



United States Department of the Interior
Office of the Secretary

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Mr. Ken Tu
U.S. Department of Agriculture Forest Service
P.O. Box 21628
Juneau, Alaska 99802-1628

Subject: Roadless Area Conservation; National Forest System Lands in Alaska

Dear Mr. Tu:

The Department of the Interior (the Department) appreciates the opportunity to provide comments on a Notice of Intent (NOI) by the U.S. Department of Agriculture (USDA) Forest Service (FS) to prepare an Environmental Impact Statement (EIS) and public rulemaking process for *Roadless Area Conservation on National Forest System Lands in Alaska* received on August 30, 2018.

The USFS has initiated the scoping process under the National Environmental Policy Act (NEPA) (42 U.S.C. 4321-4347, and the NEPA Implementing Regulations 40 CFR parts 1500-1508), in response to a January 2018 petition by the State of Alaska, requesting a regulatory exemption from the 2001 Roadless Area Conservation Rule (66 FR 3244). The Comments below represent the combined comments from the National Park Service (NPS) and the U.S. Fish and Wildlife Service (FWS).

General

The NPS manage America's national parks for the enduring benefit and legacy of present and future generations under the NPS Organic Act of 1916 (16 USC 1). The Skagway and White Pass Units of the Klondike Gold Rush National Historical Park (Klondike NHP) border the Tongass National Forest (TNF). The legislative purpose of these units is, in part, to preserve in public ownership for the benefit and inspiration of the people of the United States, the historic structures and trails, artifacts and landscapes and stories associated with the Klondike Gold Rush of 1898 (Klondike NHP Foundation Statement and Public Law 94-323). The Glacier Bay National Park and Preserve (Glacier Bay NPP) also borders the TNF, with the legislative purpose

of, in part, to preserve for the benefit, use, education, and inspiration of present and future generations nationally significant natural, scenic, historic, archeological, geological, scientific, wilderness, cultural, recreational, and wildlife values (Public Law 96-487).

In addition to sharing boundaries with the TNF, these NPS units intertwine with FS lands within the larger terrestrial and marine ecosystem of northern Southeast Alaska. Please see Attachment A prepared by the NPS and is entitled the "Tongass National Forest Roadless Areas with Species-specific Information". The Department recommends considering the NPS recommendations regarding protections provided by the roadless designation.

The FWS has supported the FS in the inclusion of the Tongass National Forest in the 2001 Roadless Rule in the August 4, 2000, letter (DOI to USDA-USFS CAET, ER00/0371). On August 26, 2002, the USFWS provided a letter to the Forest Service with a list of 36 specific areas within the Tongass National Forest to consider for Wilderness designation in their EIS (DOI to the USDA-FS, ER02/0479). On a September 6, 2018, teleconference with the FS, the USFWS agreed to review the areas identified in 2002, together with FS's most current land use maps, to produce a refined list of areas where it would be most important to maintain protections provided by the roadless designation.

Roadless areas offer refuge critical to species that are intolerant of human activities or vulnerable to overharvest or competition with invasive species. The FWS details in Attachment B impacts to species, and effects on the environment as road densities increase and construction occurs. Detailed recommendations are broken down by specific area.

Thank you for considering these comments to the NOI to prepare an EIS for Roadless Area Conservation on National Forest System Lands in Alaska. For comments from the NPS, please contact Brooke Merrell, Environmental Planning and Compliance Team Leader at 907-644-3397 or brooke_merrell@nps.gov with any questions. If you have questions regarding the FWS comments, please contact Ms. Jennifer Spegon at 907-271-2768, or jennifer_spegon@fws.gov.

