

CHAPTER 1
PURPOSE OF AND NEED
FOR ACTION

Purpose of and Need for Action

The Forest Service has prepared this draft environmental impact statement (DEIS) in compliance with the National Environmental Policy Act (NEPA) and other relevant federal laws and regulations. This DEIS discloses the potential environmental consequences that may result from the alternatives considered for the proposed Alaska Roadless Rule.

Additional documentation that describes the DEIS development, the analyses of the effects of the alternatives considered on forest resources, public involvement, and other relevant documents may be found within the record located at the Forest Service's Alaska Region Office, in the Juneau Federal Building at 709 W. 9th Street, Juneau, Alaska.

Background

The Roadless Area Conservation Rule (2001 Roadless Rule) was promulgated in January 2001 at Title 36 of the Code of Federal Regulations (CFR) Part 294 (36 CFR 294), Subpart B (66 Federal Register [FR] 3244). Currently, about 9.2 million acres (55 percent) of the Tongass National Forest (hereafter Tongass or Forest) are designated as "inventoried roadless areas" (IRAs).⁷ Maps of IRAs, for the Tongass, are available online [here](#).⁸ IRAs contain generally undeveloped areas that are typically 5,000 acres or greater in size. The 2001 Roadless Rule applies nationwide (except Idaho and Colorado), and currently provides management direction for IRAs on 44.7 million acres of National Forests (approximately 24 percent of total National Forest System [NFS] lands) by prohibiting road construction and reconstruction and timber cutting, sale, or removal in those IRAs, with certain exceptions.

Since its promulgation, the 2001 Roadless Rule has been the subject of litigation. In 2001, the State of Alaska filed a complaint, challenging the U.S. Department of Agriculture's (USDA) promulgation of the 2001 Roadless Rule and its application in Alaska. The USDA and the State of Alaska reached a settlement in 2003, and the USDA subsequently issued a rule temporarily exempting the Tongass from the 2001 Roadless Rule. In 2011, a federal court (District of Alaska) set aside the Tongass's exemption and reinstated the 2001 Roadless Rule on the Tongass (with special instructions). The Alaska District Court's ruling was initially reversed by a three-judge panel of the Ninth Circuit, but the District Court's ruling was ultimately upheld in a 6–5 en banc ruling of the Ninth Circuit in 2015. Consequently, the 2001 Roadless Rule remains in effect in Alaska and the Forest Service continues to apply the 2001 Roadless Rule to the Tongass and Chugach National Forests.

In January 2018, the State of Alaska submitted a petition (Appendix A) requesting that the Secretary of Agriculture consider exempting the Tongass from the 2001 Roadless Rule, pursuant to the Administrative Procedure Act and the USDA's petition procedures in 7 CFR 1.28. In June 2018, the Secretary of Agriculture directed the Forest Service to begin working to develop an Alaska state-specific roadless rule. In August 2018, the Forest Service granted cooperating agency status to the State of Alaska. The Forest Service and the State of Alaska believe that the proposed action represents a unique opportunity to collaboratively resolve and provide certainty to the roadless issue in the State of Alaska. The Forest Service published a Notice of Intent (NOI) to prepare an environmental impact statement (EIS) and initiate a public rulemaking process to address the management of IRAs on the Tongass on August 30, 2018 (83 FR 44252). As stated in that NOI, the USDA desires a durable and long-lasting regulation for the management of roadless areas in Alaska on the Tongass. The proposed state-specific roadless rule

⁷ The original acreage of IRAs on the Tongass was approximately 9.34 million acres. As a result of ownership changes and boundary alignment corrections, including shoreline mapping adjustments, the current acreage is 9.2 million acres.

⁸ https://www.fs.usda.gov/detail/roadless/2001roadlessrule/maps/statemaps/?cid=fsm8_037699

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would discontinue the existing regulation's prohibitions and instead rely upon existing statutory and management plan direction for managing roadless area characteristics on the Tongass.

