Mapping data and potential analyses of coarse-canopy large tree habitat exists, but are not being used by the FS to develop timber sale alternatives or develop and analyze alternatives in this SEIS. Analyses at this level would be especially useful for actions that apply across the entire landscape, such as this SEIS.

Social Changes

- The conflicts between rural and non-rural users of Sitka black-tailed deer have intensified and are expected to become more difficult. This issue relates to both the short-term increase in harvest opportunities resulting from road construction related to timber sales, and to the long-term expected decrease in total deer production related to loss of habitat due to timber harvest. Recent proposals to the Federal Subsistence Board, if adopted, would have precluded non-rural hunters, primarily from Ketchikan, from hunting on Prince of Wales Island.
- The SEIS recognizes the increase in cruise-ship tourism, but does not discuss other types of tourism in much detail, despite increases in independent service and tour businesses. It concludes that the SEIS will not affect total employment in the tourism industry. With the rapidly expanding nature of this industry in Southeast Alaska, we question whether this is a valid conclusion, but do not have the means necessary to analyze the issue.
- The number of hunting guides, primarily related to hunting of brown bears, black bears, and goats, has reached the maximum allowable limits in traditional guiding areas such as Admiralty, Baranof, Chichagof, and Kuiu Islands. At the same time, the guiding industry continues to grow. The net result is the expansion of guiding activities into portions of Southeast Alaska that historically were not subject to this pressure, particularly on the mainland.
- Conflicts between rural and non-rural users of steelhead, coho salmon, sockeye salmon, and trout have intensified as evidenced by actions taken by the Federal Subsistence Board to restrict use by non-rural users at several locations and by increasing numbers of proposals to take similar actions in other areas and for other species. This issue relates to both short-term increases in harvest opportunities resulting from road construction related to timber sales, and to the long-term expected decrease in fish production due to loss of habitat quality due to timber harvest.

In a December 20, 1999 letter to the FS regarding the National Forest System roadless policy Notice of Intent (NOI), Governor Tony Knowles described the use of adaptive management to address roadless areas:

Adaptive management is a sound process for evaluating the success of the forest plan in addressing roadless areas and related issues. Adaptive management engages scientists and resource managers in monitoring and evaluating the effectiveness of the conservation measures in the plan. It is an open process that brings stakeholders and tribes into the process, and allows for community dialogue about the specific places, resources, and uses that are important to residents. If the adaptive management process indicates changes to the plan are needed based on sound science, prudent management, and stakeholder priorities, then adjustments can be made through the forest plan amendment process.

I believe that on the Tongass National forest adaptive management will better achieve the conservation goals, cited in the roadless policy NOI, of protecting "...clean water, biological diversity, wildlife habitat, forest health, dispersed recreational opportunities and other public benefits." It can do so while contributing to the management stability so desperately needed by Southeast Alaska families that have waited 15 years to know how their forest is going to be managed. Therefore the federal government should commit the financial resources and professional staff necessary to make adaptive management work for the heath of the forest and for the well being of Alaskan families.

Adaptive management can be applied in a variety of ways and at a variety of scales. In considering the use of wilderness on the Tongass, we can again look to Governor Knowles' letter of November 14, 2001:

F-A28

The Regional Forester's 1997 TLMP Record of Decision (ROD) marked a significant milestone toward balanced, sustainable management of the multiple resource values of the Tongass. The ROD provided for a significant supply of old growth timber for harvest, and incorporated a wildlife and fish habitat conservation strategy. However, a number of the high value community fish and wildlife use areas received only limited protection. In addition, the Forest Service did not follow its inventory of roadless areas with any specific recommendations for wilderness area designation, or any explanation of how other land use designations addressed roadless area issues.

In 1999, the Undersecretary of Agriculture, in his decision on administrative appeals of the 1997 TLMP decision, removed eighteen additional areas from the timber base in order to provide increased protection for key wildlife and fish areas, and specific wildlife populations. That action strengthened significantly the TLMP's responsiveness to the state's interest in fish and wildlife areas of concern to communities.

(and continuing later)

The court rule invalidated the 1999 decision, and directed that the 1997 TLMP decision be supplemented to address the allocation of inventoried roadless areas to wilderness recommendations to Congress, or to other land use designations.

Given the importance of certain game and fish areas to local residents, the TLMP supplemental environmental impact statement (SEIS) should entail additional measures to protect key fish and wildlife habitats and local use areas, considering both wilderness designation and alternate land use designations. Those watersheds that are exceptional salmon producers or offer outstanding recreational, fishing opportunities deserve careful

attention. The SEIS should entail a commitment to the reliable, predictable timber supply that is so necessary for the local Alaska sawmills that provide jobs and stability in Alaska's communities. The supplement should also examine and be responsive to the growing importance of recreation opportunities: trails, anchorages, campgrounds, pristine backcountry, public use cabins, canoe portages wildlife observation areas, day use facilities, and scenic areas. For Alaska residents, as well as for visitors and the visitor industry, recreation is an invaluable natural, social, and economic resource.

As the Governor points out, the options are *not* limited to wilderness designation. The SEIS takes an unnecessarily narrow point of view in this respect. For example, the LUD II designations on the Tongass provide substantial protection to fish and wildlife and their habitats on the Tongass. At the same time, they provide opportunities for limited essential development activities and management activities while protecting high value habitats. Conversion of LUD II to wilderness does not seem to serve much purpose. Rather it would be useful to determine if additional limited areas of critical habitat or high community interest might be placed into the equivalent of LUD II or even a similar new LUD designed to meet both national and Alaskan needs. This would be adaptive management at its best.

Commissioner Frank Rue August 16, 2002

Appendix A

The VCUs with highest community use values are shown in Appendix A of these comments. For detailed descriptions and maps, refer to: Flanders, Lana et al (1998) Tongass Fish and Wildlife Resource Assessment 1998. Alaska Department of Fish and Game, Technical Bulletin No. 98-4.

APPLICATION TO TONGASS

LAND MANAGEMENT PLAN

Introduction

In 1996, ADF&G used the resource assessment outcomes for deer, bear, fish, subsistence and old-growth habitat for review of the Tongass Land Management Plan (TLMP) revision. High community use of fish or wildlife, or high fish and wildlife production areas provided the basis for ADF&G and the State of Alaska to identify priority areas in the Tongass National Forest that were essential to maintaining high yields of fish and wildlife for hunters, anglers, and others in communities throughout Southeast.

Methods

Using the resource assessment rankings described in this report, the highest ranked VCUs in the resource assessment for fish, deer, bears, subsistence and, secondarily, old-growth habitat, were reviewed by ADF&G to create a list of priority areas. Several levels of post-ranking review were performed. First, independent reviews of the resource assessment were requested of fish, wildlife, and habitat biologists in the area and regional offices of ADF&G. Second, a series of interdisciplinary meetings were held by regional staff to collaborate on interpretations, compare with old growth analysis results, and create a draft list of priority watersheds. Besides the data-driven resource assessment, other information used to rank community use areas included: 1) professional knowledge of habitat quality, 2) combinations of high values in one VCU, 3) Viable Population Committee report, and 4) Anadromous Fish Habitat Assessment report. Finally, within the constraints and opportunities of National Forest management and state laws and policies, a list of priority watersheds, called "community use areas" was developed.

Results

The Community Use Areas listed below represent approximately the most important 20% of subsistence use areas in Southeast Alaska. 20% of the brown bear harvest areas. 20% of the urban (Juneau and Ketchikan) deer harvest areas, 40% of the black bear harvest areas. and 30% of the pink production, coho capability. and sport fishing use areas. These were submitted by the State of -Alaska to the USFS for consideration in the revision of TLMP with the following recommendation: -work with ADF&G and Southeast communities to determine which of these areas should have appropriate management prescriptions that protect community use, and fish and wildlife values. Avoiding or minimizing timber harvest in areas of high community use will increase the predictability and reliability of the timber supply and ensure the viability of all forest dependent industries."

VCUs with Highest Community Use Values

230, 240, 550, 840, 1200, 2010, 2020, 2030, 2040, 2150, 2170, 2180, 2220, 2230, 2240, 2250, 2260, 2280, 2290, 2390, 2440, 2790, 2970, 2990, 3000, 3010, 3020, 3030, 3090, 3100, 3120, 3130, 3980, 3990, 4000, 4020, 4200, 4210, 4250, 4260, 4290, 4320, 4330, 4340, 4350, 4360, 4470, 4500, 4510, 4520, 4540, 5020, 5140, 5270, 5290, 5320, 5440, 5460, 5542, 5710, 5730, 5740, 5750, 5760, 5770, 5780, 5871, 5880, 5890, 5920, 5930, 5971, 6210, 6240, 6320, 6740, 6750, 6790, 6920, 7150, 7160, 7180, 7190, 7220, 7530, 8060

VCUs with Second Highest Community Uses Values

790, 1960, 2100, 2430, 2450, 2460, 2800, 2810, 4160, 4570, 4580, 4680, 4890, 5380, 5490, 5610, 5830, 6180, 6310, 6340, 7470

VCUs with Third Highest Community Uses Values

2360, 2920, 2940, 4670, 5810, 5910, 5960, 6200, 6250, 7200, 4240, 5940, 5950, 6220, 7390, 2400, 7130, 7140, 7200.

Discussion

The productivity and health of forest habitats influences the abundance of fish and wildlife upon which lifestyles, businesses, and other activities depend. Protection of these Community Use Areas would conserve key fish and wildlife habitat and, thereby, increase the opportunity for forest management to maintain sustained yields of fish and wildlife. However, even full protection of these Community Use Areas would not guarantee sustained yields of fish and wildlife use at current levels within the Tongass. While Old-growth Habitat Reserves within the revised TLMP were designed to maintain habitat for minimum viable populations, they are insufficient to supply sustained yields of fish and wildlife to meet the demands of hunters, anglers, and subsistence users.

Appendix B

Roadless Areas with Highest Value Fish and Wildlife Resources Needing Additional Protection

> Given the importance of certain game and fish areas to local residents, the TLMP supplemental environmental impact statement (SEIS) should entail additional measures to protect key fish and wildlife habitats and local use areas, considering both wilderness designation and alternate land use designations. Those watersheds that are exceptional salmon producers or offer outstanding recreational, fishing opportunities deserve careful attention.
>
> (Governor Tony Knowles, November 14, 2001)

Roadless units needing additional protection are prioritized within each individual Area, but not across all of Southeast Alaska. These areas are prioritized for their very high productivity, essential role in connectivity (particularly on Prince of Wales Island) and/or very high value as community use areas.

Because of the low level of analysis offered by the roadless area delineations and associated information, these are general recommendations. In many cases, specific locations could be greatly refined and would encompass much smaller subareas than the entire roadless area suggested by the SEIS if appropriate analyses were conducted to identify and map specific important habitats and community use areas within each roadless area.

Prince of Wales Island and Adjacent Islands
511 Thorne River (Honker Divide)--VCUs 574, 575, 576, 577, 578, 597.1
514 Sarkar--VCUs 554.1, 553, 551, 552, 573
531 Nutkwa--VCUs 685, 686, 689
507 Eudora--VCUs 682, 683, 684, 691, 692 693, 694, 695, 699, 700, 701, 702, 703, 704 (
519 McKenzie-- VCUs 615, 616, 617, 675, 676
515 Kosciusko--VCUs 536, 541, 542, 548, 549
509 Kogish--VCUs 589, 591, 592, 593, 594

Ketchikan Area
528 Cleveland and 529 North Cleveland--VCUs 719, 710, 717, 718, 720, 721, 722, and 723
#526 North Revilla --VCU 743
#522 Gravina
#523 South Revilla
#535 Carroll
#577 Quartz
#530 Hyder

Stikine Area
215 Castle
218 Woewodski
242 Camden

204 Madan
205 Aaron
245 East Kuiu
308 Windham-Port Houghton
201 Fanshaw

Northern Southeast Alaska
311 Chichagof
328 Hoonah Sound
330 North Baranof
339 Yakutat Forelands Italio, Akwe, Tanis Mesa, Alsek Rivers
333 Redoubt Sockeye
334 Port Alexander
338 Yakutat/Glacier Bay
342 Neka Mountain
312 Trap Bay
341 Upper Situk

Appendix C

State Of Alaska's Important Public Interest Areas, Identified By Local Communities.

On November 14, 2001, Governor Tony Knowles, recommended "... that logging and road building be avoided in important public interest areas such Honker Divide, Cleveland Peninsula, East Kuiu Island, Port Houghton, and the Poison Cove/Ushk Bay area." This recommendation has been made by the state on numerous past occasions.

This table shows SEIS roadless areas included in each of the five special Public Interest Areas.

Honker Divide:	511 Thorne River
Cleveland Peninsula:	528 Cleveland, 529 North Cleveland, 210 Frosty, 209 Anan
East Kuiu Island:	245 East Kuiu
Port Houghton	308 Windham-Port Houghton
Poison Cove/Ushk Bay area.	330 North Baranof

T-1258

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Senator Loren Leman

August 7, 2002

USDA Forest Service
Tongass National Forest, Content Analysis Team
PO Box 9079
Missoula, MT 59807 fax: 406-329-3556 Email: www.tongass-seis.net/comment.html

Submitted as public testimony to Supplemental Environmental Impact Statement reviewing roadless areas of the Tongass National Forest for potential Wilderness designation

I **support the no-action alternative** for the supplemental EIS for the Tongass. I concur with the Alaska Forest Association and others who believe that we in Alaska have enough Wilderness, but not enough jobs. Adopting Alternative 8 would eliminate 780 of the remaining 990 jobs in the forest products industry in Southeast Alaska, according to the Forest Service in its economic analysis of Wilderness designations.

Although this is a national forest, it is located in Alaska under the scrutiny of Alaskans. We care about the wise use of our natural resources and intend to ensure that we can use what was promised us when we became a state.

My hope is that the Forest Service, as land managers, will make its decisions based on facts and science, rather than the hyperbole being offered in some of the public hearings in Alaska. An assured timber supply is still the key to fostering and maintaining a timber industry in Alaska. The hypocrisy of those who consume foreign wood products and imported oil while exporting American and Alaskan jobs is incomprehensible to me.

With 16.8 million acres, the Tongass National Forest is the largest national forest in the United States. Although established in 1907, only 400,000 acres have been harvested to date. That is only four percent of its 9.5 million forested acres.

Over the next 200 years, 676,000 acres of the Tongass are designated for sustainable harvest, leaving 88 percent of the forest's old-growth untouched. Putting additional land into Wilderness will hinder access to the forest for future generations. It will block the ability to improve access to Southeast communities. It blocks construction of a power grid to provide affordable power. Additional Wilderness could block road access to Juneau, as well as completion of the road from Kake to Petersburg. It could also block a road up Bradfield Canal between Wrangell and Ketchikan, construction of a ferry terminal at the south end of Wrangell Island and a road to the east side of Baranof Island. All of these projects could be welcome additions to the infrastructure and economy of Southeast Alaska.

Sincerely,

Loren Leman
Senate Majority Leader

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Senator_Loren_Leman@legis.state.ak.us • www.akrepublicans.org/Leman.htm

T-291

Alaska State Legislature

Representative Peggy Wilson
Putting Alaska's Families First

July 9, 2002

USDA FS Tongass NF
Content Analysis Team
P.O. Box 9070
Missoula, MT 59807

Re: Supplemental Environmental Impact Statement Roadless Area Evaluation for Wilderness Recommendations

As the Alaska State Representative for House District 2 that includes Wrangell, Petersburg and Sitka, I want to go on record strongly opposing any additional Wilderness Areas in the Tongass National Forest.

My first action upon taking up this office in January of '01 was to pass HJR 6, a resolution strongly opposing the inclusion of Alaskan forests within President Clinton's Roadless Area Conservation rule. During the hearings on HJR 6, the environmental groups continually pointed out that when the Forest Service held hearings in Alaska, 62% of those testifying supported the roadless proposal. However, I received overwhelming support for HJR 6 from the people of S.E. Alaska. People laughed to think that 62% of those testifying actually supported the roadless proposal. Now I am startled and appalled to hear that the testimony in S.E. on the current SEIS has been running strongly in favor of additional Wilderness. I do not believe this really represents the feelings of the vast majority of S.E. residents. For some reason, we have become so disheartened by the actions of the Courts and the National Government that those of us who oppose additional Wilderness are no longer arguing our case but sitting back and letting the vocal minority control our future.