Sincerely,



Michaela E. Noble
Director
Office of Environmental Policy and Compliance

Enclosures

ATTACHMENT A

National Park Service Specific Comments “Tongass National Forest Roadless Areas with Species-specific Information” October 2018

Wilderness Resources

The majority of the shared boundary between Glacier Bay NPP and TNF includes designated wilderness within Glacier Bay National Park. The NPS manages its wilderness resources under the Wilderness Act and the Keeping it Wild interagency framework to preserve the following qualities: 1) undeveloped characteristics; 2) solitude, primitive, and unconfined recreation characteristics; 3) natural characteristics; and 4) untrammled characteristics. Changes in roadless status of TNF lands adjacent to NPS-managed wilderness have the potential to affect wilderness qualities, viewshed, and visitor experience within the Glacier Bay National Park Wilderness.

Viewsheds

In addition to considering viewsheds in the context of wilderness (as discussed above), impacts to viewsheds on NPS lands should be considered in the EIS. Examples include but are not limited to: 1) the narrow river valley setting of the Skagway and White Pass District NHL and 2) the viewshed from within the NHL boundary that encompasses 5,000 foot, forested mountains of the TNF, uninterrupted by modern construction. These viewsheds in particular are a part of the cultural landscape of the NHL managed by Klondike NHP.

Biosphere Reserve

The potential for changes in roadless status of TNF lands to impact the qualities of the Biosphere Reserve (with particular focus on Admiralty Island) should be considered in the EIS. Glacier Bay NPP-Admiralty Island is a joint UNESCO Biosphere Reserve site managed by the NPS and the USDA Forest Service. Biosphere Reserves are based on the functions of: conservation (contribute to the conservation of landscapes, ecosystem, species and genetic variation); development (foster economic and human development which is socio-culturally and ecologically sustainable); and logistic support (facilitate local demonstration projects, environmental education and training, and research and monitoring related to local, regional, and global opportunities for conservation and sustainable development).

Wildlife Connectivity and Corridors

Potential impacts to terrestrial wildlife should be considered in the EIS. The shared boundary between NPS and TNF represent areas of potential wildlife connectivity and movement corridors, such as the Alsek River corridor, the Endicott Gap corridor and the Couverdun/Excursion Inlet area in Glacier Bay NPP. The NPS lands provides diverse habitats for many wildlife species such as brown and black bears, wolves, mountain goats, moose, and other terrestrial wildlife species. Changes in roadless status of TNF lands adjacent to NPS-managed lands could affect wildlife populations within the park.

Other Resources

Elements impacted by changes in roadless status of TNF lands adjacent to NPS-managed lands such as night skies, natural sounds, air quality, and landscape composition on NPS lands, as well as fish and the natural flow and character of waterways such as the Skagway River, among others, should be considered in the EIS.

Tourism

The potential for changes in roadless status of TNF lands to impact tourism and its contributions to local economies in and around NPS-lands should be considered in the EIS.

The scenic and cultural values of the White Pass and Yukon Route railroad and Klondike NHP play a critical role in the growing tourism industry of Skagway. The historic integrity of Skagway, the historic and continued use of the White Pass and Yukon Route railroad and the wild and scenic nature of the tourist experience draw tourists to the area. Development of road systems and industrial activities within the Skagway and White Pass District NHL boundary or within the viewshed from the NHL boundary would adversely affect these values.

Recreation areas of Glacier Bay NPP are intertwined with TNF wilderness recreation areas by the tour vessel industry. This industry brings substantial financial resources to the state's economy, including small communities that rely on this vital input to their seasonal economy.

ATTACHMENT B

Fish and Wildlife Service General Comments October 2018

Road Density

Roadless areas offer refugia critical to species that are intolerant of human activities or vulnerable to overharvest or competition with invasive species. For example, Person et al. (1996) demonstrated wolf harvests on Prince of Wales Island in the southern portion of the Tongass National Forest doubled where road densities averaged 0.66 mile per square mile, tripled with roads at 1.19 miles per square mile, and quadrupled with road densities at 1.63 miles per square mile when compared to areas without roads. Subsequent research has confirmed road densities continue to be an important element contributing to harvest rates (Person and Russell 2008, pp. 1545 to 1548; USFS 2008a, pp. 74 to 75; and Person and Logan 2012 p. 12). The current Forest Plan standards and guidelines encourage but do not require road density limits where wolf mortality is a concern (FS 2016). The Tongass National Forest also has some of the highest densities of brown bears in the world. Local extirpation of bears, and behavioral avoidance of roads, also occurs with bears in vicinities of humans. Management of road densities, such as limiting densities to no more than 0.7 mile of open roads per square mile of forest, would reduce the probability that overharvest of wolves or other species would occur if development is ultimately allowed in roadless areas.