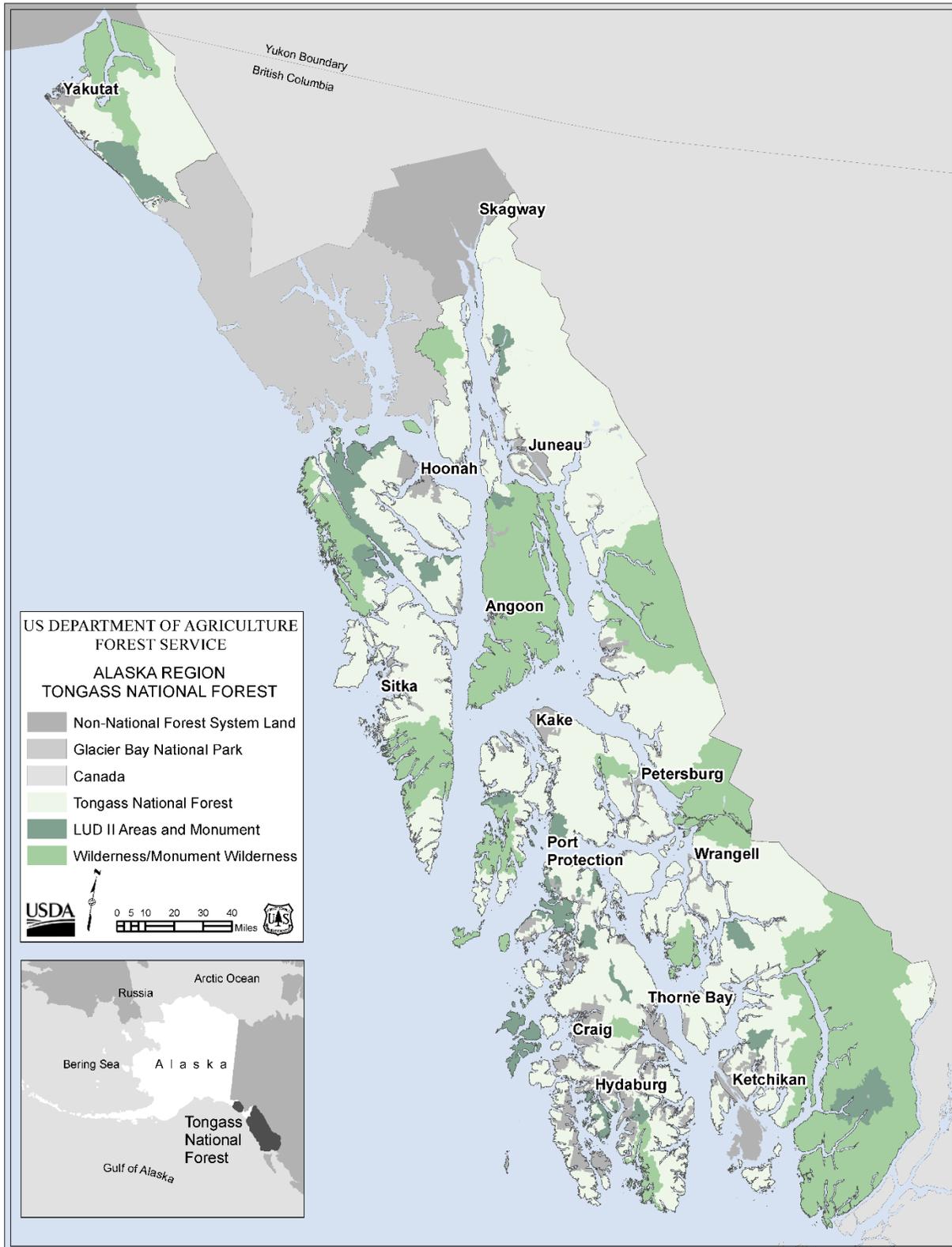
The proposed rule would not authorize any ground-disturbing activities, but rather it would discontinue the existing regulation's prohibitions and instead rely upon existing statutory and management plan direction. Before authorizing a land-use activity in roadless areas, the Forest Service must complete a site-specific environmental analysis, pursuant to the NEPA and its implementing regulations. When a specific project or activity is proposed on NFS land, the Forest Service conducts site-specific analyses of the effects associated with that project or activity and makes a decision whether or not to authorize implementation of that project or activity.

Analysis Area

The 16.7-million-acre Tongass comprises approximately 7 percent of Alaska and 80 percent of percent of Southeast Alaska – Alaska's southeastern panhandle extending from the Dixon Entrance in the south to Yakutat Bay in the north, and bordered on the east by Canada and on the west by the Gulf of Alaska. The Tongass extends approximately 500 miles north to south, and approximately 120 miles east to west at its widest point. Figure 1-1 is a vicinity map of the Forest.

The Tongass includes a narrow mainland strip of steep, rugged mountains, and icefields and more than 1,000 offshore islands known as the Alexander Archipelago. Together, the islands and mainland have nearly 11,000 miles of meandering shoreline, with numerous bays and coves. A system of seaways separates the many islands and provides a protected waterway called the Inside Passage. Federal government public lands comprise approximately 95 percent of Southeast Alaska, with about 80 percent in the Tongass and the majority of the remaining lands in Glacier Bay National Park and Preserve. The remaining land is held by the State government, Alaska Native corporations, and other private ownerships. Most of the area of the Tongass is undeveloped. Approximately 73,000 people inhabit Southeast Alaska, primarily in 32 communities plus 2 seasonal communities located on islands or mainland coastal areas. Eight of the communities have populations greater than 1,000 persons. Most of these communities are surrounded by, or adjacent to, NFS land. Three communities are connected to other parts of the mainland by road: Haines and Skagway in the north and Hyder in the south.

