

File Code: 1920
Date: August 13, 2020

Planning Participant
Electronic Mailing List Recipients

Dear Interested Party,

I have decided to amend the Tongass National Forest Land and Resource Management Plan (Forest Plan) after consideration of the need for change, public and agency input, resource specialist recommendations, and applicable laws and regulations. Enclosed is the final Decision Memo for the Tongass National Forest Moderate Vulnerability Karst Forest Plan Amendment.

My decision changes Forest Plan components related to karst and cave resources for young growth management on the page 5-6 of the Forest Plan. Forest Plan Standard S-YG-KC-02 is now removed, Forest Plan Standard S-YG-KC-03 has been amended as shown in the enclosed Decision Memo, and new Management Approaches for Karst and Caves were written to respond to comments received on the project.

Pursuant to 36 CFR 219.17 (a)(2), this plan amendment is effective immediately upon publication of a legal notice in the *Ketchikan Daily News*, the newspaper of record. The Need for Change, Response to Comments, and other supporting documentation can be found on the project webpage at <https://www.fs.usda.gov/project/?project=55198>.

Sincerely,



M. EARL STEWART
Forest Supervisor, Tongass NF

Decision Memo for Moderate Vulnerability Karst Forest Plan Amendment





DECISION MEMO
TONGASS NATIONAL FOREST
TONGASS NATIONAL FOREST LAND AND RESOURCE MANAGEMENT PLAN
MODERATE VULNERABILITY KARST FOREST PLAN AMENDMENT
U.S.D.A. FOREST SERVICE

BACKGROUND

Karst is an area of soluble rocks (typically limestone) where dissolution of underground layers may result in areas of well-developed surface drainage like sinkholes or caves. The amount or type of karst in an area is determined during field surveys. These surveys rate how vulnerable karst is to management activities. Karst vulnerability ratings are assigned based on the degree to which karst has developed. Karst development ranges from lands with deep glacial till and no surface karst features (low vulnerability) to lands with caves and sinkholes (high vulnerability).

Timber harvest activities in old and young growth stands are allowed on lands suitable for timber production as described in the Tongass National Forest Land and Resource Management Plan (Forest Plan), Appendix A. This amendment is for young growth timber harvest on moderate vulnerability karst, which is identified as having some glacial till coverage and visible surface karst features but no sinkholes or caves as would be found in high vulnerability karst areas. The Forest Plan includes plan components that specify where young-growth timber management activities can occur based on karst vulnerability ratings [Forest Plan page 5-6].

NEED FOR CHANGE

Based on project-level inventories, environmental analyses, and the initial findings from a State of Alaska inventory of young-growth stands, the *Tongass Young Growth Suitability Synopsis* (Sheets 2018) found that application of Forest Plan standard S-YG-KC-02¹ reduced the amount of young growth that could otherwise be operable for harvest. The synopsis looked at 94 young-growth stands totaling 7,832 acres and found that 1,156 acres became inoperable in moderate vulnerability karst areas when applying Forest Plan standard S-YG-KC-02. The current Forest Plan standards for commercial harvest on moderate vulnerability karst differ depending on whether the stand is old growth or young growth; standard S-YG-KC-02 requires more restrictive timber harvest standards for young-growth timber harvest than the Forest Plan requires for old-growth timber harvest

After reviewing the synopsis and considering the consequences of implementing S-YG-KC-02, particularly the increased acres of inoperable young growth on moderate vulnerability karst, I have determined there is a need to amend the Forest Plan to meet the objectives to transition to predominantly young-growth harvest. The complete need for change determination can be found on the project webpage at <https://www.fs.usda.gov/project/?project=55198>.

¹ Standards are designated with an S at the beginning. YG represents young growth harvest only. KC represents karsts and caves. This is the second standard for young growth harvest on areas with karsts and caves so is designated as 02.

DECISION

I have decided to amend the Forest Plan after consideration of the need for change, public and agency input, resource specialist recommendations, and applicable laws and regulations. My decision changes the Forest Plan components related to karst and cave resources for young growth management on page 5-6 of the Forest Plan as follows:

Remove Forest Plan Standard:

S-YG-KC-02: On lands identified as moderate vulnerability karst (see Appendix H), the maximum size of any created opening for commercial timber harvest must not exceed 10 acres with a maximum removal of 35 percent of the acres of the original harvested stand.

Amend Standard S-YG-KC-03 from:

S-YG-KC-03: Even-aged management is allowed on lands identified as low vulnerability karst lands. (Consult Appendix H.)