Effects on the environment amplify as road densities increase. As fish, game, and furbearing species decrease, the quality of recreation, hunting, fishing, and subsistence activities may decrease as well. Sitka black-tailed deer, for example, are an important subsistence food. Deer are managed by the Federal Subsistence Board to meet subsistence needs throughout the year in Southeast Alaska. Deer are the primary prey of wolves, providing approximately 77 percent of wolves' diet on Prince of Wales Island (Person et al. 1996, p. 25). Because both wolves and humans are particularly reliant on deer, a healthy deer population, in combination with effective access and harvest management, is important for the health and functionality of the wolf/human/deer system. If roadless areas are opened to road construction, it is important to consider protections of deer winter habitat in low elevation, high volume, areas of old growth.

Road construction

Activities associated with roads and road construction can reduce watershed integrity, disrupt aquatic ecological processes, cause erosion and sedimentation, and degrade water quality if the road crossing is not built to appropriate design standards. Sediment transported from roads and ditchlines can fill stream pool habitat, degrade or eliminate fish spawning habitat, and block fish passage. The Tongass National Forest has over 5,000 miles of inventoried roads and 3,650 classified road/stream crossings on Class I and II fish streams. In some cases, recent 'minimally engineered' culvert installations on existing roads are not meeting passage standards (USFS 2014). Between 1998 and 2014, the USFS has spent over \$18 million remediating high priority road stream crossings on the Tongass to bring those roads up to current USFS design standards. In summary, roads can cause ongoing ecological and economic costs if constructed without adherence to appropriate design standards.

In recognition of watershed integrity sustaining production of Pacific salmon, steelhead, and wildlife on the Tongass National Forest, analyses were conducted to rank over 1,000 watersheds by habitat attributes (Albert and Shoen, 2007). Of these 1,000 watersheds, 77 were identified as having the highest value for fish and other high-ranking ecosystem components and linkages. These 77 watersheds were recognized in the 2016 Tongass Land Management Plan (TLMP) Amendment as not available for old growth timber production (USFS 2016, p. A-5).

The FS should consider incorporating the conservation priority watersheds identified by Albert and Shoen (2007) and recognized in the 2016 TLMP Amendment (USFS 2016) in the evaluation process and maintain existing protections in these areas.

Where road systems are, or are likely to be, connected to communities we recommend the USFS consider road density limits be established at no greater than 0.7 mile of open roads per square mile of forest, to reduce impacts associated with overharvest of important game and furbearing species in areas.

The FWS recommends analyzing areas where timber harvests could be accomplished without road construction (using helicopter yarding, for example), as this would be more compatible with conservation of wildlife habitat in some areas. The FWS continue to recommend against clear-cut logging of high-volume, low-elevation, and south facing stands of old growth forest because these stands are typically critical to survival of Sitka black-tailed deer during winter.

Specific Comments Tongass National Forest Roadless Areas with Species-specific Information

The FWS has identified the following specific areas with important values for fish and wildlife currently served by the roadless designation where we recommend the FS consider maintaining the protections provided by the roadless designation. As requested by the FS, the following list contains species-specific information by location on the Tongass National Forest where due to wildlife, fishing, hunting, and subsistence opportunities, we support management strategies and Forest Plan components that would protect long-term integrity of habitats, ecosystem processes, and ecological functions. The areas listed below contain some of the best remaining fish and wildlife habitat on the Tongass National Forest.