Figure 1-1
Tongass National Forest Vicinity Map



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Purpose and Need

In response to the State of Alaska's petition for rulemaking, the Forest Service and State of Alaska agree the controversy surrounding the management of Tongass roadless areas may be resolved through state-specific rulemaking. A long-term, durable approach to roadless area management is desired that accommodates the unique biological, social, and economic situation found in and around the Tongass. The Tongass is unique from other national forests with respect to size, percentage of IRAs, amount of NFS lands and subsequent dependency of 32 communities on federal lands, and unique Alaska and Tongass-specific statutory considerations (e.g., Alaska National Interest Lands Conservation Act [ANILCA]), Tongass Timber Reform Act [TTRA]).

The USDA and Forest Service believe the 2001 Roadless Rule prohibitions on timber harvest and road construction/reconstruction can be adjusted for the Tongass in a manner that meaningfully addresses local economic and development concerns and roadless area conservation needs.

Proposed Action

The USDA desires a durable and long-lasting regulation for the management of roadless areas in Alaska on the Tongass. The State-specific roadless rule would discontinue the existing regulation's prohibitions and instead rely upon existing statutory and management plan direction to manage roadless area characteristics on the Tongass.

Decision Framework

This DEIS will inform the USDA Secretary or Undersecretary of Agriculture, in deciding whether to promulgate an Alaska state-specific rule as proposed, one of the other alternatives, or a combination of the alternatives as analyzed by the DEIS. Promulgation of a rule involves establishing regulations, which would be issued under 36 CFR Part 294, Subpart E. Appendix G Drafted Roadless Rule Regulatory Language by Alternative contains draft regulatory language for each alternative.

Public Participation

The Forest Service published an NOI to prepare an EIS for the Alaska Roadless Rule in the FR (83 FR 44252) on August 30, 2018. The NOI initiated a 45-day scoping period which ended on October 15, 2018. During this time period, the Forest Service conducted 17 public meetings including meetings in Anchorage, Alaska; Washington, DC; and communities throughout Southeast Alaska – Angoon, Craig, Gustavus, Hoonah, Kake, Ketchikan, Petersburg, Point Baker, Sitka, Tenakee Springs, Thorne Bay, Wrangell, Yakutat, and two meetings in Juneau. During the public comment scoping period following the Aug. 30, 2018 publication of the NOI which ended Oct. 15, 2018, just over 144,000 entries were logged.

Tribal and Native Corporation Participation

On July 30, 2018, the Forest Service sent letters to 32 federally-recognized tribes and 27 Alaska Native corporations, within Southeast and Southcentral Alaska, initiating government-to-government and government-to-corporation consultation on the Alaska Roadless Rule.

Cooperating Agencies

The following are cooperating agencies for the Alaska Rulemaking process:

- Angoon Community Association;
- Central Council Tlingit and Haida Indian Tribes of Alaska;
- Hoonah Indian Association;
- Hydaburg Community Association;
- Organized Village of Kake;
- Organized Village of Kasaan; and
- State of Alaska.

On July 30, 2018, the Forest Service invited 19 Southeast Alaska federally-recognized tribes to participate as cooperating agencies during the rulemaking process. Six tribes agreed to become cooperating agencies and entered into a Memorandum of Understanding (MOU). The tribes were invited to be cooperating agencies due to their specialized knowledge and expertise of land management, subsistence, natural resources, and potential impacts to specific communities within Alaska.

The State of Alaska requested cooperating agency status for the Alaska rulemaking process on June 19, 2018 and entered into an MOU on August 2, 2018. The State of Alaska is the petitioner for the rulemaking process and has special knowledge and expertise relative to natural resources, economic growth and development, resource planning, transportation, and other matters which may be affected by Forest Service management.

The State of Alaska's input as a cooperating agency was informed by the Alaska Roadless Rule Citizens Advisory Committee (the Committee). In September 2018, Governor Walker issued Administrative Order 299 to establish the Committee, which was charged with providing recommendations to assist the State in fulfilling its role as a cooperating agency. Thirteen committee members were selected by Governor Walker to represent a diversity of perspectives, including Alaska Native corporations and tribes, fishing, timber, conservation, tourism, utilities, mining, transportation, local government, and the Alaska Division of Forestry. A Forest Service representative served in an ex officio capacity to provide technical expertise for the Committee's deliberations. The Committee met for three in-person meetings in the fall of 2018 (October 2-3 in Juneau; October 24-26 in Ketchikan; and November 6-8 in Sitka). Meetings were open to the public, and each meeting included an opportunity for public comment. A final report was produced with options for the State of Alaska to consider and was provided as part of their Cooperating Agency comments to the Forest Service.

