

# Chapter 1

## Purpose and Need

### Introduction

**For this analysis, the term wilderness study area (WSA) is used interchangeably with wilderness since the Chugach National Forest Plan states that “the WSA is to be managed to maintain and protect the existing (1984) wilderness character. The WSA shall be managed as described in this prescription until Congress acts on this area.”**

Under the Forest and Rangeland Renewable Resources Planning Act of 1974, Forest and Rangelands Renewable Resources Research Act of 1978, and the Agricultural Research, Extension, and Education Reform Act of 1998 (P.L. 105-185, Section 253(c), 16 USC 1642(e)), the Secretary of Agriculture is directed by Congress to collect, analyze, and periodically report information about natural resources on the nation’s forests, range, and related lands. The program to collect information on forest resources on the national forests in Alaska is managed by the Forest Service Pacific Northwest Research Station (PNW) and is called Forest Inventory and Analysis (FIA). This information is used by other federal, state, and private entities. Some uses of FIA information include monitoring tree growth and harvests, plant diversity, invasive species, tree species composition, land use patterns, forested wildlife habitat, forest health, and biological processes.

The Alaska Region and PNW are proposing to conduct FIA in wilderness areas of the Alaska Region to meet the intent of law and regulation. As part of the inventory in wilderness, the Alaska Region and PNW are also proposing to use helicopters to access a portion of the inventory plots. The Wilderness Act does not allow the landing of aircraft except as necessary to meet the minimum requirements for the administration of the area for the purpose of the Act.

The wilderness system within the Alaska Region includes 19 wilderness areas on the Tongass National Forest (Figure 1-1) and one wilderness study area (WSA) on the Chugach National Forest (Figure 1-2). These wilderness areas include many types of ecosystems, ranging from the high mountains of the Coast Range to the maritime islands on the outer coast on the Tongass National Forest to the glacial fiords and marine environment of Prince William Sound on the Chugach National Forest. The Tongass National Forest represents one of the world’s largest coastal temperate rainforests, and approximately one-third of the 17-million acre Forest is designated wilderness (5.8 million acres). The Nellie Juan-College Fiord WSA on the Chugach National Forest makes up about one-third of that 5.45-million acre Forest (2.0 million acres).

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Forest inventories in Alaska have occurred from the 1950s through the 1970s, prior to the establishment of wilderness areas in Alaska. The focus of these earlier inventories was only on productive timber lands. Inventories occurring in the 1980s and 1990s surveyed all vegetated lands regardless of the type and amount of forest present. Recent changes to the national FIA program have reduced the plots surveyed in Alaska to those at least 10 percent stocked (at least 10 percent of the plot is covered by trees). With the exception of the 2005 season, no other FIA inventory work has been done in these wilderness areas since their establishment.

Although previous inventories were focused on forested areas, the current focus of FIA in these wilderness areas is to provide baseline data for forested and non-forested resources, such as invasive plants and rare plants, forest composition and health, air quality, vegetation type, and biomass. Many of the proposed helicopter-access plots are in areas where the vegetation may be different from the rest of the plots. The Forest Service is proposing to inventory wilderness areas in Alaska because they encompass a large portion of the Tongass and Chugach National Forests and inventories are necessary for a better informed and accurate understanding of the ecosystems and vegetation of all National Forest System (NFS) land in Alaska. This environmental impact statement (EIS) discusses the direct, indirect, and cumulative impacts to the environment from FIA activities in the wilderness areas of the Alaska Region and tiers to the Tongass National Forest Land Management Plan FEIS and to the Chugach National Forest Land and Resource Management Plan FEIS. This FIA EIS incorporates by reference the Forest Plans (USDA Forest Service 1997a, USDA Forest Service 2002a), particularly those sections dealing with wilderness, wildlife, threatened, endangered, and sensitive species, and heritage resources.

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Figure 1-1.  
Tongass National Forest wilderness areas

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Map Figure showing the project area, other adjacent landowners, and features mentioned in the Project Area section above, can be inserted here.

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Figure 1-2.  
Nellie Juan–College Fiord Wilderness Study Area

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Map Figure showing the project area, other adjacent landowners, and features mentioned in the Project Area section above, can be inserted here.