NORTHERN MAINLAND

Chilkat-West Lynn Canal, area 304, is important for waterfowl, fish, bald eagles, mountain goats, wolves, moose, and bears. The diversity of alpine forest and estuarine habitat supports a higher diversity of fish and wildlife than surrounding areas. Much of the area is very mountainous, and the west side is especially steep and rugged. The southernmost part of this roadless area, near Homeshore, has been heavily compromised by roads and clearcuts, however, much of the remainder appears to have retained its high fish and wildlife values. Protection of this area, particularly because it adjoins the Endicott River Wilderness and Glacier Bay National Park, would conserve valuable remaining undisturbed forested habitats on the mainland.

CENTRAL MAINLAND

Windham-Port Houghton, area 308, provides important habitats for waterfowl, fish, black and brown bears, wolverine, deer, wolves, moose, mountain goats, furbearers, and bald eagles. It is one of the most important and productive fish and wildlife resource areas on the mainland of the Tongass National Forest. Of highest value is the Port Houghton salt chuck area and Sandborn Canal. The part of 308 on the peninsula between Windham Bay and Tracy Arm has high value habitat with high volume estuarine meadows and brackish water environments; it is a low elevation, highly productive, old growth forest that supports a greater diversity of fish, birds, and marine and terrestrial mammals. Both areas have excellent connectivity to the Tracy Arm/Ford's Terror Wilderness. There has also been strong local and National support for managing these areas in a roadless condition in the past. Protection of this area, in combination with the Fanshaw (#201) roadless area, would conserve valuable remaining undisturbed forested habitats on the mainland.

Fanshaw, area 201, provides rich diversity of productive habitat that supports high populations of bears, deer, moose, wolves, goshawks, and an isolated population of mountain goats. Protections in this area, in combination with the Windham-Port Houghton roadless area (#308) would protect some of the most valuable remaining undisturbed forested habitats on the mainland of southeast Alaska.

Madan, area 204, provides important habitat for bears, deer, mountain goats, wolves, and goshawks. This area contains one of the smallest known isolated populations of coastal cutthroat trout and Dolly Varden char in southeast Alaska. Protection of this area, which adjoins the Stikine-LeConte Wilderness Area, conserves valuable remaining undisturbed forested habitats on the mainland.

SOUTHERN MAINLAND

The Cleveland Peninsula is a unique peninsula that offers a variety of habitats, supports a unique community of animals, and serves as a corridor for many mainland species to colonize the archipelago of Southeast Alaska. These areas receive high use by hunters, offer excellent fishing opportunities, and support unique wildlife viewing areas. There has been strong local and National support for managing for these areas under a roadless condition, primarily because of the recreation and subsistence values of these areas.

Cleveland, area 528, is one of the most important and productive fish and wildlife resource areas on the mainland in the southern part of the Tongass. It supports a rich wildlife population, providing important habitats for waterfowl, fish, brown and black bears, deer, wolves, world record mountain goats, furbearers, and bald eagles. Interior, mainland species that are otherwise absent or rare in Southeast Alaska, such as moose, wolverines, and mountain lions have been recorded in this area. The majority of the salmonid habitat and production occurs in the Vixen, Port Stewart, Black Bear, and Wasta watersheds. The area has a diverse mix of habitats, including extensive and productive bays, alpine, muskeg, and low and high volume forest. Wildlife habitat on the Cleveland Peninsula is naturally fragmented by large bays penetrating the peninsula from both sides, which create a number of pinch points. Some interior areas of the

peninsula are connected by low elevation passes that are migration corridors for many wildlife species. Development in these areas is likely to inhibit movement of animals and restrict immigration and emigration, effectively isolating the peninsula from the mainland.

The Peninsula is an important corridor for natural colonization of the southern and central islands of the Alexander Archipelago by mainland species such as mountain lions, wolverine, moose, and wolves. This is largely because the peninsula penetrates the archipelago much further than any other mainland peninsula in Southeast Alaska.

The outstanding saltwater fishing in and around the major bays of this area is a major attraction. The Cleveland Peninsula is easily accessible from Ketchikan, Meyer's Chuck, and Wrangell and is an important recreation and subsistence-use area for these residents.