To:

S-YG-KC-03: Commercial timber harvest including even-aged management is allowed on lands identified as low and moderate vulnerability karst following the guidelines in Appendix H and using an interdisciplinary process to determine the management prescription to maintain the natural processes and productivity of the karst landscape.

To address scoping comments that requested the addition of additional Appendix H guidance on young growth, the following Management Approach on Forest Plan page 5-6 is amended from:

Management Approach for Karst and Cave Resources:

It is expected that karst resources be evaluated according to their vulnerability. (Consult Appendix H)

To:

Management Approach for Karst and Cave Resources:

Where young growth management is proposed on karst lands, it is expected that a karst resource inventory and vulnerability assessment be conducted according to Appendix H.

For purposes of young growth management on karst lands, “commercial timber harvest” is intended to include all forms of commercial thinning, even-aged management, two-aged management, and uneven-aged management. Pre-commercial thinning would be appropriate when consistent with the underlying Land Use Designation.

Limited exceptions for pre-commercial and commercial thinning adjacent to karst features may be considered on a case-by-case basis if karst management objectives can be met. Factors expected to be considered include susceptibility to surface disturbance, silvicultural prescription, harvest method, slash treatment method, hydrologic conditions, and size of buffer zones.

DECISION RATIONALE

Tongass Monitoring and Evaluation Reports² have shown that the 2008 Forest Plan karst and cave standards and guidelines for commercial old-growth harvest on moderate vulnerability karst have been effective in protecting karst and cave resources. The current Forest Plan standards for commercial harvest on moderate vulnerability karst differ depending on whether the stand is old growth or young growth. This decision changes Forest Plan components related to karst and cave resources for young growth management to meet desired conditions and objectives for the transition to predominantly young-growth harvest.

After review of the project record and in consultation with the karst resource specialist, I find no rationale for more restrictive timber harvest standards for young growth on moderate vulnerability karst, as compared to what is allowable for old growth on moderate vulnerability karst. I have determined that more restrictive plan components for young growth harvest on moderate vulnerability karst are not necessary to protect karst and cave resources.

REASON FOR CATEGORICAL EXCLUSION

This amendment can be categorically excluded (CE) from documentation in an environmental impact statement (EIS) or an environmental assessment (EA). The amendment will not individually or cumulatively have significant effects on the human environment and no extraordinary circumstances exist.

The applicable category of actions is identified in agency procedures as 36 CFR 220.6(e)(16):

Land management plans, plan amendments, and plan revisions developed in accordance with 36 CFR 219 et seq. that provide broad guidance and information for project and activity decisionmaking in a NFS [National Forest System] unit. Proposals for actions that approve projects or activities, or that command anyone to refrain from undertaking projects and activities, or that grant, withhold, or modify contracts, permits, or other formal legal instruments, are outside the scope of this category and shall be considered separately under Forest Service NEPA (National Environmental Policy Act) procedures.

This category of action is applicable because the proposed amendment is programmatic and does not propose any action on the ground or commit the Forest Service to take (or refrain from) any specific actions. This decision does not authorize timber sales or any other specific activity on the Tongass National Forest. Those types of actions, if proposed, will be analyzed in a project-level NEPA analysis and decisions will be made in compliance with NEPA and other environmental laws following applicable public involvement and administrative review procedures.

² Monitoring reports are available on line at <https://www.fs.usda.gov/detail/tongass/landmanagement/planning/?cid=stelprdb5368225>

RELATIONSHIP TO EXTRAORDINARY CIRCUMSTANCES

Based on the environmental analysis I have determined that there are no extraordinary circumstances related to this project:

- **Federally listed threatened or endangered species or designated critical habitat, species proposed for Federal listing or proposed critical habitat, or Forest Service sensitive species** – This amendment does not pose new risks to threatened or endangered species or designated critical habitat. There are no changes in the management direction or plan components that protect threatened or endangered species or designated critical habitat.
- **Flood plains, wetlands, or municipal watersheds** – This amendment does not pose new risks to flood plains, wetlands or municipal watersheds. There are no changes in the management direction or plan components that protect soil and water quality.
- **Congressionally designated areas such as inventoried roadless areas, wilderness, wilderness study areas, or national recreation areas** – This amendment does not pose any risk to roadless areas, wilderness, wilderness study areas or national recreation areas. There are no changes to management direction or plan components for these designated areas.
- **Research natural areas** – This amendment does not pose any risks to research natural areas. There are no changes for Forest Plan direction for these designated areas.
- **American Indians and Alaska Native religious or cultural sites** – this amendment is procedural in nature and does not propose any ground disturbing activities. Consequently, there will be no direct effects to religious or cultural sites on the Forest.
- **Archaeological sites, or historic properties or areas** – this amendment is procedural in nature and does not propose any ground disturbing activities. Consequently, there will be no direct effects to archaeological sites or historic properties on the Forest. This amendment will result in no change to the process to protect cultural and historic resources and will not modify other management direction or plan components or Forest Service policy to avoid cultural resource sites or modify project activities to minimize impacts to them.
- **Federal Cave Resources Protection Act (FCRPA) of 1988** - this amendment is procedural in nature and does not propose any ground disturbing activities. Consequently, there will be no direct effects to the productivity of the soils of the karst landscape after harvest, the quality and quantity of the waters issuing from karst hydrologic systems, and the many resources values within underlying significant cave systems will be maintained.