## Project History

In 1996 an environmental assessment (EA), Decision Notice and Finding of No Significant Impact (FONSI) were completed for a proposal to use helicopters to access approximately 750 FIA inventory plots in the Alaska Region's wilderness system. An appeal was filed and the Appeal Deciding Officer reversed the Regional Forester's decision that granted approval to use helicopters. The decision was reversed because of the inadequacy of the environmental analysis and a failure to demonstrate that the purpose for the inventory supported the administration of wilderness on the Tongass National Forest.

During the decade that followed the reversal, there has been continued interest in the baseline wilderness data that would result from the inventory work. Some other changes occurred as well:

The 1997 Tongass Land and Resource Management Plan (TLRMP) identified the Misty Fiords and Admiralty National Monument Wildernesses as areas partially set aside for the purpose of inventory and research and to make the information available for other forest units where it may be beneficial for management of multiple use lands (USDA Forest Service 1997a);

The Agricultural Research, Extension, and Education Reform Act of 1998 require, in compliance with other applicable provisions of law, the establishment of a forest inventory program on all public lands. It also requires that national standards and definitions be established and applied to a core set of variables;

An agreement between the Wilderness and Wild and Scenic Rivers program and the FIA program acknowledged "the need within the Forest Service to establish and maintain basic information on the extent and condition of the nation's wilderness areas. The inventory is designed to provide strategic, 'state-of-the-wilderness' information on vegetation, soils, and wildlife habitat (USDA Forest Service 2005a)."

From 1996 through 2004, plots within the wilderness areas of the Alaska Region were not inventoried because many locations were not considered safely accessible by foot and approval to use helicopters had not been granted. Helicopter access to the plots was proposed again in 2004 and a Minimum Requirement Decision Guide (MRDG) was completed in 2005. The MRDG concluded that helicopters were the minimum tool needed to accomplish the inventory. The project was categorically excluded under Category 31.11 a(3): Inventories, research activities, and studies, such as resource inventories and routine data collection, when such actions are clearly limited in scope and intensity (FSH 1909.15). A total of 92 plots were inventoried in wilderness, with 59 of these plots accessed by helicopter in 2005.

During the fall of 2005, the Forest Service began preparation of an EA due to continuing concerns about the use of helicopters in wilderness areas. In the winter of 2006, the Forest Service decided to prepare an EIS because of the

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potential effects to wilderness character. Authorization of any further helicopter access to inventory plots in wilderness will not occur until an analysis of the proposed action and other alternatives' potential effects are documented in an EIS.

## Proposed Action

### Alternative 4 is the Proposed Action.

The Alaska Region and the PNW propose to use helicopters to land at a portion of FIA inventory plots in the wilderness areas of the Alaska Region. This inventory would consist of 913 inventory plots in 19 different wilderness areas and one wilderness study area (comprising a total of 7.8 million acres) over a 10-year span, with about 540 plots accessed by helicopter and 373 plots accessed by day hiking. Inventory protocol includes completing 10 percent of the plots each year. This means that approximately 91 plots would be inventoried each year. Of these 91 plots, about 54 plots would be accessed by helicopter and 37 plots will be accessed by hiking over the course of a three and one-half-month field season from June through mid-September.

Each inventory plot accessed by helicopter would require two landings. There would be a total of approximately 108 helicopter landings per year extending from the Misty Fiords National Monument Wilderness in the south, north approximately 900 air miles to the Nellie Juan-College Fiord Wilderness Study Area.

FIA helicopter flights typically average 24 minutes in duration. There is one drop-off flight and one pickup flight per plot with a span of about eight hours between each flight. An average of about 48 minutes of helicopter time per plot would occur. The actual flight route to each plot will vary based on weather, presence of other visitors, wildlife, or other factors. On average, the helicopter will place two crews out to do two plots on the days the crews are working in a wilderness area. This number may be higher within some of the larger wilderness areas.

