

**Alaska Roadless Rule
Tribal Cooperating Agency Report
Draft Environmental Impact Statement**

Table of Contents

1.0	Purpose of Document.....	2
2.0	Identified Action Items Between DEIS and Draft FEIS	2
3.0	Summary of Discussion for Outstanding Comments.....	3
3.1.	Chugach Administrative Correction and Modification Provisions	3
3.2.	Tongass Administrative Correction and Modification Provisions	3
3.3.	Roadless Inventory Approach	4
3.4.	Community Use Priority	4
3.5.	CAC Recommendations on Roadless Area Characteristics	4
3.6.	CAC Recommendations on Exceptions	4
3.7.	CAC Recommendations on Options	5
3.8.	Appendix F – Traditional Territories	5
3.9.	Traditional Knowledge Incorporation.....	6
3.10.	Mitigation for Subsistence Use in Traditional Areas	6
3.11.	Limitations on Construction, Operation and Maintenance Roads and Utilities	6
3.12.	Reinstatement of the Transportation Utility Systems LUD.....	7
3.13.	State of Alaska’s Wildlife Management Principles vs. Purpose and Need	7
3.14.	Landless and Marine Traffic Issues.....	7
3.15.	Farming Zones	7
4.0	Outstanding Analysis Topics	7
4.1.	Timber and Roads	7
4.2.	Outfitter Guides/Recreation	7
4.3.	Economics	8
4.4.	Subsistence	8

Appendix A: Tribal Cooperating Agency Raw Meeting Notes

Appendix B: List of High Priority Subsistence Sockeye Salmon Watersheds

1.0 Purpose of Document

The purpose of this report is to summarize working discussions and identify potential action items on behalf of the Tribal Cooperating Agencies on the Draft Environmental Impact Statement (DEIS) for the Alaska Roadless Rule. The comment period reflected is from January 13-24, 2020 and includes notes and discussions from a two-day workshop where the lead agency (USDA Forest Service) and State and Tribal Cooperating Agencies worked through “Outstanding Comments” and “Items Needing Additional Analysis” from the 60-day review period on the DEIS.

Section 2 outlines the action items that culminated from discussions at the two-day workshop. The remainder of the document was drawn from meeting notes provided by Ian Johnson, Melinda Hernandez-Burke and Cathy Needham and takes each agenda topic item and provides a brief summary with a conclusion/recommendation. Hoonah Indian Association, Organized Village of Kasaan, and Kai Environmental/Hydaburg Cooperative Association meetings notes are added as Appendix A.

2.0 Identified Action Items Between DEIS and Draft FEIS

There were five (5) action items identified by the Tribal Cooperating Agencies for on-going work between the DEIS and draft Final EIS (FEIS).

1. Analysis on impacts to deer habitat (wildlife and subsistence), where Ian Johnson (Hoonah Indian Association) could assist Tetra Tech with the goal of establishing methods to evaluate the effect on areas of likely harvest on deer habitat using the FRESH Model to better understand the impacts of harvest of old growth on a subsistence resource
2. Compare traditionally used high priority sockeye salmon system watersheds to the list of T77 and TNC/Audubon watersheds for potential inclusion to the watershed protection priority in Alternative 3 (see Appendix B for checklist).
3. Take into consideration “subsistence economy” in the economic effects analysis (references provided at the end of this document). It is possible that the Community Subsistence Information System (CSIS) data could be used to quantify the subsistence economy. Another example may be the non-timber product value of red and/or yellow cedar and their significant cultural ties back to Alaska Natives, and the value lost if stands are no longer available. Red cedar may be a “cleaner” example than yellow cedar (see Section 4.3)
4. Traditional Use areas have changed based on technology and harvest techniques and may not be adequately described in the DEIS analysis. Tribal cooperating agencies sought to integrate the most-recent available through community household surveys. It is unknown if that data can be extracted from the State’s CSIS data and if it is georeferenced. Ian Johnson (Hoonah Indian Association) can take a look at the data and compare it back to the Golschmidt and Haas’ Haa Aani map to help determine if and how it can be used in the analyses (see Sections 3.8 and 3.9). Forest Service will better integrate and reference Appendix E and Appendix F within the DEIS.
5. Tribal Cooperating Agencies should review the Timber and Road handouts that compare the Citizen Advisory Committee exceptions language to the Alaska Roadless Rule exceptions language, and determine how “is authorized” impacts exceptions relative to land surrounding communities.

3.0 Summary of Discussion for Outstanding Comments

3.1. Chugach Administrative Correction and Modification Provisions

The intent of including the Chugach National Forest in the Alaska Roadless Rule DEIS was to allow for the Regional Forester to make administrative boundary corrections or modifications of inventoried roadless area designations with a 30 or 45 public comment period, and without having to go through rule-making. A handout with “potential updates” was discussed that proposed keeping the administrative corrections the same, but adding sideboards to the language associated with administrative modifications.

Kyle commented that the rule did not meet the purpose and need of the DEIS. Cathy commented that during the public meetings, the public were specifically told the Chugach National Forest would not be included in the Alaska Roadless Rule. Therefore the public process for the Chugach and any meaningful Tribal engagement (government to government, Chugach area Tribal Cooperating Agencies) was not included. The U.S. Forest Service staff gave examples of how the proposed language would apply, and also stated that the item may need to be left in the DEIS for at least on alternative.

Conclusion/Recommendation: All Cooperating Agencies supported the removal of the Chugach National Forest language from the Alaska Roadless Rule DEIS and rule-making.

3.2. Tongass Administrative Correction and Modification Provisions

The question was asked if previous administrating piece existed for the Tongass, and Robin explained that because the 2001 rule does not include the administrative changes, then the boundary modification could not be done. The same handout that was used to discuss potential changes to language for the administrative boundary modification was used for discussion. It was discussion that the language is not currently in the DEIS, but could be added to one or two of the alternatives in the FEIS. The example was that it could be added to Alternative 4 which has the most roadless priorities. It was stated it was also needed for management flexibility.

Organized Village of Kasaan commented that it doesn't agree with the added flexibility, as it may overlap/conflict with traditional use areas and thus wouldn't allow for meaning public comment and they felt that “exceptions” apply and would be a better way to handle needed changes. Hoonah Indian Association was skeptical of allowing the flexibility, and would like to see better definition of what constitutes a “project”. It was asked whether this had the potential to create “donut holes” and it was stated that it would apply to “outer” boundaries.

Conclusion/Recommendation: The U.S. Forest Service will add Tongass specific language to 1-2 alternatives that allow for the administrative boundary corrections and administrative boundary modifications, with the latter having more definition to it. **Ken Tu will send out language with the updated Tongass language.**

3.3. Roadless Inventory Approach

Comments reflected that the DEIS did not use the most current roadless inventory, as the data layer used was the 2001 Roadless Conservation Area (RCA). Inventory changes have occurred in 2008 with closing up “donut holes”/mountaintops and with recent land exchanges with Sealaska Corporation and State of Alaska Mental Health. Those were not included in the inventory. The question became whether or not there was a need for a re-inventory and analysis. Ken stated that this would be difficult given the time it takes to process and he felt that these small areas would be covered in at least on alternative. Kyle stated that there would be claims about ANLICA violations if re-inventory was conducted. The USDA Forest Service and State of Alaska agreed this statement would become a response item.