Make no mistake about it; this is the future of S.E. Alaska we are fighting over. We already have a great deal of land locked up through Wilderness or other non-development designations. Locking up any additional land will leave us stuck on our small isolated islands. We will be unable to provide the vital transportation and utilities infrastructure that is badly needed if our fishing industry is going to survive and be competitive into the future. Our logging industry has all but disappeared. Adding additional Wilderness will increase the problems our already stressed fishing industry will face as they struggle to remain competitive in a worldwide market.

Our economy is in desperate shape. Please do not add any more Wilderness to the vast amounts of land already designated as Wilderness or non-development areas here in S.E. Alaska. Thanks for your consideration.

Sincerely,

Peggy Wilson

Peggy Wilson
State Representative
House District 2

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T-1056

Bert Adams, Sr., President
Yakutat Tlingit Tribe
716 Ocean Cape Road
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Yakutat, Ak. 99689
ph (907) 784-3399; Fx (907) 784-3980
Kadashan@ptialaska.net

August 1, 2002

Patricia O'Connor,
Yakutat Ranger District
USDA Forest Service
P.O. Box 427
Yakutat, Alaska 99689

Dear Patricia:

At the Regular meeting of the Yakutat Tlingit Tribe on July 25, 2002, the Council discussed the Tongass Land Management Plan Revision, Draft Supplemental Environmental Impact Statement. It was the consensus of the council that the tribe would like to see no changes in the Wilderness designation therefore it supports the present land management scheme.

Thank you for sharing this information during the public comment on June 18, 2002.

Sincerely,

Bert Adams, Sr.
President

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YKI
Yakutat Chamber of Commerce

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Organized Village of Kake
P.O. Box 316
Kake, Alaska 99830-0316
Telephone 907-785-6471
Fax 907-785-4902 / email KeexKwaan@starband.net
(Federally Recognized Tribal Government serving the Kake, Alaska area)

OVK RESOLUTION 2002-10 : PROTECTION OF KEY FISH & GAME HABITAT IN THE KAKE AREA

WHEREAS, the Organized Village of Kake (OVK) is a duly constituted Indian Tribe organized pursuant to the authority of the Federal Indian Reorganization Acts of 1934 and 1936 with the IRA Council and the duly elected governing body; and,

WHEREAS, OVK functions as the Tribal Government for the Kake area to provide services to its membership and, by it's Constitution, includes…"the protection of the tribal membership"; and,

WHEREAS, OVK, in Southeast Alaska, holds the following truths to be self-evident since time immemorial: The commonality of the customary and traditional use of each **Kwaan** (people of each community) is what binds both the Tlingit and Haida Nations together; the customary and traditional use of plant, animal, fish, land, water, and air resources binds both the Tlingit and Haida Nations together, the customary and traditional use of each **Kwaan** is inseparable from the language, tradition, and ceremonies of the Tlingit and Haida: and,

WHEREAS, the 1997 Tongass Land Management Plan (TLMP) fails to adequately protect or respect the customary and traditional use of each **Kwaan**. The 1997 TLMP plans intensive logging activities on some of the last remaining customary and traditional use areas such as East Kuiu Island, Port Camden, and Port Houghton, and Fanshaw; and,

F-A33

WHEREAS, in the draft Tongass Land Management Plan Supplemental Environmental Impact Statement Wilderness Evaluation the Forest Service recommended no additional protections for any of the 115 eligible areas; and,

WHEREAS, the Forest Service's draft "preferred alternative" fails to adequately recognize the value of providing lasting protection to important customary and traditional use areas in the Tongass, the history of previous protections, and our community concerns; and,

WHEREAS, the Forest Service has indicated that it plans logging and road building in all areas currently Congressionally or administratively unprotected; and,

WHEREAS, clear cut logging and road building have detrimental effects on fish and game populations, and related activities such as subsistence, fishing, hunting, recreation and tourism; and,

WHEREAS, many important watersheds that were previously safeguarded in the 1989 House of Representative passed version of the Tongass Timber Reform Act and by the 1999 TLMP Record of Decision are scheduled for logging in the next ten years; and,

WHEREAS, areas, including *Cleveland Peninsula, Upper Tenakee Inlet, Honker Divide, Port Houghton, Calder-Holbrook and Mt. Francis, East Saook Bay, East Kuiu Island, Castle River, Salmon Bay Lake, Keete; Mabel; and Kassa Inlets, Poison Cove, Deep Bay and Ushk Bay, Broad Finger Creek and Broad Creek, Crab Bay, Sukkwan Island, Southeast Mitkof Island, Northwest Dall Island, Southeast Rocky Pass, Totem & Douglas Bays and East Port Camden* contain highly valuable watersheds important for subsistence, fish and wildlife habitat, sport and commercial fishing, tourism, and community recreation; and,

1192

WHEREAS, it is in the best interest OVK and other customary and traditional users that these watersheds remain intact to provide fish and wildlife habitat; and,

THEREFORE BE IT RESOLVED that the Organized Village of Kake requests that customary and traditional areas such as Cape Fanshaw/Farragut Bay (VCUs 860-900), Port Houghton (VCUs 790-840), Port Camden (VCU 420), Rocky Pass (VCUs 428), Totem and Douglas Bays (VCUs 432,433), Kushneahin Lake/stream (VCR 431) and East Kuiu (VCUs 416-418, 4051) be recommended for long term protection; and,

BE IT FURTHER RESOLVED that the Organized Village of Kake urges the Forest Service heed the requests of communities, tribes, and individuals by recommending other important watersheds for long-term protection.

CERTIFICATION

This resolution was duly adopted at an Organized Village of Kake Council Meeting held this **26th** day of **June 2002** by A quorum of 6 (includes president as non-voting chairperson except in case of a tie vote) with 5 **YES VOTES,** 0 **NO VOTES,** AND 0 **Abstaining.**

Casimero A. Aceveda, President

Wilbur D. Brown Sr
Attested by

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T-1699

Hoonah Indian Association

P.O. Box 602
Hoonah, AK 99829-0602
Phone (907) 945-3545 Fax (907) 945-3703

August 15, 2002

Content Analysis Team
USDA: U.S. Forest Service
Tongass National Forest
P.O. Box 9079
Missoula, Montana 59807

RE: Tongass Forest Plan Revision Draft Supplemental Environmental Impact Statement (SEIS): Roadless Area Evaluation for Wilderness Recommendations.

Dear Members of the Content Analysis Team,

The Hoonah Indian Association is the duly constituted Indian Tribe organized pursuant to the authority of the Federal Indian Reorganization Acts of 1934 and 1936. As President of the Hoonah Indian Association I appreciate the opportunity to submit comments regarding the Roadless Area Evaluation for Wilderness Recommendations.

Hoonah is situated on Port Frederick in the northeast section of Chichagof Island in the northern part of southeast Alaska, also known as the Icy Strait region. The lands and waters of this area are the customary and traditional (C&T) use areas of the Huna Tlingit People and therefore hold a high level of importance and significance for the continuation of our traditional life-ways and culture.

The Huna People are descended from the original clans that occupied the Icy Strait region including Glacier Bay for many generations prior to European contact. We continue to express a historic and cultural connection with this land and the resources it provides.

Obviously, with the establishment of the Glacier Bay National Monument and later the Park and Preserve, much of our traditional subsistence territory is no longer available to us for traditional use. For this reason the remaining areas are vitally important to us for our future.

There are several Individual Roadless Areas described in Appendix C of the Draft SEIS of special interest to the Huna People. It is these areas that we feel it is appropriate for us to comment on, as they are historically within the traditional tribal subsistence territory of the Huna People and as such are the customary places that our people rely on for their subsistence resource needs. They not only provide our people with the fish, wildlife and forest resources they depend on for their food but essentially define who we are and where we come from. It is the protection, conservation and responsible management of these lands that we are committed to assuring. They include:

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ROADLESS AREA NAME

1.	Chichagof	(311)	5.	Game Creek	(323)
2.	Point Augusta	(317)	6.	Freshwater Bay	(325)
3.	Pavlof-East Point	(319)	7.	Neka Mountain	(342)
4.	Tenakee Ridge	(321)	8.	Neka Bay	(343)

Having had the opportunity to consult with the Hoonah Ranger District's District Ranger, Paul Matter, we realize that the decisions to be made regarding future use of the Tongass National Forest are complex and challenging. We understand that a balance must be sought between commercial timber harvest, recreational opportunity, customary and traditional subsistence resource use and long-term protection for wild and natural places. It is with this in mind that these comments are offered.

We understand that, in reality, the final decisions that are made will most likely not involve the selection of only one of the eight proposed alternatives offered but will draw on the intentions of several. For this reason the Hoonah Indian Association will not advocate for one specific alternative but will rather ask that you consider several key issues that we feel to be crucial, if the best decisions are to be made regarding long-term benefits to our community's economy, in addition to the protection of our customary and traditional subsistence opportunity.

The village of Hoonah, as mentioned, is situated on Port Frederick and is surrounded by privately owned land which has already been heavily clear-cut over the past thirty years. There is concern that a significant portion of protective fish and wildlife habitat has already been negatively impacted and even eliminated by this effort and that the cumulative effects of future clear-cut timber harvest on adjacent federal lands may well threaten some of the last remaining old growth protective reserves which lie along critical fish streams and wildlife corridors.

This is certainly the case in the Neka Mountain (342) and Neka Bay (343) area. In addition to being one of our last pristine locations, reasonably accessible by traditional users in small skiffs, the area continues to attract more and more, light recreational users from outside the area.

We would ask for additional, long-term, protective measures that would prevent any further road building or clear-cut logging above and around Neka Bay including measures that would prevent the proposed Otter Lake Timber Sale. Additional logging of

this area would require the reconstruction of the Eight Fathom log transfer facility (LTF), a saltwater log dump, that we feel would be detrimental to shell and ground fish resources including King and Dungeness crab.

Establishing additional protections for this area would maximize benefits of the remaining protective habitat for deer, a primary food resource as well as brown bear, several varieties of salmon, halibut and countless other plant and wildlife species.

In addition to insuring a continued, reasonable C&T subsistence opportunity we feel that the economic benefits for our community, from tourism and recreational use, by protecting these natural areas, will be far superior to the economic benefits of continued road building and more logging, in the long term.

Visitors to our area come to experience natural places and to enjoy the solitude and scenic rewards the area has to offer. This is a trend that we anticipate will not only continue but will increase. Visitors are often baffled and confused by the extent of the highly visible clear-cut harvest, which has and continues to occur around Port Frederick. Protection of the Neka Bay and Neka Mountain area would, to some extent, mitigate the cumulative effects of the egregious clear-cutting that has occurred on adjacent lands.

The above reasoning would also be applicable for the other areas that are of interest to the Huna People. Some of these areas have also experienced very heavy clear-cutting in the past and it would be our desire to see future management decisions that seriously considered protecting remaining areas for their value as customary and traditional harvest areas as well as irreplaceable destinations for light recreational use.

I thank you for the opportunity to submit these comments for your consideration.

Sincerely,

Frank Wright Jr.

Frank Wright Jr.
President: Hoonah Indian Association

T-2122

USDA Tongass National Forest - CAT
PO Box 9079
Missoula, MT 59807

August 17, 2002

Dear Forest Service,

I am the eldest daughter of Bessie Visaya, who was the Matriarch of the Auk Kwaans. As the current tribal leader of the Auk Kwaans, I can speak for the opinions of the members of my family. The Auk Kwaan are the original settlers of Juneau and Berners Bay, and recognize our territory as starting on the mainland at Berners Bay, including all that bay and following south along the mainland to approximately the location of Thane on Gastineau Channel, including the northern and western portion of Douglas Island as far as Point Hilda. On Admiralty Island, we include in our territory Oliver Inlet and the Seymour Canal, but not the outside of Glass Peninsula. We include in our territory Hawk Inlet and the whole of Mansfield Peninsula. The west coast of Lynn Canal from St. James Bay south to the Point Howard area has been part of our territory.

The lands around Berners Bay contain sites that are very important to us, and we used Berners Bay as a source of food and Indian medicine. Berners Bay is also a burial site known to be sacred. Spirit Mountain, also known as Lionshead Mountain, is sacred to us. Many times I have told the story about how our ancestors are buried there, including our Shaman. This mountain is known to have all our Shaman spirits dwell in it up to the present.

The Auk Kwaan ask that all of our traditional lands on Admiralty, especially Mansfield Peninsula, remain or become Wilderness National Monument. We ask that all of our lands outside of Admiralty be granted long-term protection under the Tongass Land Management Plan as Wilderness. We especially ask to protect the sacred grounds where our ancestors are buried in Berners Bay. Parts of Berners Bay are already LUD II, and changing our lands to Wilderness is the best way to make sure our people and our cultural traditions are protected. This is what is morally and ethically right.

Sincerely,

Rosa Miller

Rosa Miller
Tribal Leader
3444 Nowell Avenue, #202A
Juneau, AK 99801
907-586-2158

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HYDABURG COOPERATIVE ASSOCIATION

T-2650

August 16, 2002

Mr. Dale Bosworth, Chief
USDA—Forest Service, Tongass
Content Analysis Team
P.O. Box 9079
Missoula, Montana 59807

Dear Mr. Bosworth:

RE: TONGASS LAND MANAGEMENT PLAN REVISION—DRAFT SUPPLEMENTAL ENVIRONMENTAL IMPACT STATEMENT: *ROADLESS AREA EVALUATION FOR WILDERNESS RECOMMENDATIONS*

The Hydaburg Cooperative Association (HCA) appreciates the opportunity to comment on the revisions to the Tongass Land Management Plan proposed in the *Draft Supplemental Environmental Impact Statement—Roadless Area Evaluation for Wilderness Recommendations.*

The Hydaburg Cooperative Association is the tribal government for Hydaburg, and was established in 1938 under the authority of the Indian Reorganization Act. Families in the community of Hydaburg has had a long and intimate association with the forests and waters of Prince of Wales and surrounding islands, from the Coronation Islands to Cape Muzon, and from Karta Bay to Cape Chacon.

We agree with the Secretary of Agriculture when he laid out five principles on which the protection and management of roadless values should be based:

1. Informed decision-making
2. Working together, by collaborating with States, tribes, local governments, organizations, and individuals through a fair and open process that is responsive to local input and information;
3. Protecting forests
4. Protecting communities, homes, and property
5. Protecting access to property.

The Forest Services must know of the importance of the areas under consideration to the Haida people. The Hydaburg Coastal Management Plan (July 1983) outlines the importance of the area of Cordova Bay. As for working together, the Forest Services should participate in meaningful consultations with HCA during the planning process. Consultation cannot occur if there is not regular communications between the parties. HCA would like to establish a formal

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Hydaburg, Alaska 99922

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connection with the Forest Service to begin consulting with each other. We mean by consult *to seek information or advice from.*

We believe that the Forest Service should work to protect those communities within its jurisdiction from economic harm. Hydaburg's economy requires access to those resources that surround our community. We need to protect what future prospects that remain to us for our families and their future.

HCA CANNOT SUPPORT ANY ALTERNATIVES

The Hydaburg Cooperative Association cannot support the preferred alternative, nor any of the other proposed alternatives unless and until the U.S. Forest Service participates in a meaningful consultation process with Hydaburg. We have made an attempt to initiate consultation, but the District Ranger has a different idea of consultation than HCA. If we may suggest, can we establish a mutually agreed to protocol as a means developing better communications on issues of importance to the people of Hydaburg and the Forest Service.

Respectfully,

Becky Frank

Becky Frank
President

ORGANIZED VILLAGE OF KA
PO BOX 26 –KASAAN ✧ KETCHIKAN, AK 99950-0340 ✧T: 907.542.2230 ✧ F: 9
E-MAIL KASAANIRA@HOTMAIL.COM

T-2656

RESOLUTION NO. OVK-02-08-003

A RESOLUTION OF THE ORGANIZED VILLAGE OF KASAAN IN OPPOSITION OF THE PROPOSED WILDERNESS OPTIONS FOR THE TONGASS NATIONAL FOREST AS PROPOSED BY THE USDA USFS IN THE TONGASS LAND MANAGEMENT PLAN.