The current FIA inventory operation has been conducted using an 86-foot research vessel that sleeps 12 FIA crew members. The boat is equipped with a helipad where the helicopter flights originate. The boat will generally be anchored in a bay for one day or overnight. In certain areas, such as Misty Fiords where anchorages can be limited, the boat may be present for several days at one anchorage. In this case, the helicopter may have to fly farther to access the inventory sites because the boat cannot anchor closer. Once those plots are inventoried, approximately five plots per year are revisited during the 10-year period of the inventory for quality control purposes. Some of these quality control plots will not require helicopter access. With the exception of quality control plots, each plot would not be accessed again for at least several decades. Any decision to use helicopters to access plots beyond the current proposed inventory would be the subject of a separate analysis.

In addition to the plots accessed by helicopter, the crews will use a helicopter to fly over potential hiking routes to approximately four plots per year. These overflights will be used to determine if there are hazards that are not detectable from maps and aerial photos. Floatplanes will be used to access approximately 5-10 plots per year, with the majority of these being at inland lakes.

Overall, there would be an average of one plot accessed by helicopter per 144,444 acres of wilderness (226 square miles) at a frequency of about every two days.

## Decision to Be Made

The decision to be made, based on this analysis, is whether or not helicopters will be allowed to access any of the plots in wilderness. It will also identify what mitigation measures and monitoring requirements, if any, will be required as part of the Selected Alternative.

This project is not anticipated to require Forest Plan amendments. The Regional Forester is the Responsible Official for any decision to authorize helicopter landings in wilderness areas.

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### Purpose

The purpose of this analysis is to determine the effects of the use of helicopters to safely collect statistically valid FIA inventory data consistent with national protocols in the wilderness areas of the Alaska Region. The short and long-term benefits and impacts of the inventory are considered in the analysis.

### Need

#### The Need to Inventory Wilderness Area Plots

FIA inventory is a scientific use of wilderness areas that provides managers with baseline information that could be used to determine if ecological conditions related to the natural environment are changing. The FIA inventory provides objective and scientifically credible information on key ecosystem processes that include but are not limited to:

- What vegetation is there and what it looks like;
- Whether the vegetated area is increasing or decreasing;
- Whether the number of species is growing or decreasing;
- How quickly trees are growing and dying; and
- How the ecosystem is changing over time.

While protecting the wilderness character, wilderness areas are to be devoted to recreational, scenic, scientific, educational, conservation, and historical purposes. Collecting information and learning about the wilderness resource is part of administering wilderness. Part of that administration means that a greater understanding of the wilderness resources provides insight into how

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certain disturbance events (e.g. fire, insect or pathogen infestation) can occur. In addition, as areas outside of wilderness continue to get developed or managed more intensively, the wilderness areas and their resources become more unique and appreciated.

The baseline data collected by FIA in the wilderness areas would be useful because it generally represents “unmodified conditions.” This is because these wilderness areas in Alaska are extremely large, remote, and largely unaffected by humans. This information could be used to help managers identify if management options are warranted (e.g. removal of invasive species) and monitor change in the ecological conditions related to the natural wilderness environment and to the non-wilderness area environment that pose a threat to wilderness areas.

The information obtained from an inventory would help assess if insects such as spruce bark beetle or pathogens like dwarf mistletoe are occurring in wilderness areas. Insects or pathogens could originate from adjacent non-wilderness areas and spread to the wilderness areas and may affect how, or if, they will be managed or protected. Similarly, declines in sensitive plant species outside wilderness could spur the need for increased monitoring inside the wilderness areas.

## The Safety Need

One of the most important considerations in conducting the FIA inventory is the need for the field crews to have safe access to and from inventory plots. The remoteness of the wilderness areas in the Alaska Region that makes it so unique and valuable also creates difficult and dangerous access for field crews to inventory plots.

While many wilderness areas in the continental United States have rugged terrain, the combination of steep, wet, and heavily vegetated slopes that are prevalent in the wilderness areas of the Alaska Region make foot travel more hazardous. These wilderness areas contain relatively few trails that can be used for access by field crews. For example, the wilderness system in the Alaska Region comprises 7.8 million acres with 195 miles of trail, while Colorado’s largest wilderness has 500,000 acres and 475 miles of trail. In addition, the use of pack stock to help transport equipment does not occur in the wilderness areas of the Alaska Region.

In order to access inventory plots within the wilderness areas, FIA crews can use a variety of means, including foot travel, floatplanes, boats, helicopters, or a combination of these means.