Conclusion/Recommendation: Tribal Cooperating Agencies feel some due diligence is warranted for this to be a response item. Jacque agreed to request the land exchange information, and Cathy recommended that the table in the SE RAC comment letter (item 15 on page 20) be looked at to make sure those 350,000 acres were covered and how they were looked at across alternatives.

3.4. Community Use Priority

There was much confusion between the three different ways “community use” was used throughout the document, and that language needs to be/will be clarified in the DEIS. There was further discussion about Hydaburg and Kake “community use area” maps, which should be more reflective of their traditional territories. While this only applies to Alternative 3, Hydaburg wanted numbers/data in Appendix E to be reflective of the area. There should be accountability for Kake’s comments regarding this matter as well.

Conclusion/Recommendations: This matter was moved to be a response item, and Cathy worked with Jacque during the meeting to address the Hydaburg Boundaries. The Kake traditional use area for Appendix E may still be “outstanding” from the discussion.

3.5. CAC Recommendations on Roadless Area Characteristics

The primary issue was that the Citizen Advisory Committee’s Roadless Area Characteristics definitions had complete consensus from the CAC, and they expected the language to reflected in the DEIS verbatim. The USFS said the language was stated more as a “position” than definition, which is why language was truncated. The discussion referenced a table handout titled “Roadless Area Characteristics – Comparison” that was a side by side comparison of the CAC language and the Alaska Roadless Rule Language. One suggestion was to give the CAC work some context in the preamble and incorporate the CAC language in the FEIS.

Conclusion/Recommendation: The recommendation was to incorporate the comparison table in the FEIS and to provide explanation language in the preamble.

3.6. CAC Recommendations on Exceptions

The discussion referred to two tables that Ken handed out that compares CAC proposed language and Alaska Roadless Area proposed language for exceptions for timber and for roads. The CAC

wanted greater predictability so that a project proponent would have more confidence in proposing projects under exceptions if they fit. Currently, the language discourages people from putting forth projects that may fit exception in roadless areas in the first place. The CAC used the term “is authorized”, however the USDA Forest Service did not want the perception that any project is pre-authorized without site specific analysis. Kyle asked that the DEIS explain why “is authorized” is not used. He also recommended that some language could be changed from “as requested” to “if needed”, which would also aid in perceptions.

Conclusion/Recommendation: Ken will look at Alternative 5 for incorporating discussed language because it doesn’t have all the roadless categories. A section for exceptions applicable to all roadless categories may also be included. The Tribal Cooperating Agencies would like to look at how the “is authorized” language and how it may impact statements relative to their surrounding areas.

3.7. CAC Recommendations on Options

The concern was that the range of alternatives that the CAC doesn’t exactly match up to the range of alternatives in the DEIS, with the underlying issue that the DEIS shows discretion and flexibility in options, while the CAC seeks predictability so that proponents know whether or not a proposed project is worth bringing forward.

Conclusion/Recommendation: This issue is a response item that includes an explanation about the range of alternatives. Also some minor language incorporation that allows more certainty, or opportunity, for development projects in roadless areas so it doesn’t deter proponents from proposing projects.

3.8. Appendix F – Traditional Territories

The discussion was centered about traditional territories being used as the analysis areas within the DEIS, and that right now that Community Use Areas are being used for the boundaries for analyses. The Tribal Cooperating Agencies stated in February that these boundaries were not appropriate, and Kyle explained that they were developed for fisheries. However, when it comes to analysis, datasets fit into the Community Use Area boundaries and it would be a huge undertaking to fit them into traditional territories. One suggestion was to apply the Section 810 analysis to traditional territories using newer data from the Community Subsistence Information Systems (CSIS) database, and for traditional territories use the widely accepted Haa Aani (Goldschmidt and Haas) boundaries. Robin brought up the question of whether or not the use of CSIS data in the analysis would change the outcome/ranking between alternatives, which would be important to know sooner rather than later.

Conclusion/Recommendations: A CSIS data request needs to go the State ASAP, since it might take 2 weeks to return. A due diligence analysis should be run for the Section 810 Subsistence analysis to determine if the newer data changes the rankings of alternatives. It was also recommended that someone on the team look at the State of Alaska Wildlife Action Plan and determine if it actually directly applies back.

3.9. Traditional Knowledge Incorporation

There were many public comments associated with incorporating traditional and/or local knowledge into the DEIS, however the challenge is there are no region wide data sets that have that knowledge to work into any analyses. For the discussion, it would have been helpful to have a summary of some of the other public comments that were made with respect to traditional knowledge, to see where information could be incorporated and/or updated. One suggestion was to integrate the Tlingit and Haida Climate Change Adaptation Plan into the document, however Chad stated there needs to be a metric to measure effects between alternatives otherwise it is difficult to integrate into an analysis.

It was also identified that Subsistence/Trade Economy could be incorporated into Key Issue #2 from the Purpose and Need and the Roadless Area Characteristics narrative could include traditional uses, such as forest products. Ian recommended that Terry Chapin would be a huge resource to reach out to, to help quantify subsistence economies, which ties into these points.

Conclusion/Recommendations: Traditional Ecological Knowledge was not incorporated into the DEIS, however there are opportunities to integrate with subsistence economies being at the forefront. Cooperating Agencies could go through a list of the public comments that were made about traditional and/or local knowledge and provide further feedback if a closer look would be beneficial.

3.10. Mitigation for Subsistence Use in Traditional Areas

It was discussed that the concern over mitigation was premature, with no subsistence finding or determination being made. The real outstanding issue is more in-line with the first sentence of Response Comment #62, which was the basis of discussion. Kyle recommended looking at Access Travel Management (ATM) Plan to see how a Section 810 Analysis could apply to a programmatic EIS such as the Alaska Roadless Rule. Robin mentioned that the analysis will be looking at how to determine where timber harvest would occur, and then could update the discussion in the EIS to reflect the analysis for both timber and roads. A lot of the discussion revolved around the need for an updated effects analysis for subsistence, which would be discussed on Day 2 of the workshop.

Conclusion/Recommendations: With respect to mitigation, this is not outstanding because it is premature. It is recommended to make Response Comment #62 an outstanding issue and have a more thorough discussion with respect to the Section 810 Subsistence Analyses. Resources could be looking at other programmatic Section 810 analyses, and looking at the SE RAC recommendations on how to address analyses.

3.11. Limitations on Construction, Operation and Maintenance Roads and Utilities

The comment appears to be taken out of context, and is likely not an outstanding issue.

Conclusion/Recommendations: No action or recommendation.

3.12. Reinstatement of the Transportation Utility Systems LUD

It was discussed that the Transportation Utility Systems (TUS) were an overlay in the 2008 Forest Plan, however under the Roadless Rulemaking there no changes are being made to the Forest Plan so this issue is outside of the scope. Kyle said that the State's comment letter has responses to some language changes that can improve the exceptions, again by changing "as requested" to "if needed".

Conclusion/Recommendations: This item was moved from outstanding to a response item, and can take into consideration the State of Alaska's comments.