Key Issues

The regulations implementing NEPA (40 CFR 1501.2) require federal agencies to develop and evaluate alternatives to recommended courses of action in any proposal that involves unresolved conflict concerning alternative uses of available resources. Public involvement was used to identify points of disagreement about the proposed Alaska Roadless Rule, and to identify key issues to use as a basis for developing and evaluating alternatives. The following three key issues were identified for the Alaska state-specific roadless rulemaking effort and will be carried forward throughout the analysis.

Key Issue 1 – Conserve roadless area characteristics

The Tongass includes large undeveloped areas, with several portions of the Forest consisting of contiguous roadless areas that exceed 1 million acres and represent large blocks of unfragmented wildlife habitats, undeveloped or natural areas, and opportunities for primitive recreation and/or solitude. This large scale of roadless areas, including wildernesses and national monuments, does not exist anywhere else in the NFS outside of Alaska. The Tongass is the largest national forest in the United States and the majority of the Tongass is in a natural condition, unlike most other national forests. It represents one of the largest, relatively intact temperate rainforests in the world.

Roadless areas are important because of their wildlife and fish habitat, recreation values, importance to multiple economic sectors, inherent passive use values, traditional properties and sacred sites for local indigenous people, and ecosystem services values they provide. Passive use values represent the value that individuals assign to a resource independent of their use of that resource and typically include existence, option, and bequest values. These values represent the value that individuals obtain from knowing that expansive roadless areas exist, knowing that they are available to visit in the future should they choose to do so, and knowing that they are available for future generations to inherit.

Ecosystem services represent the services provided to society by healthy ecosystems. These services and benefits include what some consider to be long-term life support benefits to society as a whole. Examples of ecosystem services include watershed services, soil stabilization and erosion control, improved air quality, climate regulation, carbon sequestration, and biological diversity.

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The following units of measure are used to evaluate how each alternative responds to this key issue:

- Qualitative degree of impacts to roadless area characteristics;
- Total acres of designated roadless areas by alternative and by Alaska Roadless Area (ARA);
- Acres of designated roadless area removed and added; and
- Acres of designated roadless area in development LUDs.

Key Issue 2 – Support local and regional socioeconomic well-being, Alaska Native culture, rural subsistence activities, and economic opportunity across multiple economic sectors

The Tongass comprises approximately 80 percent of Southeast Alaska and therefore plays a critical role in supporting local and regional economy, promoting economic diversification, and also enhancing rural community well-being. The visitor industry, seafood industry, and resource extraction industries contribute to local jobs and income alongside public sector employment spanning federal, state, and local government. While the visitor and seafood industries are the largest private-sector employers across Southeast Alaska, resource extraction remains important in some rural communities where jobs are limited and unemployment is oftentimes high.

The Forest Service manages land for the multiple-use and sustained yield of all renewable resources. There is fragmentation and disagreement among the public regarding the best management of federal lands for economic development purposes and to support the overall economic vitality of Tongass communities. Many believe the visitor industry and seafood industries have become the mainstay of Southeast Alaska's economy and therefore should have prominence in Forest Service land management decision-making. Others note that resource extraction, including forest products and the minerals industry, continue to provide jobs and income sources in remote and isolated Southeast communities. Furthermore, Southeast Alaska residents, communities, and Alaska Native individuals and tribes provide consistent reminders of Tongass value for subsistence uses, recreational hunting and fishing, and independent travelers and outdoor enthusiasts – and that these activities yield economic value as well.

The following units of measure are used to evaluate how each alternative responds to this key issue:

- Qualitative degree of effect to forest products industry;
- Qualitative degree of effect to visitor industry;
- Qualitative degree of effect to fisheries industry;
- Qualitative degree of effect to locatable and leasable minerals development potential;
- Qualitative degree of effect to energy project development potential;
- Qualitative degree of effect to major transportation projects;
- Acres of forest land suitable for timber production (old growth and young growth);
- Acres of increase in suitable old growth by substantially altered areas, logical extensions of roaded areas, and areas more distant from roads;
- Acres of increase in high-volume suitable old growth by substantially altered areas, logical extensions of roaded areas, and areas more distant from roads;
- Qualitative degree of support for Alaska Native culture due to improved access to tree harvest for cultural purposes;
- Qualitative degree of support for subsistence activities; and
- Qualitative degree of effects to communities – overall level of potential change for communities.

