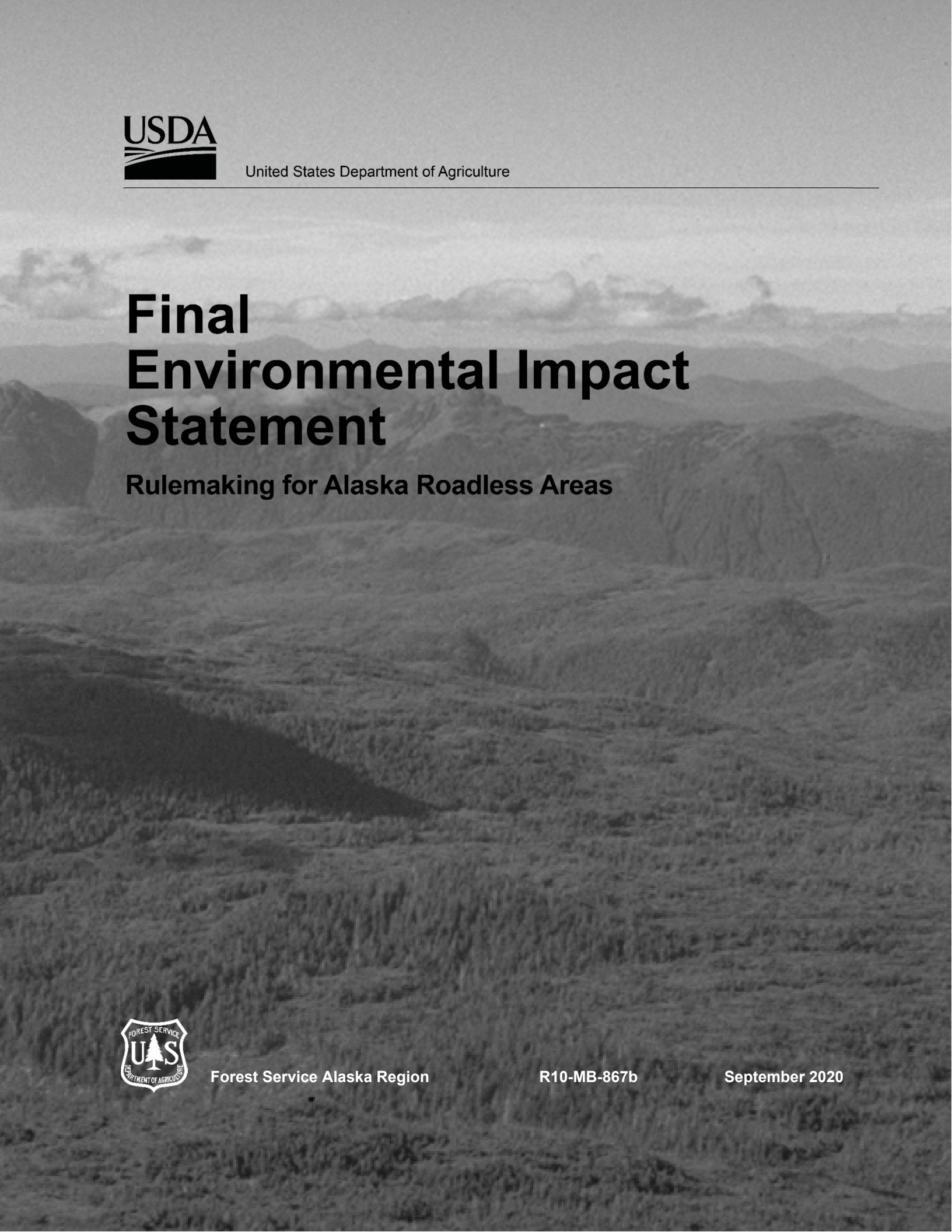

United States Department of Agriculture

Final Environmental Impact Statement

Rulemaking for Alaska Roadless Areas

Forest Service Alaska Region R10-MB-867b September 2020

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Final Environmental Impact Statement

September 2020

Lead Agency:	USDA Forest Service
Cooperating Agencies:	Angoon Community Association; Central Council Tlingit and Haida Indian Tribes of Alaska; Hoonah Indian Association; Hydaburg Cooperative Association; Organized Village of Kasaan; and State of Alaska.
Responsible Official:	Sonny Perdue U.S. Secretary of Agriculture
For Further Information:	Visit the Forest Web site at: https://www.fs.usda.gov/project/?project=54511 or Contact: Ken Tu Alaska Roadless Interdisciplinary Team Lead

Abstract

Following receipt of a petition from the State of Alaska, submitted pursuant to the Administrative Procedure Act, the Secretary of Agriculture directed the Forest Service to develop an Alaska-specific roadless rule in June 2018.The proposed state-specific roadless rule would replace the 2001 Roadless Rule and, along with existing statutory and land management plan direction, guide roadless area management on the Tongass National Forest.

This Final Environmental Impact Statement (FEIS) responds to the Secretary's direction by analyzing six alternatives including the No Action Alternative. Three key issues are identified: 1) conservation of roadless area characteristics; 2) support of local and regional socioeconomic well-being including community stability, Alaska Native culture, rural subsistence activities, and economic opportunity across multiple economic sectors; and 3) conservation of terrestrial habitat, aquatic habitat, and biological diversity. The six alternatives provide a range of options for addressing the key issues. Five Alaska Roadless Area management categories were developed that prohibit timber harvest, road construction, and road reconstruction with a range of exceptions, and are applied differentially across four of the alternatives. Other than expanding the suitable timber land base, none of the action alternatives propose to change the Tongass Land and Resource Management Plan, including the projected harvest level. Direct, indirect, and cumulative effects of the alternatives are compared and disclosed in Chapters 2 and 3.

The Secretary for the U.S. Department of Agriculture has identified Alternative 6 as the preferred alternative.

CONTENTS

LIST OF TABLES

LIST OF FIGURES

ACRONYMS AND ABBREVIATIONS

2001 Roadless Rule	Roadless Area Conservation Rule
ADED	Alaska Department of Economic Development
ADF&G	Alaska Department of Fish and Game
ADNR	Alaska Department of Natural Resources
ADOT&PF	Alaska Department of Transportation & Public Facilities
AFHA	Anadromous Fisheries Habitat Assessment
AKEPIC	Alaska Exotic Plants Information Clearinghouse
AKNHP	Alaska Natural Heritage Program
ANCSA	Alaska Native Claims Settlement Act of 1971
ANILCA	Alaska National Interest Lands Conservation Act of 1980
AP&T	Alaska Power & Telephone
ARA	Alaska Roadless Area
BA	Biological Assessment
BBER	Bureau of Business and Economic Research
BCR	Bird Conservation Region
BE	Biological Evaluation
BLM	U.S. Department of the Interior, Bureau of Land Management
BMP	Best Management Practice
CA	Census Area
CDP	Census Designated Places
CEQ	Council on Environmental Quality
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CFR	Code of Federal Regulations
CMAI	culmination of mean annual increment
DEIS	Draft Environmental Impact Statement
DOL	Department of Labor
DPS	distinct population segment
EFH	essential fish habitat
EIS	Environmental Impact Statement
ESA	Endangered Species Act
ESI	Existing Scenic Integrity
ESU	evolutionarily significant unit
°F	degrees Fahrenheit
FCRPA	Federal Cave Resources Protection Act
FEIS	Final Environmental Impact Statement
FERC	Federal Energy Regulatory Commission
FHWA	Federal Highway Administration
Forest Plan	Tongass National Forest Land and Resource Management Plan
FPA	Federal Power Act
FRESH	Forest Resource Evaluation System for Habitat
FR	Federal Register
FSM	Forest Service Manual
GIS	geographic information system
GMU	Game Management Unit

GNA	Good Neighbor Authority
IDT	Interdisciplinary Team
IRA	Inventoried Roadless Area
LTF	log transfer facility
LUD	Land Use Designation
LWD	large woody debris
MBF	thousand board feet
MBTA	Migratory Bird Treaty Act
MIS	Management Indicator Species
MMBF	million board feet
MMI	mass movement index
MMPA	Marine Mammal Protection Act
MOU	Memorandum of Understanding
MW	megawatt
NEPA	National Environmental Policy Act
NFMA	National Forest Management Act of 1976
NFS	National Forest System
NHPA	National Historic Preservation Act
NMFS	National Marine Fisheries Service
NOA	Notice of Availability
NOI	Notice of Intent
NPS	National Park Service
NRIS	Natural Resource Information System
NVUM	National Visitor Use Monitoring
OGR	old-growth reserve
P	Primitive
PNW	Pacific Northwest
POG	productive old growth
PTSQ	projected timber sale quantity
PWSQ	projected wood sale quantity
R	Rural
RARE	Roadless Area Review and Evaluation
RM	Roaded Modified
RMA	Riparian Management Area
RN	Roaded Natural
Roadless Rule	Roadless Area Conservation Rule
ROD	Record of Decision
ROS	Recreation Opportunity Spectrum
RV	Residual Value
SAFETEA-LU	Safe, Accountable, Flexible, Efficient Transportation Equity Act - A Legacy for Users
SATP	Southeast Alaska Transportation Plan
SDM	Size-Density Model
SEIS	Supplemental Environmental Impact Statement
SIO	Scenic Integrity Objective
SMS	Scenery Management System

SNAP	Scenarios Network for Alaska & Arctic Planning
SPM	Semi-Primitive Motorized
SPNM	Semi-Primitive Non-Motorized
T77	Tongass 77
TNC	The Nature Conservancy
TRUCS	Tongass Resource Use Cooperative Survey
TTRA	Tongass Timber Reform Act of 1990
TWYGS	Tongass-wide Young-Growth Studies
U	Urban
U.S.C.	United States Code
USDA	United States Department of Agriculture
USFWS	U.S. Fish and Wildlife Service
VCU	Value Comparison Unit
VMS	Visual Management System
WAA	Wildlife Analysis Area
WCF	Watershed Conditions Framework

EXECUTIVE SUMMARY

Executive Summary

The Forest Service has prepared an environmental impact statement (EIS) in compliance with the National Environmental Policy Act (NEPA) and other relevant federal laws and regulations. This Final EIS (FEIS) discloses the potential environmental consequences that might result from the proposed actions and alternatives.

Background

Inventoried Roadless Areas

Inventoried Roadless Areas (IRAs) on the Tongass National Forest (Tongass) include 9.37 million acres (56 percent of the Tongass) across 110 IRAs. When these designated roadless areas are combined with Wilderness and National Monument areas, the Tongass is currently more than 90 percent undeveloped and unavailable for timber harvest and road building. Developed areas cover about 1.3 million acres, or about 8 percent, of the Tongass. Southeast Alaska residents (approximately 73,000) are, for the most part, surrounded by largely undeveloped land.

Several portions of the Tongass constitute contiguous IRAs exceeding 1 million acres, and thus represent large, unfragmented wildlife habitats and opportunities for solitude. Many of the Tongass IRAs represent wildlife habitats, ecosystems, and visual characteristics, such as coastal islands facing the open Pacific, extensive beaches on inland saltwater, old-growth temperate rain forests, ice fields, and glaciers that exist nowhere else in the National Forest System (NFS). Many of these areas are remote and difficult to access for primitive recreation and contain other important resources, such as timber, minerals, renewable energy opportunities, and salmon-producing streams. While IRAs provide a large portion of the land base in Southeast Alaska, National Parks, National Monuments, and designated Wildernesses also contribute to the undeveloped nature of the region.