Anan, area 209, provides important habitat for all the major wildlife species that inhabit the mainland. It also supports a relatively high population of black and brown bears. Anan Creek attracts the largest known concentration of black bears in southeast Alaska, a spectacle that attracts approximately 2,500 visitors per year. This area also offers a rare opportunity to view both brown and black bears at the same time. Since there is a hierarchy amongst bears, and between species of bears, large tracts of undisturbed wilderness are necessary to support these densities, and to preserve this unique opportunity to interact with bears. This area receives high use by hunters, and offers excellent fishing opportunities.

Harding, area 207, immediately adjacent to the Cleveland Peninsula, provides important habitat for all the major wildlife species that inhabit the mainland. It also supports a relatively high population of brown bears particularly in the Harding and Eagle River drainages, but also Tom, Marten, and Hoya Creek watersheds. This area receives high use by hunters, offers excellent fishing opportunities especially for steelhead trout, and supports high populations of bears. Protection of this area, in combination with the Anon (#209) and North Cleveland (#529) roadless areas, would conserve valuable remaining undisturbed forested habitats on the mainland of southeast Alaska.

NORTHERN ISLANDS

The areas described below offer outstanding opportunities for residents to hunt, fish, and encounter wildlife. The areas support healthy deer populations, salmon runs, and shellfish habitats. Subsistence users from Sitka, Angoon, Petersburg, and Kake use these areas extensively to obtain various foods. Secure anchorages, outstanding scenery, and high wildlife populations are among the reasons that the areas are so popular.

Chichagof, area 311, provides important habitat for waterfowl, bald eagles, and other wildlife species. Much of this area is considered to be critical deer winter range for Sitka black-tailed deer. Chichagof Island also has some of the highest densities of brown bears in the world. Many streams throughout this roadless area are rated high for salmonid production. One of the most important areas is from Kadashan Bay to the head of Tenakee Inlet, and upper Hoonah Sound.

North Kruzof, area 326, supports high populations of brown bears, deer, and furbearers, has a good mix of habitats, and receives high use by recreationalists.

North Baranof, area 330, provides important habitat for waterfowl, fish, bald eagles, brown bears, and Sitka black-tailed deer. In fact, most of this area is considered to be critical deer winter range. Baranof Island has some of the highest densities of brown bears in the world. Of highest value is the area bound by Saook Bay (including the Lake Eva watershed), Kelp Bay, the South Baranof Wilderness Area, and the west side of the Duffield Peninsula (including the Fish Bay watershed). The Lake Eva watershed has become a popular destination for small cruise ships.

CENTRAL ISLANDS

Woewodski, area 218, supports populations of black bears, deer, and wolves with a variety of habitats including alpine, lake, muskeg, old growth forest, and estuaries. Woewodski likely serves as a stepping stone for movement of animals between Mitkof and Kupreanof Islands. The island is accessible by boat (navigable all around), and because of its proximity to Petersburg and Wrangell, is a popular recreation area especially for hunters. The cove on the southeast side is a popular anchorage. There is a high altitude (greater than 500 feet) population of cutthroat trout in Harry's Lake, and both Harry's and Harvey's Lakes are used by breeding amphibians.

Mosman, area 233, supports populations of black bears, deer, wolves, goshawks, and moose with a variety of habitats including alpine, lake, muskeg, old growth forest, bays, and estuaries; the most impressive part being the peninsula west of Mosman Inlet. Logjam, Porcupine, Pump, and Navy Creeks have been identified as some of the highest quality fish habitat on the Wrangell Ranger District. Protection of this area, in combination with the South Etolin (#234) roadless area and South Etolin Wilderness Area, would conserve valuable remaining undisturbed forested habitats on the island.