Key Issue 3 – Conserve terrestrial habitat, aquatic habitat, and biological diversity

The Tongass includes large, undeveloped, and natural land areas that represent expansive unfragmented blocks of wildlife habitat. This scale and size of contiguous habitat is not available elsewhere in the NFS

outside of Alaska. Although wildlife species on the Tongass are associated with more than one habitat type, many inhabit old-growth forests or prey on species that inhabit old-growth forests. The Old-growth Habitat Conservation Strategy was developed to maintain the integrity of the old-growth forest ecosystem, and thereby conserve biological diversity across the Forest by retaining intact, largely undisturbed habitat. In addition, because of its predominantly undeveloped nature, a number of wide-ranging species find optimal habitat in the more remote areas of the Forest.

Fish and the aquatic resources on the Tongass support subsistence, commercial, and sport fisheries, as well as traditional and cultural values. The Tongass includes high-value, intact watersheds that were designated to be managed for intact ecological values and aquatic habitat productivity, and many commenters believe these areas should be protected so that they can continue to provide the clean water and fish habitats that are essential to the ecological and economic health of the Southeast Alaska communities and residents who rely on them.

The following units of measure are used to evaluate how each alternative responds to this key issue:

- Percent of existing and original productive old growth (POG) harvested over the long term;
- Percent of original high-volume POG harvested over the long term;
- Percent of original large-tree POG harvested over the long term;
- Acres of young-growth harvest in sensitive areas;
- Average road density over the long term;
- Percent of Wildlife Analysis Areas (WAAs) with road density <0.7 miles/square mile; and
- Qualitative ratings of species-specific effects.

Issues Eliminated from Detailed Analysis

NEPA regulations require the agency to identify and eliminate from detailed study those issues that are not significant or that have been covered by prior environmental review, to narrow the scope of the analysis. Reasons for eliminating issues from detailed study include when the issues are related to the following:

- General opinions or position statements not specific to the proposed action;
- Items addressed by other laws, regulations, or policies;
- Items not relevant to the potential effects of the proposed action, or otherwise outside the scope of this analysis; and/or
- Items that have no or negligible effects.

Although changes in management direction could influence the nature of future projects, the timing, location, and details of future projects are currently unknown. This proposal does not make site-specific decisions or authorize any ground-disturbing activities. Therefore, site-specific impacts of projects are not considered in this DEIS and only broad environmental issues commensurate with program-level, landscape-scale decision making are considered. Impacts of future projects would need to be assessed on a project by project basis as they are proposed.

Many of the issues dismissed are anticipated to have similar resource effects for each of the various alternatives as those effects disclosed in the 2016 Forest Plan Final EIS (FEIS). This is because implementation of Forest Plan standards and guidelines would be the same for all alternatives and none of the alternatives predict a projected timber sale quantity (PTSQ) greater than the amount disclosed in the 2016 Forest Plan FEIS (46 million board feet [MMBF] per year). Although road construction and/or timber harvest could potentially increase within some designated roadless areas, these effects would be evaluated at the project-level.

Eliminated issues are not addressed beyond the rationale provided below:

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Geology and Geologic Features

None of the roadless area management alternatives propose alteration of geologic processes or features. Impacts to geology or geologic features would be based on site-specific proposals, which are currently unknown, and would be addressed in subsequent project environmental analyses. From a broad standpoint, the impacts to geology and geologic features from the proposed alternatives would be the same as disclosed in the 2016 Forest Plan FEIS. While this is also true for karst and cave resources, effects to these resources are discussed in the body of Chapter 3 due to their sensitivity to harvest and development.

Soil Characteristics and Composition

None of the roadless area management alternatives propose alterations to soil characteristics or composition. Impacts to soil characteristics and composition would be based on site-specific proposals, which are currently unknown, and would be addressed in subsequent project environmental analyses. From a broad standpoint, the impacts to soil characteristics and composition from the proposed alternatives would be the same as disclosed in the 2016 Forest Plan FEIS due to similar harvest levels and Forest Plan standards and guidelines.