The Roadless Area Conservation Rule (2001 Roadless Rule) was originally codified at Title 36 of the Code of Federal Regulations (CFR) Part 294 (36 CFR 294), Subpart B (66 Federal Register [FR] 3244) in January 2001. The 2001 Roadless Rule applies nationwide (except Idaho and Colorado where state-specific rules have superseded the 2001 Rule and were completed in 2008 and 2012, respectively). The 2001 Rule remains applicable to 44.7 million acres of National Forests (approximately 24 percent of total NFS lands) and prohibits road construction/reconstruction and timber harvest, sale, or removal, with limited exceptions.

Since its promulgation, the 2001 Roadless Rule has been the subject of litigation. In 2001, the State of Alaska filed a complaint, challenging the U.S. Department of Agriculture's (USDA) promulgation of the 2001 Roadless Rule and its application in Alaska. The USDA and the State of Alaska reached a settlement in 2003, and the USDA subsequently issued a rule temporarily exempting the Tongass from the 2001 Roadless Rule. In 2011, a federal court (District of Alaska) set aside the Tongass's exemption and reinstated the 2001 Roadless Rule on the Tongass with special instructions. The Alaska District Court's ruling was initially reversed by a three-judge panel of the Ninth Circuit, but the District Court's ruling was ultimately upheld in a 6–5 en banc ruling of the Ninth Circuit in 2015. In September 2017, the District Court for the District of Columbia rejected all procedural and substantive claims that the 2001 Roadless Area Conservation Rule was unlawfully promulgated; both nationally and as applied to Alaska. Alaska appealed the District Court's ruling to the Court of Appeals for the District of Columbia Circuit. On September 26, 2018, the D.C. Circuit ordered the appeal be held in abeyance following USDA's acceptance of Alaska's Petition for Rulemaking and directed that status reports be filed with the court every 90 days. Consequently, the 2001 Roadless Rule remains in effect in Alaska and the Forest Service continues to apply the 2001 Roadless Rule within the Tongass and Chugach National Forests.

State of Alaska Petition

In January 2018, the State of Alaska submitted a petition requesting that the Secretary of Agriculture exempt the Tongass from the 2001 Roadless Rule (see Appendix A). In June 2018, the USDA Secretary directed the Forest Service to begin working with the State to consider an Alaska state-specific roadless rule. In August 2018, the Forest Service granted cooperating agency status to the State of Alaska. The Forest Service and the State of Alaska believed that the rulemaking represented a unique opportunity to collaboratively address and provide certainty to the roadless issue in the Tongass. The Forest Service published a Notice of Intent (NOI) to prepare an EIS and initiated a public rulemaking process to address the management of IRAs on the Tongass on August 30, 2018 (83 FR 44252). As stated in the NOI, USDA desires a durable and long-lasting solution for the conservation and management of roadless areas on the Tongass. The state-specific roadless rule identified in the preferred alternative would discontinue the existing regulation's prohibitions and instead rely upon existing statutory and land management plan direction to manage roadless areas on the Tongass.

Tongass Land and Resource Management Plan

The 16.7-million-acre Tongass was the first forest to complete a Land and Resource Management Plan (Forest Plan) under the National Forest Management Act (NFMA) in 1979. That Forest Plan was amended in 1986 and 1991 and revised more broadly in 1997. A final Supplemental Environmental Impact Statement (SEIS) was completed in 2003, which further evaluated roadless areas for their wilderness potential. The Forest Plan was amended in 2008 in response to a Ninth Circuit Court ruling and a 5-Year Plan Review completed in 2005. The Forest Plan was subsequently amended in 2016 to address the Secretary of Agriculture's direction to transition to a young growth-based timber program in 10 to 15 years. The Forest Plan anticipates production of an average of 46 million board feet (MMBF) per year while transitioning to predominantly young growth harvest after about 16 years. Additional objectives of the 2016 Forest Plan Amendment (Forest Plan) include facilitation of the development of renewable energy projects and responding to findings of the 5-Year Review of the 2008 Forest Plan.

All discretionary Forest Service activities authorized on the Tongass must be consistent with the Forest Plan as well as existing laws and regulations. In addition, as with other roadless rulemakings, the Alaska roadless rulemaking process does not require an amendment or revision of any forest plan, aside from an administrative change to the area that is suitable for timber production.

Purpose and Need

In response to the State of Alaska's petition for 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 (the Tongass comprises almost 80 percent of Southeast Alaska), and Alaska and Tongass-specific statutory considerations (e.g., Alaska National Interest Lands Conservation Act [ANILCA]), Tongass Timber Reform Act [TTRA]). In ANILCA, Congress sought to balance national environmental interests with "adequate opportunity for satisfaction of the economic and social needs of the State of Alaska and its people" (16 U.S.C. §3101(d), Sturgeon v. Frost, 139 S.Ct. 1066, 1075).

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.

The State of Alaska believes that roadless conservation interests for the Tongass can be adequately protected under the Tongass Forest Plan and that the 2001 Roadless Rule prohibitions are unnecessary. In addition, the State believes application of the 2001 Roadless Rule substantially impacts the social and economic fabric of Southeast Alaska and violates ANILCA and TTRA.

In response to the State's petition, commercial and non-profit organizations have expressed strong opinions, for and against, the idea of a regulatory review

Key Issues

In 2001, the USDA determined that the Tongass National Forest deserved "special attention in formulating alternatives due to its unique social and economic conditions" (USDA Forest Service 2000). More specifically, USDA's Record of Decision identified:

> "the agency has considered the alternatives of exempting and not exempting the Tongass National Forest, as well as deferring a decision per the proposed rule. Social and economic considerations were key factors in analyzing those alternatives, along with the unique and sensitive ecological character of the Tongass National Forest, the abundance of roadless areas where road construction and reconstruction are limited, and the high degree of ecological health. In developing the proposed action, the agency sought to balance the extraordinary ecological values of the Tongass National Forest against the needs of the local forest dependent communities in Southeast Alaska." (66 FR 3254)

Then, as now, USDA's (and that of the State, cooperators, and interested members of the public) assessment of policy preferences regarding roadless management rests primarily on the different weights ascribed to the these ecological, social, and economic factors rather than any specific data or scientific findings. To be sure, the agency has carefully considered comments submitted that sought clarifications or updated information and revised the FEIS accordingly.

With striking similarity to the issues highlighted in 2001, the following three key issues were identified for the Alaska state-specific roadless rulemaking effort and will be carried forward throughout the analysis.

Key Issue 1 – Roadless area conservation

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

Roadless areas are important because of their wildlife and fish habitat, recreation values, importance to multiple economic sectors, traditional properties and sacred sites for indigenous people, inherent passive use values, and ecosystem services they provide. Passive use values represent the value that individuals assign to a resource independent of their use of that resource and typically include existence, option, and bequest values. These values represent the value that individuals obtain from knowing that expansive roadless areas exist, knowing that they are available to visit in the future should they choose to do so, and knowing that they are available for future generations to inherit. Ecosystem services represent the services provided to society by healthy ecosystems. These services and benefits include what some consider to be long-term life support benefits to society as a whole. Examples of ecosystem services include watershed services, soil stabilization and erosion control, improved air quality, climate regulation, carbon sequestration, and biological diversity.

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

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

The Forest Service manages land for the multiple-use and sustained yield of all renewable surface resources. There is, however, disagreement among the State, cooperators, and public regarding the best management of federal lands for economic development purposes and the overall economic vitality of Tongass communities. Many believe the visitor industry and seafood industries have become the mainstay of Southeast Alaska's economy and, therefore, should have prominence in Forest Service land management decision-making. Others note that resource extraction, including forest products and the minerals industry, continue to provide jobs and income sources in Southeast Alaskan communities.

Southeast Alaska residents, communities, and Alaska Native individuals and tribes rely extensively on the Tongass for a wide variety of subsistence resources and traditional cultural activities. Many of them also use the forest for recreational hunting, fishing, and other activities. These activities yield economic value as well, and are important to local and regional socioeconomic well-being.

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

The Tongass includes large, undeveloped, and natural land areas that represent expansive unfragmented blocks of wildlife habitat. This scale and size of contiguous habitat is not generally available elsewhere in the NFS outside of Alaska. Although wildlife species on the Tongass are associated with more than one habitat type, many inhabit old-growth forests or prey on species that inhabit old-growth forests. The Tongass Old-growth Habitat Conservation Strategy (2016 Forest Plan Amendment EIS, Appendix D) was developed to maintain the integrity of the old-growth forest ecosystem, and thereby conserve biological diversity across the Forest by retaining intact, largely undisturbed habitat. In addition, because of its predominantly undeveloped nature, a number of wide-ranging species find optimal habitat in the more remote areas of the Forest.

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

Features Common to Multiple Alternatives

Tongass Land and Resource Management Plan (Forest Plan)

Except for the timber land suitability determinations described below, none of the alternatives would make any changes to the Forest Plan including the following:

- Goals and Objectives;
- Land Use Designations or Management Prescriptions;
- Forest-wide Standards and Guidelines;
- Plan Components developed under the 2012 Planning Rule; and/or
- Projected Timber Sale Quantity (PTSQ), Projected Wood Sale Quantity (PWSQ), and the Young-growth Transition.

None of the alternatives authorize any site-specific projects or other ground-disturbing activities. Specific projects that include timber harvest, road construction, and/or road reconstruction must undergo appropriate site-specific environmental analysis when they are proposed, to comply with NEPA. None of the alternatives considered in this FEIS waive any applicable requirements regarding site-specific environmental analysis, public involvement, consultation with Alaska Native tribes, Alaska Native corporations, and other agencies, or compliance with other applicable laws.

Activities that are not otherwise prohibited are permissible in roadless areas under all alternatives, including the no-action alternative (2001 Roadless Rule).

Timber Suitability

Alternatives 2, 3, 4, 5, and 6 would result in an administrative change to the timber land suitability determinations made in the 2016 Forest Plan Amendment. Specifically, lands identified as suitable for timber production that were deemed unsuitable solely due to implementation of the 2001 Rule would be set aside and redesignated as suitable for timber production. As described in Appendix A to the Forest Plan (USDA Forest Service 2016a), old-growth forest located within Phases 2 and 3 of the Tongass Timber Sale Program Adaptive Management Strategy, within the Tongass 77 (T77) Watersheds and The Nature Conservancy (TNC)/Audubon Conservation Priority Areas, within non-development Land Use Designations (LUDs), and in other areas designated by the Forest Plan as not suitable, would continue to be not suitable for timber production. This administrative change would apply to lands removed from the roadless inventory and to lands identified as "Community Priority" or "Timber Priority" in Alternatives 3 and 4, respectively. The administrative change to the Tongass suitability determinations would not preclude future adjustments to suitability determinations as part of subsequent Forest Plan amendment or revision processes for the purpose of addressing other multiple use needs.

Changes Between the DEIS and FEIS

A number of changes, corrections, and clarifications from the Draft Environmental Impact Statement (DEIS) have been made based on public comments and internal reviews. The most notable changes are summarized below. Minor edits and corrections are not included in this list.