South Etolin, area 234, supports populations of black bears, deer, wolves, and moose. It has one of the smallest isolated populations of Dolly Varden char that we know of in this area. It has a variety of habitats including alpine, lake, muskeg, old growth forest, bays, and estuaries. Olive Creek provides high quality fish habitat, and is a popular steelhead and rainbow trout fishery. Protection of this area, in combination with the Mosman (#233) roadless area and South Etolin Wilderness Area, would conserve valuable remaining undisturbed forested habitats on the island

KUIU ISLAND

The following areas would provide protection that would conserve valuable remaining undisturbed forested habitats.

Camden, area 242, has high wildlife habitat values for waterfowl, fish, deer, wolves, and goshawks, and has a high diversity of songbirds. It supports one of the highest densities of black bears in southeast Alaska, drawing many hunters to the area. The Slippery Lakes system offers

excellent fishing, including a strong steelhead run. There is a popular boat portage between Bay of Pillars and Camden Bay.

East Kuiu, area 245, portions of this roadless area appear to have retained high to very high fish and wildlife values for waterfowl, fish, furbearers, deer, wolves, and bald eagles. It supports high densities of black bears, drawing many hunters to the area. Salt Lagoon/Seclusion Harbor and No Name Bay appear to have the highest value habitats, especially the Seclusion Harbor salt chuck. Protection of this area adjacent to the Tebenk of Bay Wilderness Area would conserve valuable remaining undisturbed forested habitats on the island.

There has been strong local and National support for managing for these areas under a roadless condition, primarily because of the recreation and subsistence values of these areas.

Security, area 240, supports high densities of black bears, drawing many hunters to the area. The area has particularly high wildlife values for waterfowl, fish, deer, wolves, and goshawks. It has a variety of habitats including alpine, lake, muskeg, old growth forest, bays, and estuaries. Fall Dog Creek provides high quality fish habitat, and supports a unique November spawning run of chum salmon important to subsistence users, bears, and eagles. The communities of Kake and Kupreanof have previously recommended this area be designated as a Wilderness Area because of high subsistence values. Protection of this area would conserve valuable remaining undisturbed forested habitats on the island.

KUPREANOF ISLAND VICINITY

The following area near Kupreanof Island include uniquely productive river and estuary systems important to many species of fish and wildlife. Hunters, anglers, and other recreationists use this area heavily. The drainage is one of the last remaining intact, otherwise unprotected systems in Duncan Canal.

Castle, area 215, the area provides important habitat for deer, wolves, and black bear. It receives high use by recreationalists from the local area and elsewhere. The Forest Service cabins are heavily used, primarily for fishing and waterfowl hunting. This is one of the few places that humans regularly penetrate inland from the shoreline, by following the Castle River upstream. Inland, many small lakes are frequented by waterfowl. Kah Sheets Creek and Lake support the only sockeye salmon run in the area and provide important habitat for steelhead and cutthroat trout, as well as coho salmon. Protection of this area in combination with the South Kupreanof (#214) roadless area would conserve valuable remaining undisturbed forested habitats on Kupreanof Island.

SOUTHERN ISLANDS PRINCE OF WALES ISLAND

Although much of Prince of Wales Island has been heavily harvested, the southern end of the island still supports relatively large roadless areas with high fish and wildlife habitat values. The areas we recommend for protection contain a mix of productive habitats that dramatically increase the long-term functional value of the existing adjacent South Prince of Wales Wilderness.

Eudora, area 507, is one of the most pristine roadless areas left on Prince of Wales Island. It has a unique population of Pacific yew (*Taxus brevifolia*), which contains a compound called taxol that is used as a chemotherapy drug. In addition, the area supports many highly productive fish streams, as well as black bear, deer, and wolf populations. The area has extensive karst resources, primarily in the north and has a diverse mix of habitats, including extensive and productive bays, alpine, and muskeg. It has great connectivity to the South Prince of Wales Wilderness Area.

Nutkwa, area 531, has many productive fish streams, and black bear, deer, and wolves are common. The area contains the second highest percentage of old growth of the in any of the areas analyzed as roadless 2002. Due to the high proportion of higher volume forest, the area provides excellent connectivity to the South Prince of Wales Wilderness.

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