A preliminary review of effects to soils was conducted, looking at the acres of suitable land on soils with a mass movement index (MMI) of 3. The Forest Plan removes very high hazard class MMI 4 from suitability because of the risk of irreversible damage to the resource. MMI 3 soils are considered high hazard, but less so than MMI 4 soils and can be harvested on. As expected, acres of suitable MMI 3 soils increase with each of the Alaska Roadless Rule alternatives, ranging from an increase of 6 percent for Alternative 2, 20 percent for Alternative 3, and 36 to 38 percent for Alternatives 4 through 6. However, because none of the alternatives predict an increase in the PTSQ, this does not correlate to an increase in harvest on MMI 3 soils. As with other soil characteristics, site-specific conditions would be evaluated at the project-scale. Similarly, harvest and road building on steep slopes, and associated risk of landslides, would be based on site-specific proposals. From a broad standpoint, the associated risk of harvest and road building on high risk soils and steep slopes from the proposed alternatives would be the same as disclosed in the 2016 Forest Plan FEIS due to Forest Plan standards and guidelines.

Water Quantity and Quality

None of the roadless area management alternatives propose specific actions that would alter water quantity or quality. Impacts to water quantity or quality would be based on site-specific proposals, which are currently unknown, and would be addressed in subsequent project environmental analyses. From a broad standpoint, the impacts to water quantity or quality from the proposed alternatives would be the same as disclosed in the 2016 Forest Plan FEIS due to Forest Plan standards and guidelines and would utilize the application of best management practices (BMPs) which are consistent with the Alaska Forest Resources Practices, Act Clean Water Act, Magnuson–Stevens Fishery Conservation and Management Act, and Alaska’s Department of Environmental Conservation Water Quality Standards.

Air Quality

None of the roadless area management alternatives propose specific actions that would alter air quality. Impacts to air quality would be based on site-specific proposals, which are currently unknown, and would be addressed in subsequent project environmental analyses. From a broad standpoint, the impacts to air quantity from the proposed alternatives would be the same as disclosed in the 2016 Forest Plan FEIS due to Forest Plan standards and guidelines.

General Vegetation

None of the roadless area management alternatives propose specific actions that would alter general vegetation. Impacts to general vegetation would be based on site-specific proposals, which are currently unknown, and would be addressed in subsequent project environmental analyses. From a broad standpoint, the impacts to general vegetation from the proposed alternatives would be the same as disclosed in the 2016 Forest Plan FEIS due to Forest Plan standards and guidelines.

General Wildlife Species/Habitat

None of the roadless area management alternatives propose specific actions that would alter general wildlife habitat. Impacts to general wildlife habitats would be based on site-specific proposals, which are currently unknown, and would be addressed in subsequent project environmental analyses. From a broad standpoint, the impacts to general wildlife habitat from the proposed alternatives would be the same as disclosed in the 2016 Forest Plan FEIS due to Forest Plan standards and guidelines.

General Aquatics Species/Habitat

None of the roadless area management alternatives propose specific actions that would alter general aquatic species. Impacts to general aquatic species would be based on site-specific proposals, which are currently unknown, and would be addressed in subsequent project environmental analyses. From a broad programmatic standpoint, the impacts to general aquatic species and habitat from the proposed alternatives would be the same as disclosed in the 2016 Forest Plan FEIS due to Forest Plan standards and guidelines.

Essential Fish Habitat

The Magnuson–Stevens Fishery Conservation and Management Act mandates that agencies initiate consultation with the National Marine Fisheries Service (NMFS) for any activities that could affect essential fish habitat (EFH). This consultation is completed for site-specific projects with ground-disturbing activity. The application of Forest-wide standards and guidelines and BMPs developed to meet soil protection, water quality standards, and fish habitat protection will help protect EFH on the Tongass and adjacent estuarine and marine waters. Adoption of any of the alternatives would not specifically result in any actions that could affect EFH, and any action that would be taken following adoption of an Alaska Roadless Rule that could affect EFH would undergo such consultation.

Invasive Aquatic Species

Executive Order 13112 addresses the prevention of the introduction of invasive species and provides for their control and minimization of the economic, ecological, and human health impacts the invasive species causes. None of the roadless area management alternatives propose specific actions that would introduce invasive aquatic species. Impacts of invasive aquatic species would be based on site-specific proposals, which are currently unknown, and would be addressed in subsequent project environmental analyses.

Wetlands

Executive Order 11990 requires protection of wetlands by mandating federal agencies to avoid, if possible and practicable, adverse impacts to wetlands. None of the roadless area management alternatives propose specific actions that would have adverse impacts to wetlands. Identification, assessment, and protection of wetlands would be based on site-specific proposals, which are currently unknown, and would be addressed in subsequent project environmental analyses. From a broad standpoint, the protection of wetlands from the proposed alternatives would be the same as disclosed in the 2016 Forest Plan FEIS due to Forest Plan standards and guidelines.