- Corrections were made to IRA boundaries (Alternative 1) based on ownership changes and mapping corrections. The alternatives for the FEIS are based on these updated IRA boundaries. The corrections removed areas misidentified in the 2001 Roadless Rule (i.e., designated Wilderness identified as IRA), aligned IRA boundaries with Wilderness area boundaries, added lakes and aligned IRA boundaries with current NFS ownership. This resulted in a net increase of about 30,000 acres from the 9.34 million acres identified in 2001.
- A new "roaded roadless" analysis was conducted between the DEIS and FEIS resulting in additional areas identified with existing timber harvest and roads within IRAs.
- Areas identified as logical extensions were adjusted and removed from roadless designation in Alternatives 3 and 4 to eliminate small, isolated roadless areas.
- Community Priority Areas: The community priority designation was applied for Hydaburg and Kake, resulting in increasing the number of Community Priority Areas for Alternative 3.
- Cooperating Agencies noted that T77 Watershed/TNC-Audubon Conservation Priority areas mapped for the DEIS did not include several high-priority sockeye salmon watersheds important to Alaska Native Tribes. Therefore, areas identified as logical extensions in the DEIS that overlapped with the high-priority sockeye salmon watersheds were added back into the roadless inventory for Alternatives 2 and 3 to minimize effects to these watersheds.
- The DEIS assumed that timber harvest was distributed evenly across the suitable timber lands. In response to a number of comments and internal discussions, it was decided that old-growth harvest acres could be allocated in a more realistic pattern (since only 11 to 19 percent of the suitable old growth is harvested over 100 years). Thus, for the FEIS, a model to project more accurately the distribution of harvest was developed (see Chapter 3, Introduction, Assumptions for Future Harvest).
- The mileages of new road construction, road reconstruction, and new roads over decommissioned road grades were estimated for each alternative; and these were spatially allocated based primarily on where harvest occurred (see Chapter 3, Introduction, Assumptions for Future Road Construction and Reconstruction).
- In the DEIS, a number of Biodiversity, Wildlife, and Water tables from the 2016 Forest Plan Amendment EIS were referenced, especially in the Affected Environment sections, because conditions have not changed significantly. The tables from the 2016 Forest Plan Amendment EIS were presented in Appendix C. In order to be more precise in the FEIS, the attributes in these tables were analyzed specifically for this EIS, and updated information is now presented in new tables in the text that is specific to this EIS. Appendix C has, therefore, been eliminated.

- The DEIS incorrectly stated that a Biological Assessment would be prepared for the Decision. Since there are no anticipated effects that would influence threatened or endangered species, preparing a Biological Assessment is not necessary. Biological Assessments may be prepared for site-specific actions proposed in the future, as appropriate.
- Maps showing lands suitable for old-growth and young-growth timber production were created for each community use area by alternative. However, to better approximate where future old-growth harvest might occur, some suitable old growth is excluded because it is considered less desirable low-volume old growth or for poor economics. These maps are intended to illustrate to the reader the potential impacts of timber harvesting resulting from the final rule by community. These maps are provided in Appendix D, which is made available electronically in the data storage device accompanying this FEIS and on the project website.
- In Appendix G, the Roadless Rule for Alternative 2 was corrected by removing the regulatory prohibition of commercial old-growth timber harvest in certain high priority watersheds. This is consistent with what was analyzed in the DEIS and was only intended to apply to Alternative 3.
- In Appendix G, exceptions to the prohibitions on timber harvest and road building in ARAs have been revised.

Proposed Alaska Roadless Boundary Correction and Modification Provisions

Alternatives 2, 3, 4, and 5 include administrative correction and modification provisions for inclusion in the proposed Alaska Roadless Rule to provide for future boundary and classification changes. While the proposed rule and DEIS announced an intention to extend this provision to the Chugach National Forest, in response to public comment, this provision has been adjusted and would apply only to the Tongass National Forest. Administrative corrections would be limited to adjustments that remedy clerical errors, typographical errors, mapping errors, or improvements in mapping technology. Administrative modifications would be limited to conformance to statutory changes, or incorporation of changes due to land adjustments. The Chief may issue administrative corrections after a 30-day public notice and opportunity to comment period. The Chief would provide at least a 45-day public notice and opportunity to comment period for all modifications.

Alaska Roadless Area Management Designations

Alternatives 2, 3, 4, and 5 provide for a variety of management approaches within roadless areas through ARA land management designations which include LUD II Priority, Watershed Priority, Roadless Priority, Community Priority, and Timber Priority. The management designations prohibit timber harvest, road construction, and road reconstruction with exceptions that are applied differentially across the alternatives. A brief description of each management designation follows.

LUD II Priority (Alternatives 2, 4, and 5)

LUD II Priority ARAs would be managed in accordance with applicable statutory direction. Specifically, these lands would continue to be managed in a roadless state to retain their wildland character as defined in the Tongass Timber Reform Act (TTRA; Title II, Section 201) and the National Defense Authorization Act for Fiscal Year 2015 (Public Law 113-291, 128 Stat. 3729, Section 3720(f)).

Approximately 870,000 acres of the Tongass are congressionally designated as LUD II (847,000 acres currently designated as IRA under the 2001 Roadless Rule and 22,000 acres currently not designated as IRA). Alternatives 2 and 4 propose to designate 854,000 LUD II acres as LUD II Priority ARA. Alternative 5 proposes to apply the LUD II Priority ARA only to LUD II areas that are currently designated as IRA.

Alternative 3 proposes to remove all LUD II areas from roadless designation rather than designating LUD II lands into an ARA. LUD II areas under Alternative 3 would continue to be managed as directed by their congressional designations.

Watershed Priority (Alternatives 2 and 3)

The Watershed Priority ARA is more protective than the 2001 Roadless Rule as it offers fewer exceptions for timber harvest, road construction/reconstruction. It also provides for activities specific to aquatic habitat improvement. Approximately 3,284,000 acres in Alternative 2 and 3,259,000 acres in Alternative 3 would be managed under this designation. The Watershed Priority designation is applied to areas identified in the Forest Plan as T77 Watersheds and TNC/Audubon Conservation Priority Areas, as well as high-priority sockeye salmon watersheds.

Additionally, for Alternative 3, commercial old-growth timber harvest would be prohibited on NFS lands in T77 Watersheds and TNC/Audubon Conservation Areas that extend beyond ARA boundaries. A prohibition on old-growth harvesting currently exists through the Forest Plan. But Alternative 3 examines establishing regulatory continuity between these roadless and watershed management systems given how extensively they overlap (the listed watersheds comprise over half of the Tongass' roadless areas, and approximately 90 percent of the watershed areas are within roadless area boundaries). Thus, the old-growth harvest prohibition would be extended beyond the designated roadless area boundaries in order to maintain the balance and integrity of the watershed protection system. As with all roadless rule provisions, the new prohibition would supersede current and future forest plans, with the plan continuing to provide management direction in other regards. In this manner, Alternative 3 affords high-priority watershed areas greater regulatory protection than under the 2001 Roadless Rule. Young-growth timber harvest outside of ARAs within these high-priority watershed areas is not prohibited.

Roadless Priority (Alternatives 2, 3, 4, and 5)

The Roadless Priority ARA is similar to the 2001 Roadless Rule but is less restrictive and addresses Alaska-specific concerns. Specifically, it provides for infrastructure development to connect and support local communities, and road construction/reconstruction for access to renewable energy sites and leasable minerals. In addition, the Roadless Priority ARA includes specific exceptions that, while they are allowed under the 2001 Roadless Rule, are included to improve overall clarity.

Community Priority (Alternative 3)

The Community Priority ARA allows for small-scale timber harvest[1] (less than one MMBF) and associated road construction/reconstruction. In addition, it allows for infrastructure development to connect and support local communities and traditional Alaska Native cultural uses. In all cases, activities within Community Priority ARAs would have to be consistent with the underlying Forest Plan LUD requirements. Even if a timber harvest, road building, or other activity would be permissible under the Alaska Roadless Rule, it may not be allowable because of Forest Plan requirements specific to the LUD that applies to the area, or other suitability criteria as explained in the Forest Plan, Appendix A. This designation applies to approximately 370,000 acres and is proposed in Alternative 3 adjacent to seven communities: Hydaburg, Juneau, Kake, Ketchikan, Sitka, Wrangell, and Yakutat.

This ARA was developed to address desires of these seven communities to retain roadless designations while allowing for small timber operators in the community, infrastructure development to support the communities, and provide for traditional Alaska Native cultural uses.

Timber Priority (Alternative 4)

The Timber Priority ARA allows timber harvest, road construction, and road reconstruction to facilitate timber management and provide economic opportunity. It is only included in Alternative 4 and would apply to approximately 757,000 acres. While management of lands in this ARA management designation would not be subject to any regulatory prohibitions on timber harvest or road construction, retaining them in roadless designation is a means of acknowledging the roadless values of these lands to ensure appropriate consideration in future, site-specific project planning and analysis. Table ES-1 displays the ARAs by alternative.

[1] Timber harvest in Community Priority ARAs would be limited to micro sales, salvage sales, and small commercial sales less than one MMBF in size.

Table ES-1
Alaska Roadless Areas (ARA) by Alternative and Management Designation

	Alternative					
	1	2	3	4	5	6
ARA Management Designations	No Action	Roaded Roadless	Logical Extension	Partial Dev. LUDs[1]	All Dev. LUDs	Full Exemption
LUD II Priority	N/A	√		√	√	N/A
Watershed Priority	N/A	√	√			N/A
Roadless Priority	N/A	√	√	√	√	N/A
Community Priority	N/A		√			N/A
Timber Priority	N/A			√		N/A

N/A = not applicable

[1] Includes Timber Production and Modified Landscape LUDs, but not Scenic Viewshed.

Alternative 1 (No Action)

Alternative 1 is the no action alternative as required by the Council on Environmental Quality's NEPA regulations and reflects a continuation of current land management pursuant to the 2001 Roadless Rule (see Map 1 in map packet or on thumb drive). This alternative does not mean that no activities would occur on the Tongass National Forest; rather, it means the activities currently occurring would continue, including implementation of the Tongass timber program at levels defined in the Forest Plan. This alternative continues general prohibitions on timber harvest (and sale), road construction, and road reconstruction within IRAs with limited exceptions (Table 2-3).

Under Alternative 1, roadless areas consist of 110 IRAs identified in the 2001 Roadless Rule. These IRAs were originally mapped in 1996 for the Tongass Forest Plan Revision and the provisions of the 2001 Roadless Rule (as provided for by the Court's reinstatement Order) would apply to those IRAs (summarized below). As a result of ownership changes and boundary alignment corrections recognized during this review, these IRAs actually encompass 9.37 million acres[2] of NFS land. Under this alternative, the prohibitions of the 2001 Roadless Rule would continue to apply across the 110 IRAs, encompassing approximately 56 percent of the Tongass.

Under Alternative 1, the 2001 Roadless Rule IRA boundary modifications (increases and decreases) would continue to require rulemaking except for minor clerical or technical corrections.

Alternative 2

Alternative 2 provides limited additional timber harvest opportunity while maximizing roadless area designations. It removes approximately 142,000 acres from roadless designation that have been substantially altered by known road construction or timber harvest. These areas are generally known as "roaded roadless" areas but include additional areas considered to be substantially altered. Alternative 2 also adds 110,000 acres as ARAs.

The 110,000 acres of added roadless areas maximize the geographic scope of roadless area designations by including portions of congressionally-designated LUD II areas not included as IRAs under the 2001 Roadless Rule, currently unroaded small islands, and unroaded areas greater than 5,000 acres as identified by prior forest planning efforts. Adding additional roadless designations to unroaded islands provides for long-term, continued recreational and outfitter and guide opportunities on these islands.