PUBLIC INVOLVEMENT

This action was originally listed as a proposal on the Tongass National Forest Schedule of Proposed Actions in January 2019.

A combined scoping and 30-day comment letter was sent via postal mail and email on July 24, 2019 to a mailing list including people who have subscribed to be informed about this type of

project and was posted to the project webpage <https://www.fs.usda.gov/project/?project=55198>. A legal notice was published in the *Ketchikan Daily News* announcing the 30-day comment period on July 25, 2019. A total of nine responses were received. Some commenters said that the Forest Plan amendment was not needed and there were some that agreed that the Forest Plan amendment was needed. There were several other concerns but most fit into four categories:

1. Some of the commenters felt that an environmental assessment or an environmental impact statement must be used to amend a forest plan, especially if there is a possibility that timber harvest would increase due to the amendment.
 - The proposed amendment was analyzed in the 2016 Forest Plan Final Environmental Impact Statement (FEIS) in the analysis of Alternatives 1 to 4 (page 3-35 to 36).
 - "Alternatives 1 through 4 would be managed in similar fashion so long as karst management objectives could be met."
 - "Project-specific karst evaluations would still be required and effects would be avoided or minimized through project and site specific management prescriptions, such as requiring partial suspension yarding or limiting the size of openings (to) moderate changes to precipitation throughfall." (FEIS, page 3-35)
 - Amending the Forest Plan with a categorical exclusion is appropriate because although the proposed amendment provides broad guidance for project and activity decision-making, it does not approve projects or activities, nor does it propose ground-disturbing activities. If activities are proposed that would implement the Forest Plan, including this amended plan content, those activities would require further environmental review at an appropriate level based on the scope and scale of the proposed activity.
2. Many of the commenters were concerned about maintaining the natural processes and productivity of the karst landscape including the productivity of the soils, the quality and quantity of the waters issuing from karst hydrologic systems, and protection of the many resources values within underlying significant cave systems as per the requirements of the FCRPA.
 - The Forest Plan includes standards and guidelines that require evaluation of karst resources and maintenance of soil productivity after harvest to maintain the quality and quantity of the waters issuing from karst hydrologic systems and to protect the many resources values within underlying significant cave systems as per the requirements of the Federal Cave Resources Protection Act of 1988 (Forest Plan page 4-23 and Appendix H). These standards and guidelines will not change with the proposed amendment.
 - The proposed amendment requires karst resource specialists during implementation to determine to what extent harvest may occur in young-growth stands on moderate vulnerability karst areas while meeting the requirements of the FCRPA and the standards and guidelines in Chapter 4 and Appendix H of the Forest Plan. Based on the vulnerability assessment and case-by-case review, it is possible that fewer acres may be available for harvest in some stands and more acres available in other stands compared with the current standard.