WHEREAS, the Organized Village of Kasaan IRA (hereinafter "OVK IRA") is a federally recognized Indian Tribe organized pursuant to the Indian Reorganization Act of June 18, 1934 (48 Stat 984) and May 1, 1936 (49 Stat 1250); and

WHEREAS, the OVK IRA Council is the governing body of the Indian Tribe, by the authority of its constitution and bylaws; and

WHEREAS, the OVK IRA is a federally recognized Indian Tribe under Federal Law and is empowered under its constitution to execute agreements and contracts with the United States and other agencies to benefit its Tribal members; and

WHEREAS, the OVK IRA believes strongly that since time immemorial; the commonality of the customary and traditional uses of each traditional tribal village/clan is what ties not only the Haida and Tlingit peoples of Southeast Alaska together, but also those of other Alaska Native decent that now reside here in southeast Alaska, and that the customary and traditional uses of plant, animal, fish, land, water, and air resources binds all of the Alaska Native peoples together, the customary and traditional uses of each residing Alaska Native peoples is inseparable from the language, tradition, and ceremonies, of the Haida and Tlingit; and,

WHEREAS, the 1997 Tongass Land Management Plan (TLMP) and subsequent revisions fails in many aspects to adequately protect or respect the customary and traditional uses of the residing Alaska Native peoples, nor did the process in which the TLMP was developed include or adequately recognize the Tribal governments that represent the Alaska Natives that reside within the boundaries of the Tongass National Forest; and,

WHEREAS, the USFS pursuant to Executive Order # 13175, which establishes the responsibility of the federal government to consult with federally recognized tribes on a government to government basis, has failed to properly consult with the federally recognized tribes which reside within the Tongass National Forest; and,

WHEREAS, the 1997 TLMP and subsequent revisions plan intensive logging activities on some of the last remaining customary and traditional use areas throughout the Tongass National Forest; and,

WHEREAS, in the draft TLMP Supplemental Environmental Impact Statement Wilderness Evaluation the United States Forest Service (USFS) has recommended no additional protections of any kind for any the 115 eligible areas; and,

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WHEREAS, the USFS's draft "preferred alternative" fails to adequately recognize the value of providing lasting protections for the culturally significant customary and traditional use areas in the Tongass National Forest, nor does it recognize the history of previous protections or community concerns; and,

WHEREAS, the USFS has indicated that it plans logging and road building in all areas currently Congressionally or administratively unprotected; and,

WHEREAS, clear cut logging and road building have proven detrimental effects on fish and game populations, and related activities such as customary and traditional use gathering/harvesting, fishing, hunting, recreation, and tourism; and,

WHEREAS, many important watersheds that were previously safeguarded in the 1989 House of Representatives passed versions of the Tongass Timber Reform Act and by the 1999 TLMP Record of Decision are scheduled for logging in the next ten years; and

WHEREAS, many areas within the Tongass National Forest contain highly valuable watersheds which prove important for customary and traditional use, fish and wildlife habitat, sport and commercial fishing, tourism, and community recreation; and,

WHEREAS, it is in the best interest of the OVK IRA and other customary and traditional use users that these watersheds remain intact to provide fish and wildlife habitat; and,

NOW THEREFORE BE IT RESOLVED, that the Organized Village of Kasaan requests that all customary and traditional use areas within the Tongass National Forest be recommended for long term protection; and,

NOW THEREFORE BE IT FURTHER RESOLVED, that the Organized Village of Kasaan urges the USFS heed the requests of the tribal governments, communities, and individuals residing in the Tongass National Forest by recommending other important watersheds for long-term protection.

APPROVED, PASSED AND ADOPTED by a duly constituted quorum of the Organized Village of Kasaan IRA on this 15th day of August, 2002; by a roll call vote of: 6 yea, Ø nay, Ø abstain, and Ø absent.
ROLL CALL:
Della Coburn, Yes; Julia Coburn, Yes; Audrey Escoffon, Yes; Caroline Hendrixson, Yes; Pam McCamy, Yes; and Paula Peterson, Yes.

Richard J. Peterson, President

ATTESTED:
Paula K. Peterson
Paula Peterson, Council Secretary

T-2657

Sitka Tribe of Alaska

Tribal Government for Sitka, Alaska

August 16, 2002

Unites States Department of Agriculture
U.S. Forest Service, Tongass National Forest
Content Analysis Team
Post Office Box 9079
Missoula, MT 59807

RE: Comments on the Tongass Wilderness SEIS, Support of Alternative 3

Dear Madam or Sir,

The Tribal Council of the Sitka Tribe of Alaska is responsible for the health, safety, and welfare of more than 3,100 enrolled Tribal Citizens who are primarily of Tlingit, Haida, Tsimshian and Aleut descent. As such, our Tribal Council would also like to preserve all of our traditional hunting, fishing, and gathering areas for the generations to come. The Tribal Council of Sitka Tribe of Alaska hereby supports Alternative Three, among the list of eight alternatives given by the U.S. Forest Service for the Tongass Wilderness SEIS.

The Sheet'ka Kwaan, or traditional territory of the Sitka Tribe, is understood to include the western side of Baranof Island from Cape Ommaney to Lisianski Strait, the northern portion of Baranof Island, the Southern and southwestern side of Chichagof Island, the greater part of the inside waters of Peril Strait and the myriad islands and the waters that surround this territory. As our traditional territory is the only section of concern to us, Sitka Tribe of Alaska is only commenting on this small piece of the Wilderness SEIS.

Government-to-Government Consultation

As an initial note, Sitka Tribe of Alaska has been very pleased with the level of Consultation that has occurred between the Sitka District Ranger's office and the Tribal Council of the Sitka Tribe. During the initial meeting, Carol Goularte, the new Sitka District Ranger, gave an introduction to the process. At the second consultation meeting, she supplied the Tribe with as much information as she could find regarding the Tribe's concerns about Wilderness. At the third consultation meeting, the Forest Service staff did their best to honestly answer some of the Tribal Council's biggest concerns about the SEIS. Because of this level of education, the Tribal Council was able to make a decision that reflected their true wishes.

It was also important that Ms. Goularte and the other staff from the Sitka District Ranger office saw how confused the Sitka Tribal Council and staff are regarding land use designations and subsistence. Many questions arose at our final consultation meeting that were almost unanswerable, because little thought has gone into developing local

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subsistence policies. There are many apparent loopholes in the law and our Tribal Citizens need to know that their customary and traditional practices are lawful.

Wilderness in Alaska

The idea of Wilderness is a hard concept to grasp for residents of Southeast Alaska, and especially our Tribal Citizens. For example, under "Desired Condition" of the Wilderness management prescription, it states, "Ecological processes and natural conditions are not measurably affected by past or current human uses or activities." The Tlingit people have a way of life that closely meshes with the landscape, and this idea that humans could be separated from Haa Aani (Our Land) is difficult to understand.

The Alaska National Interest Land Conservation Act (ANILCA) gives subsistence a priority over all other federal laws in Alaska and this fact must not be ignored. In the Management Prescription for Wilderness in Alaska, many references are made to ANILCA, especially in regard to subsistence. ANILCA is important for Alaskan subsistence users, as subsistence is given priority over all other uses. However, there is a bit of confusion as to whether or not the subsistence practices of our Tribal Citizens are allowed under the current Land Management Plan. This is disturbing, and Sitka Tribe of Alaska hopes that some of this inconsistent management can be resolved through continued consultation with the Sitka District Ranger office.

A question arises when considering our traditional harvest of herring eggs, for example. In spring, before the herring spawn, our Tribal Citizens cut down small hemlock trees and put them in the water so that the herring will spawn on the branches. Many people sell the herring eggs when they are harvested, as this is legal under federal law. However, if a Tribal Citizen were to cut down a green tree in a Wilderness area and sell the herring eggs on hemlock branches, it appears that the person would be breaking the law as written. This is an act of customary trade and should be legal, but the current law is unclear. This is where our Tribal Citizens become wary of a LUD like Wilderness.

The purpose of Title VIII of ANILCA is to protect the opportunity to continue the subsistence way of life. Wilderness is not inconsistent with that law as long as the Forest Service develops specific policies which protect subsistence.

Sitka Tribe of Alaska would rather see the Forest Service adopt a more open management style, than designate large areas of Wilderness across the Tongass. If the Tribal Council has a seat at the table when Forest Service policies are adopted, there will be less arguing and more collaborative achievement. The consultation process used for this SEIS is a good example of how we can achieve a common goal of sustainable management of Tongass resources while also providing for the subsistence needs of the people of Southeast Alaska.

Archeological Protection

As I mentioned previously, our people have lived in this area for thousands of years. As you might imagine, there are many sacred places around this area that remain undocumented. We would prefer that they remain undisturbed by human hands. In this

way, we would support Wilderness because these important cultural sites will become protected. However, Sitka Tribe would like *all* archeological sites to be protected and given a buffer zone, similar to anadromous streams.

In the future, Sitka Tribe will likely achieve most of this work by establishing a Tribal historic preservation officer, as provided in section 101(d)(2) of the National Historic Preservation Act. We hope that we will be able to work closely with the Forest Service to protect these very valuable sites.

Support for Alternative Three

While none of the alternatives matches exactly the Sitka Tribal Council's desires, Alternative three was chosen as the best. Alternative three closely matches the Tribal Council's desire to protect subsistence, while not discouraging development. Please keep in mind that our Tribal Council made this decision based on the narrow focus of our Traditional Territory, as described above.

Poison Cove and Ushk Bay (Area 328)

This area is important to the Sitka Tribe of Alaska because there are several native allotments in this area and this is an important area for Sitka Area subsistence harvesters. At least four native Sitka families can claim historical use of Ushk Bay and still use this area today. There is also an important village site in Ushk Bay that Sitka Tribe would like to preserve from commercial timber harvest and road building activities. Giving this area a Wilderness Land Use Designation will ensure that the forests in the area will continue to provide subsistence resources that would otherwise be negatively affected by commercial timber harvest.

Area 328 does not lie directly between Sitka and another small community, so the possibility of a power corridor through the area is unlikely.

Adding these 97,329 acres of Wilderness will not negatively affect Sitka's economy because this area is far enough from town that local bidders would be at an equal disadvantage as bidders from other places. This area is remote enough from town that a daily commute to and from the site is impractical.

In fact, taking area 328 out of the timber base will prevent a potential negative effect commercial logging would have on subsistence harvest of deer. Additionally, the native allotment owners will benefit from keeping this area off limits to commercial timber harvest. We must recognize that people live and subsist in this area and depend on the area resources for customary and traditional harvest.

In closing, regardless of the land use designations that are developed for the Sheet'ka Kwaan, it is important that the Forest Service recognize the specific values of the local people, over one-third of which are Tribal Citizens. Several of the most important concerns of the Tribal Council are:

- Protecting our native allotments;
- Protecting our customary and traditional resources;

- Protecting all archeological sites, documented and undocumented, from disturbance;
- Finalizing the special forest products policy; and
- Protecting all of our traditional monument sites from disturbance.

Thank you for providing me the opportunity to comment on this supplemental environmental impact statement. I attached to this letter a copy of some comments that were compiled from our Tribal Citizens in 1996 during the previous TLMP EIS comment period. I hope that these comments will assist you in your decision making process.

Best regards,

Lawrence Widmark
Chairman, Sitka Tribe of Alaska

Cc: Carol Goularte, Sitka District Ranger, U.S. Forest Service

Attachment: Tongass Land Management: Comments of Sitka Tribal Citizens

Tongass Land Management:
Comments of Sitka Tribal Citizens'

There are no objectives for subsistence in the plan and the plan does not address cultural and traditional foods. The impact of timber harvesting on private lands is not taken into account in the plan. TLMP planning documents do not address burial or cultural sites.
Subsistence Harvester
6/11/96

My family uses all of the Sitka area for subsistence. We also use locations outside of the Sitka areas. We use almost all of Southeast Alaska for subsistence.
Subsistence Harvester
6/11/96

I don't think there is a part of Baranof or Kruzof Islands that I don't use for subsistence.
Subsistence Harvester
6/12/96

I'd rather they not take another one of our trees from all of Southeast Alaska. If they are going to take any trees, I would prefer it if they make something of them here in Alaska, such as finished lumber products. I hear that KPC is in trouble and I'd like to see them shut down.
Elder
6/19/96

I use the areas from Basket Bay to Necker Bay for traditional food gathering. Cutting any timber in these areas would impact salmon streams and deer habitat necessary to continue to live a traditional subsistence lifestyle here in Sitka [Southeastern Alaska].
Subsistence Harvester
6/20/96

The United States Forest Service is the most sinful agency when it comes to the Tlingit People. The Tlingit have sovereign rights to all of these lands. It was not abandonment when they used one area and left to use another area. They would return. Areas are named after Russians, but the Tlingit rights to these lands are unlimited. Rights to paddle in every bay. Indians have sacred rights to these lands. The Tlingit hold a physical, social and spiritual association with this land. Smoke houses had been in those locations from time immemorial. These are significant archeological sites. The United States Forest Service must protect these sites. Families were threatened with jail or the loss of their children if they did not put them into school. This put a stop to the camping and they appeared not to be using the camp areas then. We still have rights to this home land of ours. Protect all of the Sitka Tribe's traditional territory. We ourselves cannot sell our future generation's land. This is our homeland. The lord put us here.
Elder
6/25/96

My father was from Sitka and I speak on behalf of my father. There isn't a place that the Native people haven't utilized in Southeast Alaska. Before you can fall a tree, you go up to the tree and tell it, "I need to take you to keep my family warm." You apologize to it. Cedar was the same way. The Native people talked to trees, respected them. It is like the Southern Indians say, the Earth is the mother.
Elder
6/25/96

Headwaters are important for spruce roots. Large stands of old growth yellow ceder. The Katlian and Nakwasina areas are important for art materials. Halleck Island and Nakwasina Passage is important for subsistence hunting for deer.
Subsistence Harvester/Artist
6/25/96

Must listen to Elders, it has been that way since the beginning. No logging in the Sitka Tribe's traditional territory, period (though I am not a "tree-hugger). When I go hunting, I give my thanks to the forest, trees, land, air--for shooting a deer, catching a fish. A lot of my friends don't. Its about respect. Just trying to get something to take home, I tell them. Just take what I need.
Subsistence Harvester
6/25/96

Logging has already done enough damage. Might log on private land. Trying to hold onto land for grandchildren.
Subsistence Harvester
7/1/96

People have to make a living so logging needs to be balanced in. As long as the logging is not right down town or in the immediate Sitka area. I hunt in the Southern Baranof area, there are too many hunters on the north end.
Subsistence Harvester
7/1/96

Subsistence needs more support. Younger people don't know how to do it, put up fish, put up berries. They have to be taught what subsistence means. Lost art pretty soon. Probably lose what we do have due to abuse, due to over-exploitation. Wasteful commercial harvesting of resources. Abuse by unlimited harvesting by commercial interests. A few years ago, nobody cared about subsistence because everybody did subsistence. Fresh crab, clams, fish, salmon, deer. Used to be able to live real good. Now, those days are leaving us.
Elder
7/1/96

Eventually it will have to be logged, there is no substitute for paper or wood. There needs to be a way found to use all kinds of wood, no waste wood or wood products like sawdust. Even the chemicals, if they could be used over again there would be less of them in the environment. At this point, the technology is not advanced enough to support this sort of activity. We ought to wait until the technology is better. We need to set aside areas to farm trees, alder, poplar. Right now when they go out and cut wood, they cut #1 grade wood and use it for pulp--such waste. Pulp wood made from wood that could make violins. Some of the wood is so beautiful, only to be made into pulp. We will not be able to stop change. I like the idea of setting aside natural monuments and wilderness areas. Trees grow thickest and most abundantly in rainforests. They are a natural target for logging. Soil is like gold. Forests build up and support the soil, as the soil supports the trees. You kill a place when you clear cut all the trees. Salmon streams and green plants, they all need the forest and the soil to survive.

Elder
7/2/96

I support the creation of jobs by logging. However, now that the logs that are taken from the Sitka area are leaving Sitka I think that we need to protect subsistence areas over logging.

Elder
7/3/96

Through the years, my family used to do a lot of subsistence fishing out at Old Sitka. The stream there had pinks, and 20 years ago it had chum. Don't think there's any now. Result of fish management and how the environment is treated. Twenty years ago a lot of the logging done effected subsistence. There needs to be some sort of balance. Can't just clear-cut and not replant the trees. I don't think that clear cutting is a good idea. I understand the need for trees . . . but I do not think that logging ought to be allowed in subsistence areas. Whenever there is something of value, it gets over harvested for the money it generates. Over use, and then people wonder why the resource doesn't come back.