A preliminary review of effects to wetlands was conducted. This analysis concluded that the amount of timber harvest on wetlands is expected to vary slightly among alternatives; about 5 percent for old growth and 8 percent for young growth based on the assumption that timber harvest would be distributed evenly across suitable acres across the Forest. Miles of road under all alternatives would be minimized, as individual projects would avoid wetlands to the extent feasible, as required in the Forest-wide standards and guidelines. It is expected that new road miles would vary only slightly among alternatives but would be lowest with Alternatives 1 and 2 and highest with Alternatives 4, 5, and 6. Alternative 3 would be intermediate in terms of road miles built on wetlands.

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Floodplains

Executive Order 11988 requires federal agencies to avoid, to the extent possible, the long- and short-term adverse impacts associated with the occupancy and modification of floodplains and to avoid direct and indirect support of floodplain development wherever there is a practicable alternative. None of the roadless area management alternatives propose specific actions that would have short- or long-term adverse impacts to floodplains. Identification and assessment of short- and long-term effects would be based on site-specific proposals, which are currently unknown, and would be addressed in subsequent project environmental analyses. From a broad programmatic standpoint, short- and long-term effects to floodplains from the proposed alternatives would be the same as disclosed in the 2016 Forest Plan FEIS due to Forest Plan standards and guidelines.

National Historic Preservation Act

In carrying out the responsibilities under Section 106 of the National Historic Preservation Act (NHPA), the Forest Service consulted with the State of Alaska Department of Natural Resources, Division of Parks and Outdoor Recreation, Office of History and Archaeology, resulting in a letter (10/08/2018) from the State Historic Preservation Officer concurring with the Forest Service's determination that changes in management direction for designated roadless areas on the Tongass would not result in undertaking, as defined in 36 CFR 800.16(y). Although road construction and/or timber harvest could potentially increase within some designated roadless areas, impacts under the NHPA would be based on site-specific proposals, which are currently unknown, and would be addressed in subsequent project environmental analyses.

Specific Location Impacts

Comments were received requesting detailed analysis of specific timber sales, road densities, and impacts to commercial special use permit areas. None of the roadless area management alternatives propose site-specific projects or actions. Specific location impacts would be based on site-specific proposals, which are currently unknown, and would be addressed in subsequent project environmental analyses.

Changes in Timber Markets

Commenters stated that timber demand has decreased in the United States, causing Alaska timber to be shipped to overseas markets; as a result, the timber industry is no longer a driving economic force in Alaska. Pacific Northwest Research Station published new planning-cycle demand projections (Daniels et al. 2016) that identified three future scenarios representing alternative futures for Southeast Alaska's forest products industry – the transition to young-growth timber harvest, growing wood energy markets, and rebound in domestic housing market. The 2016 Forest Plan FEIS's use of a projected timber demand of an annual average of 46 MMBF of Tongass timber as the PTSQ was reasonable, conservative, and based on an evaluation of the best available information. The Forest Service has considered the current market situation and determined that no change to the PTSQ are needed at this time for purposes of this rulemaking.

Tongass Timber Reform Act

The TTRA (Section 101) directs the Forest Service to seek to provide a supply of timber from the Tongass that meets annual market demand and the market demand for each planning cycle to the extent consistent with providing for the multiple-use and sustained-yield of all renewable resources, and other applicable requirements. The current Forest Plan provides sufficient timber to meet projected demand for timber from the Tongass as described in the 2016 Forest Plan FEIS and Record of Decision (ROD; USDA Forest Service 2016b, c) and by a series of annual applications of the Morse methodology. The Morse methodology is implemented, on an annual basis, to estimate current timber supply needed to meet market demand – as required by the TTRA's "seek to meet market demand" provision. This would continue under all alternatives.

Below-cost Timber Sales

Financial analyses for the Forest Plan were presented in the 2016 Forest Plan FEIS (pp. 3-516 to 3-519) based on modeling that involved first maximizing young-growth harvest under a non-declining even flow and then adding old-growth volume to reach the annual average harvest of 46 MMBF and maximizing the net present value. Modeling results for the Forest Plan indicated positive discounted net revenues over the 15-, 25-, and 100-year periods. The analyses suggested that individual timber sales offered during the first 25 years of the planning period would likely need to include a mix of old growth and young growth to appraise positive, and to cover both logging and stumpage costs while providing a normal profit and risk. Under the Consolidated Appropriations Act, 2018 (H.R. 1625 section 410), timber sales that do not appraise positive using the current Region 10 RV (Residual Value) appraisal cannot be offered. All the action alternatives would increase availability of suitable old growth and young growth for harvest. Greater acreage of suitable land would provide greater flexibility in the selection of future timber sale areas, as well as the potential for more flexibility in sale design, depending on the planning areas selected which are currently unknown. This improved flexibility could, in turn, improve the Forest Service's ability to offer economic sales that meet industry needs. This greater flexibility could be beneficial during the first two decades of the 2016 Forest Plan (the transition period), which is the period of greater old-growth timber harvest. Potential revenue from future projects would be considered in project-specific analysis.