3.13. State of Alaska's Wildlife Management Principles vs. Purpose and Need

Kyle stated that the Roadless Rule and the State's wildlife plan are separate and administratively isolated from one another and there is no need to comply between the two.

Conclusion/Recommendation: Make this issue a Response item.

3.14. Landless and Marine Traffic Issues

Ken Tu stated the comment refers to conflicts among landless and marine traffic issues and is a non-issue.

Conclusion/Recommendation: The issue should be dropped or a Response item.

3.15. Farming Zones

Ken Tu stated that this issue was outside the scope of the analysis.

Conclusion/Recommendation: Make this issue a Response item.

4.0 Outstanding Analysis Topics

4.1. Timber and Roads

It was acknowledged that the DEIS treats timber across all lands equally rather than suitable, and that a re-analysis is likely to occur. This in turn relates to the roads analysis and "remote" is categorized with the existence of infrastructure. Ken believes the timber analysis is challenging because we don't know where future actions will be, however it as discussed that the "stumpage" data could be used to show that timber doesn't come evenly off the landscape and that some regions thus have a higher potential for where future timber harvest actions, including road building, will be. The Tribal Cooperating agencies would like to apply the decisions of the Timber and Roads analysis to model potential subsistence impacts.

4.2. Outfitter Guides/Recreation

The discussion included a closer look at the economic analysis and how it relates back to how timber sales may impact recreational use areas and/or outfitter guide use areas (using updated data).

4.3. Economics

The economic analysis needs to include the “subsistence economy”, as well as potential impacts from the two topics identified above (timber/roads and outfitter/guides/recreation). The Tribal Cooperating Agencies would like to engage in the subsistence economy analysis, and recommended that it needs to include non-timber forest products. An example that was brought up in subsequent discussions, included the cultural significance of red cedar to local subsistence economies for things such as totems, canoes, weaving, and artisans, and how when timber harvest removes red cedar from the landscape it impacts the availability of the resource for future generations.

Specifically with respect to Subsistence Economy (which is separate from the Section 810 Subsistence Analysis discussed in Section 4.4), we provided the following reference list for some background:

- Robert J. Wolfe and Robert J. Walker, 1989. Subsistence Economies in Alaska: Productivity, Geography, and Development Impacts. Arctic Anthropology, Vol. 24, No. 2, pp. 56-81.
- Brock, Matthew and Philippa Coiley-Kenner, 2009. A compilation of traditional knowledge about the fisheries of Southeast Alaska. Alaska Department of Fish and Game, Division of Subsistence.

It was also recommended the team outreach to someone like Terry Chapin at the University of Alaska Fairbanks and/or Stephen Langdon and engage them on possible ways to analyze subsistence economy; they may be able to identify relevant data sets.

4.4. Subsistence

There was discussion on resources and best ways to go about updating the subsistence analysis so that it is sufficient enough to make a Section 810 subsistence determination. While there might not be regionwide trend or geospatial data, the subsistence analysis could focus on deer or deer habitat and fish or fish habitat and how timber and roads directly impact these resources. Cathy and Jacquie can look at high priority sockeye salmon watersheds that are designated through the Fisheries Resource Monitoring Program (FRMP), which is robust in that it had multi-agency strategic planning ranking and are supported through the Office of Subsistence Management. That list could be compared back to the T77 and TNC/Audubon watersheds to assure there are no other watersheds that didn't get the Watershed Priority designation under Alternative 3. This would address some of Hydaburg's “outstanding concern statements”. Ian can look at if newer datasets from CSIS increase our understanding of use area and aid TetraTech on developing methods on spatial modeling of deer habitat.

Some resources to immediately look at include:

- Community Subsistence Information System data (<https://www.adfg.alaska.gov/sb/CSIS/>) that houses household subsistence survey data—the data request from the State and georeferenced that back with Haa Aani/Traditional Territories
- The deer habitat model and sideboards that important to maintain habitat around communities, with sideboards such as slope, snow intercept, etc. that are relevant.

Possibly overlay the high value deer habitat from the deer model with the “stumpage” results provided by the state and included in the 2007 management plan and look for overlap

- The list of high priority subsistence sockeye salmon watersheds and the “left out” ones from T77 and/or TNC/Audubon
- The subsistence hearing transcripts and information provided within
- The six (6) bullet items starting on page 14 of the SE RAC comment letter that refers to where/why the subsistence analysis was inadequate and provides insight on how to meet the criteria of Section 810 analyses

Appendix A

Tribal Cooperating Agency Raw Meeting Notes

Raw Notes from Hoonah Indian Association

Day 1 01/16/2020

Marina, Ken, Shannon O'Brien, Ken, Robin Dale, Chad, Rita La'Ford – national office, Melinda, Paula, Ray Paddock, Chris Maish – state forester, Kyle Moselle – State DNR, Cer Scott – Environmental, Bob S., Jackie Foss,

Goal : respond to the comments. Technical workgroup meeting, our specialized knowledge and experiences around the comments. Technical aspects of the comments. Reduction of advocacy – we are working as if all alternatives are viable. 5 action alternatives in the end for Sonny Perdue to choose from.

All of the actions need to be viable in the end – “not public consensus” – WHAT?

Viable, defensible, - an analysis that supports the alternative, need to demonstrate that you took a “hard look” – information in the record that shows you did that. For instance, a main issue – where are the data and information behind the EIS? “reasonable range responsive to the purpose and need”

Statement of purpose and need – can we get this?

Kyle – Need to fill the gaps in the analysis and concerns of the commenters but not address them.

Ken – How was the list of concern statements generated – these were pulled from 375,000 comments. A team of people code the responses in the letters and put it into a category – Lumps them into groups. Draft up a concern statement based on the coding. Modify alt, create a new alt, new analysis, factual corrections, or warrants no response. Disposition – Analysis – need to modify the analysis to respond to the comments, outstanding – need to modify or create a new alternative.

Ken – needs a statement of work 2 Mondays from now. 27th to the contractor. Need to understand what we are going to do different in analysis and alternatives.

Cathy is requesting that this be changed to analysis or outstanding :

Title VIII, Section 810 of the Alaska National Interest Lands Conservation Act (ANILCA) requires Federal agencies having jurisdiction over lands in Alaska to evaluate the potential impacts of proposed actions on subsistence uses and needs. Commenters were concerned that the analysis is of the proposed change does not adequately account for the impacts on native peoples.

6.1 ANILCA Section 810

Response

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.

Purpose and concern : "...which is to consider options for a state-specific roadless rule that will better incorporate the economic interest concerns and statutory requirements while conserving roadless area characteristics."

Commercial firewood sale – what is that? Can that be used to support a biomass system?