After removals and additions, Alternative 2 consists of 9.34 million inventoried roadless acres, or about 30,000 fewer roadless acres than under Alternative 1. The 9.34 million acres are designated to three ARA land management categories including LUD II Priority, Watershed Priority, and Roadless Priority (see Map 2 in map packet or on thumb drive).

[2] The original acreage of inventoried roadless areas on the Tongass was approximately 9.34 million acres. As a result of ownership changes and boundary alignment corrections, including shoreline mapping adjustments, the actual acreage is 9.37 million acres.

Alternative 2 applies the most protective ARA, Watershed Priority, to 3.28 million acres, primarily identified as T77 Watersheds and TNC/Audubon Conservation Priority Areas and high-priority sockeye salmon watersheds. The Watershed Priority ARA is considered most protective because it includes fewer exceptions than the 2001 Roadless Rule, while still allowing activities needed for fisheries protection, maintenance, or improvement.

Under Alternative 2, a net of 20,000 old-growth acres and 11,000 young-growth acres, previously identified as unsuitable timber lands, would revert to suitable timber lands, as they were when the roadless rule did not apply to the Tongass.

Alternative 3

Alternative 3 provides moderate additional timber harvest opportunities. Alternative 3 establishes roadless designations for T77 Watersheds, TNC/Audubon Conservation Priority Areas, and high-priority sockeye salmon watersheds inside roadless areas and also prohibits old-growth harvest in T77 Watersheds and TNC/Audubon Conservation Priority Areas outside of roadless areas (similar to the Forest Plan). Additional timber harvest opportunity is provided by removing substantially-altered roadless areas (including roaded roadless, similar to Alternative 2) and extending the bounds of these areas to logical end points of existing road and timber harvest systems, generally defined as the nearest watershed boundary (i.e., ridgeline of 14th-field hydrologic unit) from an existing road system. Removing these areas from the roadless inventory represents the logical extensions of substantially altered acres from existing infrastructure and likely encompasses the more economically feasible locations for future timber harvest with the least impact to roadless characteristics. Additional small-scale timber harvest opportunities are provided by the designation of Community Priority[3] ARAs for Hydaburg, Juneau, Kake, Ketchikan, Sitka, Wrangell, and Yakutat.

Alternative 3 designates 8.22 million acres as ARAs. It removes approximately 1.25 million acres from roadless designation including both development and non-development LUD acres, and adds 107,000 acres to ARAs including unroaded small islands and unroaded areas greater than 5,000 acres as identified by prior forest planning efforts. Adding additional roadless designations to unroaded islands provides for continued recreational and outfitter and guide opportunities on these islands.

Alternative 3 applies the most protective ARA, Watershed Priority, to 3.26 million acres primarily identified as T77 Watersheds, TNC/Audubon Conservation Priority Areas, and high-priority sockeye salmon watersheds. The Watershed Priority ARA is considered most protective because it includes fewer exceptions than the 2001 Roadless Rule, while still allowing activities needed for fisheries protection, maintenance, or improvement. The remaining roadless areas include 4.60 million acres in Roadless Priority and 0.37 million acres in Community Priority (see Map 3 in map packet or on thumb drive). Additionally, for Alternative 3, commercial old-growth timber harvest would be prohibited on NFS lands in T77 Watersheds, and TNC/Audubon Conservation Priority Areas, including those that extend beyond ARA boundaries.

Alternative 3 proposes a net decrease of 1.14 million roadless acres, as compared to the no action alternative, and includes both development and non-development LUDs. Roadless area designation would be removed from the 847,000 congressionally-designated LUD II acres that are currently within an IRA. The removal of roadless designation from congressionally-designated LUD II acres represents the majority of the decrease in designated roadless acres proposed under Alternative 3. Removing roadless designation from LUD II acres aligns with congressional intent that LUD II areas be managed “in a roadless state to retain their wildland character” (USDA Forest Service 2016a).

Alternative 3 would revert a net of 85,000 old-growth acres and 15,000 young-growth acres, previously identified as unsuitable timber lands, to suitable timber lands, as they were when the roadless rule did not apply to the Tongass.

[3] Timber harvest in Community Priority ARAs would be limited to micro sales, salvage sales, and small commercial sales less than one MMBF in size.

Alternative 4

Alternative 4 provides additional timber harvest opportunity while maintaining roadless designations for Scenic Viewsheds and T77/TNC-Audubon Conservation Priority Areas that are in roadless areas. Approximately 401,000 acres are removed from roadless designation, including substantially-altered areas and logical extensions of substantially-altered acres (similar to Alternatives 2 and 3), along with selected additional locations for economic timber sales. Protection is maintained for Scenic Viewsheds, and most T77 Watersheds and TNC/Audubon Conservation Priority Areas by designating them as Roadless Priority ARAs.

Additionally, Alternative 4 adds 7,000 acres as LUD II Priority ARA. These added roadless acres are LUD II areas that were not designated as IRA under the 2001 Roadless Rule. No additional lands would be added to ARAs.

The net result of removals and additions under Alternative 4 is 8.98 million roadless acres, which are designated into three categories of ARAs: LUD II Priority, Roadless Priority, and Timber Priority (see Map 4 in map packet or on thumb drive). This alternative was developed to provide for a high level of timber management opportunities thus, timber management is allowed in the Timber Priority ARA, which consists of the Timber Production and Modified Landscape LUDs, as identified in the Forest Plan.

Alternative 4 proposes a net decrease of 394,000 roadless acres as compared to the no action alternative. However, the net increase in suitable timber lands is substantially higher than expected based on the decrease in roadless acres alone. This is because the Timber Priority ARA acres produce a large component of suitable timber.

Under Alternative 4, a net of 161,000 old-growth acres and 15,000 young-growth acres previously identified as unsuitable timber lands would revert to suitable timber lands, as they were when the roadless rule did not apply to the Tongass.

Alternative 5

Alternative 5 provides maximum additional timber harvest opportunity by removing all Timber Development, Modified Landscape, and Scenic Viewshed LUDs identified by the Forest Plan from roadless designation, including T77 Watersheds and TNC/Audubon Conservation Priority Areas within aforementioned development LUDs. Areas with mineral potential, as identified by the Forest Plan's minerals overlay, are also removed from roadless designation (see Map 5 in map packet or on thumb drive).

Alternative 5 would designate 7.05 million acres as ARAs. About 2.32 million acres would be removed from roadless area designation including mineral overlay acres and the majority of development LUDs including T77 Watersheds and TNC/Audubon Conservation Priority Areas. The 7.05 million roadless acres are designated to two ARAs: LUD II Priority (0.85 million acres) and Roadless Priority (6.20 million acres) (see Map 5 in map packet or on thumb drive). Alternative 5 also reverts a net 168,000 old-growth acres and 17,000 young-growth acres previously identified as unsuitable timber lands to suitable timber lands, as they were when the roadless rule did not apply to the Tongass.

Alternative 6 (Preferred Alternative)

Alternative 6 is the preferred alternative and provides maximum additional timber harvest opportunities as the full exemption alternative, which was requested by the State of Alaska's petition (Appendix A). It removes all 9.37 million inventoried roadless acres on the Tongass from roadless designation. Acres removed from roadless designation would continue to be managed in accordance with statutory mandates and by the Forest Plan (see Map 6 in map packet or on thumb drive). Existing protections to roadless characteristics provided by Forest Plan non-development LUDs (including LUD II, Remote Recreation, Semi-remote Recreation, Old-growth Habitat, Special Interest Area, Wild River, Scenic River, and others) would remain in place.

Alternative 6 would revert a net total of 168,000 old-growth acres and 20,000 young-growth acres previously identified as unsuitable timber lands to suitable timber lands, as they were when the roadless rule did not apply to the Tongass. Table 2-8 summarizes the key elements of Alternative 6.

Maps

Large-scale color maps showing roadless areas by IRA or ARA (Map 1 to 6) are included on the thumb drive version of the FEIS, in the map packet that accompanies the FEIS paper copy, and on this project's website: https://www.fs.usda.gov/project/?project=54511. Additional maps showing the lands that would be suitable for timber production (Maps 7 to 12) and the lands that would be suitable for timber production by certain outfitter/guide use areas (Maps 13 to 18) are included on the thumb drive and website. Maps showing lands suitable for timber production by community use area for each alternative are included in Appendix D on the thumb drive and website.

Comparison of the Alternatives

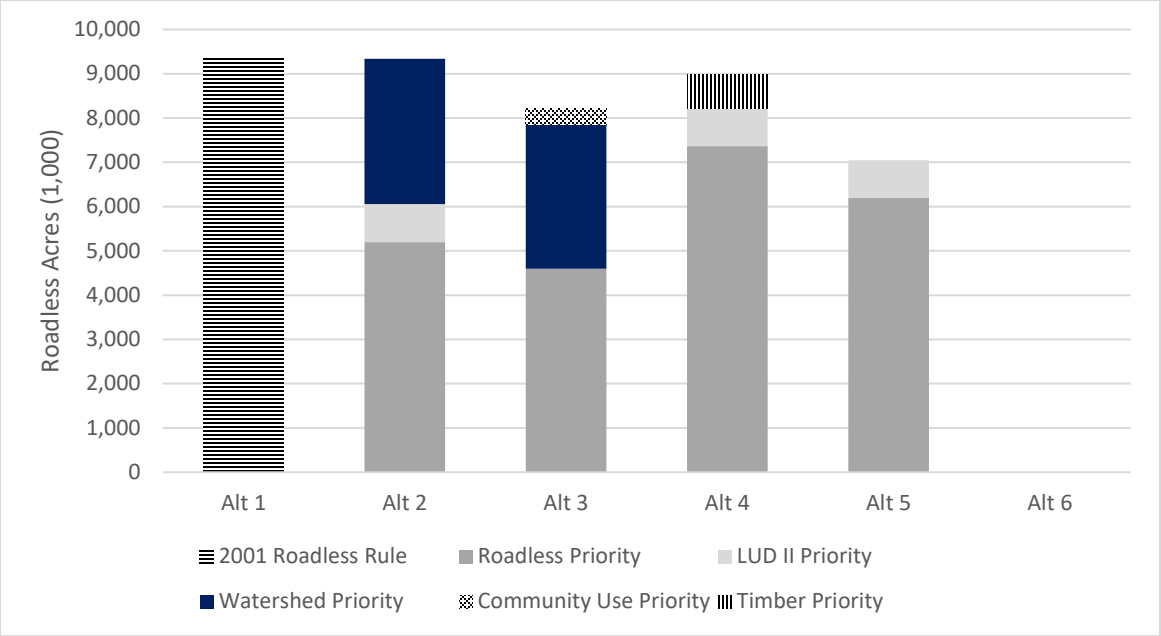
This section compares the environmental consequences of the six alternatives with respect to the significant issues described in Chapter 1. This comparison is based on the effects analyses presented in Chapter 3. For reference, Table ES-2 summarizes the acres by ARA, the acres removed or added from inventoried roadless, and the total old-growth acres that are suitable for timber production under Alternative 1 and the five action alternatives. Figure ES-1 displays the ARAs by alternative and management designation.