## The Sampling Need

In order for FIA data to be statistically valid, national inventory design and sampling protocols were developed to ensure quality data are collected. One of the reasons wilderness areas are inventoried is to obtain statistically valid inventory data for the entire Chugach and Tongass National Forests. Wilderness

areas make up approximately one-third of both the Chugach and Tongass National Forests. Wilderness areas are statistically important because they can contain ecological, geological or other features of scientific or educational value that are not present in non-wilderness areas. Without collecting FIA data on one-third of the land base within the Chugach and Tongass National Forests, there would be a large gap in knowledge about the region's ecology and this could affect the ability to determine if ecological changes related to the natural wilderness environment are occurring. This gap could include distribution of species, discovery of rare plants, spread of invasive species, and detection of insect infestations.

## Uses of FIA Data

FIA inventory would provide a valuable source of baseline information for monitoring ecological changes. This information would be important in large, remote wilderness areas of the Alaska Region because of questions regarding the statistical ability to make inferences from non-wilderness areas to wilderness, where data may be limited or not exist. Direct measurements from wilderness areas do not need to rely on proxy measurements or extrapolations from other regions or areas that may not provide representative data.

Information collected from FIA plots in Lower 48 wilderness areas have been used in conjunction with other tools such as satellite imagery, LIDAR, aerial photography, or other data, where it exists, for numerous studies that affect wilderness resources. Some of these studies include:

- Habitat mapping for sensitive and management indicator species (Hillis and Lockman 2004; Samson 2006);
- Estimating old growth (Bush and Zeiler 2004);
- Determining the level of ecological diversity (Haney et al 2000);
- Identifying the role of dead wood and snags in the ecosystem (Ohman and Waddell 2002);
- Comparing pre-settlement habitat to current forest conditions (Frelich 1995);
- Understanding catastrophic windstorm events (Moser et al 2006 in editorial review);
- Recovery from a major wildfire (Azuma and Christensen 2003).

Information about these resources could in turn lend the wilderness areas greater protection. For example, Haney et al (2000) used FIA data to help determine the ecological capacity of southern Appalachian wilderness areas and to identify if the areas provided suitable resource protection.

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## FIA Data Users and Timeframes

The data obtained from the FIA inventory would be used as part of a long-term approach to monitoring the ecological conditions related to the natural environment. It can take years before one forest is inventoried. Additional time may be needed to complete research and studies based on the data. In addition, the data collected is for baseline purposes and it can be hard to predict that FIA data will result in specific research on a particular wilderness resource. The research or administrative studies that occur do not mean that a management action would or should occur. Moreover, the ability to answer questions about the wilderness environment today and foretell the types of questions that will need to be asked in future decades is not easily achieved. Those tasks do become more difficult when there is limited or no baseline data.

In many cases, wilderness managers are necessarily focused on pressing short-term social and recreation issues. The day-to-day activities of most wilderness managers do not typically incorporate active involvement in scientific or statistical analysis projects. This can be compounded by the lack of good communication and understanding between managers and scientists (Six et al 2000). Employee turnover can contribute to a loss of "corporate" knowledge about changes to wilderness conditions and using the standardized FIA inventory can provide consistent data to a succession of managers and resource specialists.

Many wilderness managers have other priorities or may not be operating with the same timeframes. The importance and utility of FIA data depends on the perspective of the person considering the data and the type of questions attempting to be answered. None of these perspectives are incorrect and none can be stated with absolute certainty. In speaking generally about scientific activities in wilderness, Landres (2000) states that, "Benefits depend on who considers the information important and how it might eventually be used." He identifies three different groups that may derive benefits from proposed activities:

- wilderness managers gaining information from the wilderness they manage;
- regional and national-level managers and policy-makers gaining information about several wildernesses or the entire National Wilderness Preservation System; and
- Society at large gaining information about relatively pristine ecological systems and the benefits people derive from these.

"Each of these users typically operates at a different spatial and temporal scale and the proposed activities are typically designed for one scale and therefore typically benefit one user more than another."