Outstanding Issues

1. Chugach Administrating

- a. Language was too open. Makes it look like you could change roadless areas. The intent is to fix the boundary layer – errors in the boundary layer can be fixed. 2001 roadless rule doesn't have a defined process for changing the process.
- b. Does this fit the purpose and need? National purpose and need.
 - i. FS attorney – just drop it due to this. You'd have to go through the process anyway
 - ii. FS counterparts – FS folks think we need this.
 - iii. For "reasonable range" – leave it into one alternative – **they will blend alternatives?**

2. Tongass Administration

- a. Boundaries and "themes" – roadless management categories
- b. Changes to boundaries – would that be exemption process of this administrative process?
- c. Management flexibility –
 - i. What is a "project"
 - ii. Does this allow for creation of donuts?
 - iii. Mores specific constrictions on how the public comment?
 - iv. NEPA would apply to the activity?
- d. Boundary modification – apply to 1 or 2 alternatives
- e. **They will send out language with the updated Tongass language**

3. Roadless area designations

- a. Methods – 2001, 2003, 2008 IRA – they use the 2001 Roadless Conservation area. The no action is that inventory.
- b. 2008 Roadless area would include mountain tops
- c. Changes – started with 2001 roadless, fixed areas that are roaded roadless – such as Kupernof,
 - i. Alternative 2 adds it to some of the alternatives
 - ii. What is the outstanding question – do we respond by looking at the inventory and adding additional areas?
 - iii. Must not have infrastructure, must be connected to roadless areas, size, exclude islands
 - iv. **There are land exchanges that occurred after 2008 how are those built in?**

v. Are there other known land exchanges after 2008?

- vi. Do we re-inventory? Kyle – that will violate ANILCA and they wouldn't recommend that. The state always said that re-inventory
- vii. Last land exchange was 2015 through state
- viii. Regional Advisory Committee brought up inventory as an issue.

4. Community priority and roadless category area – alternative 3

- a. They are going to Move this to a response and write a response on how they responded

5. Citizen Advisory Committee Recommendations Not Reflected

a. Should we modify the roadless areas characteristics, do we need to change the exceptions across the alternatives, do we need to create a new alternative that is not incorporated?

- i. Kyle – Roadless characteristics, these were in the CAC, felt strongly about the characteristics that they developed and their specificity to the Tongass. Roadless characteristics are enforceable within roadless.
- ii. Kyle - When the draft came out there were 2001 roadless characteristics amended for Alaska – there is no discussion about why to change or amend them for Alaska. This did not address the comments –
- iii. FS misunderstood the recommendation . they understood them as positional statements about roadless areas in Alaska – of the conditions. They took the CAC and merged with 2001 roadless area definitions to account for the issues raised in the CAC. Alaska area roadless characteristics.
- iv. Regulatory characteristics of roadless – 2001 roadless rule. Appendix G – definitions are in their what defines a roadless area. They use those to help define a projects impact on roadless areas
- v. Kyle – incorporate that table CAC in the FEIS

vi. Need to provide context to the characteristic to the description in the EIS and add in language that was stripped from the CAC and 2001 Roadless Rule.

vii. Putting the context into the pre-amble?

1. Kyle – Citizens group wants language verbatim

6. Citizen advisory committee recommendations on exceptions

- a. Ken – FS believes that we accommodated the major of CAC recommendations
- b. # 7 in timber – the actual issue “is authorized” – the underlying issue is discretion and flexibility – FS wants discretion and CAC wants to have predictability. In the exceptions they want to create greater predictability so they can know what the outcome will be so they are no discouraged in the process from get-go.
- c. Ken – does this rule authorize secondary actions? We couldn't defined authorizing that because of their NEPA requirements. The Roadless rule does not authorize or mandate any actions. They cannot pre-authorize anything without a site-specific analysis . There may be discretion, but how to consider that?
- d. Citizens groups – use 228 in roadless areas. “you have 228 for defined process for reasonable activity for mining activity, but you don't rely on that for the same action in a roadless areas”.
- e. Is needed vs is requested

f. Review issue of “authorized” in the timber sheet. This is pertinent and needed from all cooperating agencies

Comment [J1]: HIA should look at this language and determine how it impacts statements relative to our surrounding lands.

7. Citizen recommendations on options.

- a. Response needed, have a range of alternatives
- 8. Can create a blend if it is within the range of the alternative – you have to “recognize” the alternative

9. Appendix F – Traditional Territories

- a. Issue, multiple definitions of community use
 - i. Community use – Appendix F - traditional use areas of tribes – use “traditional use”
 - 1. Ken – we heard these were not mapped correctly. Need to use the actual use areas.
 - 2. Ken – on Monday we heard it was very important to keep appendix F. Which is the Goldschmidt map or something else?
 - 3. Ken – would prefer to use Appendix E and modify
 - ii. Community use – Appendix E – use areas developed by the state from the late 1990s and depicts where the state felt the resources were being utilized by communities. These were fish and wildlife resources, it was done by fish and game – one resource department . They used this because it is one of the few categorizations consistent across Alaska – Ken – he thinks it is well supported, but it’s old. Kyle – has heard that time component (1990 is issue) and technology issue – people are capable of going further now and can travel further based on the resources they have. – Use “community use area”
 - iii. Community use – Roadless management category – community use priority area. – Use “community priority”
- b. CAC – if you use community use 1990 data that is way outdated information.
 - i. Use of Subsistence data – household harvest surveys and collecting new information
 - ii. RFI process through the state to get the data
 - 1. Took 2 weeks for Kyle to get the proper data from them.
 - iii. Resolution : outreach to the state, re-run the analysis based on the community use data.
 - iv. Bob – need to overlay maps of the new data with the old to determine what the changes are
- c. Draft EIS does not include Appendix F into the analysis. It was not integrated into the use areas.
- d. Cathy – Haa ani boundary is pretty widely accepted .
 - i. Kyle - Is there a description of the data used in the analysis?
 - ii. We are reiterating these again and we were here last February.
- e. Analysis issue : how do we do the subsistence analysis and what data do we have to update the analysis? How much would this change the effects analysis? Contractor didn’t feel it would change the analysis?
 - i. Robin – does this matter. Would this change the ranking of your alternatives? If this would change the ranking then you have a major issue.

Comment [J2]: Ian will look at CSIS data and compare to Goldschmidt.

Comment [J3]: This is important. We need to, as cooperating tribes, contribute as much as we can. Minimum contribution is not likely to change the ranking of the alternatives.

- ii. Kyle – state was never asked for updated information. Perhaps couch it as communities of interest.
- iii. Robin – would these data change the ranking? If we find yes, then we have a bigger problem. We wouldn't be able to say its just a data gap.
- iv. Ranking of alternatives – what does that mean? For instance Alt 2 & 3 have a lighter effect and 4&5 have more effect. If the new information would change this effect then you have a responsible official doesn't know what their decision making.
- v. State wildlife action plan – has climate change and impacts on wildlife at a level. Perhaps has utility – this is from 2015

10. Traditional Knowledge Incorporation

- a. This is only one example of how Hyدابurg felt the rule didn't apply. Apply this across all tribes. Any person with historic and traditional knowledge.
- b. Perhaps updating some of this information is a start.
- c. Outstanding issue : TEK was not integrated into the DEIS. How to rectify that?
 - i. Need to house this data in this useable format for future
- d. Ken – this is a progromatic analysis. The general borad understanding of traditional knowledge at the broader scale.
 - i. Integration of traditional use. Climate change adaptation plan. MOUs for climate change plan – created a template for SE Alaska tribes, integrates their primary concerns into the plan.
 - ii. Drafted the adaptation plans towards tribal concerns, subsistence resources
 - iii. Working on a template for adaptation plan for socio economic conditions – drinking water,
- e. Chad- having a metric as determine effects between alternatives is very difficult. Hard to integrate this into an analysis.
- f. What does an economic analysis of subsistence economy?
- g. Review CAC for traditional economies
- h. Community well-being issue – analysis of well-being.