Table ES-2
Roadless Areas by Alternative and Management Designation

	Alternative					
	1	2	3	4	5	6
Roadless Designation (acres)	No Action	Roaded Roadless	Logical Extension	Partial Dev. LUDs[1]	All Dev. LUDs	Full Exemption
Total Roadless Area	9,368,000	9,336,000	8,224,000	8,975,000	7,047,000	0
ARA Management Designations						
LUD II Priority	N/A	854,000	0	854,000	847,000	0
Watershed Priority	N/A	3,284,000	3,259,000	0	0	0
Roadless Priority	N/A	5,199,000	4,595,000	7,363,000	6,200,000	0
Community Priority	N/A	0	370,000	0	0	0
Timber Priority	N/A	0	0	757,000	0	0
Change in Roadless Area Acres						
Roadless Area Removed	0	142,000	1,252,000	401,000	2,321,000	9,368,000
Roadless Area Added	0	110,000	107,000	7,000	0	0
Net Change	0	-32,000	-1,144,000	-394,000	-2,321,000	-9,368,000
Old-Growth Acres Suitable for Timber Production						
Total Acres	227,000	247,000	312,000	388,000	395,000	395,000
Net Change	0	20,000	85,000	161,000	168,000	168,000
T77 & TNC/ Audubon Conservation Priority Areas Outside of Roadless given Long-term Regulatory Protection						
Total Acres	0	0	507,000	0	0	0

[1] Includes Timber Production and Modified Landscape LUDs, but not Scenic Viewshed.
N/A = not applicable
Note: Numbers may not appear to sum correctly due to rounding.

Figure ES-1
Roadless Areas by Alternative and Management Designation



Key Issue 1 – Roadless area conservation

Roadless area conservation is analyzed in terms of both the acres designated as roadless and the degree of protection provided by each alternative. In terms of acres designated, Alternatives 1 and 2 provide the highest degree of regulatory protection with approximately 9.37 million acres designated as roadless and Alternative 6 provides the lowest with zero acres of designated roadless areas. Alternative 5 removes all regulatory roadless designations within development LUDs[4] and has the second lowest number of acres designated roadless with 7.05 million acres.

Alternatives 3 and 4 are intermediate in terms of the acres designated as roadless. However, the roadless designations provided in development LUDs by Alternative 4 are lower than for Alternative 3 because all Timber Priority ARA lands under Alternative 4 are in development LUDs and Alternative 3 would designate T77 Watersheds, TNC/Audubon Conservation Priority Areas, and high-priority sockeye salmon watersheds as Watershed Priority ARAs. In addition, the removal of roadless designation from LUD II acres accounts for a large share of the reduction in designated roadless area acres under Alternative 3. These acres would retain their specific statutory protections and be managed to preserve roadless area characteristics (Table 2-10). Therefore, protection of roadless characteristics is much greater under Alternative 3 compared with Alternative 4.

The roadless rule language under Alternative 1 would be unchanged from the 2001 Roadless Rule (as reinstated by the District Court). Under Alternative 6, the Tongass would be fully exempted from the 2001 Roadless Rule. The rule language would be modified under Alternatives 2, 3, 4, and 5.

The Roadless Priority and LUD II Priority management categories would be very slightly more permissive than Alternative 1 in terms of road construction, salvage timber harvest, and mineral development, and would be slightly more permissive in terms of energy and transportation project development. The Watershed Priority ARA would be slightly less permissive relative to timber harvest, road construction, and other developments and the Community Priority and Timber Priority categories under Alternatives 3[5]

[4] Note that, with the exception of the Timber Priority ARA designation, roadless designation on development LUDs provides more protection for these areas, because development LUDs are areas most likely to be developed if they were not designated roadless. Most non-development LUDs have Forest Plan direction which limits their potential for development.

[5] Timber harvest in Community Priority ARAs would be limited to micro sales, salvage sales, and small commercial sales less than one MMBF in size.

and 4, respectively, would be substantially more permissive of development, especially timber harvest and road construction.

As a result, Alternatives 1, 2, and 3 would provide the greatest protection of roadless characteristics. Alternative 1 would protect the most acres and existing management direction would provide the highest degree of protection, with the existing general prohibitions remaining in place for all areas. Alternative 2 would offer similar levels of protection. The roaded roadless and other substantially altered areas that would be removed under Alternative 2 have limited roadless characteristics, and increased regulatory protection would be added for the Watershed Priority ARA. Alternative 3 would offer the next most protection of roadless area characteristics. Roaded roadless and other substantially altered areas along with logical extension areas would be removed under Alternative 3 (as well as LUD II areas), and most ARAs would be managed as Roadless Priority or Watershed Priority ARAs. Additionally, T77 Watersheds and TNC/Audubon areas outside of roadless would be given regulatory protection from old-growth harvest. About 3 percent of ARAs under Alternative 3 would be designated as Community Priority, which allows limited timber harvest opportunity. Alternatives 4 through 6 would provide the least amount of roadless designations, with Alternative 6 removing all acres from regulatory roadless designation.

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

Support for Southeast Alaska resource-based industries and local/regional socioeconomic well-being is compared among the alternatives by industry/category in the following subsections.

Forest Products Industry

The Forest Plan, as amended in 2016, established an average annual Projected Timber Sale Quantity (PTSQ) of 46 MMBF prior to the young-growth transition. The old-growth contribution to the PTSQ is expected to start out high and decrease over time as more young growth becomes economic to harvest. During the first decade, an average of about 12 MMBF of young growth and 34 MMBF of old growth was expected to be sold annually. From Year 11 through Year 15 an average of about 28 MMBF of young growth and 18 MMBF of old growth were expected to be sold annually. Old-growth volume offered was projected to decrease until it reaches 5 MMBF per year (expected to occur about Year 16), at which point it is to be stabilized at 5 MMBF per year to support small operators and specialty products such as wood for musical instruments. Young growth sales are expected to continue to increase at a rapid rate after Year 16 and are expected to reach an upper limit of 98 MMBF about Year 18. If less than the average annual PTSQ figure of 46 MMBF is sold in the early years of a decade, the Forest Plan allows the difference to be added to the sale quantity for the remainder of the decade. During the initial two years of implementing the Forest Plan, the total volumes sold were 30.7 MMBF (Fiscal Year 2017) and 9.0 MMBF (Fiscal Year 2018).

None of the action alternatives would result in changes to the PTSQ and the timber objectives of the Forest Plan would continue to require transitioning to primarily young-growth harvest. Harvest levels are not expected to vary significantly among the alternatives. However, the alternatives do vary in terms of the amount and location of acres of land suitable for timber production. Greater total acreage of suitable land would provide greater flexibility in the selection of future timber sale areas, as well as the potential for more flexibility in sale design, depending on the planning areas selected. This improved flexibility could, in turn, improve the Forest Service's ability to offer economic sales that meet the needs of industry. This greater flexibility could be beneficial during the first two decades of the 2016 Forest Plan (the transition period), when most old-growth harvest would take place.

Under Alternative 1, about 227,000 acres of old growth and 334,000 acres of young growth are currently suitable for timber production. The young-growth suitable acres would increase slightly (3 through 6 percent) under the action alternatives. For old growth, however, the suitable acreage increase would range from 7 percent for Alternative 2 to 74 percent for Alternatives 5 and 6. For Alternatives 3 and 4 the increase would be 37 percent and 71 percent, respectively. It should be noted that harvest levels and

road construction are not expected to change significantly among the alternatives, although harvest and road locations would be more widespread as suitable acres increase.

The additional suitable old-growth acres are comprised of lands fitting into three broad categories or areas: roaded roadless and other substantially altered areas (Alternatives 2 through 6); logical extension areas and areas adjacent to roads (Alternatives 3 through 6); and areas more distant from existing roads (Alternatives 4 through 6). In addition, suitable old-growth acres would be added in Community Priority ARAs, which are associated with seven communities (Alternative 3).[6] The substantially altered areas removed, the areas immediately adjacent (logical extensions), and the Community Priority ARAs are assumed to be more economical to harvest due to their proximity to existing infrastructure. The additional acres added under Alternatives 4 through 6 are farther from existing infrastructure and thus less likely to be economic to harvest.

Recreation and Tourism

Timber harvest and road construction projects within roadless areas have the potential to affect outfitter/guide operations which provide recreation opportunities on the Forest and are often dependent on high scenic integrity and undisturbed landscapes. Development projects permitted as a result of changes in roadless area designations could also affect outfitter/guide use in other adjacent or nearby areas as outfitter/guides displaced from one location seek other places to take clients. Some use areas are presently at capacity, which could exacerbate potential displacement effects. The Forest's ability to meet outfitter/guide demand, especially for operators seeking more remote areas, could also be affected.

The outfitter/guide analysis prepared for this EIS used changes in suitable old-growth acres in conjunction with information about existing outfitter/guide use to focus on potentially affected areas. The resulting analysis identified 15 outfitter/guide use areas where potential conflicts between existing outfitter/guide use and future management activities could occur. In most of these areas, existing outfitter/guide use occurs near areas where development has occurred, either near or along shorelines and/or Forest road systems. Similarly, in most cases, timber harvest that could already occur in these areas (under Alternative 1) has the potential to conflict with existing outfitter/guide use. Viewed in terms of increases in acres suitable for harvest, impacts under Alternatives 2 and 3 would be nonexistent to very minimal in all areas, with increases in designated roadless acres and reductions in suitable acres occurring in some areas under these alternatives. By expanding the acres available for harvest, Alternatives 4, 5, and 6 could in some cases add to these potential impacts by increasing the geographic extent of the acres affected, which could also result in an increase in road miles.

Commercial Salmon Harvesting and Processing

None of the alternatives are expected to significantly affect the commercial fishing or fish-processing industries. Riparian Management standards and guidelines established in the Forest Plan would remain in place under all of the alternatives. While there would be some variation in the level of protection, these variations are not expected to affect the commercial fishing industry. The future of the commercial fishing industry in Southeast Alaska is more likely to depend upon occurrences outside of the Tongass National Forest such as hatchery production, offshore harvest levels, and changes in ocean conditions (USDA Forest Service 2016b).

Mining and Mineral Development

Locatable minerals development is possible within designated roadless areas under all alternatives. The General Mining Act of 1872 authorizes and governs prospecting and mining for locatable minerals on NFS lands, including designated roadless areas. Changes in roadless management are, therefore, not expected to affect existing or future locatable mineral exploration or mining activities on the Forest.

Under the 2001 Roadless Rule roadbuilding is prohibited for any new leasable mineral projects, including geothermal projects, within IRAs. Changes in management under Alternatives 2 to 6 would allow road development to differing degrees. Within Timber Priority ARAs, roads would be permissible for leasable

[6] Timber harvest in Community Priority ARAs would be limited to micro sales, salvage sales, and small commercial sales less than one MMBF in size.

projects. The Tongass has no recent or current leasable mineral activity and the demand for leasable minerals is expected to remain low. As a result, changes in designated roadless management are expected to have limited impacts on mineral development. Geothermal energy projects could be allowed in Roadless Priority and Community Priority ARAs under exceptions provided for community utility projects.

Infrastructure Development

With some exceptions, discretionary federal road development is limited in IRAs. Examples of exceptions include roading pursuant to reserved or outstanding rights, roads provided for by statute or treaty, or a qualified Federal Aid Highway. Roadless designation would be removed to various degrees under the action alternatives with corresponding implications for regional highway development. In most cases, the alternative rules would be more permissive with respect to regional road systems.

Tree Harvest for Alaska Native Cultural Purposes

Tree harvest for Alaska Native cultural purposes is allowed under the 2001 Roadless Rule (Alternative 1) but road access for the tree harvesting is not. Alternatives 2, 3, 4, and 5 do support Alaska Native culture through explicit rule language that allows increased access to cutting, customary trade, and removal of trees for the purposes of Alaska Native customary and traditional uses. This increased access is provided in the Roadless and Community Priority ARAs. Access for cultural purposes in ARAs has benefits but access as a result of removing roadless area designations or designating them as Timber Priority ARAs may increase competition with the timber industry for trees to be used for traditional or cultural purposes, and this competition is the greater concern of the Tribes.