Subsistence Harvester
7/9/96

I think the United States Forest Service needs to do a little more consultation with all Tribes before deciding what areas to log. I think there should be some logging, but make sure important areas for subsistence and for cultural areas area protected.

Subsistence Harvester
7/15/96

We don't have a timber industry here in Sitka to benefit the economy . . . to a subsistence user then, timber cutting is crazy, insane. The United States Forest Service proposed areas for cutting are always in areas, as you can see from this Alternative #3 TLMP map, that are heavily used for subsistence by local people. From a subsistence standpoint I am against any clear cutting, now or in the future. To me it seems that the USFS just goes through the motions, how much do they care about the subsistence users? Clearly, like our herring fisheries here in Sitka, our voices are hardly heard in terms of resource management. Another management issue where they look at the money and not the users. I don't feel users are abusers. Commercial takers are always abusers . . . give them ten more trees and they will take eleven. I don't feel that way about subsistence . . . they don't take more than they need. To have someone else managing subsistence resources for us and we'll always be low priority when it comes to planning. Kind of like asking me, a subsistence user, to tell them how to sell timber. They ask us about subsistence, but in reality, the Forest Service doesn't care.

Subsistence Harvester
7/16/96

The United States Forest Service's track record for clear cutting is poor. If they were able to use sustained yield methods then they could harvest different patches. But they've ruined too much habitat already. Until they can send someone who can protect the deer and the salmon . . . until they can correct the wrongs they've already done, they can't take more. I would like the USFS to stay away from Kruzof, Baranof, and Chichagof Islands--they are prime habitat areas. The best of the best are these islands here. Angoon, Hoonah, Juneau residents come here to the Sitka area for subsistence food. That is how important these areas here are.

Elder
7/16/96

I feel the same way about them (United States Forest Service) as I do the IRS. Wouldn't like to see them log anywhere. All depends . . . I have 27 acres, I'm all gung-ho to log it. No taxes to be paid, not in a wild life reserve. But I wouldn't like to see it logged, my land. I hate to see any place logged, probably like anybody else.

Subsistence Harvester
7/26/96

Don't care to see any logging, always been against it. Used to log here and there, now they want to log all of Southeast. Seven years ago I took the ferry from here to Washington, down below Ketchikan, British Columbia . . . it looks awful. As you look at it you wonder about the animals. Where do the deer, the bears, the birds hide? Years ago I cut down a tree in Palmer and watched all of the squirrel come out of it. It was forty below zero and you just know all of those squirrel were dead. It made me see what happens. That was the last time I cut down a tree for employment. Glad to see the pulp mill not here, realize a lot of people employed, but you can smell the Campbell River from 40 miles away. I have lived here eighteen years and I have known 5-6 people die of cancer. I would like to see a survey done of the cancer rates of people who worked out here at the mill. A man I knew died, thirty years old, but he had worked in the terrible part of the mill. I wouldn't take $4-5 more an hour to breathe that. Died at thirty. I'd be interested to see how many people die of cancer who worked at the mill. I notice more whales out there now that it is gone. Yeah, I'm against logging the forest. If its just a tiny little area for what they need, okay. But not the whole forest. They don't replant, its all just talk. If they replanted the moment they cut . . . but they don't do that.

Subsistence Harvester
7/26/96

Don't want them to cut the trees down, I'm totally against that. Harbor Mountain, Blue Lake, Herring Cove are all important deer hunting areas.

Subsistence Harvester
8/13/96

Years ago, people used to know their land by the rocks and mountains. Now much of the land is logged. My Uncle used to talk about Elephant Mountain (Hoonah) being strong. And all of a sudden, the loggers came in and the Chookeneidi could no longer talk about it being strong, as the mountain starting as a pebble. Sacred, and now it is all stumps. Traditional ways, cultural ways and now there are no fish in some rivers and the deer don't go to the logged places. The deer won't go there anymore.
Elder
8/13/96 (Also concerned with Halleck Island which she and 28 others hold claim to via a Native Allotment)

Logging sucks.
Teenager
8/13/96

Good food is good medicine.
Elder
8/14/96

T-2862

KIC
Ketchikan Indian Community
2960 Tongass Ave.
Ketchikan, Alaska 99901
(907) 225-5158
Fax (907) 247-0429

August 16, 2002

USDA Forest Service
Tongass National Forest
Content Analysis Team
P.O. Box 9079
Missoula, Montana 59807

To Whom It May Concern:

Please be advised that Ketchikan Indian Corporation d/b/a Ketchikan Indian Community (KIC) has conducted a telephone poll vote today adopting KIC Resolution 02-43 titled: TO DESIGNATE GRAVINA ISLAND ROADLESS LANDS FOR WILDERNESS PROTECTION LUD II 2 – LOCATION 522.

A signed copy of this resolution will be mailed to you.

Sincerely,

Martha A Johnson

Martha A. Johnson
Administrative Assistant to the Tribal Council

cc: David Landis, Interim General Manager
Tribal Council

08/09/02 05:13A P.001 2475158 rtha Johnson

KETCHIKAN INDIAN COMMUNITY
TRIBAL COUNCIL

TELEPHONE POLL VOTE

August 16, 2002

To Designate Gravina Island Roadless Lands for Wilderness Protection LUD II 2 - Location 522

KIC TRIBAL COUNCIL			
COUNCIL MEMBER	YAY	NAY	ABSTAIN
Charles W. White, President	No Vote Unless there is a tie	No Vote Unless there is a tie	No Vote
Norman Arriola, Vice President	Yes		
Marly F. Edenso, Treasurer	Yes		
Sue Pickrell		No	
Terence Field	No contact		
Merle N. Hawkins	Yes		
Robert Sanderson, Jr.	No contact		
David Jensen	Yes		

TELEPHONE POLL VOTE RESULTS: Passed by a majority vote

Martha Johnson 247S158 08/09/02 05:13A P.002

KIC

Ketchikan Indian Community
2960 Tongass Ave.
Ketchikan, Alaska 99901
(907) 225-5158
Fax (907) 247-0429

RESOLUTION: KIC-02-43

TITLE: DESIGNATE GRAVINA ISLAND ROADLESS LANDS FOR WILDERNESS PROTECTION LUD II 2 - LOCATION 522

BY: KETCHIKAN INDIAN CORPORATION TRIBAL COUNCIL d/b/a KETCHIKAN INDIAN COMMUNITY

WHEREAS, the Ketchikan Indian Community (the "Tribe") is a federally recognized Tribal government pursuant to the Indian Reorganization Act (IRA) of 1936 as amended, whose membership resides in the Ketchikan area; and

WHEREAS, the Ketchikan Indian Community Tribal Council (the "Tribal Council") is the representative Tribal government of the Tribe; and

WHEREAS, the health, education, and welfare of its membership is of paramount importance to the well being of the Ketchikan Indian Community; and

WHEREAS, it is in the best interest of the subsistence users to insure that fish and wildlife resources on Gravina Island remain abundant and are protected; and

SO THEREFORE BE IT RESOLVED, that Ketchikan Indian Community Tribal Council hereby endorses the congressionally designated roadless area on Gravina Island for wilderness.

CERTIFICATION

The foregoing resolution was adopted at a duly convened meeting of the Ketchikan Indian Corporation Tribal Council, assembled this __th day of _____, 2002, at the Ketchikan Indian Community, 2960 Tongass Avenue, Ketchikan, Alaska 99901, by a vote of _____ FOR, _____AGAINST, and _____ABSTAINING.

_____ _____
Charles W. White, President Date

ATTESTED:

_____ _____
Susan Pickrell, Tribal Secretary Date

Martha Johnson 247S158 08/09/02 05:13A P.003

T-3231

HYDABURG COOPERATIVE ASSOCIATION

RESOLUTION 02-10

A RESOLUTION ADDRESSING THE HYDABURG COOPERATIVE ASSOCIATION'S POSITION WITH RESPECT TO THE TONGASS LAND MANAGEMENT PLAN REVISION—DRAFT SUPPLEMENTAL ENVIRONMENTAL IMPACT STATEMENT—ROADLESS AREA EVALUATION FOR WILDERNESS RECOMMENDATIONS.

WHEREAS, the Hydaburg Cooperative Association is the tribal governing body for Hydaburg, Alaska, and was established in 1938 pursuant to the Act of June 18, 1934 (48 Stat 984), as amended by the Act of May 1, 1936 (49 Stat. 1250, 48 USC 358); a federally recognized Indian tribe;

WHEREAS, the Hydaburg Cooperative Association has a duty to its citizens to protect their rights and interest in the hereditary lands and waters of the Haida;

WHEREAS, the U.S. Forest Service is requesting comments on the Draft Supplemental Environmental Impact Statement on Roadless Area Evaluation for Wilderness Recommendation

WHEREAS, the areas under review are of historic, cultural and spiritual importance to the Haida people;

NOW, THEREFORE, BE IT RESOLVED that HCA will not support the preferred alternative or any of proposed alternatives, until the Forest Services enters into meaningful consultation with the Hydaburg Cooperative Association.

Certification

This resolution was duly adopted at a Hydaburg Cooperative Association meeting held this 14th day of August 2002 by a quorum of 6 Yes and Ø No.

ATTEST:

Vicki LeCornu

Vicki LeCornu, Secretary

RECEIVED
AUG 22 2002
CAET

P.O. Box 349
Hydaburg, Alaska 99922

Phone: 907-285-3666
Fax: 907-285-3667

F-A44

T-2109

CRAIG COMMUNITY ASSOCIATION
P.O. Box 828
Craig, Alaska 99921
Phone: 907-826-3996
Fax: 907-826-3997
Email: cgtribe@aptalaska.net

August 15, 2002

USDA Tongass National Forest – CAT
P.O. Box 9079
Missoula, MT 59807
Fax (406) 329-3556

To whom it may concern:

As residents and users of the Tongass National Forest there are concerns about the continued efforts to push logging roads and timber sales into pristine roadless areas of the Tongass. Over the past fifty years, industrial scale logging has targeted the rare low-elevation old growth most valuable for fisheries and wildlife. As users of these resources the impacts have been felt on fishing, hunting, subsistence, traditional uses and recreation.

The areas of Southern Prince of Wales have vital importance to the people of the local communities of Craig, Hydaburg, Klawock, and Kasaan. The lands that are up for development should be protected into Wilderness or LUD II. The areas of Keete, Mable, and Kassa should be protected into the Wilderness or at least a LUD II status. Simply for the reason there should not be commercial development next to already protected areas these areas are South Prince of Wales Wilderness and Nutkwa, which is under LUD II status. These were the areas that the Haida and Tlingit people had some of there first settlements at. This purpose alone should have the impact these lands be put into some sort of protection against any kind of commercial development. The areas of the Outer Islands of Craig: San Juan Bautista, SanFernando and Sumez are put into the same consideration for protection. As well as the following areas

RECEIVED
AUG 23 2002
CAET

Upper Tenakee Inlet
Crab Bay
Broad Finger and Boards Creeks
East Saook Bay
Port Haughton
Cape Fanshaw
Castle River
Port Camden
Mandan Bay
Rocky Pass

Salmon Bay
Calder Holbrook
Honker Divide
Sukkwan Island
Keete, Mable, Kassa
Northwest Dall Island
Gravina Island
Cholomondeley area
Johnson Bay, Moira Sound
Cleveland Peninsula

The feelings are that these areas be set aside for Protection against Development; for there purpose are vital to the Indigenous peoples, and residents that live in all areas being considered.

Thank you for the opportunity to comment.

Sincerely,

Craig Community Association.

CRAIG COMMUNITY ASSOCIATION
P.O. Box 828
Craig, Alaska 99921
Phone: 907-826-3996
Fax: 907-826-3997
Email: cgtribe@aptalaska.net

Resolution 02-18 Craig Community Association: Protection of

WHEREAS: the Craig Community Association (IRA) is a duly constituted Federally Recognized Indian Tribe, organized pursuant to authority of Section 16 of the Act of Congress of June 18, 1934 (48 stat.948), as amended by acts of Congress, June 15, 1935 (49 stat.1250); and

WHEREAS: the Craig Community Association Tribal Council is the governing body of the Craig Tribe in accordance with its Constitution and By-Laws; and

WHEREAS: the Craig Community Association, in Southeast Alaska, holds the following truths to be self-evident since time immemorial: the commonality of the customary and traditional use of land, sea, and natural resources is what binds the Haida/Tlingit Nations together, the customary and traditional use of each Village is inseparable from the language, tradition, ceremony, of the Haida/Tlingit people; and

WHEREAS: the 1997 Tongass Land Management Plan (TLMP) fails to adequately protect or respect the customary and traditional of each Traditional use site. The 1997 TLMP plans intensive logging activities on some of the last remaining customary and traditional use areas such as Kassa, Keete, Moira, and Mable Bay, and the other documented (Haida/Tlingit) traditional use sites and

WHEREAS: in the draft Tongass Land Management Plan Supplemental Environmental Impact Statement Wilderness evaluation the Forest Service recommended no additional protections for any 115 eligible areas; and

WHEREAS: the Forest Service's draft "preferred alternative" fails to adequately recognize the value of providing lasting protection to important customary and traditional use areas in the Tongass, the history of previous protections, and community concerns; and

WHEREAS: the Forest Service has indicated that it plans logging and road building in all areas currently Congressionally or administratively unprotected; and

WHEREAS: clear cut logging and road building have detrimental effect on fish and game populations, and related activities such as subsistence, fishing, hunting recreation and tourism; and

WHEREAS: many important watersheds that were previously safeguarded in the 1989 House of Representative passed version of the TongassTimber Reform Act and by 1999 TLMP Record of Decision are scheduled for logging in the next ten years; and

WHEREAS: areas including Craig, the Islands of San Christoval Channel, SanFernando, St. Johns, and Sumez Islands, as well as areas south of Craig that has important traditional value. These areas have valuable watersheds that are important to our traditional uses; and

WHEREAS: it is the best interest of the Craig Community Association and other customary and traditional users that these valuable watersheds remain intact to provide fish and wildlife habitat; and

THEREFIRE BE IT RESOLVED: That the Craig Community Association request that the customary and traditional areas of San Christoval channel, San Fernando, Sumez, and St. Johns and other areas within the boundaries of the (Craig Tribe) Craig Community Association be recommended for long term protection; and

BE IT FUTHER RESOLVED: THAT THE Craig Community Association urges the Forest Service to heed the request of communities, Tribes, and individuals by recommending other important watersheds for long-term protection.

CERTIFICATION

This Resolution was adopted, at a duly held meeting of the Craig Community Association Tribal Council on this 15 day of August, 2002 by a vote of 6 Yes Ø No Ø Abstain Ø Absent

Virginia Lawniki
Attest: Tribal Secretary. Virginia Lawniki

CCA President, A. Millie Stevens

F-A46

T-1290

ANNA MORRISON
Lane County Commissioner
West Lane District

August 12,2002

USDA Forest Service
Tongass National Forest, Content Analysis Team
Box 9079
Missoula, Montana 59807

Dear Tongass Content Analysis Team:

I would like to go on record as supporting Alternative 1, the No Action Alternative of the Tongass SEIS. This particular forest is more protected than all of the others in your system.

As a member of Oregon Women In Timber, we are fully aware of the economic devastation that has impacted the small forest products community by the loss of timber harvesting opportunities.

I believe the Forest Service should stay focused on a multiply use approach to the management of the Tongass. There is already more than enough Tongass National Forest acreage set aside for those who want that wilderness experience. We need to create more opportunities for local communities to have new jobs and sustain their economy.

Sincerely,

Anna Morrison
Anna Morrison
County Commissioner

RECEIVED
AUG 19 2002
CAET

PUBLIC SERVICE BUILDING / 125 EAST 8TH AVENUE / EUGENE, OR 97401 / (541) 682-4203 / FAX (541) 682-4616

CITY OF PETERSBURG
P.O. BOX 329 • PETERSBURG, ALASKA 99833
TELEPHONE (907) 772-4511
TELECOPIER (907) 772-3759

August 12, 2002

Mr. Larry Lunde
USDA FS Tongass NF
Content Analysis Team
PO Box 9079
Missoula, MT 59807

Dear Mr. Lunde:

The City of Petersburg, Alaska agrees with the selection of the No Action alternative for the Draft Supplement Environmental Impact Statement (SEIS) in the Roadless Area Evaluation for Wilderness Recommendations on the Tongass National Forest. We agree that the years of evaluations already taken for the development of the 1997 Tongass Forest Plan is sufficient and that no additional wilderness areas need to be designated within the Tongass National Forest.