11. Mitigation measures for subsistence

- a. Ken – initial reaction. Types of measure would be most appropriate at the project level.
- b. Kyle – how this is framed, before you mitigate you have to determine what the impacts are, for subsistence is there impacts that needed to be mitigated? If there are, then that could be where our discussion goes. This comment doesn't talk about what the impact would be
- c. Ken – at the project level is the most important place to put the effects, programmatically we only know the conceptual effect
- d. Robin – in analysis we are looking at how to determine where we are likely to go for harvest. Not assume even harvest. We'll have more information on specific areas. We could update the discussion in the EIS based on hat analysis including road systems, harvest,
- e. Cathy – comment 62 – 62 is response comment. I agree with Kyle, # 62 is the “horse” and mitigation is the cart. #62 is related to the subsistence determination and needs to be elevated to an outstanding issue

Comment [J4]: Ian will be doing GIS analysis for subsistence and thinking about a gis model that Tetra Tech could use for analysis

- f. Ken – mitigation for climate change. This rule doesn't effect climate change because of consistent levels of change across all alternatives.
- g. Cathy – can that same thing be said for subsistence? Ken – we dn't know what the subsistence determination is going to be and I haven't see those. Chad – not sure what the subsistence is going to be, not sure what that #62 is going to go. We need to figure out how the traditional use areas are going to be used.
- h. Kyle – access management travel management plans. They are road related in the Tongass and had 810 analysis in them. Revisit assumptions of timber harvest and road building. Check these for consideration of how subsistence 810 analysis would be used.
- i. Ken/Cathy – Issue #62 take the first sentence as an outstanding issue and response for the second part of the #62.
- j. Cathy – effects analysis on subsistence – this was initially flagged as a response but should this be moved to outstanding. Do you have what you need? Probably not, this is going to require an analysis. Do you need cooperating agency input into that?

Comment [IJ5]: This demands greater thought. They know how many acres will be harvested in 15 years. Have they modeled how much carbon sequestration potential that is?

12. 810 Analysis/Subsistence Hearing

- a. Kyle - A determine of effects needs to be made on this analysis – we don't know this yet and need to see that. Is there analysis and what is the effect on it? If there's a determination of effects FS is obligated to mitigate them. The state agrees that a determination needs to be made.
- b. Cathy – 5,6,7 of CAC has direction for what is needed
- c. Robin – 810 determination would be in the pre-amble of the rule. There is analysis in the EIS, and we know that we need to look at new data from the state and that we are going to take a new approach for likely areas for analysis. Both of those will change the results of the analysis.
- d. Ken – Table this until we have more information
- e. Robin – as part of the determination, have you use minimum lands, have you taken reasonable steps to mitigate?, what are the steps?
- f. Cathy – there are 6 bullet points where CAC felt analysis was lacking. Step by step from the FS handbook that states what to do with finding. Do analysis, present the finding, do subsistence hearings based on the finding, based on that input you get
- g. Robin – we used findings from the FS plan (page 300 of the DEIS)

13. Description of limitation on construction, etc.

- a. Kyle – is this 2001 limitations or limitations based on a new roadless rule?

14. Issue 106 and 150

- a. Robin – expanded the exceptions.
- b. Kyle – this probably isn't outstanding, we have a response to it.
- c. Kyle – we have a qualifying language in the CAC item 8. Changing "is needed" to "is requested". Language would be " a road is requested for one of the following reasons....". Don't need feasible because that's incorporated in NEPA
- d. Kyle – a proposed action is a trigger for NEPA
- e. Ken – at the root of the CAC issues – no qualifying things. We can not approve a future action through this rule making.

15. State of AK wildlife management principals and purpose and need

- a. Kyle - Intensive plan and wildlife management plan do not interact with each other. There is no need to comply between these two things. They are administratively isolated from one another.
- b.

Day 2 01/17/2020

- 16. Kyle : another theme : LUDII doesn't exist in all areas. Roadless is the only protection of an area – see bottom of Hydaburg comment Issue #119
- 17. Cathy : We are incorporating local knowledge through use of T77 watersheds. Need to apply the framework of the T77 watersheds
 - a. Ken - Fisheries monitoring program : pull out watersheds that are important to the tribe, weave them into the framework

Outstanding Analysis Issues

- 18. Analysis Team Background and background on the issues –
 - a. Dave Cox, tetra tech
 - b. Ken – are going to re-work some analysis. This analysis is a bit different because its programmatic analysis and we don't know what the future actions are. In terms of effects they are looking at trends, not a specific trend. What is the overall trajectory for fisheries, water quality, timber. They are looking at a SE Alaska-wide scale. Datasets across landscape are difficult to extrapolate
 - c. Dave Cox – making reasonable assumptions is difficult. Re-thinking some projects based on what the first few years may look like
 - d. Ken – we are going to re-work the timber analysis, Assumption : evenly distributed effects across 180,000 acres of suitable timber. For roads analysis need to be more realist.
 - e. Kyle – economical timber analysis – Does that include the cost or road building?
 - f. Ken – outfitter/guide recreation more quantifiable
 - g. Ken – Economics – reworking that
 - h. Ken – reworking subsistence

19. Analysis – Timber

- a. Dave – Through the last few planning cycles they treated all suitable lands the same. Quantification of roads – how likely is the road. Kyle – what is a remote area? Macro scale? Or micro scale? As in far from a mill or far from any development? Dave – proximity to infrastructure. You'd get areas that would be most likely accessed first, these would be developed. Kyle – that's part of the state's comments around timber sale adaptive management plan "phase 1,2,3". In that plan you can't build into phase 3 areas. Robin – 2016 forest plan does allow entry into phase 2 and 3 in young growth. Does not ban road construction in phase 2 and 3 – there are no limitations. Dave – there are two types of suitability. Robin – Suitability acres identified young growth and old growth and phase 1 and phase 2. Kyle – stumpage fee includes the cost of road building

- b. Dave – Suitable – lots of things that total acres to quantify what would be – Spread across the forest – if applied evenly
- c. Robin – 18 deer/square model – have we run
- d. Dave – Fresh and “regular” deer model – that was not re-run for this analysis. Opening of roadless rule allows you to “spread out and decrease impact”
- e. Potential risk –
- f. Robin – important if economic analysis incorporates road, and does this economic analysis filter to harvestable lands?
 - i. Kyle – maybe, you have the methods, these are in PDF format and can provide the layers. These are divided by BCUs
 - ii. Robin – if you overlay the forest plan on this does that change the stumpage value?
 - iii. Kyle – analysis did not go beyond what is allowed in the forest plan. The take away that is that assumption of evenly distributed harvest is false. Important to note this is only saw logs. Chris would be the most informed about this.

20. Analysis – Recreation

- a. We are lacking where outfitters and recreation guides are. They looked at outfitter guide use areas – know the numbers in those areas. Which of the areas that are
- b. Outfitter guides – they want “wilderness like” experiences. Small boat cruises.