Based on this rationale, Alternatives 2 and 1 would appear to be best overall, because of the relatively low level of competition with commercial timber harvest they would create. Alternative 2 would rank higher than Alternative 1 because they are almost the same in terms of competition and Alternative 2 includes over 5 million acres of Roadless Priority, which would improve access relative to the 2001 Roadless Rule. Alternatives 4 and 3 would rank in the middle overall. Alternative 4 would rank higher than Alternative 3 because they are very similar in terms of acres opened up for competition, but Alternative 4 includes over 7 million acres of Roadless Priority while Alternative 3 includes less than 5 million acres in Roadless and Community Priority ARAs, combined. Alternatives 5 and 6 would allow road construction for access to Alaska Native cultural sites, but would also allow the most access for commercial timber harvest and other competing uses, which would outweigh the benefits. Potential conflicts between competing uses under Alternatives 5 and 6 would primarily be limited to areas managed as development LUDs.

Rural Subsistence Activities

Potential effects on rural subsistence activities (harvest and use of natural resources for food, shelter, clothing, transportation, handicrafts, and trade) are expected to be similar to the current Forest Plan under all of the action alternatives, with similar effects anticipated with respect to abundance and distribution, access, and competition. Timber harvest levels are expected to remain the same for all alternatives, with similar or only slightly different miles of road construction/reconstruction also anticipated. While there would be some new road access under all alternatives in the long run, nearly all new roads constructed under the alternatives would be closed following harvest based on past harvest practices. These roads would, therefore, not be available for use by highway vehicles or high-clearance vehicles. They may, however, be available for access by other methods and could, as a result, have the potential to affect existing subsistence patterns. Although overall road miles would be similar, based on the relative distribution of acres suitable for timber production, road miles are expected to be slightly higher for Alternatives 4, 5, and 6. The effects on particular groups of subsistence users or resources are difficult to predict at the programmatic level, but the slight difference in road miles is expected to result in little to no difference to rural subsistence activities between alternatives.

Community Effects

Relative to Alternative 1, no major community effects would be expected under the action alternatives. The largest degree of change would be expected under Alternatives 4, 5, and 6 because these

alternatives would result in larger increases in suitable timber (and potential harvest) within many community use areas, especially in those that are more remote (see Appendices D and E).[7] Communities with economies that benefit from timber harvest or seek increased roaded access could see some modest benefits, but communities with economies that are dominated by the visitor industry have expressed concerns (see Table E-2 in Appendix E). Based on an evaluation of employment and business licenses by community, along with the amount of suitable timber within community areas (which serves as an index to potential timber harvest), the following observations can be made:

- Alternatives 1 and 2 are expected to generally result in very little to no effect on communities. However, because this EIS is programmatic in nature, the direct effects associated with project activities on any community cannot be identified until specific projects are proposed.
- Alternative 3 is expected to have very minimal potential for community effects, either adverse or beneficial. Community Priority ARAs in this alternative may be beneficial to communities by increasing flexibility for the communities adjacent to designated roadless areas.
- Alternatives 4, 5, and 6 (especially Alternatives 5 and 6) have an increased potential for effects on communities relative to the other alternatives, especially in those communities where the visitor industry sector is important. This is primarily because those communities rely on undisturbed landscapes, which in turn may affect visitor use. The smaller and less economically diversified communities have a greater risk of effects. In addition, communities influenced by the timber industry may experience minor beneficial effects resulting from flexibility for timber harvest. Because of the programmatic nature of this EIS, the effects on any community cannot be identified until specific projects are proposed, but it is expected that they would range from no effect to a minimal effect for these alternatives.

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

Old-Growth Habitat

Relative to old-growth habitat conservation, all of the alternatives would have old-growth harvest levels similar to the level authorized by the Forest Plan. There may be slightly more high-volume and large-tree productive old growth (POG) harvested under the action alternatives than was predicted for the Forest Plan because of the increased options for developing economic timber sales. However, this is speculative and depends on harvest levels reaching predicted decadal levels, as well as on being able to economically access these stands. In addition, the proportion of high-volume and large-tree POG in the added suitable acres under the action alternatives is lower than the proportion in the Alternative 1 suitable acres.

The transition to young-growth management would continue to slow the long-term decrease in deer habitat capability due to the reduction in POG harvest, under all of the alternatives. Because long-term POG harvest and road densities are not expected to differ significantly among alternatives, effects on old-growth–dependent wildlife species are expected to be almost identical to those predicted under the 2016 Forest Plan Amendment EIS.

Young Growth in Special Habitats

Young growth suitable for timber harvest occurs in a number of habitats under the Forest Plan, including Riparian Management Areas, Beach and Estuary Fringe, and the Old-growth Habitat LUD. Young growth on specific portions of these areas may be harvested using required silvicultural prescriptions following Forest Plan direction. The suitable acres of young growth on these special habitats would increase slightly under the action alternatives, but only slightly because the majority of existing young-growth stands are not in designated roadless areas. Therefore, little to no difference in effects among the alternatives is expected.

[7] Appendix D presents suitable old-growth and young-growth timber maps for the community use areas identified for the 32 communities evaluated in this EIS (see Appendix E). These maps are available electronically only. They are included on the thumb drive accompanying this document and are also available online at: https://www.fs.usda.gov/project/?project=54511

Road Density

Slightly more road miles would be developed under the action alternatives with more acreage removed from roadless. Under current conditions approximately 4,929 miles of road (including decommissioned road) exist on the Tongass and the average road density is approximately 0.19 mile per square mile. Under Alternatives 1 and 2, total road miles after 100 years would equal about 5,922, while total road miles under Alternative 6 would equal about 5,972. The other action alternatives would range from 5,941 to 5,968 miles after 100 years. The overall road density on the Tongass would be approximately 0.23 under all of the alternatives. At present approximately 68 percent of 6th field subwatersheds on the Tongass have no roads. After 100 years, this percentage would drop to 62 percent for Alternative 1, 61 percent for Alternative 2, 60 percent for Alternative 3, 58 percent for Alternatives 4 and 5, and 56 percent for Alternative 6. This pattern would be reversed for watersheds with existing high road densities, although differences would be slight. For example, 0.6 percent of the watersheds would have road densities greater than 3 miles per square mile under Alternatives 1 and 2, but 0.5 percent of the watersheds would have densities this high under Alternatives 3, 4, 5, and 6 (due to roads being more spread out).

Fish Habitat

Overall effects to fish habitat are expected to be negligible under all alternatives, because of the strong protections to fish habitats provided by Forest Plan LUDs, Forest-wide standards and guidelines including the riparian management strategy, and the lack of old-growth harvest or associated road construction allowed in the T77 watersheds and TNC/Audubon Conservation Priority Areas. Alternative 3 provides additional long-term regulatory protection for T77 watersheds and TNC/Audubon Conservation Priority Areas by prohibiting old-growth harvest by regulation. Localized effects on fish habitat may occur, but these are expected to be minimal overall.

Species-Specific Effects

The transition to young-growth management would continue to slow the long-term decrease in deer habitat capability due to the reduction in POG harvest, under all of the alternatives. Because long-term POG harvest and road densities are expected to be similar to those under the Forest Plan, effects on old-growth dependent or associated wildlife species are expected to be almost identical to those predicted by the 2016 Forest Plan Amendment EIS.

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CHAPTER 1
PURPOSE OF AND NEED FOR ACTION

Purpose of and Need for Action

The Forest Service has prepared this final environmental impact statement (FEIS) in compliance with the National Environmental Policy Act (NEPA) and other relevant federal laws and regulations[8]. This FEIS discloses the potential environmental consequences that may result from the alternatives considered for the proposed Alaska Roadless Rule.

Background

Inventoried Roadless Areas (IRAs) on the on the 16.7-million acre Tongass National Forest (Tongass) include 9.37 million acres (56 percent of the Tongass) across 110 IRAs. When these designated roadless areas are combined with Wilderness and National Monument areas, the Tongass is currently more than 90 percent undeveloped and unavailable for timber harvest and road building. Regardless of Forest Plan land use designation, much of the forest is protected by regulation as National Monuments, Wilderness, or LUD II lands (Figure 1-1). Developed areas cover about 1.3 million acres, or about 8 percent, of the Tongass. Southeast Alaska residents (approximately 73,000) are, for the most part, surrounded by largely undeveloped land.

Several portions of the Tongass constitute contiguous IRAs exceeding 1 million acres, and thus represent large, unfragmented wildlife habitats and opportunities for solitude. Many of the Tongass IRAs represent wildlife habitats, ecosystems, and visual characteristics, such as coastal islands facing the open Pacific, extensive beaches on inland saltwater, old-growth temperate rain forests, ice fields, and glaciers that exist nowhere else in the National Forest System (NFS). Many of these areas are remote and difficult to access for recreation and contain other resources, such as timber, minerals, renewable energy opportunities, and salmon-producing streams. While IRAs provide a large portion of the land base in Southeast Alaska, National Parks, National Monuments, and designated Wildernesses also contribute to the undeveloped nature of the region.