We endorse the preferred alternative that would allow for **no more** additional wilderness designations. We specifically recommend the following roadless areas **not** be recommended for wilderness because of the potential long term economic impacts that could affect the City of Petersburg. These areas are; Fanshaw, Spires, Thomas, Maden, Aaron, Cone, Harding, Bradfield, Anan, Frosty, North Kupreanof, Missionary, Five Mile, South Kupreanof, Castle, Lindenberg, Green Rocks, Woewodski, North Mitkof, East Mitkof, Central Mitkof, Manzanita, Crystal, Kadin, Woronkofski, North Etolin, Mosman, South Etolin, West Zarembo, East Zarembo, South Zarembo, Kashevarof Islands, Keku, Security, North Kuiu, Camden, Rocky Pass, Bay of Pillars, East Kuiu, South Kuiu, Windham-Port Houghton, El Capitan, Salmon Bay, and North Cleveland.

Enclosed are previous comments the City of Petersburg has provided to your planning efforts. We ask that they be included in the planning record and be considered in the preparation of the decision.

The new administration stresses community support and more local control. We hope this is reflected not only in the final decision of the SEIS, but in all future decisions affecting the watersheds of the Tongass.

The 1997 Forest Plan decision is a good balance and provides adequate protection to the resources of southeast Alaska. The City of Petersburg will not endorse a recommendation for more wildernesses in southeast Alaska and asks that you choose the No Action alternative.

RECEIVED
AUG 19 2002
CAET

Sincerely,

Paul A. Anderson

Paul Anderson
Mayor Protem

Enclosures

By: Fax & email w/o enclosures
US Postal Service: 08-13-02 w/enclosures

cc: Tom Puchlerz, Forest Supervisor
Dennis Bschor, Regional Forester

RESOLUTION NO. 1691
CITY OF PETERSBURG

A RESOLUTION SUPPORTING THE DECISION OF THE USDA FOREST SERVICE TO RECOMMEND NO ADDITIONAL ACREAGE FOR WILDERNESS AREAS IN THE TONGASS NATIONAL FOREST

Offered by: Anderson
Supported by: Tremblay

WHEREAS, the USDA Forest Service has prepared a Draft Supplemental Environmental Impact Statement to the 1997 Tongass Land Management Plan Revision Final Environmental Impact Statement that evaluates alternatives for recommending wilderness designations to Congress; and

WHEREAS, the Tongass Land Management Plan (TLMP) was created to assure residents of Southeast Alaska that a long-term economic balance would be provided; and

WHEREAS, the recommended No-Action Alternative reaffirms the 1997 forest plan revision, which was developed for over nearly a decade, with extensive public and congressional comment; and

WHEREAS, any further diminishment of the timber base in the Tongass National Forest would increase economic harm and negatively affect the quality of life in Petersburg and all other Southeast Alaska communities.

THEREFORE BE IT RESOLVED, the Council of the City of Petersburg, Alaska supports the decision of the Tongass National Forest Supervisor to recommend a No-Action Alternative regarding the Tongass National Forest. The City also encourages the Forest Service to take public comments from Petersburg residents seriously during the process and to not log and build logging roads in watersheds that are primary salmon producing watersheds or otherwise community use areas important to Petersburg residents, such as Castle River, Port Houghton and Cape Fanshaw, etc.

Passed and approved by the City Council of Petersburg, Alaska, this 9th day of August 2002.

Paul Anderson, Mayor Protem

ATTEST:

Kathy O'Reaf, City Clerk

City of Ketchikan

334 Front Street
Ketchikan, Alaska 99901
Phone 907-225-3111
Fax 907-225-5075

July 3, 2002

USDA FS Tongass NF
Content Analysis Team
P.O. Box 9079
Missoula, MT 59807

At its regular meeting of July 2, 2002, the Ketchikan City Council unanimously voiced its support for the decision of the USDA Forest Service to recommend the "no action" alternative in the Tongass National Forest.

Enclosed is a copy of the Council's resolution for your information.

Sincerely,

Bob Weinstein
Mayor

RECEIVED
JUL 0 9 2002
CAET

CITY OF KETCHIKAN, ALASKA

RESOLUTION NO. 02-2040

A RESOLUTION OF THE COUNCIL OF THE CITY OF KETCHIKAN, AFFIRMING THE DECISION OF THE USDA FOREST SERVICE TO RECOMMEND NO ADDITIONAL ACREAGE FOR WILDERNESS AREAS IN THE TONGASS NATIONAL FOREST; AND ESTABLISHING AN EFFECTIVE DATE.

WHEREAS, the USDA Forest Service has prepared a Draft Supplemental Environmental Impact Statement to the 1997 Tongass Land Management Plan Revision Final Environmental Impact Statement that evaluates alternatives for recommending wilderness designations to Congress; and

WHEREAS, the Tongass Land Management Plan (TLMP) was created to assure residents of Southeast Alaska that a long-term economic balance would be provided; and

WHEREAS, the recommended No-Action Alternative reaffirms the 1997 forest plan revision, which was worked out with extensive public and congressional comment over nearly a decade; and

WHEREAS, any further diminishment of the timber base in the Tongass National Forest would exacerbate the economic harm to Ketchikan and other Southeast Alaska communities caused by previous changes in federal policy.

NOW, THEREFORE, BE IT RESOLVED by the Council of the City of Ketchikan, Alaska, as follows:

Section 1. The Council of the City of Ketchikan, Alaska supports the decision of the Tongass National Forest Supervisor to recommend a No-Action Alternative regarding the Tongass National Forest.

Section 2. This resolution is effective immediately upon passage and approval.

PASSED AND APPROVED this 2nd day of July, 2002.

Bob Weinstein

Bob Weinstein, Mayor

ATTEST:

Katherine M. Suiter

Katherine M. Suiter
City Clerk

CITY OF KETCHIKAN, ALASKA

RESOLUTION NO. 99-1960

A RESOLUTION OF THE COUNCIL OF THE CITY OF KETCHIKAN, ALASKA OPPOSING THE INCLUSION OF THE TONGASS NATIONAL FOREST IN THE U.S. FOREST SERVICE'S NATIONAL ROADLESS AREA REVIEW; AND ESTABLISHING AN EFFECTIVE DATE.

WHEREAS, the Tongass National Forest is essential in bringing stability and certainty to the economy of Southeast Alaska, providing jobs for many families dependent on such stability; and

WHEREAS, the Tongass Land Management Plan (TLMP) was created to assure residents of Southeast Alaska that a long-term economic balance would be provided; and

WHEREAS, after a long process a final Record of Decision was issued a few months ago to finalize TLMP, and including the Tongass National Forest in a "roadless area" policy review would be in direct conflict with TLMP; and

WHEREAS, any further diminishment of the timber base in the Tongass National Forest would exacerbate the economic harm to Ketchikan and other Southeast Alaska communities caused by previous changes in federal policy; and

NOW, THEREFORE, BE IT RESOLVED by the Council of the City of Ketchikan, Alaska, as follows:

Section 1. The Council of the City of Ketchikan, Alaska strongly opposes the inclusion of the Tongass National Forest in the "roadless area" policy review.

Section 2. The Council of the City of Ketchikan, Alaska opposes any unilateral action to modify TLMP as such action is contrary to proper resource planning.

Section 3. This resolution is effective immediately upon passage and approval.

PASSED AND APPROVED this 21st day of October, 1999.

Bob Weinstein

Bob Weinstein, Mayor

ATTEST:

Katherine M. Suiter

Katherine M. Suiter
City Clerk

CITY OF KETCHIKAN, ALASKA

RESOLUTION NO. 00-1978

A RESOLUTION OF THE COUNCIL OF THE CITY OF KETCHIKAN, ALASKA SUPPORTING THE RECOMMENDATION OF THE U.S. FOREST SERVICE TO EXCLUDE THE TONGASS NATIONAL FOREST FROM THE NATIONAL ROADLESS AREA CONSERVATION PROPOSAL; AND ESTABLISHING AN EFFECTIVE DATE.

WHEREAS, the Tongass National Forest is essential in bringing stability and certainty to the economy of Southeast Alaska, providing jobs for many families dependent on such stability; and

WHEREAS, the Tongass Land Management Plan (TLMP) was created to assure residents of Southeast Alaska that a long-term economic balance would be provided; and

WHEREAS, any further diminishment of the timber base in the Tongass National Forest would exacerbate the economic harm to Ketchikan and other Southeast Alaska communities caused by previous changes in federal policy; and

WHEREAS, the U.S. Forest Service is recommending that the Tongass National Forest be excluded from additional restrictions on roads until the five-year forest plan review scheduled for April, 2004.

NOW, THEREFORE, BE IT RESOLVED by the Council of the City of Ketchikan, Alaska, as follows:

Section 1. The Council of the City of Ketchikan, Alaska strongly supports the recommendation of the U.S. Forest Service to exclude the Tongass National Forest from the roadless area conservation proposal.

Section 2. The Council of the City of Ketchikan, Alaska supports proper resource planning in the Tongass National Forest with decision making at the local level.

Section 3. This resolution is effective immediately upon passage and approval.

PASSED AND APPROVED this 18th day of May, 2000.

Bob Weinstein

Bob Weinstein, Mayor

ATTEST:

Katherine M. Suiter

Katherine M. Suiter
City Clerk

CITY OF KETCHIKAN, ALASKA

RESOLUTION NO. 01-2000

A RESOLUTION OF THE COUNCIL OF THE CITY OF KETCHIKAN, ALASKA OPPOSING THE INCLUSION OF THE TONGASS NATIONAL FOREST IN THE NATIONAL ROADLESS AREA CONSERVATION PLAN; AND ESTABLISHING AN EFFECTIVE DATE.

WHEREAS, the Tongass National Forest is essential in bringing stability and certainty to the economy of Southeast Alaska, providing jobs for many families dependent on such stability; and

WHEREAS, the Tongass Land Management Plan (TLMP) was created to assure residents of Southeast Alaska that a long-term economic balance would be provided; and

WHEREAS, any further diminishment of the timber base in the Tongass National Forest would exacerbate the economic harm to Ketchikan and other Southeast Alaska communities caused by previous changes in federal policy; and

WHEREAS, the final decision by federal administration was to include the Tongass National Forest in the roadless area conservation plan with no regard to either a proper planning process or to economic impacts on Southeast Alaska communities; and

WHEREAS, Governor Tony Knowles has initiated legal action against the federal government in an effort to overturn this federal fiat.

NOW, THEREFORE, BE IT RESOLVED by the Council of the City of Ketchikan, Alaska, as follows:

Section 1. The Council of the City of Ketchikan, Alaska strongly opposes the decision to include the Tongass National Forest in the roadless area conservation plan.

Section 2. The Council of the City of Ketchikan, Alaska strongly supports the decision by Governor Knowles to file litigation to overturn the application of the roadless designation to the Tongass National Forest.

Section 3. This resolution is effective immediately upon passage and approval.

PASSED AND APPROVED this 18th day of January, 2001.

Bob Weinstein

Bob Weinstein, Mayor

ATTEST:

Katherine M. Suiter

Katherine M. Suiter
City Clerk

T-279

CITY/BOROUGH OF JUNEAU
ALASKA'S CAPITAL CITY

OFFICE OF THE MAYOR

Telephone: (907) 586-5240; Facsimile: (907) 586-5385
Sally_Smith@ci.juneau.ak.us

July 9, 2002

USDA FS Tongass National Forest
Content Analysis Team
P.O. Box 9079
Missoula, Montana 59807

Dear Sir or Madam:

The 16.9 million-acre Tongass National Forest covers 73% of the land area of Southeast Alaska. Currently, the Tongass Land Management Plan (TLMP) provides that only about 22% of that nearly 17 million acres is available for development, and within that acreage potential development is greatly restricted.

Though harvest of timber in the Tongass has been a contentious subject in recent years, it is a fact that the economy of Southeast Alaska is sagging under the weight of changing federal timber and land use policies. Forest and timber related jobs, historically 1/3 of the region's economy, dropped from 4600 to 670 during the 1990s. Related payroll is down $100 million. Federal policies have had a profound effect on the region's economy, an economy that has been in a steady decline. We are seriously in need of an economic transfusion.

A healthy economy requires the investment of private capital, which requires a climate of stability and predictability. The moving target of federal land use policy in Southeast has eroded stability, and the only predictability so far has been that there will continue to be less land open for development of any kind. This uncertainty surrounding federal land use policy in Southeast Alaska has effectively stopped new capital investment in any timber-related operation and stifled investment in non-timber operations.

Any changes to the land use policies of the TLMP that further restrict development potential will continue to negatively affect the region's economy. **Alternative No. 1 – no action – provides Southeast Alaska the most potential for needed stability, by continuing the policies so carefully crafted during the TLMP development.**

Sincerely,

Sally Smith

Sally Smith
Mayor

cc: CBJ Assembly
John MacKinnon, Interim City Manager

RECEIVED
JUL 15 2002
CAET

155 So. Seward Street, Juneau, Alaska 99801-1397

F-A51

T-287

City of Tenakee Springs

RESOLUTION 2002-20

In the Council
June 27, 2002

Introduced by
Roger V. Lewis

A RESOLUTION FOR THE CITY OF TENAKEE SPRINGS, ALASKA URGING THE UNITED STATES FOREST SERVICE TO SAFEGUARD IMPORTANT COMMUNITY USE AREAS DURING ITS TONGASS WILDERNESS EVALUATION

WHEREAS, the residents of the community of Tenakee Springs, Alaska, are heavily dependent on the resources of the Tongass National Forest for our health, livelihoods and lifestyles; and

WHEREAS, the revised Tongass Land Management Plan (TLMP) fails to adequately safeguard the lands utilized by the people of Tenakee Springs. The current TLMP plans intensive logging activities in important community use areas such as Crab Bay, Seal Bay, Long Bay, Upper Tenakee Inlet and Finn Cove; and

WHEREAS, the draft TLMP Supplemental Environmental Impact Statement Wilderness Evaluation recommends no new Congressional protections for Tongass wildlands; and

WHEREAS, the Forest Service's draft preferred alternative fails to adequately recognize the value of providing lasting protection to important watersheds and habitats in the Tongass, the history of previous protections, and long-standing community concerns; and

WHEREAS, the Forest Service has indicated that it plans logging and road building in all areas not currently Congressionally or administratively protected, including important watersheds used by residents of Tenakee Springs for hunting, fishing, recreation, tourism, subsistence harvesting; and

WHEREAS, clearcut logging and road building have detrimental effects on fish and game populations, and related activities such as subsistence, fishing, hunting, recreation and tourism; and

WHEREAS, many important watersheds that were previously safeguarded by the Tongass Timber Reform Act as passed by the House of Representatives 1989 and the final 1999 Tongass Land Management Plan Record of Decision are scheduled for logging in the next ten years, and

WHEREAS, it is in Tenakee Springs best interest that these and other watersheds remain intact to provide subsistence, fishing, hunting, recreation, and tourism opportunities.

THEREFORE BE IT RESOLVED that the Common Council of the City of Tenakee Springs, Alaska urges the Forest Service to heed the requests of communities, tribes, and individuals by recommending important watersheds for lasting protection; and

BE IT FURTHER RESOLVED that the City of Tenakee Springs requests that the Forest Service recommend Crab Bay (VCUs 231-234), Seal Bay (VCUs 229-230), Long Bay (VCU 228), Upper Tenakee Inlet (VCUs 223-227), and Finn Cove VCU 236) for permanent protection as a Wilderness or LUD II protection; and

BE IT FURTHER RESOLVED that the City of Tenakee Springs urges the Forest Service to select the Alaska Rainforest Conservation Act Alternative (Alternative 6) as its final decision.

ADOPTED 5 Ayes, 2 Absent THIS 27th DAY OF June 2002

Vice Mayor for
Janice J. Eagle
City Council President
ex officio MAYOR

ATTEST:

Mary M. Almy
Mary M. Almy,
City Clerk

RECEIVED
JUL 15 2002
CAET

T-444

CITY of WRANGELL, ALASKA

INCORPORATED JUNE 15, 1903

BOX 531, 99929 (907) 874-2381
FAX: (907) 874-3952

ADOPTED AUGUST 1972

July 16, 2002

USDA Forest Service Tongass National Forest
Attn: Tom Puchlerz, Forest Supervisor
Content Analysis Team
P.O. Box 9079
Missoula, MT 59807

Dear Mr. Puchlerz:

This letter will serve as my comments on the Tongass Forest Plan Revision Draft Environmental Impact Statement (SEIS). Selecting the No-Action Alternative is the correct choice.