21. Henry Eickman – economist

- a. Ken – synopsis of changes in the economic analysis
- b. Henry – It was a qualitative analysis so the question is : what is need to be quantified?
 - i. Quantifying applies to the regulatory documents, not the EIS to quantified
 - ii. EIS – no necessary to quantify it, but they are going to monetize it
 - iii. Roads, road miles, and maintenance cost
 - iv. Create variation across the alternatives to show cost . They will quantify road miles for the EIS
 - v. Cost benefit analysis in the regulatory process – Any net-benefit conclusions? It would be ideal to show variation in documents of cost analysis
 - vi. Updating with new outfitter guide revenues and new costs data from the FS
 - vii. Quantifying ecosystem services – scenery and recreation. Comments say to be more inclusive of ecosystem services.
- c. Ken – economics of trade and trade economy.
 - i. Henry – this has been heard by contractor
 - ii. Marina – Trade economy, value of resources from land, in Kasaan there is no store. Trading fish for deer.
 - iii. Quantifying the cost of subsistence from CSIS database?
- d. Cathy – Walker and Wolfe 1987 , Brock and Kenner 2009
 - i. Brock, Mathew, and Philippa Coiley-Kenner. *A compilation of traditional knowledge about the fisheries of Southeast Alaska*. Alaska Department of Fish and Game, Division of Subsistence, 2009.
- e. Kyle – 2007 map – Tetra Tech map - this is from the 2008 plan and was reused in the 2016 plan
- f. Summary of actionable items –

- i. Dave – Concern over watersheds that are important – need to ensure that we get the sockeye systems incorporated. Reflecting other facts in land management that impact forest characteristics, TTRA, LUDII, Forest Plan, phases, etc. Need to see how
 - ii. Dave Timber – keeping the same PTSQ. Change how harvest is distributed – look at volume, access, consulting with local forest that assumptions are in line with local knowledge
 - iii. Dave outfitter guides – looking for a way to quantify, will rely on the redistribution of timber
 - iv. Dave subsistence – Further consider non-forest resources, traditional subsistence economies, How will any resource extraction impact weavers, hunters, and other subsistence, Even if not directly impacted need to understand how the limits are.
 - 1. Chad – how are we going to do subsistence? We have the community use areas. That unit analysis works pretty well right now, but may not be accurate of , how far people are actually traveling to get resources. What other unit may be more appropriate?
 - 2. Ken – this is still unresolved we are doing the ROI for more data from the state. Kyle did an initial inquiry
 - 3. Jackie – can substitute in better data for worse if its deemed to be better.
 - v. Dave – continuing to work with the forest service so that the issue comments are cleared up.
 - vi. Henry – bring more resources to the table. Talk to Terry C and Steve Langdon
22. Review the subsistence effects analysis in the DFEIS to do mitigate
- a. Need the subsistence hearing transcripts
 - b. Do the 810 analysis
 - i. Chad Programmatic analysis and not site specific analyses which makes the 810 analysis difficult – do you make it for the whole
 - ii. Cathy – key in sockeye and deer
 - iii. Robin – different types of conclusions – is there going to be a significant limitation for any resources? If yes, then go into the subsistence hearings and you go
 - 1. to access and competition,
 - 2. minimal lands necessary,
 - 3. has the agency taken reasonable steps to mitigate?
 - iv. Cathy – the impact to subsistence were not presented at the subsistence hearings, rather they just asked for a feedback on subsistence
 - 1. In the ANILCA process you need to have a specific issue, the findings from the hearings are not useful because it wasn't asking for a specific effects
 - v. Robin – all of the hearings have been transcribed, but need to finalize the Tlingit translations
 - vi. Cathy - SE Alaska Regional Council to the Federal Subsistence Board
23. Kyle : purpose and need statement were truncated. Limits the purpose and need and what was limited was related to the preferred alternative
24. Ken wrap up :

- a. Apology again for unintentionally misleading cooperating agencies on the outcome (i.e., that alt 6 was selected)
- b. Remove Chugach language
- c. Tongass Language : one modification/solution may be. Tried to constrain the language. Perhaps keep administrative correction and remove the administrative boundary language? Section 2 of that. This would apply for 2-5
 - i. Chad : operational question - say we do have land change? How do we make the determination that it's roadless if there is no analysis? Robin – in the land acquisition process of land there is a look at the surrounding lands
- d. Expand on roadless characteristics will be reframed based on CAC
 - i. Coalition letter had roadless characteristics
 - ii. Robin – Articulation of the CAC language is there
 - iii. Robin – are there identified access needs that haven't been addressed within an alternative?
- e. Subsistence – we will keep Appendix F, Appendix E we will proceed with further information from the state
- f. Description of limitations –
- g. Subsistence analysis – inclusion of effects and subsistence trade economy, explore and see what we can do

25. Timelines –

- a. Timelines for cooperating agency input timelines with Cathy
- b. Scope of work to Contractor 31st, they get 1 month
- c. Preliminary from march, go through cooperating agencies with. 2 week scheduled for comments.
 - i. We need to think about what we are feeding back on – first 2 weeks of march. Looking for fatal flaws
- d. Submit to contractor, 2 weeks to finalize
- e. It goes into clearance into the “black box”. We will keep us informed along the way. A draft final rule goes in at that time. As cooperating agencies we review FEIS
- f. File EIS in mid-May in federal registration – that releases the FEIS but the final rule is not published and there is a 30-day stay then will release the final rule. “implementable the day of publication”

Raw Notes from Organized Village of Kasaan

- CA Tribes were led to believe that it was not likely at all that the Secretary would choose Alternative 1 or Alternative 6, so initially focused on the middle alternatives.
- Outdated data such as the State's data in the subsistence analysis should not be used
- Boundary changes should have no flexibility and have to go through the current 2001 process to modify as a RR exception and it should not be in any alternatives
- Traditional trade economy of the indigenous peoples of Southeast Alaska was not fully considered. Subsistence is *not* enough to consider. The value that all the resources that are traded are not considered. Harvesting food is a portion of the overall traditional economy. An analysis needs to be done based on *all* resources gathered and traded in relation to the market value of said resources and the amount traded and utilized annually. The traditional economy not only circulates through the indigenous communities, products are made, sold and a visitor attraction for western economics.
- The turn-around time with reviewing docs from the USFS as a CA has been too short, and the USFS has not had enough time to properly gather the data needed for the EIS
- Not all comments were reviewed by the USFS before the CAs met at the workshop – not acceptable. Again, timeline too short.
- The USFS and the State of Alaska have absolutely no right to decide what the traditional boundaries of the indigenous peoples of Alaska are. The only appropriate parties to inform the USFS of traditional boundaries are the tribes.
- 2007 map w/economic timber analysis is outdated and should not be used

**Alaska Roadless Rule
Technical Work Group Meeting
Outstanding Issues on Draft EIS
Raw Notes from Hydaburg Cooperative Association/Kai Environmental**

Introductions: Marina Anderson (Kasaan), Ken Tu (IDT Leader), Shannon O'Brien, Ian Johnson, Robin Dale, Chad Van Ormer, Reta Laford (Roadless Team Liaison), Melinda Hernandez, Paula Peterson, Ray Paddock, Chris Maisch, Kyle Moselle, Cer Scott, Ken Weitzel, Bob Starbard, Jackie Foss, and Raeanna Wood. Stephanie Russ is on phone

Chad Introduction: Goal of the meeting is to work through the outstanding issues, then the issues needing further analysis. All the action alternatives need to be viable in the end. Viability = defensible (supported by analysis....data or procedural....meets the purpose and need). Kyle, are there other criteria? And is quantifiable data REQUIRED? NEPA requires one to identify knowledge gaps.