3. Others were concerned about the lack of pre-harvest stand information since the young growth that would be considered for harvest now was harvested before the 1988 FCRPA and karst and cave standards and guidelines in the 1997 Forest Plan.
 - Forest Plan standards and guidelines require an evaluation of karst landscapes including vulnerability mapping before activities can take place (Appendix H). This will not change with the proposed amendment. The interactive map (<https://usfs.maps.arcgis.com/apps/MapJournal/index.html?appid=f68102482a5d4d1eaf3ceedcb877b63e>) included with the scoping for the proposed amendment included areas where karst landscapes are "Known Not Assessed". Activities can only be approved after the evaluation is completed and only if the activity is consistent with the Forest Plan, including the karst and cave standards and guidelines.
 - These areas of "Known Not Assessed" were analyzed in the 2016 Forest Plan FEIS (page 3-35); they were included with the low vulnerability acres in order to assess the largest number of acres that could potentially be harvested (maximum effects analysis).
4. Changes between the 2008 Forest Plan and 2016 Forest Plan included removing some language from Appendix H regarding young-growth harvest to bring the 2016 Forest Plan into compliance with the 2012 Planning Rule (36 CFR 219). This change was not clearly articulated in the 2016 Forest Plan and several of the commenters requested that the 2008 language be returned to Appendix H.
 - In order to respond to these concerns, I updated the **Management Approaches for Karst and Cave Resources** (Forest Plan page 5-6) to read:
 - Where young growth management is proposed on karst lands, a karst resource inventory and vulnerability assessment will be conducted according to Appendix H.
 - For purposes of young growth management on karst lands, "commercial timber harvest" is intended to include all forms of: commercial thinning, even-aged management, two-aged management, and uneven-aged management. Pre-commercial thinning would be appropriate when consistent with the underlying Land Use Designation.
 - Limited exceptions for pre-commercial and commercial thinning adjacent to karst features may be considered on a case-by-case basis if karst management objectives can be met. Factors expected to be considered include: susceptibility to surface disturbance, silvicultural prescription, harvest method, slash treatment method, hydrologic conditions, and size of buffer zones.

The above list does not include all comments, just the most frequently mentioned comments. A summary of comments and the Forest Service responses can be found on the project webpage <https://www.fs.usda.gov/project/?project=55198>.

I considered all comments and the Forest Service response to those comments before I decided to approve this Forest Plan amendment.

GOVERNMENT TO GOVERNMENT CONSULTATION

A letter requesting consultation was sent to 30 Alaska Native Tribes and Alaska Native Corporations. No written or electronic comments/correspondence have been received.

APPLICATION OF SUBSTANTIVE REQUIREMENTS

The plan amendment process within 36 CFR 219.13(b)(5) requires determining which substantive requirements are directly related to the plan direction being added, modified, or removed and applying such requirement(s) within the scope and scale of the amendment.

The responsible official must determine that a specific substantive requirement is directly related to the amendment when scoping or the NEPA effects analysis reveals substantial adverse effects associated with that requirement, or when the proposed amendment would substantially lessen protections for a specific resource or use.

I have determined this amendment will not have substantial adverse effects or substantially lessen protections for karst resources on the Tongass National Forest. Therefore, no substantive requirements are required to be identified at this time (36 CFR 219.13(b)(5)(ii)(B)).

FINDINGS REQUIRED BY OTHER LAWS AND REGULATIONS

This amendment is consistent with the Findings in the 2016 Tongass Land and Resource Management Plan Record of Decision (p. 39-46) since the amendment will not individually or cumulatively have significant effects on the human environment and no extraordinary circumstances exist.

National Forest Management Act – This decision is consistent with the requirements of the 2012 Planning Rule as set forth in 36 CFR 219 subparts A and B.

The proposed amendment is consistent with Tongass National Forest Land and Resource Management Plan. The proposed changes to two standards and the addition of management approaches will continue to meet the overall goals and objectives of karst and cave resources.

Federal Cave Resources Protection Act of 1988 – This decision is consistent with the requirements of the 1988 FCRPA. The standards and guidelines in Chapters 4 and 5, and direction in Appendix H of the Forest Plan, will maintain the productivity of the soils of the karst landscape, maintain the quality and quantity of the waters issuing from karst hydrologic systems, and protect the many resources values within underlying significant cave systems.

ADMINISTRATIVE REVIEW OPPORTUNITIES

A legal notice announcing the pre-decisional administrative review process (objection period) for this amendment was published in the *Ketchikan Daily News*, the newspaper of record, on June 19, 2020. On August 12, 2020, the Objection Reviewing Official notified the Responsible Official that no objections were received. Pursuant to 36 CFR 219.58 (c), when no objection is filed within the allotted filing period, the Responsible Official may approve the plan amendment on, but not before, the fifth business day following the end of the objection-filing period.



IMPLEMENTATION DATE

Pursuant to 36 CFR 219.17 (a)(2), a plan amendment for which an EIS [Environmental Impact Statement] is not prepared is effective immediately upon publication of a legal notice announcing the decision in the newspaper of record.

CONTACT INFORMATION

For additional information, contact: Cathy Tighe, Planning Staff Officer, cathy.tighe@usda.gov, Tongass National Forest, 648 Mission Street, Ketchikan, AK 99901, 907-228-6274.

M. EARL STEWART

Date

Forest Supervisor

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