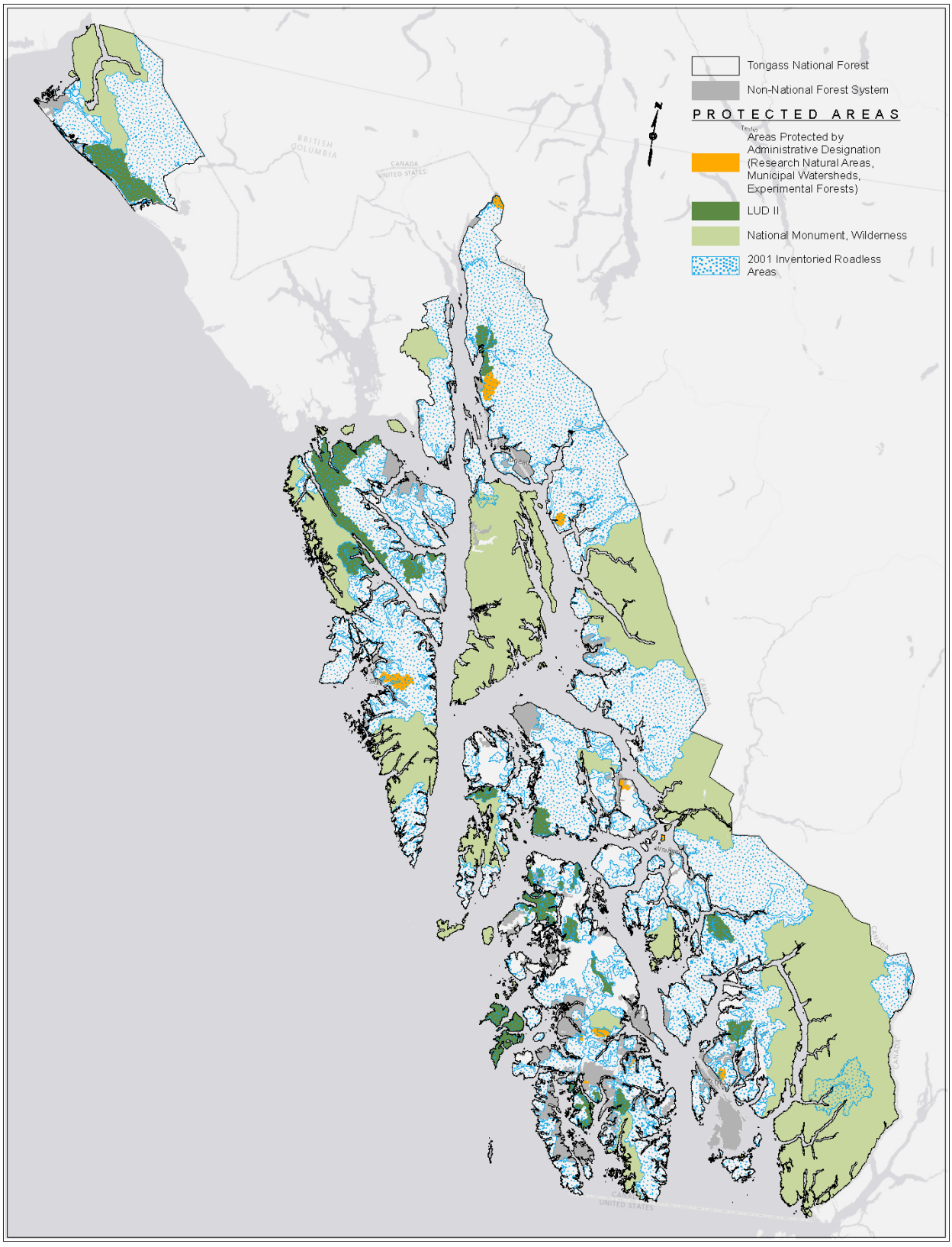
The Roadless Area Conservation Rule (2001 Roadless Rule) was promulgated in January 2001 (66 Federal Register [FR] 3244). Currently, about 9.37 million acres (56 percent) of the Tongass National Forest (hereafter Tongass or Forest) are designated as “inventoried roadless areas” (IRAs).[9] Maps of IRAs, for the Tongass, are available online here.[10] IRAs contain generally undeveloped areas that are typically 5,000 acres or greater in size. The 2001 Roadless Rule applies nationwide (except Idaho and Colorado), and currently provides management direction for IRAs on 44.7 million acres of National Forests (approximately 24 percent of total National Forest System [NFS] lands) by prohibiting road construction and reconstruction and timber cutting, sale, or removal in those IRAs, with certain exceptions.

[8] On September 14, 2020, the Council on Environmental Quality’s revised NEPA regulations became effective (see 85 FR 43304). Those regulations apply to NEPA processes begun after September 14, 2020 (40 CFR 1506.13). While agencies may apply CEQ’s revised regulations to ongoing activities and environmental documents begun before September 14, 2020, the Forest Service has elected to complete this NEPA process using the prior regulations, recognizing that where existing agency NEPA procedures are inconsistent with CEQ’s revised regulations CEQ’s revised regulations govern unless there is a clear and fundamental conflict with the requirements of another statute.

[9] The original acreage of inventoried roadless areas on the Tongass was approximately 9.34 million acres. As a result of ownership changes and boundary alignment corrections noted during this rulemaking, including shoreline mapping adjustments, the actual acreage is 9.37 million acres.

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

Figure 1-1
Areas Protected by Regulation and Administrative Designation within the Tongass



Since its promulgation, the 2001 Roadless Rule has been the subject of litigation. In 2001, the State of Alaska filed a complaint, challenging the U.S. Department of Agriculture's (USDA) promulgation of the 2001 Roadless Rule and its application in Alaska. The USDA and the State of Alaska reached a settlement in 2003, and the USDA subsequently issued a rule temporarily exempting the Tongass from the 2001 Roadless Rule. In 2011, a federal court (District of Alaska) set aside the Tongass's exemption and reinstated the 2001 Roadless Rule on the Tongass (with special instructions). The Alaska District Court's ruling was initially reversed by a three-judge panel of the Ninth Circuit, but the District Court's ruling was ultimately upheld in a 6–5 en banc ruling of the Ninth Circuit in 2015. In September 2017, the District Court for the District of Columbia rejected all procedural and substantive claims that the 2001 Roadless Area Conservation Rule was unlawfully promulgated, both nationally and as applied to Alaska. Alaska appealed the District Court's ruling to the Court of Appeals for the District of Columbia Circuit. On September 26, 2018, the D.C. Circuit ordered the appeal be held in abeyance following USDA's acceptance of Alaska's Petition for Rulemaking and directed that status reports be filed with the court every 90 days. Consequently, the 2001 Roadless Rule remains in effect in Alaska and the Forest Service continues to apply the 2001 Roadless Rule to the Tongass and Chugach National Forests.

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

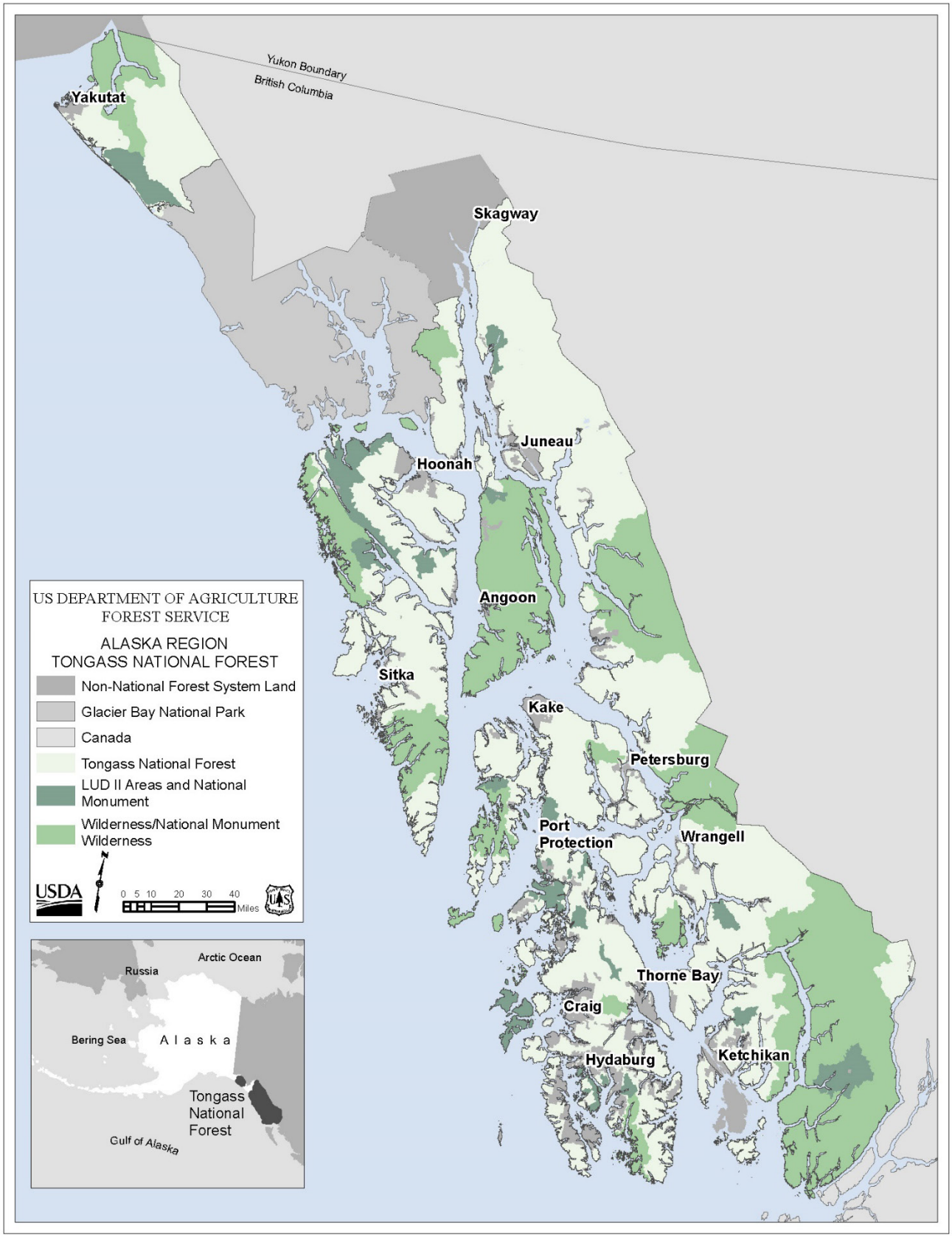
No alternative examined in this FEIS would authorize any ground-disturbing activities. Before authorizing a land-use activity in roadless areas, the Forest Service must complete a site-specific environmental analysis, pursuant to the NEPA and its implementing regulations. When a specific project or activity is proposed on NFS land, the Forest Service conducts site-specific analyses of the effects associated with that project or activity and makes a decision whether or not to authorize implementation of that project or activity.

Analysis Area

The 16.7-million-acre Tongass comprises approximately 7 percent of Alaska and 80 percent of percent of Southeast Alaska – Alaska's southeastern panhandle extending from the Dixon Entrance in the south to Yakutat Bay in the north, and bordered on the east by Canada and on the west by the Gulf of Alaska. The Tongass extends approximately 500 miles north to south, and approximately 120 miles east to west at its widest point. Figure 1-2 is a vicinity map of the Forest.

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

Figure 1-2
Tongass National Forest Vicinity Map



Purpose and Need

In response to the State of Alaska's petition for 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 (the Tongass comprises almost 80 percent of Southeast Alaska), and unique Alaska and Tongass-specific statutory considerations (e.g., Alaska National Interest Lands Conservation Act [ANILCA]), Tongass Timber Reform Act [TTRA]). In ANILCA, Congress sought to balance national environmental interests with "adequate opportunity for satisfaction of the economic and social needs of the State of Alaska and its people" (16 U.S.C. §3101(d), *Sturgeon v. Frost*, 139 S.Ct. 1066, 1075).

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.

The State of Alaska believes that roadless conservation interests for the Tongass can be adequately protected under the Tongass Forest Plan and that the 2001 Roadless Rule prohibitions are unnecessary. In addition, the State believes application of the 2001 Roadless Rule substantially impacts the social and economic fabric of Southeast Alaska and violates ANILCA and TTRA.

In response to the State's petition, commercial and non-profit organizations have expressed strong opinions, for and against, the idea of a regulatory review.

Proposed Action

The NEPA process begins with a proposed action; in this case the State of Alaska's petition to remove the Tongass National Forest from application of the 2001 Roadless Rule. The rule would discontinue the existing regulation's prohibitions and instead rely upon existing statutory and management plan direction to manage roadless area characteristics on the Tongass.

Decision Framework

This FEIS examines environmental, social, and economic consequences in order to inform USDA's judgment in deciding whether to promulgate a regulatory exception for the Tongass as proposed by the State, or one of the other alternatives, or a combination or variation of the alternatives analyzed by the FEIS. Any new final regulation would be issued under 36 CFR Part 294, Subpart E. Appendix G, Drafted Roadless Rule Regulatory Language by Alternative, contains draft regulatory language for each alternative.

Public Participation

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

On October 17, 2019, the Department published a Notice of Proposed Rulemaking in the Federal Register (84 FR 55522) and on October 18, 2019 a Notice of Availability (NOA) for the DEIS was published (84 FR 55952). The publication of the NOA initiated a 60-day comment period ending on December 17, 2019. During the 60-day comment period, the Forest Service conducted 21 public meetings including Anchorage, Alaska; Washington, DC; and Southeast Alaska communities – Angoon, Craig, Gustavus, Haines, Hoonah, Hydaburg, Juneau, Kake, Kasaan, Ketchikan, Pelican, Petersburg, Point Baker, Sitka, Skagway, Tenakee Springs, Thorne Bay, Wrangell, and Yakutat. Approximately 267,000 comment letters/emails were received during the 60-day comment period including 11 petitions containing about 117,000 signatures.