At the forest level, wilderness areas on the Tongass and Chugach National Forests are an important component of the entire forest and the Alaska Region. In the case of both Forests, the wilderness areas comprise almost a third of the land area. There are many reasons why wilderness areas are ecologically important. One example of this is their size and amount of old growth they contain help maintain viable, well-distributed old-growth associated wildlife populations. More complete information about items such as habitat capability and reliable old growth estimates are based on having information from all areas of the Forests.

Assessing the impacts and positive outcomes of activities in wilderness is a difficult task. The questions of what types of benefits would occur, who receives the benefits, and when those benefits are realized need to be weighed against the impacts. Ultimately, “there are no objective, quantitative means for making this evaluation, and once the benefits and impacts are explicit, the decision-maker will need to make a subjective judgment about whether the benefits of the proposed activity outweigh the impacts, or vice versa (Landres 2000).” The consideration of impacts and benefits of the proposed use of helicopters for FIA work is the subject of this EIS.

## Legal Direction

### Wilderness Act

Wilderness areas are designated by Congress, and the Wilderness Act is the primary legislation for the management of wilderness areas. Section 2(c) defines wilderness as:

A wilderness, in contrast with those areas where man and his works dominate the landscape, is hereby recognized as an area where the earth and its community of life are untrammelled by man, where man himself is a visitor who does not remain. An area of wilderness is further defined to mean in the Act an area of undeveloped Federal land retaining its primeval character and influence, without permanent improvements or human habitation, which is protected and managed so as to preserve its natural conditions and which (1) generally appears to have been affected primarily by the forces of nature, with the imprint of mans work substantially unnoticeable; (2) has outstanding opportunities for solitude or a primitive and unconfined type of recreation; (3) 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; and (4) may also contain ecological, geological, or other features of scientific, scenic, or historical value.

In addition, Section 4(b) of the Act states:

Except as otherwise provided in this Act, each agency administering any area designated as wilderness shall be responsible for preserving the wilderness character of the area and shall so administer such area for such other purposes for which it may have been established as also to preserve the wilderness

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character. Except as otherwise provided in the Act, wilderness areas shall be devoted to the public purpose of recreational, scenic, scientific, educational, conservation, and historical use.

The Act also places prohibitions on certain uses and Section 4(c) states:

Except as specifically provided for in this Act, and subject to existing private rights, there shall be no commercial enterprise and no permanent road within any wilderness area designated by this Act and except as necessary to meet minimum requirements for the administration of the area for the purpose of this Act (including measures required in emergencies involving the health and safety of persons within the area), there shall be no temporary road, no use of motor vehicles, motorized equipment or motorboats, no landing of aircraft, no other form of mechanical transport, and no structure or installation within any such area.

## **The Alaska National Interest Lands Conservation Act (ANILCA)**

The Alaska National Interest Lands Conservation Act (ANILCA) specifically allows several uses in wilderness for traditional activities including airplanes and motorboats (Section 1110). In addition, ANILCA provides for reasonable access to and operation and maintenance of existing air and water navigation aids, communication sites, and related facilities, as well as existing facilities for weather, climate and fisheries research and monitoring (Section 1310a). Similarly, new facilities may also be built for national defense purposes, related air and water navigations aids, and facilities for weather, climate, and fisheries research and monitoring. Reasonable access is determined on a case-by-case basis.

## **Agricultural Research, Extension, and Education Reform Act**

The Agricultural Research, Extension, and Education Reform Act of 1998 states:

In compliance with other applicable provisions of law, the Secretary shall establish a program to inventory and analyze, in a timely manner, public and private forest in the United States.

It also requires that national standards and definitions be established:

To ensure uniform and consistent data collection for all forest land that is publicly or privately owned and for each State, the Secretary shall develop, in consultation with State foresters and Federal land management agencies not under the jurisdiction of the Secretary, and publish national standards and definitions to be applied in inventorying and analyzing forests and their resources in this subsection. The standards shall include a core set of variables to be measured on all sample plots (16 USC 1642(e)).

## **Forest and Rangeland Renewable Resources Research Act**

The Forest and Rangeland Renewable Resources Research Act of 1978 authorizes an:

Increase in the frequency of forest inventories in matters that relate to atmospheric pollution and conduct such surveys as are necessary to monitor long-term trends in the health and productivity of domestic forest ecosystems (Section 3(A)).