There is too much of the Tongass National Forest in your single use restrictive land use designations. We must restore the balance of uses that has been destroyed over the past ten years if we are to maintain an economy in Wrangell, and a healthy usable forest. We run the risk of losing all of our private sector wealth creating jobs if a reliable economic timber supply from the Tongass is not provided. A timber industry is only one economic component of Wrangell's and Region's economy, but directly affects communities health and other industries.

We must not be overwhelmed by the assault being brought by the National Environmental Movement. You as a decision maker must not let the massive mailings that are generated by the wealthy environmental interest that are concerned only with locking up the Tongass stand in the way of recognizing the importance of assuring that the interest of this community is given full consideration. There will be more negative comments from environmental groups than there are people in Alaska.

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JUL 22 2002
CAET

CITY OF WRANGELL, ALASKA

Page 2
Tom Puchlerz, Forest Supervisor
USDA Forest Service Tongass National Forest
Content Analysis Team
July 15, 2002

Contrary to the misinformation coming from the environmental groups the Tongass will not be destroyed by adopting the No-Action Alternative and continuing to harvest about 4% of the forest over a 100 year rotation.

Sincerely,

Bruce E. Harding
Mayor

cc: Dennis Bschor, Regional Forester
Alaska Delegation
All Southeast Alaska Mayors
Senator Robin Taylor
Representative Peggy Wilson
George Woodbury, AFA
Silver Bay Logging, Inc.

KETCHIKAN GATEWAY BOROUGH

RESOLUTION NO. 1673 Amended

A RESOLUTION OF THE ASSEMBLY OF THE KETCHIKAN GATEWAY BOROUGH, ALASKA, AFFIRMING THE DECISION OF THE USDA FOREST SERVICE SUPERVISOR TO RECOMMEND NO ADDITIONAL ACREAGE FOR WILDERNESS AREAS IN THE TONGASS NATIONAL FOREST; AND PROVIDING FOR AN EFFECTIVE DATE.

RECITALS

A. The USDA Forest Service has prepared a Draft Supplemental Environmental Impact Statement to the 1997 Tongass Land Management Plan Revision Final Environmental Impact Statement that evaluates alternatives for recommending wilderness designations to Congress.

B. The Tongass Land Management Plan (TLMP) was created to assure the residents of Southeast Alaska that a long-term economic balance would be provided.

C. The Alaska National Interest lands Conservation Act (ANILCA) of 1980 clearly prohibited any study of new wilderness in Alaska without prior Congressional approval.

D. The recommended "No-Action" Alternative reaffirms the 1997 forest plan revision, which was worked out with extensive public and congressional comment over nearly a decade.

E. Any further diminishment of the timber base in the Tongass National Forest would exacerbate the economic harm to Ketchikan and other Southeast Alaska communities caused by previous changes in federal policy.

F. There exists no law required the solicitation and the pro & con counting of public comments for the purposes of justifying a science and knowledge based land management decision.

NOW, THEREFORE, IN CONSIDERATION OF THE ABOVE FACTS, IT IS RESOLVED BY THE ASSEMBLY OF THE KETCHIKAN GATEWAY BOROUGH, ALASKA as follows:

Section 1. The Ketchikan Gateway Borough supports the decision of the Tongass National Forest Supervisor to recommend a "No-Action" Alternative regarding the Tongass National Forest.

Section 2. The Ketchikan Gateway Borough supports the ANILCA "NO MORE" clause, and strongly recommends the Forest Service final decision fully adhere to this "NO MORE' clause.

Section 3. The Ketchikan Gateway Borough supports Tongass National Forest land management decisions that are based on science, professional knowledge, sound forest management principles, and local government and local citizens cooperation & input. The Ketchikan Gateway Borough does not support he solicitation and pro & con counting of public comment simply to attempt to influence or justify land management decisions.

Section 4. The Borough Clerk is directed to mail a certified copy of this resolution to USDA FS Tongass NF, Content Analysis Team, PO Box 9079, Missoula, MT 59807.

Section 5. This resolution is effective upon adoption.

ADOPTED this 15 day of July, 2002.

BOROUGH MAYOR

ATTEST:

BOROUGH CLERK

Approved as to form:

BOROUGH ATTORNEY

EFFECTIVE DATE: 07/15/02			
ROLL CALL	YES	NO	ABSENT
BERGERON	✓		
COOSE	✓		
LYBRAND	✓		
SALAZAR	✓		
SALLEE		✓	
SARBER			✓
BURTON	✓		
MAYOR (Tie Vote Only)			N/A
4 AFFIRMATIVE VOTES REQUIRED FOR PASSAGE			

RECEIVED
JUL 24 2002
CAET

T-561

CITY of WRANGELL, ALASKA
INCORPORATED JUNE 15, 1903
BOX 531, 99929 (907) 874-2381
FAX: (907) 874-3952

ADOPTED AUGUST 1972

July 24, 2002

To Whom It May Concern:

The City of Wrangell is writing to express opposition to some of the areas proposed as Wilderness in the DSEIS Roadless Area Evaluation for Wilderness Recommendations of the Tongass Land Management Revision. As we reviewed the proposed areas it became clear many of these designations might effectively preclude the development of an efficiently integrated surface transportation and electrical generation and distribution system for Southeast Alaska.

We are all aware of how the Alaska Marine Highway and the communities it serves have suffered under legislative budgetary reductions. Combining continued ferry service reductions with the loss of our timber industry spells certain economic death to our communities. Unless we develop the most cost-effective transportation and utility corridor system, Southeastern Alaska communities will remain mere shells of their former robust economies.

Even before we suffered the loss of the timber base as a consequence of the last national administration, we experienced the unintentional consequences of the newly created IFQ program. This program resulted in the severe reduction in IFQ landings to communities such as Petersburg and Wrangell that traditionally landed and processed this seafood. These landings went to communities with connections to the continental highway system. A highway connection to Canada serving the communities of Petersburg, Wrangell and Prince of Wales Island would level the playing field and bring IFQ deliveries back to these and other fishing communities.

Many of the proposed Wilderness areas would effectively halt any economic recovery from occurring. If the proposed Cone Mountain area in the Stikine Region were to be designated Wilderness would be severely impede the effort to bring a highway connection to Wrangell. While the area may have high value as wilderness, such a designation would preclude the planned highway connection to Canada. Such a designation is unacceptable to the community of Wrangell.

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Should the Cone Mountain Wilderness designation be made and then Canada demand access to the sea, guaranteed by treaty, the clearly more economic choices they would have would be the Stikine or Unuk River. Precluding the Craig and Bradfield rivers as a transportation option would likely result in the Stikine and Unuk River's being chosen as the best option for Canada to have tidewater access. Our efforts have sought to avoid these watersheds.

The region surrounding Wrangell is already significant in terms of the amount of legislated Wilderness. If anything, people need more access to Wrangell and Petersburg to enjoy the surrounding Wilderness. The proposed Wrangell to Cassiar Highway road connection would be highly complimentary towards allowing people to access both official and unofficial wilderness. It would serve the tourism industry in British Columbia and Alaska very well.

The area to the Northwest of Petersburg on Kupreanof Island is also proposed for a Wilderness designation. Such a designation would effectively preclude a cost-effective transportation and electrical intertie connection to Kake and Sitka. We are opposed to a Wilderness designation in this area as well.

In 1992 the Alaska State Legislature passed and sent Senate Joint Resolution 40 to the President, Congress and the United States Forest Service. The resolution sought to make clear Alaska wanted to establish, reserve and maintain a hydroelectric site, transportation and corridor system for Southeast Alaska. The plan was entitled the Southeast Alaska Transportation and Utility Corridor plan. SETUC was laid out after the ANILCA legislation passed in 1981, it was intended to serve as a framework for future transportation and corridor systems for our region. Wilderness and roadless designations would serve to block an economic future for our region. Any wilderness designations blocking these corridors and sites absolutely must be precluded.

The City of Wrangell strongly opposes any further Wilderness designations that would further limit future energy sites, energy and transportation corridors.

Sincerely,

Bruce E. Harding
Mayor

cc: Southeast Alaska Mayors
Senator Robin Taylor
Chip Weber, Wrg. Forest Ranger
USDA FS Tongass NF
Alaska Congressional Delegation
Representative Peggy Wilson
Steve Brink

ALASKA MUNICIPAL LEAGUE
Alaska Conference of Mayors
217 Second Street, Suite 200 ▪ Juneau, Alaska 99801 ▪ Tel (907)586-1325, Fax (907)-463-5480

T-714

August 2, 2002

Dale Bosworth, Chief
United States Department of Agriculture
Forest Service
Stop Code: 1144
201 14th Street @ Independence Avenue, S.W.
Washington D.C. 20250

Dear Chief Bosworth:

Again, thank you for your efforts in meeting with local Alaskan officials in order to better understand our state's dilemma regarding timber harvests. I'm now writing to you as President of the Alaska Municipal League, an organization with 142 member municipalities, representing almost 98% of the population of this state. Following are our comments on the Tongass Forest Plan Revision Draft S.E.I.S.

Our official policy statement currently reads in pertinent past:

> In matters concerning management of the National Forests in Alaska, the planning process established by Congress should be followed and the information and recommendations derived from that process be considered prior to executive or congressional action that would affect those forests. Municipalities should be treated as partners, not only as stakeholders in the planning process. Communities' recommendations should be accorded significant weight in matters regarding Alaska's National Forests.
>
> Congress has passed the National Forest Management Act and the National Environmental Policy Act, which establish an open public process for deciding how national forests should be managed. This process should be used to guide the decision-making process.

In addition virtually all of the local officials that I have contacted endorsed preferred Alternative 1, i.e. the "No-Action Alternative" and we applaud the Forest Service for their thorough analysis of the conditions which support this position.

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Alaska is currently struggling to improve a lamentable economy. The fisheries are grappling with woefully low prices, petroleum production is waning, coal is in trouble, agriculture has many problems and mineral activity has waned as well. Increasing wilderness areas would exacerbate the great difficulties faced by our decimated timber industry, (down to much less than 100 MMBF per annum from a high average of 520 MMBF harvest some years ago.) We'll never cut more than 4% of the Tongass in a hundred years! Please allow our National Forests to realize the multiple-use policy of the great founder and visionary Gifford Pinchot and make the appropriate recommendations to congress.

Thank you,

John "Jack" Shay
President, Alaska Municipal League
Mayor, Ketchikan Gateway Borough

Cc: USDA FS Tongass National Forest Content Team
Senator Frank Murkowski
Senator Ted Stevens
Representative Don Young
Governor Tony Knowles
Southeast Conference

F-A56

T-1536

KETCHIKAN
GATEWAY
BOROUGH

OFFICE OF THE MAYOR
John "Jack" Shay
344 Front Street
Ketchikan, AK 99901-6494
907-228-6605
(Fax) 907-247-8439

August 13, 2002

USDA FS Tongass NF
Content Analysis Team
Post Office Box 9079
Missoula, Montana 59807

RECEIVED
AUG 19 2002
CAET

Re: Comments of the Ketchikan Gateway Borough, Alaska on the Tongass Land Management Plan Revision Draft Supplemental Environmental Impact Statement – Roadless Area Evaluation for Wilderness Recommendations

Dear Content Analysis Team:

This letter sets forth the formal comments of the Ketchikan Gateway Borough on the Tongass Land Management Plan Revision Draft Supplemental Environmental Impact Statement – Roadless Area Evaluation for Wilderness Recommendations (DSEIS). The Mayor and Assembly of the Ketchikan Gateway Borough support the DSEIS's Preferred Alternative and strongly oppose the Forest Service recommending any additional wilderness in the Tongass National Forest.

The Alaska National Interest Land Conservation Act (ANILCA) set aside some 5.4 million acres of the Tongass as Wilderness. The Tongass Timber Reform Act (TTRA) designated an additional 1.2 million acres as Wilderness and Congressional LUD II lands. Under the 1997 TLMP, 13 million acres of the Tongass are in Wilderness, National Monument, and mostly natural land use designations. Under the revised forest plan at least 90% of the roadless areas on the Tongass will remain roadless at the time of the next plan revision.

Especially given the vast areas of wilderness and other lands where development is restricted under the forest plan, a recommendation to designate additional wilderness will have adverse impacts on essentially all areas of concern to the

Mayor/Personal Address: P.O. Box 3159, Ketchikan, AK 99901
Telephone 225-7429

Ketchikan Gateway Borough and its residents. These include impacts on natural resource based industries such as wood products, mining, and tourism. They also include impacts on recreation opportunities available to both visitors and local residents. Any recommendation to designate additional wilderness will also have negative impacts on the infrastructure needs of the Borough and the region, such as transportation and utility systems.

The decline in the availability of economic timber from the Tongass and the resulting downturn in the timber industry has had a devastating impact on the social and economic well being of the Borough. As the DSEIS points out, in the period from 1990-1999 all Southeast Alaska boroughs lost timber industry jobs. Regionwide, the number of timber industry jobs fell from approximately 3400 to 700. The greatest decline, 1024 jobs, occurred in the Ketchikan Gateway Borough, representing over 70% of the Borough's wood products employment. During that same time period, per capita income declined 7%, having increased by 24% in the previous ten-year period. The 1997 TLMP reduced the timber base from 2.4 million acres to the 676,000 acres presently scheduled as available for timber harvest activities. Further reduction in the availability of economic timber will further erode the economic and social stability of the Borough. Additionally, with the Borough's acquisition of an ownership interest in a veneer plant, the Borough has both a governmental interest in the economic health of the region and a financial interest in the vitality of the timber industry.

Recommending more wilderness on the Tongass will make additional mineral resources unavailable. Southeast Alaska has significant deposits of molybdenum, uranium, tungsten, and other strategic minerals,, as well as gold and silver. Placing these deposits off limits is not only harmful to local economies, but contrary to the national interest.

Recreational opportunity is a recognized wilderness value. However, on the Tongass, additional wilderness would actually have an adverse impact on recreation and tourism. The availability of wilderness experiences on the Tongass is far greater than the demand. According to the SDEIS analysis, the demand for roaded recreation opportunity is greater than the supply, and demand for semi-primitive motorized recreation may soon exceed supply. In contrast, the supply of recreational opportunities in non-motorized setting is projected to exceed demand. These circumstances have implications for both tourism and recreation.

The time, expense and physical challenges involved in experiencing the roadless areas of the Tongass put them beyond the reach of many local residents and visitors. Further restrictions on the accessibility of recreation areas by recommending additional wilderness will hamper the tourism sector of the Borough's already-struggling economy and restrict the recreational opportunities of its residents.

Mayor/Personal Address: P.O. Box 3159, Ketchikan, AK 99901
Telephone 225-7429

An important aspect of restoring economic stability to the region has been infrastructure projects of local governments and others to provide more efficient transportation and utility systems. Recommending additional wilderness designation has the potential to make these projects impossible to carry out. Such actions could eliminate road access from Ketchikan and Wrangell to the mainland through the proposed Bradfield Canal Route, and could also eliminate other needed road developments benefitting other communities in Southeast Alaska. At its extreme, such designations could block any road access whatsoever to Southeast Alaska. Additional wilderness recommendations could also preclude the development of the power line routes needed for the Southeast Alaska Electrical Intertie.

In adopting ANILCA, Congress specifically found that it had struck the proper balance between areas designated for multiple use and those designated for wilderness purposes. It further instructed the Forest Service to not conduct additional roadless area reviews for the purpose of wilderness designation. TTRA recognized that the Forest Service must provide sufficient timber to support the industry and the timber-dependent communities of Southeast Alaska. The Preferred Alternative for the draft SEIS is consistent with this Congressional direction. The Preferred Alternative would not change the 1997 TLMP revision. The 1997 TLMP was developed after years of effort and millions of dollars being spent. That revision emphasized fish and wildlife habitat protection to the detriment of the local and regional economies of Southeast Alaska, and especially the Ketchikan Gateway Borough. Because there is no need for additional wilderness on the Tongass and wilderness recommendations would eliminate proposed transportation and utility projects, withdraw areas from mineral production, restrict tourism and recreation opportunities, and affect the future economic development of Southeast Alaska communities, the DSEIS Preferred Alternative should be adopted by the Forest Service.