Ken Tu: List of concern statements (they are draft). ~375K comments (most comments received were on alternatives 1 and 6). Concern statements have people combing through looking for key words and then statements are put together. If it is determined not to be substantive comment, it doesn't make it to concern statement list (i.e. big foot analysis). Each comment is assigned a disposition (Outstanding is a catch all group) (KEN READ LIST OF THINGS TO DO, GET THAT LIST). Ken has to get a new Statement of Work to new contractor, which includes reconciliation of issues going over in workshop. All unique letters have been combed through, so most substantive comments should be in concerns statement list. The team doesn't have discretion to say yea or nay on anything decided

Item 1: Chugach concern statement – intent is to be able to expand boundary layer – some modification would require rule-making, so trying to roll this into this rule-making to provide an administrative process. (DISCUSSION TURNS TO ADMINISTRATION CORRECTION AND MODIFICATION LANGUAGE IN DEIS/PROPOSED RULE). State commented that this rule did not meet the purpose and need, and stated that administrative changes should apply to the national 2001 rule so a change should be targeted to just one forest. State purposefully left the Chugach out in the early stages. Cathy pointed out the public process, Kyle reinforced that cooperating agency status was not extended and government to government. There is an option to leave it in one alternative, so you have a range of alternatives, so it is available to the Secretary, however it doesn't meet the purpose and need. Robin gave an example of a specific example of the intent could have improved a process in the Chugach. Group consensus is that it should be removed, Ken will have to talk to attorneys, the rationale being not defensible, misleading public process and doesn't meet the Purpose and Need.

Sub-Item: Ian, does this administrative piece exist for the Tongass in the DEIS (use the handout language for the rule-making piece). Chris asked if this could be done through exceptions rather than administrative action (rather than rule-making), Robin said because the 2001 doesn't include the administrative change then boundary modification could not be done. The boundary modification for the Tongass will likely stay, with the potential update language in order to address the comments that have been received (not currently in, but could be added to at least one alternative, such as Alternative 4 with has the most roadless priorities). Kasaan

doesn't agree with the flexibility to the changes to the boundaries (rationale is about traditional use areas and that "exceptions" would apply). Hoonah is skeptical of the flexibility a proposed, and would like a better definition of what a "project" is. Clarify that it is "outer" boundaries.

Possibly apply the administrative boundary corrections (1), but not administrative boundary corrections (2).

Item 2: Roadless Inventory Approach – Concern was DEIS did not use most current roadless inventory. Example would be those brought forth by Kake, as well as Sukkwan. Roadless data layer is the 2001 Roadless Conservation Area. The 2008 expanded roadless into "donut" holes, and was not used in the analysis. The outstanding issue is, do they take the time to include the 2008 inventory more and start working on small areas. Recent land exchanges were included in the analysis. This discussion basically determined it was a non-issue. Follow up would include the SE RAC comments #6.

Item 3: Community Use Priority – The Hydaburg and Kake community use areas, and Yakutat all had input into boundaries for their community use area. How does the analysis change between alternatives? This only applies to Alternative 3. All communities this applied to, there were no comments wherethis is moved to a response

Community use is being used for three different things, and that language needs to be cleaned up

Item 4: CAC recommendations on roadless area characteristics – do we need to modify the roadless area characteristics? These were a non-consensus item amongst the CAC. 2001 Roadless characteristics "Amended for Alaska", but it wasn't recognized that the CAC came up with those characteristics. See Roadless Area Characteristics Comparison Table handout from Melinda. USFS felt that CAC recommendations were "position" statements, so they wrote them to reflect how the CAC recommendation was 'different' from the 2001 characteristics. Kyle observed that the Alaska Roadless characteristics are CONCISE, where more information was provided to the 2001 Rule. The State feels that having a preamble recognizing the CAC work is important, and adding some of the detail back in would be helpful as well. Recommendation is to include the table into the FEIS.

Item 5: CAC recommendations on exceptions – Refer to colorful table labeled 3. The USFS feels they accommodated the CAC, but small changes. The complication is that it had to be the difference among alternatives proposed language. See also table labeled 4. Discussion on mining access (although the law/Act allows for mining access, there is another layer of decision making)....so the debate is the secondary analysis needed through NEPA for amendment to 228 (the CAC says to use 228 process in roadless areas....reasonable access for mining activity). The issue is that the DEIS does not explain the procedural process that USFS goes through. (if needed vs. if requested).

Item 6: CAC recommendations on options – The state feels there is enough overlap in the range of alternatives....so the concern can be downgraded to "response". Refer Table 1 Options in CAC report, and how they apply to range of alternatives.

Side discussion: regarding having a range of alternatives, and whether or not it is likely that things are shaped into a new alternatives that has all the parts and pieces. If there is going to be some reconciliation by changing parts and pieces...where changes are being housed.

Item 7: Appendix F – Traditional Territories

The unresolved issue is that community use language, being used in three ways:

- State of Alaska Community Use area (done by ADFG) and only applies to fish, and is not reflected for land uses. The data is old and outdated (1990), and yet it was used. This termed used for analysis in the DEIS
- Roadless Management use Community Priority – not further discussed, this clarification can be made
- Community Use in Appendix F could be called Traditional Use Areas – which is the Haa Aani map

This links into the comments how using 20 year old data from TRUCS for subsistence analysis. The question becomes two fold...one the use of outdated data, and two the use of the data applied to Community Use Boundaries – should those boundaries be moved to be reflective of Traditional Territories. There may be consensus about using Haa Aani maps in the analysis (but I think people are on separate pages). Community Use Data was the most consistent dataset across the region (although there is updated information, it may not apply).

This issue also links back into SE RAC comments #6 and #7 – regarding old data

Ranking (see Ian's notes on this) – the question is once they get the new data, they have to decide how this will apply back to a Section 810 determination

State of Alaska Wildlife Action Plan – might actually directly apply back – and includes updated data

Item 8: Traditional Knowledge Incorporation

Many comments touched on this, but how to reconcile it without a specific dataset that can be incorporated into any kind of analysis. This was brought up by SE RAC, and many other comments. An example was using T&H's Climate Change Adaption Plan could be incorporated or used in the climate change analysis. Would be helpful to see other comments with respect to traditional and local knowledge, to see if there are other specific instances where updated information

Turned into a conversation specific by subsistence economy (see economic analysis)

Key Issue 2 might be able to incorporate "economies" – trade economies

Get list from IAN about other comments that draw on this traditional knowledge (someone like Chapin might be able to help quantify subsistence economies) reference numbers 36, 119, 120 and E.O. 128987 (Environmental Justice)

Issue 9: Mitigation measures for subsistence use in traditional use areas – Section 810 analysis – could pull from ATM management plan and the 810 analysis that went into those.