The Forest and Rangeland Renewable Resources Planning Act of 1974 states:

The Secretary of Agriculture shall develop and maintain on a continuing basis a comprehensive and appropriately detailed inventory of all National Forest System lands and renewable resources. This inventory shall be kept current so as to reflect changes in conditions and identify new and emerging resources and values (Section 5).

## Program Direction

The Forest Service currently has a Memorandum of Understanding (MOU) between the National Forest System and the FIA programs. The purpose is to collect renewable forest resource information across all the lands of the United States. These lands include National Forests and Grasslands as well as private land, and the intent is to have data collection, management, analysis, and reporting consistent across all lands. The FIA information is of high interest and use to managers and they are to have access to all FIA data to assist in management of these lands (USDA Forest Service 2001).

The Forest Service also has an agreement between the Wilderness and Wild and Scenic Rivers program and the FIA program. It acknowledges the need within the Forest Service to establish and maintain basic information on the extent and condition of the nation's wilderness areas. A reliable inventory is basic to the development of any land use plan, whether they are recreational development, commercial enterprise, or preservation of fragile environments.

The inventory is designed to provide strategic, “state-of-the-wilderness” information on vegetation, soils, and wildlife habitat (USDA Forest Service 2005a).

This project is consistent with the 1997 Tongass Land and Resource Management Plan and the 2002 Chugach Land and Resource Management Plan. All alternatives, including the Proposed Action, are consistent with the Forest Plans. All applicable Forestwide and Land Use Designation Standards and Guidelines have been incorporated. Additional direction comes from applicable Forest Service manuals and handbooks which are incorporated into this analysis.

## Public Involvement

### Scoping

Among other things, the scoping process is used to invite public participation, to help identify public issues, and to obtain public comment at various stages of the EIS process. Although scoping begins early, it is really an iterative process that continues until a decision is made. In addition to the following specific

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activities, the FIA project has been listed on the Alaska Region's Schedule of Proposed Actions (<http://www.fs.fed.us/sopa/>) since October 2005. To date, the public has been invited to participate in the project in the following ways:

Comments were received during development of the Minimum Requirements Decision Guide in 2004-2005.

A website (<http://www.fs.fed.us/r10/ro/projects-plans/fia/index.shtml>) was developed to share information about the project in the fall of 2005.

A letter was mailed on December 7, 2005 to give members of the public and organizations who had previously expressed concerns about the inventory an update about the project's status.

A total of 20 comments were received prior to the Draft EIS and they focused on: whether helicopters are the minimum tool to conduct the inventory; if the inventory is essential for managing the wilderness areas; how the inventory data will be used to manage wilderness; and effects to wilderness character, wildlife, vegetation, and other resources.

## **Consultation with Tribal Governments and Other Government Agencies**

The Forest Service fosters collaborative stewardship by working closely with federally recognized tribal governments and entities and other government agencies. Collaboration may take the form of formal and informal consultations with tribes and agencies, as well as reviews by agencies with regulatory authority over activities considered in the FIA project.

Consultation with the tribes began with a letter dated November 10, 2005 that was sent to all the tribes within the Alaska Region of the Forest Service. The same letter was also e-mailed to the tribes. In addition, a letter dated November 23, 2005 was sent to all the Alaska Native Claims Settlement Act (ANCSA) corporations within the Region as part of National Historic Preservation Act Section 106 Consultation. Four comments were received and no concerns were expressed about the project.

Copies of the Draft EIS were mailed to the tribes and corporations and additional contact was made by district rangers or their staff. No requests for formal consultation were requested and no concerns were expressed about the project.

The National Marine Fisheries Service (NMFS), United States Fish and Wildlife Service (USFWS), and the Alaska Department of Fish and Game (ADF&G) were contacted and did not have concerns about the project.

## **Notice of Intent (NOI)**

A Notice of Intent to prepare an environmental impact statement was published in the Federal Register on February 3, 2006. Legal notices were also placed in the two newspapers of record for Regional Forester decisions (Juneau Empire

and Anchorage Daily News) on February 6, 2006 notifying the public of the preparation of an EIS for this project.