As the Mayor of the Ketchikan Gateway Borough, I attended and listened to the public comments made at the hearing held in Ketchikan, Alaska. Several people asked if the Forest Service was going to attempt to count comments pro and con and then use the count to affect the final decision as the Forest Service as so often done under the Clinton administration. District Ranger Jerry Ingersoll clearly stated "NO" they were not. Sadly, we are already hearing Forest Service employees saying in public that they may consider recommending more wilderness because most of the people who spoke at the hearings wanted more wilderness. You know and I know the mix of people commenting at the hearings does not, by anyone's imagination, represent the majority of Southeast Alaskans' position on this subject. I know of no law requiring the Forest Service to base decisions on how the people comment (vote). Your decision must be based on science, professional knowledge, sound forest management principles, and local government and local citizen cooperation and input. The Ketchikan Gateway Borough urges you to stick to your preferred alternative of no more wilderness on the Tongass National Forest.

Mayor/Personal Address: P.O. Box 3159, Ketchikan, AK 99901
Telephone 225-7429

Please do not jeopardize the professional reputation of the Forest Service more by reverting back to comment counting to support a decision.

Sincerely,

Jack Shay
Mayor

cc: Mark Rey, Under Secretary for Natural Resources & Environment
Dale Bosworth, Chief
Dennis Bschor, Regional Forester, USDA FS - Juneau
Tom Puchlerz, Forest Supervisor, USDA FS - Ketchikan
Steve Brink, Deputy Regional Forester, USDA FS - Juneau
Senator Ted Stevens
Senator Frank Murkowski
Congressman Don Young

Mayor/Personal Address: P.O. Box 3159, Ketchikan, AK 99901
Telephone 225-7429

T-1605

CITY OF KUPREANOF ALASKA

Post Office Box 50
Petersburg, Alaska 99833

12 August 2002

USDA FS Tongass NF
Content Analysis Team
PO Box 9079
Missoula, MT 59807

Dear Analysis Team:

Please find enclosed comments from the City of Kupreanof to The Tongass Land Management Plan Revision - Draft Supplemental Environmental Impact Statement.

Sincerely,

CITY OF KUPREANOF

Richard Sprague, Mayor

RECEIVED
AUG 19 2002
CAET

To the Tongass National Forest:

The City of Kupreanof supports increased protection for presently unroaded areas of the Tongass National Forest. Experience has shown that Wilderness status is the only sure way to protect the fish and wildlife habitat values and recreation and aesthetic values of National Forest land in the long term. Please consider our input below regarding Wilderness designation for specific Roadless Areas described in the 2002 Wilderness Draft Supplemental Environmental Impact Statement (SEIS).

The citizens of Kupreanof chose to lead a subsistence lifestyle that is closely tied to the land, leaving our environment in as undeveloped a state as is practical. Within our own community, the Kupreanof Policy Plan (1984) declares our intention to "preserve a roadless community" and "oppose all road construction within [City of Kupreanof] boundaries," and we have enacted and enforced ordinances to ensure that these goals are achieved. We feel that surrounding areas of the Tongass National Forest that are important to Kupreanof community members must also be maintained in a roadless condition, to ensure healthy and harvestable fish and wildlife populations and to allow the citizens of Kupreanof, and all who visit the Tongass, to experience the peace and wonder that is found in wild places "where man himself is a visitor who does not remain" (Wilderness Act of 1964). Compromising the wilderness values of the areas listed below will adversely affect both the livelihood of our residents, many of whom fish commercially, and the desirability of living in our community.

The City of Kupreanof supports an alternative for the Wilderness SEIS that lies somewhere between the Proposed Alternative 5 and 6. We are not opposed to small timber sales in existing roaded areas that would support local businesses. However, we are opposed to new roads being built in areas that are currently roadless. Wilderness designation is the only way to ensure that roadless areas remain roadless, for as long as the Wilderness Act is in force.

Recommendations for Specific Roadless Areas

244 Bay of Pillars & 245 East Kuiu: These areas have been repeatedly recommended for Wilderness designation, and the City of Kupreanof has long been on record as supporting this recommendation. Wilderness designation is needed to ensure that the central portion of Kuiu Island does not turn into the maze of clearcuts and logging roads that characterize North Kuiu. These important areas are used by members of our community for both commercial fishing and subsistence, and have been used in the past as ecotourism destinations by Kupreanof guides.

213 Five Mile: We would like to see this area added to the Petersburg-Duncan Salt Chuck Wilderness. The City of Kupreanof has discussed with the Petersburg Ranger District the possibility of constructing a loop trail that connects this drainage with Petersburg Creek to the west, and with the Kupreanof waterfront trail to the south. We presently have a grant from the State of Alaska to begin laying out a route for this trail. The loop trail would take 2-3 days to hike, and would represent an unparalled

recreational opportunity in Southeast Alaska. We are not aware of any other hiking loop of this length, especially not one that could be so easily accessed by tourists from either the ferry system or by scheduled air carrier. The route appears to be free of avalanche dangers, making it available for winter travel as well as for summer hikes. The pass that would connect the Five Mile Drainage with Petersburg Creek is open, with outstanding views of the precipitous south face of the peak to the north. The Five Mile drainage itself has excellent views of the glaciers and mountains of the Coast Range to the east. We feel that Wilderness designation is needed to ensure that the exceptional scenic values of the Five Mile Creek watershed are retained, especially as this area is so close to a major Southeast Alaskan community.

308 Port Houghton, 201 Fanshaw, & 202 Spires: We would like to see the entire Port Houghton drainage, Cape Fanshaw, Farragut Bay, and the shoreline from Farragut Bay to Thomas Bay recommended for Wilderness designation. As USFS well knows, Port Houghton is critically important for commercial fish production and an important ecotourism destination. Wilderness designation of Port Houghton is also needed to provide a refuge for wildlife to balance the extreme development that has occurred in Hobart Bay to the north. Port Houghton, as well as the remainder of the coastline south to Thomas Bay, are important subsistence and recreational areas for Kupreanof community members, and have great scenic value for boaters in Frederick Sound, particularly participants in whale watching cruises.

218 Woewodski: Woewodski Island is one of the largest unroaded islands remaining in the Tongass, and the largest in the immediate area. The island is extensively used by local residents for hunting and recreation and is one of the most consistent and easily reached places to hear and see wolves in the area. Woewodski Island has limited timber resources, and we feel that it is well suited to being managed as a designated Wilderness to provide wildlife habitat and a place for recreation for those who cannot or do not chose to travel to more remote Wildernesses.

214 & 215 Castle River Drainage: We support a Wilderness designation for the entire Castle River drainage. The excellent sport and subsistence fisheries on Castle River draw both residents and visitors to the area, and there is broad community support for leaving this area in a wild state. As the SEIS states, "the opportunity for solitude is very high and the opportunity for primitive recreation is outstanding." The uplands of the Castle River drainage are heavily used by waterfowl during migration, and the tidelands are an important waterfowl hunting area.

243 Rocky Pass: We are encouraged that USFS currently manages this area as a collection of nondevelopment LUDs, but we feel that it deserves more permanent protection as Wilderness. Rocky Pass offers an opportunity for small boat exploration in an unusually protected yet wild setting. Wolves can be see along the shores, fishing and hunting are excellent in the many bays, and the area is reasonably accessible (from Kake) without being overrun, or likely to become so for the foreseeable future. Kupreanof residents use Rocky Pass for both for recreation and for hunting. The Rocky Pass area is also the connection between Kupreanof and Kuiu Islands for dispersing wildlife, an

important connection to maintain in the highly fragmented island environment of Southeast Alaska.

We appreciate the opportunity to participate in the Tongass National Forest planning process. Please continue to involve the City of Kupreanof in this and future planning activities for the Tongass.

Sincerely,

Richard Sprague
Mayor, City of Kupreanof

City of Kupreanof
PO Box 50
Petersburg Alaska 99833

T-1703

City of Pelican

BOX 737 - PELICAN, ALASKA 99832 - PHONE: 735-2202/2203 - FAX: 735-2258 - E-MAIL: pelikan@ptialaska.net - WEBSITE: www.pelican.net

CITY OF PELICAN
RESOLUTION # 2002-5

A RESOLUTION FOR THE CITY OF PELICAN, ALASKA URGING THE UNITED STATES FOREST SERVICE TO SAFEGUARD IMPORTANT COMMUNITY USE AREAS DURING ITS TONGASS WILDERNESS EVALUATION

WHEREAS, the residents of the community of Pelican, Alaska are heavily dependent on the resources of the Tongass National Forest for our health, livelihoods and lifestyles; and

WHEREAS, the revised Tongass Land Management Plan (TLMP) fails to adequately safeguard the lands utilized by the people of Pelican. The current TLMP plans intensive logging activities in important community use areas on Admiralty, Baranof and Chichagof; and

WHEREAS, the draft TLMP Supplemental Environmental Impact Statement Wilderness Evaluation recommends no new Congressional protections for Tongass wildlands; and

WHEREAS, the Forest Service's draft preferred alternative fails to adequately recognize the value of providing lasting protection to important watersheds and habitats in the Tongass, the history of previous protections, and long-standing community concerns; and

WHEREAS, the Forest Service has indicated that it plans logging and road building in all areas not currently Congressionally or administratively protected, including important watersheds used by residents of Tenakee Springs for hunting, fishing, recreation, tourism, subsistence harvesting; and

WHEREAS, clearcut logging and road building have detrimental effects on fish and game populations, and related activities such as subsistence, fishing, hunting, recreation and tourism; and

RESOLUTION 2002-5
PAGE 2

WHEREAS, many important watersheds that were previously safeguarded by the Tongass Timber Reform Act as passed by the House of Representatives 1989 and the final 1999 Tongass Land Management Plan Record of Decision are scheduled for logging in the next ten years; and

WHEREAS, it is in Pelican's best interest that these and other watersheds remain intact to provide subsistence, fishing, hunting, recreation, and tourism opportunities.

NOW, THEREFORE BE IT RESOLVED that the City Council of Pelican, Alaska urges the Forest Service to heed the requests of communities, tribes, and individuals by recommending important watersheds for lasting protection.

PASSED, APPROVED AND ADOPTED THIS 6th **DAY OF** August, **2002.**

Signed: Kathie Wasserman
Kathie Wasserman, Mayor

Attest:

Betty L. Bean
Betty L. Bean, City Clerk/Treasurer

RECEIVED
AUG 20 2002
CAET

F-A61

T-1719

CITY OF PORT ALEXANDER

P.O. Box 8068 Port Alexander, AK 99836 907/568-2211 Fax 907-568-2207

Resolution No 02-09

A Resolution Urging the United States Forest Service to Safeguard Important Community Use Areas

Whereas, the residents of Port Alexander Alaska are heavily dependent on the resources of the Tongass National Forest for our water, health, livelihoods, and lifestyles; and

Whereas, the revised Tongass Land Management Plan (TLMP) fails to adequately safeguard the lands utilized by the people of Port Alexander; and

Whereas, the draft TLMP Supplemental Environmental Impact Statement Wilderness Evaluation recommends no new Congressional protections for Tongass wildlands; and

Whereas, the Forest Service's draft preferred alternative fails to adequately recognize the value of providing lasting protection to important habitats in the Tongass, the history of previous protections and long standing community concerns; and

Therefore, Be It Resolved that The Council for Port Alexander urges the Forest Service to heed the requests of communities and individuals by recommending important habitats for lasting protection; and

Be It Further Resolved that the City of Port Alexander urges the Forest Service to select the Alaska Rainforest Conservation Act Alternative (Alternative 6) as its final decision.

ADOPTED this 5th day of August, 2002, at a Port Alexander City council meeting.

David D Wallen
David D Wallen, mayor

ATTEST: Karen Maley
Karen Maley, city clerk

RECEIVED
AUG 20 2002
CAET

T-2125

348 W 12th Street
Phone: (907) 586-1819
Fax: (907) 586-2819
marc_wheeler@yahoo.com

FROM THE DESK OF
MARC WHEELER

August 16, 2002

USDA Tongass National Forest – CAT
PO Box 9079
Missoula, MT 59807

To whom it May Concern:

As a local elected official in Juneau, Alaska, I believe the Forest Service has failed to recognize the wilderness values of Tongass National Forest lands in the Juneau area. I urge the Forest Service to reconsider its Preferred Alternative to recommend the following additional Forest Service lands in the Juneau area for Wilderness protection: Berners Bay, Cowee and Davies Creek, the Mansfield Peninsula, and Benjamin Island.

Berners Bay: This area provides outstanding recreational opportunities to Juneau residents for boating, kayaking, canoeing, hunting, and fishing. Berners Bay is Juneau's "Backyard Wilderness." The area has meant so much to me and my wife that we decided to get married there in June of this year. Please recommend the current LUD II area for Wilderness protection to safeguard against roads and mining.

Cowee and Davies Creeks: These watersheds feed an important sport and commercial fishery, and are some of the few watersheds on the Juneau road system that provide brown bear habitat. I enjoy fishing for coho salmon and Dolly Varden trout on Cowee Creek's lower reaches. I have also enjoyed the magnificent sight of the Davies Creek glacier, which calves down a 1000 foot cliff in a magnificent explosion of ice and snow. Please recommend these watersheds for Wilderness protection.

The Mansfield Peninsula: Juneau deer hunters heavily use this area on the northern tip of Admiralty Island. Please recommend the area for Wilderness protection and addition to the National Monument to protect deer hunting opportunities for future generations.

Benjamin Island: This small island near the Juneau road system provides a critical haul-out for Steller sea lions and has unique local fauna. It is one of my favorite spots for deer hunting, since it's easily reached from the road system by kayak, and easily covered by foot. Please recommend the island for Wilderness designation to protect its unique wildlife.

I have limited my recommendations to local Juneau areas to respect the opinions of elected officials and citizens from other Tongass communities. Folks in other communities may feel differently about increased protection of Forest Service lands near their community. In Juneau, however, I believe you would find large spread support for providing additional protection for the lands listed above.

Thank you for the opportunity to provide comments,

Marc Wheeler
Areawide Assemblymember
City and Borough of Juneau

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AUG 23 2002
CAET

T-2182

Eileen Scheldt
City of Thorne Bay
P.O. Box 19110
Thorne Bay AK 99919 USA

date transferred: Thursday, August 15, 2002
date submitted: August 8, 2002, 12:35 pm EDT

Text:

City of Thorne Bay
Resolution 02-08-01-02

A Resolution of the City Council of the City of Thorne Bay, Alaska, Supporting US Forest Service Alternative Plan Number One for the Draft SEIS

WHEREAS, the City Council is the governing Body for the City of Thorne Bay, Alaska; and

WHEREAS, the Supplemental Enivronmental Impact Statement (SEIS) was orderd by the Federal District Court of Alaska in Sierra Club vs. Rey, because 1997 Forst Plan Revision Final EIS did not include alternatives that considered Wilderness recommendations; and

WHEREAS, the draft SEIS has evaluated 115 inventoried roadless areas that make up about 9,680,000 acres, or 58 precent of the Tongass National Forest; and

WHEREAS, it is the No-Action Alterniative, and represents the 1997 Forest Plan Revision land allocations and standards and guidelines, which are used to provide resource protection and emphasis for the Tongass National Forest.

NOW, THEREFORE, BE IT RESOLVED that the City Council for the City of Thorne Bay, Alaska supports the US Forest Service Alternative Plan Number One for the Draft SEIS.

PASSED AND APPROVED ON August 1, 2002

Wallace J. Greentree, Mayor

ATTEST:
Eileen Scheldt, City Clerk

[Sponsor: Steve Scheldt]

A copy of the Resolution can be provided upon request.

T-3236

KETCHIKAN
GATEWAY
BOROUGH

OFFICE OF THE MAYOR
344 Front Street
Ketchikan, AK 99901-6494
907-228-6605
(Fax) 907-247-8439

August 13, 2002

USDA FS Tongass NF
Content Analysis Team
Post Office Box 9079
Missoula, Montana 59807

Thank you for the opportunity to comment on your draft Supplemental EIS for Roadless Area Evaluation for Wilderness Recommendations.

We recognize you were ordered to prepare this draft by Judge Singleton; however, we hope you recognize the entire effort is a waste of time and is in violation of the language in ANILCA that was intended to prevent roadless and wilderness studies at least until the current Land Management Plan has been implemented. This continuing interruption of the timber sale program and other programs on the Tongass must end.

