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First name: Debora

Last name: Cooper

Organization: National Park Service (NPS)

Title:

Comments: HC383

Memorandum

Subject: *USDA Notice of Intent to prepare an Environmental Impact Statement (EIS) and public rulemaking process for *Roadless Area Conservation on National Forest System Lands in* [text italicized for emphasis] (ER-18/0402; FR Doc No: 2018-18937).* [text bolded for emphasis]

The National Park Service (NPS) appreciates the opportunity to provide comments on a Notice of Intent (NOI) by the U.S. Department of Agriculture (USDA) Forest Service to prepare an Environmental Impact Statement (EIS) and public rulemaking process for *Roadless Area Conservation on National Forest System Lands in Alaska.* [text italicized for emphasis] This process will address the management of inventoried roadless areas on the Tongass National Forest (TNF). In conducting the rulemaking process, USDA is responding to the State of Alaska's petition requesting an exemption of the TNF from the current standing national 2001 Roadless Rule. An Alaska Roadless Rule would replace the 2001 Roadless Rule, which prohibits with some exception road construction, road reconstruction, and timber harvesting on certain National Forest System lands across the country.

BACKGROUND [text bolded for emphasis]

America's national parks are managed for the enduring benefit and legacy of present and future generations under the NPS Organic Act of 1916 (16 USC 1). Two NPS units share boundaries with the TNF:

1) The Skagway and White Pass Units of the Klondike Gold Rush National Historical Park (Klondike NHP)

Legislative Purpose (in part) [text underlined for emphasis]: 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).

2) Glacier Bay National Park and Preserve (Glacier Bay NPP)

Legislative Purpose (in part) [text underlined for emphasis]: 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 are further intertwined with Forest Service lands within the larger terrestrial and marine ecosystem of northern Southeast Alaska.

The Forest Service, on behalf of the USDA, is currently soliciting public input on the nature and scope of the environmental, social, and economic issues related to Alaska-specific rulemaking that should be analyzed in depth in the Draft EIS. NPS offers the following comments in the context of park purpose and congressional direction.

NPS COMMENTS [text bolded for emphasis]

Archeological and Cultural Resources [text bolded and underlined for emphasis]

KLONDIKE NHP. Klondike NHP manages the Skagway and White Pass District National Historic Landmark (NHL) for its association with the Klondike Gold Rush, an event that made a significant contribution to the broad patterns of history for exploration, settlement, and transportation between 1897 and 1910. The area is also within the traditional territory of the Tlingit who used the valley as a trading route over the Coast Mountains and into the interior. They also hunted and fished in the Skagway River Valley and lived in the area before the gold rush. The White Pass played a vital transportation role during World War II. The White Pass and Yukon Route railroad was designated an International Historic Civil Engineering Landmark by the American Society of Civil Engineers on September 10, 1994. Klondike Gold Rush International Historical Park (which includes the White Pass) was designated by proclamations signed by both the President of the United States and the Prime Minister of Canada on August 5, 1998.

Although the NHL boundary does not encompass Forest Service land, the historic and significant use of the land was not limited to today's property boundaries. These nationally and internationally significant historic sites and uses of the area are known within and outside the current NHL boundary. Therefore, construction of roads and related development undertaken on National Forest lands adjacent to NPS lands could irreparably damage the situ historic and prehistoric archaeology. The EIS should carefully consider the possibility for such effects to archeological and cultural resources.

Wilderness Resource [text bolded and underlined for emphasis]

GLACIER BAY NPP. 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) untrammeled 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. These potential resources should be considered in the EIS.

Viewsheds [text bolded and underlined for emphasis]

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, which encompasses 5,000 foot, forested mountains to 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 [text bolded and underlined for emphasis]

GLACIER BAY NPP-Amiralty 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). 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.

Wildlife Connectivity and Corridors [text bolded and underlined for emphasis]

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. 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. These potential impacts to terrestrial wildlife should be considered in the EIS.

Other Resources [text bolded and underlined for emphasis]

Changes in roadless status TNF lands adjacent to NPS-managed lands have the potential to affect 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. These elements should be considered in the EIS.

Tourism [text bolded and underlined for emphasis]

KLONDIKE NHP. 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.

GLACIER BAY NPP. 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.

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.

Thank you for considering these comments to the NOI to prepare an EIS for ****Roadless Area Conservation on National Forest System Lands in Alaska.**** [text italicized for emphasis] Please contact Brooke Merrell, Environmental Planning and Compliance Team Leader at [Phone Number] or [email] with any questions.

Sincerely,

[Signature]

Debora Cooper

Associate Regional Director for Resources and Planning

[POSITION]