Mitigation is too early, without the finding or the determination. Comment item #62 is more appropriate to elevate from “Response” to either outstanding or needs more analysis.

SE RAC comments, inadequate effects analysis, uses old data,

Issue 10: Limitations on construction, operation and maintenance of roads and utilities also related to issue lumped with Reinstatement of the TUS LUD (Issues 106 and 150).

The reinstatement is a Forest Plan issue, cannot be reinstated – because the Forest Plan addresses the same things in different ways now. This is outside the scope of the proposed action, and in the Forest Plan was an objection (need to look at the response)

The limitations on construction, operation and maintenance of roads and utilities – is an example on how the ‘exceptions’ in the DEIS were overstated...which was the State’s comment or issue – reconciled this making it a response (not outstanding) – determine whether or not to take State’s recommendation

Issue 11: State of Alaska’ wildlife management principles vs. purpose and need

The AKRR and the State’s wildlife plan are separate and isolated from one another and this does not apply. So the State doesn’t see a need to make a connection.

Issue 12: Landless and marine traffic issues

Non-issue – likely dropped and substantive

Issue 13: Farming zones

Outside the scope – just warrants a response

DAY 2

Dave Cox (Tetra Tech), Stephanie Russ and Marina joined by phone, also Henry (Tetra Tech, Economist)

Comment: Watershed priority and the FRMP watersheds – use of local knowledge of important sockeye salmon systems and whether or not they are on T77

Ken Tu: When it comes to analysis, the problem is having standard data across the region. Ian has sideboards (GET NOTES). Analysis USFS knows they are going to do are likely timber, roads, Kyle has economic analysis from contractor, outfitter/guides and recreation, economics and subsistence, wildlife (deer)

Dave Cox: Timber analysis (treating all lands equal rather than suitable) – Kyle has sent AFA information, maybe look at ranger districts. This also relates to “roads” analysis where remote is categorized the existence of infrastructure. Forest Plan allows for road building in Phases I, II and III (associated with

young growth). Ian questioned in what is the backbone of the AFA analysis (stumpage, which is georeferenced) that drives the economic part with respect to road building. Which may be something that can be applied across the landscape

When you look at where likely timber harvest is going to occur, analyze timber value and compare back to subsistence. Suitability: young growth, old growth, productive old growth. Ian would like to see the suitable acres. Reiterative model that selects areas across the landscape that shows where expected harvested would come from. Then overlay that with subsistence areas (deer habitat, slope). 18,000 acres gets plugged into a spatial mapping model across the landscape (reiteration part keeps it away from site specific analysis). Need to predetermine metrics (deer, berries, slope, habitat capability by deer).

Can we take the "Stumpage" georeferenced data and overlay that with the deer model to spatially look at where a higher overlap comes (high impacts)?

Analysis for Recreation: How timber sales impact the recreation aspect that is economic

If you overlay the stumpage map with the Forest Plan, does the analysis change? (Analysis did not go beyond the forest plan, does include standards and guidelines, stream buffers).

The map that Kyle handed out shows the broad stroke assumption that harvest is most likely occur (rather than evenly distribute across the region). DEIS tried to look at this with respect to timber suitability, but

Analysis for Wildlife: background was pulled from 2016 Plan, and they are in the process of updating with the USFS current GIS data layer.

WRAP UP from analysis team: "subsistence economy analysis" and bring it back to Tribal cooperating agency. Also the watershed priority including watersheds that might have been missed in T77. Timber analysis and modeling that doesn't assume even distribution of harvest. Ways to quantify outfitter/guiding associated with timber analysis and the analysis. Subsistence needs to consider non timber products, subsistence economies and trade economies. Clean up the issue statements so that they are accurately capturing the concerns.

Subsistence spatial analysis: no one is sure what this looks like, but should include another look at updated data from CSIS data set.

Ken Wrap up: remove chugach, ok to keep administration for the Tongass (in general)....Ken wants to keep administrative correction and drop the administrative boundary. CAC recommendations, will expand on Roadless Area characteristics, for the exceptions go to the State's comments which incorporated CAC recommendations for things like electrical. Timber analysis and associated roads analysis will be focused more (rather than even distribution). Subsistence analysis and effects, including the subsistence trade economy (limited by data, time, and resources, but will explore).

Timeline: Preliminary FEIS by beginning of March and there will be a 2 week review (first two weeks) which will be done simultaneously with IDT review and attorney review. In that two weeks, it's looking for fatal flaws, and there should be a section that discusses changes between Draft and Final EIS.

1.5 weeks from end of draft Final into "clearance" and then OMB determines when FEIS is released. This will be in conjunction with a draft Final Rule. Cooperating agencies only applies to FEIS.

Mid-May FEIS goes out to EPA, 30-day "stay" after FEIS is finalized before the Final Rule can be released and then implementable upon publication.

Final Rule and ROD are published in federal register.

Chad meeting critique: Ian is cautiously optimistic on subsistence issues being address, but the failure is the forced and expedited timeline. Robin appreciates the candid process and "vulnerability" that comes through. Reta was impressed with respectful communication and engagement. Melinda appreciates the candidness, some things we talked about a year ago so . Paula echos comments and felt comments and having the state together...did have a problem with getting information so late, and a lot to take in, she is positive about the outcomes and the future. Ray echo echo echo, nice to sit and work as a team. Kyle appreciated working with Tribes, and hopes for meeting were met, and feels we assisted building a document, objections day will be calibrated back to this positive experience. Cer thanks for attendance and information to absorb. Bob misses the wisdom of having Kake with us as CA, having Ian at the table on the team. Ken appreciated the respectfulness, apologize in the messaging in leading people to believe alt 6 wouldn't be a preferred alt. Jackie is grateful for additional data. Raeanne. Chad acknowledged this was the most challenging and these two days were a bright spot USFS hopes to carry forward in future.

Appendix B
High Priority Subsistence Sockeye Salmon Watersheds

Community	Watershed	T77/TNC Audubon	Wildnerness/LUDII
Angoon	Kanalku Lake		
	Kook Lake		
	Sitkoh Lake		
	Hasselborg Lake		
	Eva Lake		
Craig/Klawock	Sarkar Lake		
	Klawock Lake		
	Hatchery Creek		
Hoonah	Karta Lake		
	Hoktaheen Lake		
	Neva Lake		
Hydaburg	Pavlof Lake		
	Hetta Lake		
	Eek Lake		
	Kasook Lake		
	Manhattan Lake		
	Hunter's Bay		
	Keete Inlet		
Kake	Klakas Lake		
	Falls Lake		
	Gut Bay		
	Kutlaku Lake		
	Kushneahin Lake		
Kasaan	Karta Lake		
	Hatchery Creek		
Saxman/Metlakatla	Wolverine Creek		
	Naha Lake		
	Kegan Cove		
	Hugh Smith		
	Necker Bay		
Sitka	Klag Bay		
	Redoubt Lake		
	Redfish Lake		
	Ford Arm		
	Salmon Lake		
	Salmon Bay		
Wrangell/Petersburg	Mill Creek		
	Thoms Creek		
	Kah Sheets Creek		
	Stikine River		
Yakutat	Situk River		
	Ahrnklin River		
	Akwe/Italio Rivers		
	Alsek River		