## Mailing List

A mailing list was established to provide interested citizens, groups, tribes, ANCSA corporations, and agencies with information and documents. The list consists of 114 individuals and organizations that have expressed interest or been consulted about the project. As people responded to scoping or contacted the Forest Service, their names were added to the list. The mailing list for the EIS is provided in Chapter 4 of this document.

## Local News Media

A news release dated February 6, 2006 was sent out to a list of approximately 265 newspapers, radio stations, and interested parties.

## Availability of Draft EIS

The date of publication of the Notice of Availability of the draft EIS in the Federal Register was June 23, 2006, and legal notices published in the Juneau Empire and Anchorage Daily News referred to the Federal Register date as the start of the 45-day period. Draft EIS documents were also mailed to federal and state agencies, federally recognized tribal governments, ANCSA corporations, and anyone else who requested them, and Draft EIS recipients are listed in Chapter 4. Fifty-one comments were received on the Draft EIS and were evaluated in the Final EIS. Appendix A of the Final EIS contains the Response to Comments.

## Issues

Significant issues for the FIA project were identified through public and internal scoping. Significant issues are used to develop and compare alternatives, prescribe mitigation measures, and analyze the environmental effects. Similar issues were combined into one statement where appropriate. The following three issues were determined to be significant and within the scope of the project decision:

**Wilderness:** The use and noise from helicopters and other forms of access and inventory activity could compromise the area's wilderness character and visitor experience. The units of measure are the number or amount of helicopter flights and person days.

**Wildlife:** The noise from helicopters and other forms of access and inventory activity could affect wildlife. The units of measure are the number of helicopter flights and person days.

**Safety:** Accessing all the sites on foot would require field crews to carry additional equipment over a longer period, which exposes field crews to

## Draft EIS

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potential injury while traveling in the steep, wet terrain with heavy packs. The units of measure are helicopter flights and person days.

These issues are addressed through the Proposed Action and alternatives. Additional concerns were considered but determined not to be significant for the project decisions to be made; they are discussed separately below.

## Other Issues and Concerns

In addition to the significant issues described above, the public raised other concerns during the scoping period. Although these concerns may be addressed to varying degrees in the analysis, they were not considered significant issues, as defined by the Council of Environmental Quality regulations (40 CFR, Section 1501.7), and they did not drive the development of alternatives to the Proposed Action. Others are not related to the decision, or their resolution is outside the scope of this analysis. Many potential resource effects would have the same mitigation in all alternatives or are controlled through adherence to Forest Plan standards and guidelines.

## Resource Concerns Discussed in Chapter 3

Concerns were expressed about the following resources, which are addressed in Chapter 3 under Other Environmental Considerations:

**Vegetation Resources:** Vegetation could be impacted by activity at helispots, trampling by crews when hiking or camping, as well as fuel spills by the helicopter.

**Invasive Species:** The risk of introduction of invasive species could occur as the result of hiking or helicopter access to the inventory plots.

**Heritage Resources:** Cultural sites could be impacted by crews accessing plots by hiking or helicopter, as well as camping at these sites.

**Air Quality:** Emissions from the helicopters could degrade the air quality.

**Water Quality:** Streams, ponds and lakes could have water quality affected by FIA activities.

## Federal and State Permits, Licenses, and Certifications

No permits, licenses, or certifications are necessary for this project.

## Coastal Zone Management Act (CZMA) Determination

Under the Coastal Zone Management Act (CZMA), the Forest Service must determine whether an activity such as the FIA inventory will affect any land or water use or any natural resource of Alaska's coastal zone. If the project will affect the coastal zone, the Forest Service must provide the State with a

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“consistency determination” stating that the activity will be conducted in a manner that is consistent to the maximum extent practicable with the enforceable policies of the Alaska Coastal Management Program (ACMP).

The Forest Service has determined that this project will not affect the coastal zone and does not require ACMP review. The reasons for this negative determination are that the project will involve no ground-disturbing activity. The only effect on the environment is the temporary noise of helicopter flights to and from the inventory plots. This negative determination was provided to the Alaska Department of Natural Resources, Office of Project Management and Permitting, which did not respond within 60 days. Therefore, under 15 CFR 930.35(c), the State's concurrence with the negative determination is presumed.

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