Changes to the 1872 Mining Law

Comments received suggested that reforming or changing the 1872 Mining Law, as amended, would address potential future environmental impacts. While the Mining Law is fundamentally a law for acquiring property rights, rather than an environmental law, presumably the comments were directed at eliminating the ability to establish property rights and increasing agency discretion to prevent mining. This is dismissed from consideration because making or amending law is an explicit function of Congress and not within the authority of the Secretary of Agriculture.

Irreversible or Irretrievable Commitment of Resources

An irreversible or irretrievable commitment of resources will not be made by the rulemaking. None of the roadless area management alternatives propose specific actions that would cause irreversible or irretrievable commitments of resources. Although road construction and/or timber harvest could potentially increase within some designated roadless areas, commitment of resources would be based on site-specific proposals, which are currently unknown, and would be addressed in subsequent project environmental analyses.

Incorporation by Reference

To focus on the issues and streamline the EIS, the following documents are incorporated by reference:

- The Tongass Land and Resource Management Plan, as amended (USDA Forest Service 2016a), and accompanying EIS and ROD (USDA Forest Service 2016b and 2016c);
- The Tongass Land and Resource Management Plan, as amended (USDA Forest Service 2008a), and accompanying EIS and ROD (USDA Forest Service 2008b);
- The 2003 Roadless Area Evaluation for Wilderness Final Supplemental Environmental Impact Statement (USDA Forest Service 2003a) and accompanying ROD (USDA Forest Service 2003b);
- The Tongass Land and Resource Management Plan Revision (USDA Forest Service 1997a), as amended, and accompanying FEIS and ROD (USDA Forest Service 1997b);
- Forest Service Roadless Area Conservation Final EIS (USDA Forest Service 2000); and
- The record for this DEIS.

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Scope and Applicability

Scope of the DEIS

The scope of this DEIS consists of the range of actions, alternatives, and impacts that are considered relevant to the proposed action. The proposed rule is geographically limited to proposed ARAs and existing IRAs established in the 2001 Roadless Rule, or the “analysis area” within the Tongass (see Chapter 3 for a further discussion of the analysis area). The proposed rule is focused on the exemptions of the prohibitions for timber harvest and road construction/reconstruction within designated roadless areas on the Tongass. The proposed rule would not suspend, revoke, or modify land-use permits, contracts, or other legal instruments issued before the effective date of the proposed rule. Rulemaking establishes regulations with which future actions would have to comply, and does not make site-specific decisions or authorize any ground-disturbing activities.

This analysis is a generalized review which the Council on Environmental Quality (CEQ) recognizes as any broad or high-level NEPA review of proposed policies, plans, programs, or projects.

While environmental impacts should be disclosed as soon as information is reasonably available and at the earliest practicable stage, it is not reasonable or efficient to develop numerous timber harvest or other project-level scenarios, nor is the public served by developing worst-case, best-case, or other hypothetical activity scenarios. It is reasonable and efficient to limit detailed site-specific impact analyses to when specific proposals are brought before the agency.

The relationship between regulations, land and resource management plans (forest plan), and national forest projects is of particular importance to roadless rulemaking. Hierarchically, the proposed Alaska Roadless Rule is two steps removed from any Tongass project-specific decision. A regulation is hierarchically above a forest plan, which must comply with all applicable regulations. A forest plan provides broad guidance for future project activities within a specific national forest.

Roadless rules are narrowly focused prohibitions and exceptions established by the Secretary concerning whether and how timber harvest and road construction/ reconstruction may be allowed within specifically designated roadless areas. The alternatives evaluated in this DEIS focus on the particular prohibitions and exceptions. General guidance considering other discretionary aspects of management of the Tongass is better addressed through forest planning. Forest Plans are periodically revised and provide greater flexibility to adapt as the Forest Service gains greater understanding and/or circumstances change on the ground.

Applicability

With one exception, the lands subject to this rulemaking are NFS lands on the Tongass. Therefore, the detailed descriptions and analyses of the affected environment and impacts on resources will be limited to the Tongass.

The one exception is that a single administrative provision concerning boundary corrections and modifications would be made applicable to IRAs designated by the 2001 Roadless Rule on the Chugach National Forest to align practices with other states that have state-specific roadless rules (Idaho and Colorado). This provision is administrative in nature and does not have any environmental effects.