F-A63

Key Issue #1, Additional wilderness designation will provide greater long-term protection of roadless areas on the Tongass National Forest than is provided by the 1997 Tongass Forest Plan.

There are already more than enough wilderness areas designated by Congress on the Tongass. This forest has been picked over by wilderness advocates twice before and their wilderness wish lists were granted. The areas remaining have been passed over twice before and consequently are third-rate wilderness areas. On the other hand, our timber industry has been driven to the brink of extinction during this wilderness expansion era.

Additionally, there are millions of acres of alpine meadows and sub-alpine timber that are wonderful hiking and hunting areas in the roadless areas that are planned for multiple use. Most of these areas are too remote to be available to Southeast Alaska residents who work and have at most a day or two to recreate each week. Also, with the aging of our population there is a growing number of persons with disabilities. These citizens have an absolute right to experience the profound enrichments of forest visits. The access provided by roads into the valleys below these alpine areas thus provide a recreation opportunity for all these people, whereas maintaining these areas as roadless precludes any realistic access to all but the very rich or those who have the time, vitality or physical ability to hike many miles overland before hiking up into the alpine areas.

The ecology of the forest can be enhanced by proper management. Song birds and small mammals thrive in the clear cut areas where logging has occurred.

- The normal clearcut size on the Tongass provides greatly enhanced deer habitat because there is improved browse in the clearcuts and adequate cover both summer and winter in the adjacent stands of timber.

- The 200+ foot buffer (100 on each side of the high water line) for fish streams also provides cover and feed for deer in harsh winters. Deer typically find haven in the timbered draws during harsh winters. The draws provide shelter from the wind and from the deep snow, water to drink and the slopes adjacent to these small streams provides good winter browse.

- The second growth stands provide less browse when the trees are very dense and blocks the sunlight, but this can be prevented by sound forest management such as pre-commercial and commercial thinning.

Key Issue #2 Additional Wilderness designation will affect the social and economic well-being of the communities of Southeast Alaska.

You correctly state in your draft SEIS that there is very little private land in Southeast so the impacts of federal land management decisions are much more severe than in other regions where there is a smaller percentage of federal land.

Our timber industry has been and is short of timber in both the short term and the long term. We do not agree with the Forest Service practice of using the prior year's harvest level as part of the calculation of the demand for timber. The harvest levels have been artificially constrained and to use those harvest levels to determine how much timber to make available simply provides a self-fulfilling prophesy. The industry cannot rebuild and become viable again without an assured supply of economic timber. As we all know, it takes an average of three years to harvest timber sales because of the extensive road building requirements and because of all the constraints imposed on both construction and harvesting activities. The industry must have at least 300 MMbf of annual harvest to be viable. The current Land Management Plan provides for a maximum of only 267 MMbf and the industry is counting on state timber sales to make up the difference in order to achieve the needed 300 MMbf. The demand calculation should not be a reason to provide less than the volume needed to remain viable. Currently there is only about 300 MMbf of supply. The goal is to raise this to 900 MMbf in order to achieve the three year supply. Designating more wilderness will make it impossible to achieve this goal.

Do not make any land management decisions that will preclude the timber industry from becoming viable. Any additional wilderness withdrawals will only further erode the confidence investors have that the Forest Service will be able to provide timber to the dependent manufacturing industry in Southeast Alaska. Additional wilderness withdrawals will also reward and encourage additional attempts to lock up the last remaining multiple-use areas on the Tongass.

Access across federal lands has frequently been a problem. Proposing wilderness areas will add to that problem. Language that purports to provide access across wilderness boundaries has been ineffectual.

We need to restore balance to the management of the Tongass. Currently there are vast unutilized wilderness withdrawals on the Tongass. At the same time there is insufficient multiple use land to

Mayor/Personal Address: P.O. Box 3159, Ketchikan, AK 99901
Telephone 225-7429

assure a viable timber industry. Adding even one acre of wilderness in a misguided attempt to assuage wilderness advocates will do nothing to help restore balance. Keep in mind that posted on their web site, the Alaska Rainforest Campaign has two overarching goals:

- "To limit logging in the Tongass and Chugach National Forests to no more than today's historically low levels; and,
- To permanently protect areas of the Tongass and Chugach from logging and other harmful development."

The Forest Service should continue to have the management courage to maintain the no-action alternative for this SEIS. The Forest Service should, upon completion of this SEIS, begin a Plan revision that will restore some of the multiple-use areas and make the changes necessary to provide for a viable timber industry.

Some of the wilderness proponents are soliciting pro-wilderness comments through a misinformation campaign (e.g. the Rainforest Coalition web site states: "*During the last 45 years, the Alaska timber industry has clearcut over 1 million acres of old-growth forest and built more than 4,650 miles of logging roads in the Tongass.*" That is incorrect. Only about 400,000 acres have been harvested over the last 95 years and some of that is now in areas that have been designated as wilderness. Also, many of these roads have been "put to bed" or are otherwise overgrown and unusable. Others use money making schemes to sell form letter comments through the internet. Still others are promoting wilderness in order to further their anti-logging beliefs, not because there is a shortage of wilderness. The comments generated in these ways should be disregarded. The Forest Service should instead listen to the comments of the local communities and people that will be directly affected by additional wilderness withdrawals.

Sincerely,

John "Jack" Shay
Mayor

cc: Dennis Bschor, Regional Forester, USDA FS Region 10
Mark Rey, Under Secretary for Natural Resources & Environment
Dale Bosworth, Chief
Tom Puchlerz, Forest Supervisor, USDA FS - Ketchikan
Steve Brink, Deputy Regional Forester, USDA FS-Juneau
Senator Ted Stevens
Senator Frank Murkowski
Congressman Don Young

Mayor/Personal Address: P.O. Box 3159, Ketchikan, AK 99901
Telephone 225-7429

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AUG 19 2002
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T-546

Gustavus Community Association

Post Office Box 62
Gustavus, Alaska 99826

July 21, 2002

To: USDA Tongass National Forest—CAT
P.O. Box 9079
Missoula, MT 59807

FAX (406) 329-3556

Dear Sir or Madam:

As we have consistently stated for more than a decade, the Gustavus Community Association (GCA) supports increased protection from clearcut logging for the Tongass National Forest, and as well supported the inclusion of the Tongass in the Forest Service's roadless initiative. At the same time, GCA has consistently supported a truly sustainable value-added wood products industry based on cutting timber from the Tongass' existing road system.

The residents of the community of Gustavus are heavily dependent on the resources of the Tongass for our businesses, for subsistence, and for recreation. The revised Tongass Land Management Plan failed to adequately protect areas important to the community of Gustavus. Of particular concern are Chicken Creek, (part of Roadless Area 342) and Pt. Couverden (Roadless Area 304).

The Gustavus Community Association urges the Forest Service to select the Alaska Rainforest Conservation Alternative (Alternative 6) as its final decision.

Thank you for this opportunity to testify on this vital issue.

Sincerely,

Gregory P. Streveler
Chairman
Gustavus Community Association

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T-566

PRINCE OF WALES COMMUNITY ADVISORY COUNCIL

Jon Bolling, Chairman
Craig Templin, Vice-Chairman
Eileen Scheldt, Sec./Treas.

PO Box 725
Craig, AK 99921
Phone: 907-826-3275
Fax: 907-826-3278

July 26, 2002

USDA FS Tongass NF
Content Analysis Team
PO Box 9079
Missoula, MT 59807

Re: Draft **SEIS Tongass Land Management Plan Revision**

Dear Sirs:

The Prince of Wales Community Advisory Council met July 23rd at a regularly scheduled meeting. Because of high interest in the **SEIS** we had requested that the USFS give an informational presentation at that meeting. Mr. Dewayne Thornburgh, planning officer, of the Thorne Bay Ranger District did hold an open house and presented maps of all of the alternatives as well as other information at the meeting. He also answered many questions from the meeting participants.

A motion to support **Alternative 1** (the no action alternative) was made. POWCAC members in attendance (from Craig, Coffman Cove, Thorne Bay, Naukati, Whale Pass and the Prince of Wales Chamber of Commerce) unanimously passed the motion and this letter was drafted as a result.

Specifically cited were the many hours of previous community participation that went into the 1997 Forest Plan Revision.

Sincerely,

Craig L. Templin
Vice-Chairman

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JUL 30 2002
CAET

PARTICIPATING COMMUNITIES
Coffman Cove, Craig, Hollis, Hydaburg, Kasaan, Klawock, Naukati, Thorne Bay, Whale Pass

T-1002

Saltery Cove Community
PO Box 9844
Ketchikan, AK 99901

July 26, 2002

USDA Tongass National Forest
PO Box 9079
Missoula, MT 59807

RE: TLMP Revision 2002

The community of Saltery Cove, located in VCU 519, supports Alternative 6 as our preferred alternative. The community of Saltery Cove consists of 20 families spread around the Cove on fourteen lots and five tracts. We come from varying backgrounds, from loggers, teachers, pilots, state workers, to lawyers, moving to Saltery Cove because of the availability of private land, but more because of the desire to live in and be sustained by the great Alaskan Wilderness.

We were very disappointed in 1991 when we found out McKenzie Inlet would be harvested. McKenzie is our backyard. It was the last area around Skowl Arm where you could go and not see evidence of logging or man for that matter. It is where we go to hunt, fish, crab and shrimp. McKenzie is where we took our friends and relatives when we wanted to show them what Alaska used to look like. It was a beautiful area, but we also realized the desire to harvest the marketable timber located there, so most of us said and did nothing to deter from that. We do, however, have some serious objections about the proposed harvest in VCU 519.

The proposed Cholmondeley Sale DEIS plans to log and road this community's watershed. The community's domestic watershed is located in VCU 519. Clean and uncontaminated water is necessary to sustain this community. The watershed that supplies our homes and businesses will suffer degradation by adding sediment and contaminates if the proposed roads and logging in this area is allowed. The Forest Service DEIS has left no doubt that the quality and quantity of our water would be compromised. A change in wind patterns and velocity as a result of any logging is also a concern. The proposed LTF is in a subsistence fishing and shrimping area. The small lake, located in VCU 519, has a very delicate ecosystem. It serves as a nesting area for Canada Geese, and migratory resting area for Trumpeter Swans in the winter and spring.

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Steelhead, Cutthroat, Coho and Pink Salmon also use the lake and its drainage. The proposed wildlife corridor is fragmented and will not be sufficient to sustain the deer, gray wolf, bear and other wildlife in the area.

We are not being unreasonable requesting Alternative 6. This is a small area with little economic value to the Forest Service in comparison to the effect it will have on our community. The lodge and visitors currently put more money into the Ketchikan economy (fuel, air taxis, lodging, etc.) than logging will produce. Logging in areas where there is no conflict with small communities would be a better idea.

Sincerely,

Saltery Cove Community

Cc: SEACC
419 6th Street, Suite 200
Juneau, AK 99801

A RESOLUTION BY THE COMMUNITTIES OF SALTERY COVE, SUNNY COVE, WEST ARM CANNERY, SPORTSMAN'S COVE LODGE AND CLOVER BAY LODGE URGING THE UNITED STATES FOREST SERVICE TO PROTECT THE AREAS THAT AFFECT OUR LIVELIHOODS AND QUALITY OF LIFE.

Whereas, the revised Tongass Land Management Plan fails to adequately protect the drinking watersheds of the communities and lodges from degradation that will result from proposed road building and logging activities.

Whereas, the Forest Service has indicated that it prefers to road and log the Cholmondeley (VCU 519) without regard to the degradation of the drinking watersheds of the communities caused by road building and logging or the adverse affects of large clearcuts on the thriving tourism industry in this area.

Whereas, the Forest Service has not given adequate consideration to the people who now live in the proposed logging areas. The Tongass is home to many ways of life, not just logging.

Whereas, Visitors to this area are interested in scenic wilderness areas with thriving wildlife communities, not an area surrounded by large clearcuts.

Whereas, many community jobs depend on having clean water and an unlogged and scenic viewshed.

Whereas, logging and roadbuilding on the proposed scale of the Cholmondeley Sale will have adverse affect on the thriving wildlife populations the Cholmondeley sale area now provides for.

Whereas, the clean drinking water necessary to maintain the communities and lodges will be degregated by the proposed logging and roading of our watersheds.

Whereas, the proposed logging and log transfer facilities will damage areas currently used for subsistence and commercial fisheries.

Whereas, the Cholmondeley area is one of the largest unlogged, unroaded areas left on Prince of Wales Island.

Whereas, the proposed Cholmondeley sale would leave a fragmented inadequate wildlife corridor, placing VCU 519,507 and 531 in LUD II, would provide the only unroaded and unlogged cross island corridor on Prince of Wales Island for the wildlife.

Whereas, the Forest Service has timber available in already roaded and logged areas.

Whereas, the Forest Service's economic analysis focuses on the value of timber without documenting or analyzing the economic value of other industries or resources.

Whereas, the Forest Service has not provided an analysis of the economic value of the existing lodges to the local economy.

Therefore, be it resolved that the communities of Saltery Cove, Sunny Cove, West Arm Cannery, Sportsman's Cove Lodge and Clover Bay Lodge request that VCU 519 be designated as LUD II.

Further be it resolved that the communities of Saltery Cove, Sunny Cove, West Arm Cannery, Sportsman's Cove Lodge and Clover Bay Lodge support Alternative 6 as our preferred alternative.

Dated this day 10th day of August

Liz Williams — For Saltery Cove, P O Box 361, Kasaan, Alaska 99950-0340

Larry McQuarrie — For Sportsman's Cove Lodge, P O Box 9618, Ketchikan, Alaska 99901

Carole Taylor — For Sunny Cove, P O Box 5235, Ketchikan, Alaska 99901

Bonnie Oaksmith — For Clover Bay Lodge, P O Box 8944, Ketchikan, Alaska 99901

Carole Taylor — For West Arm Cannery, P O Box 5235, Ketchikan, Alaska 99901

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AUG 19 2002
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T-1708

CITY OF CRAIG ALASKA

FAX NUMBER CALLING: Various

DATE: 8/8/02

TO: All POWCAC Members

In Naukati: Please hold for Hal & Dorothy Sheppard.

FROM: Jon Bolling

TELECOPIER: (907) 826-3278

NUMBER OF PAGES (INCLUDING COVER SHEET): Two

IF ANY PROBLEMS OR TO CONFIRM TRANSMISSION CALL:

AT (907) 826-3275

DOCUMENTS BEING TRANSMITTED: Attached is POWCAC Resolution 02-02.

Please have your governing bodies consider approving the resolution as soon as possible, as the comment deadline on this matter is August 17. I will send you originals in the mail.

Please call me if you have any questions.

Jon Bolling

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AUG 20 2002
CAET

(907) 826-3275 • Fax (907) 826-3278 P.O. Box 725, Craig, Alaska 99921

PRINCE OF WALES COMMUNITY ADVISORY COUNCIL
RESOLUTION No. 02-02

A JOINT RESOLUTION BY AND BETWEEN THE COMMUNITIES OF THE PRINCE OF WALES COMMUNITY ADVISORY COUNCIL (POWCAC) SUPPORTING ALTERNATIVE No.1 OF THE 2002 ROADLESS AREA EVLAUATION FOR WILDNERNESS RECOMMENDATIONS DRAFT SEIS

WHEREAS, the Prince of Wales Community Advisory Council acts in an advisory capacity for participating communities on Prince of Wales Island; and,

WHEREAS, the Supplemental Environmental Impact Statement (SEIS) was ordered by the Federal District Court of Alaska when it ruled that the 1997 Forest Plan Revision Final EIS did not include alternatives that considered Wilderness recommendations; and,

WHEREAS, Alternative 1, the No-Action Alternative, is the Preferred Alternative in the Draft SEIS; and,

WHEREAS, the No-Action Alternative is very similar to the 1997 Forest Plan Revision with regard to land use designations, standards and guidelines, which provides a balance of resource protection and utilization within the Tongass National Forest.

NOW, THEREFORE, BE IT RESOLVED that the communities of the Prince of Wales Community Advisory Council hereby recommends adoption of Alternative I of the 2002 Draft SEIS.

PASSED AND APPROVED this 23rd day of July, 2002 by the Prince of Wales Community Advisory Council.

Craig L. Templin

Craig Templin, Vice Chair

ATTEST:

Eileen Scheldt

Eileen Scheldt, Secretary

Passed and approved this _____ day of _____, 2002 by the

_____.