Tribal and Native Corporation Participation

On July 30, 2018, the Forest Service sent letters to 32 federally-recognized tribes and 27 Alaska Native corporations, within Southeast and Southcentral Alaska, initiating government-to-government and government-to-corporation consultation on the Alaska Roadless Rule. The following government-to-government consultations have occurred in association with this rulemaking effort:

- May 2, 2018 – Forest Service Government-to-Government consultation with Ketchikan Indian Community;
- August 24, 2018 – Forest Service Government-to-Corporation consultation with the Chugach Alaska Corporation and Cook Inlet Region Incorporated;
- September 5, 2018 – Forest Service Government-to-Government consultation with the Hoonah Indian Association;
- September 12, 2018 – Forest Service Government-to-Government consultation with Ketchikan Indian Community and Organized Village of Saxman;
- September 12, 2018 – Forest Service Government-to-Government consultation with the Central Council Tlingit and Haida Indian Tribes of Alaska;
- September 24, 2018 – Forest Service Government-to-Government consultation with Wrangell Cooperative Association;
- October 1, 2018 – Forest Service Government-to-Government consultation with Organized Village of Saxman;
- November 15, 2018 – Forest Service Government-to-Government consultation with Organized Village of Kasaan;
- December 14, 2018 – Forest Service Government-to-Government consultation with Organized Village of Kasaan, Prince of Wales Tribal Conservation District, Craig Tribal Transportation Staff, and Hydaburg Community Association;
- May 6, 2019 – Forest Service Government-to-Government consultation with Sitka Tribe of Alaska.
- November 2, 2019 – USDA Government-to-Government consultation Central Council Tlingit and Haida Indian Tribes of Alaska, Hoonah Indian Association, Hydaburg Cooperative Association, Ketchikan Indian Community, Klawock Cooperative Association, Organized Village of Kake, Organized Village of Kasaan, Organized Village of Saxman, and Skagway Traditional Council; and
- April 28, 2020 – USDA Government-to-Government consultation with Central Council Tlingit and Haida Indian Tribes of Alaska, Hydaburg Cooperative Association, Organized Village of Kake, Organized Village of Kasaan, and Skagway Traditional Council.

Cooperating Agencies

The following are cooperating agencies for the Alaska Rulemaking process:

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

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

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

On July 30, 2018, the Forest Service invited 19 Southeast Alaska federally-recognized tribes to participate as cooperating agencies during the rulemaking process. Six tribes agreed to become cooperating agencies and entered into a MOU. Since then, the Organized Village of Kake withdrew as a Cooperating Agency in December 2019.The tribes were invited to be cooperating agencies due to their specialized knowledge and expertise of land management, subsistence, natural resources, and potential impacts to communities within Southeast Alaska.

Changes between the DEIS and FEIS

A number of changes, corrections, and clarifications from the Draft Environmental Impact Statement (DEIS) have been made based on public comments and internal reviews. The most notable changes are summarized below. Minor edits and corrections are not included in this list.

- The 2001 IRAs geographic information system (GIS) data had not been updated since the rule was set in place. Since then, the Tongass National Forest has undergone several administrative changes to its ownership including shoreline mapping, Wilderness boundaries were updated, and the Tongass was exempted from the roadless rule. Further, previous policy was to exclude lakes from GIS layers. This practice has been abandoned since then, but the GIS data for the 2001 roadless rule were never updated.

  Thus, corrections were made to IRA boundaries (Alternative 1) based on ownership changes and mapping corrections. The alternatives for the FEIS are based on these updated IRA boundaries. The corrections removed areas misidentified in 2001 (e.g., designated Wilderness identified as IRA), added small areas between wilderness and 2001 IRAs, added lakes, and aligned IRA boundaries with current NFS ownership, including the updated marine shoreline. This resulted in a net increase of about 30,000 acres from the 9.34 million acres identified in 2001.

- The Tongass updates the roads and activities (timber harvest) information often. Since the Tongass was exempted from the roadless rule between 2003 and 2011, timber harvest and road construction occurred in IRAs—this is described as "roaded roadless." A new roaded roadless analysis was conducted between the DEIS and FEIS resulting in additional areas identified with existing timber harvest and roads within IRAs.
- Areas identified as logical extensions were adjusted and removed from roadless designation in Alternatives 3 and 4 to eliminate small, isolated roadless areas.
- Community Priority Areas: The community priority designation was applied for Hydaburg and Kake, resulting in increasing the number of Community Priority ARA acres for Alternative 3.
- Cooperating Agencies noted that Tongass 77 (T77) Watersheds/The Nature Conservancy (TNC)-Audubon areas mapped for the DEIS did not include several high-priority sockeye salmon watersheds important to Alaska Native Tribes. Therefore, areas identified as logical extensions in the DEIS that overlapped with the high-priority sockeye salmon watersheds were added back into the roadless inventory for Alternatives 2 and 3 to minimize effects to these watersheds.
- The DEIS assumed that timber harvest was distributed evenly across the suitable timber lands. In response to a number of comments and internal discussions, it was decided that old-growth harvest

acres could be allocated in a more realistic pattern (since only 11 to 19 percent of the suitable old growth is harvested over 100 years). Thus, for the FEIS, a model to project more accurately the distribution of harvest was developed. The three new primary assumptions that changed the distribution of harvest were: 1) projected harvest acres were limited to suitable medium- and high-volume old growth only; 2) the proportion of projected harvest in the northern ranger districts was reduced; and 3) Value Comparison Units (VCUs) with the lowest estimated total old-growth stumpage values were dropped from consideration for the harvest (see Chapter 3, Introduction, Assumptions for Future Harvest).

- The mileage of new road construction, road reconstruction, and new roads over decommissioned road grades were estimated for each alternative; and these were spatially allocated based primarily on where harvest occurred (see Chapter 3, Introduction, Assumptions for Future Road Construction and Reconstruction). Assumptions made were similar to those made for the 2016 Forest Plan Amendment EIS.
- In the DEIS, a number of Biodiversity, Wildlife, and Water tables from the 2016 Forest Plan Amendment EIS were referenced, especially in the Affected Environment sections, because conditions have not changed significantly. The tables from the 2016 Forest Plan Amendment EIS were presented in Appendix C. In order to be more precise in the FEIS, these attributes were analyzed specifically for this EIS and updated information is now presented in new tables in the text that is specific to this EIS. Appendix C has, therefore, been eliminated.
- The DEIS incorrectly stated that a Biological Assessment would be prepared for the Decision. Since there are no anticipated effects that would influence threatened or endangered species, preparing a Biological Assessment is not necessary. Biological Assessments may be prepared for site-specific actions proposed in the future, as appropriate.
- Maps showing lands suitable for old-growth and young-growth timber production were created for each community use area and alternative. These maps show suitable old-growth and young-growth. However, to better approximate where future old-growth harvest might occur, some suitable old growth is excluded because it is considered less desirable low-volume old growth or for poor economics. These maps are provided in Appendix D, which is made available electronically in the data storage device accompanying this EIS or on the project website.
- In Appendix G, the Roadless Rule for Alternative 2 was corrected by removing the regulatory prohibition of commercial old-growth timber harvest in certain high priority watersheds. This is consistent with what was analyzed in the DEIS and was only intended to apply to Alternative 3.
- In Appendix G, exceptions to the prohibitions on timber harvest and road building in ARAs have been revised.

Key Issues

In 2001, USDA determined that the Tongass National Forest deserved “special attention in formulating alternatives due to its unique social and economic conditions” (USDA Forest Service 2000). More specifically, USDA’s Record of Decision identified:

> “the agency has considered the alternatives of exempting and not exempting the Tongass National Forest, as well as deferring a decision per the proposed rule. Social and economic considerations were key factors in analyzing those alternatives, along with the unique and sensitive ecological character of the Tongass National Forest, the abundance of roadless areas where road construction and reconstruction are limited, and the high degree of ecological health. In developing the proposed action, the agency sought to balance the extraordinary ecological values of the Tongass National Forest against the needs of the local forest dependent communities in Southeast Alaska.” (66 FR 3254)

Then, as now, USDA’s (and that of the State, cooperators, and interested members of the public) assessment of policy preferences regarding roadless management rests primarily on the different weights ascribed to the these ecological, social and economic factors rather than any specific data or scientific findings. To be sure, the agency has carefully considered comments submitted that sought clarifications or updated information and revised the FEIS accordingly.

With striking similarity to the issues highlighted in 2001, the following three key issues were identified for the Alaska state-specific roadless rulemaking effort and will be carried forward throughout the analysis.

Key Issue 1 – Roadless Area Conservation

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

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

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

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

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

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

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

The Forest Service manages land for the multiple-use and sustained yield of all renewable surface resources. There is fragmentation and disagreement among the State, cooperators, and public regarding the best management of federal lands for economic development purposes and to support the overall economic vitality of Tongass communities. Many believe the visitor industry and seafood industries have become the mainstay of Southeast Alaska's economy and therefore should have prominence in Forest Service land management decision-making. Others note that resource extraction, including forest products and the minerals industry, continue to provide jobs and income sources in Southeast communities.

Southeast Alaska residents, communities, and Alaska Native individuals and tribes rely extensively on the Tongass for a wide variety of subsistence resources and traditional cultural activities. Many of them also use the forest for recreational hunting, fishing, and other activities. These activities yield economic value as well, and are important to local and regional socioeconomic well-being.

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

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

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

The Tongass includes large, undeveloped, and natural land areas that represent expansive unfragmented blocks of wildlife habitat. This scale and size of contiguous habitat is not generally available elsewhere in the NFS outside of Alaska. Although wildlife species on the Tongass are associated with more than one habitat type, many inhabit old-growth forests or prey on species that inhabit old-growth forests. The Tongass Old-growth Habitat Conservation Strategy (2016 Forest Plan Amendment EIS, Appendix D) was developed to maintain the integrity of the old-growth forest ecosystem, and thereby conserve biological diversity across the Forest by retaining intact, largely undisturbed habitat. In addition, because of its predominantly undeveloped nature, a number of wide-ranging species find optimal habitat in the more remote areas of the Forest.

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

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

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

Issues Eliminated from Detailed Analysis

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

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

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

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

Eliminated issues are not addressed beyond the rationale provided below:

Geology and Geologic Features

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

Soil Characteristics and Composition

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

A preliminary review of effects to soils was conducted, looking at the acres of suitable land on soils with a mass movement index (MMI) of 3. The Forest Plan removes very high hazard class MMI 4 from suitability because of the risk of irreversible damage to the resource. MMI 3 soils are considered high hazard, but less so than MMI 4 soils and can be harvested on. As expected, acres of suitable MMI 3 soils increase with each of the Alaska Roadless Rule alternatives, ranging from an increase of 6 percent for Alternative 2, 21 percent for Alternative 3, and 35 to 39 percent for Alternatives 4 through 6. However, because none of the alternatives predict an increase in the PTSQ, this does not correlate to an increase in harvest on MMI 3 soils. As with other soil characteristics, site-specific conditions would be evaluated at the project-

scale. Similarly, harvest and road building on steep slopes, and associated risk of landslides, would be based on site-specific proposals. From a broad standpoint, the associated risk of timber harvest and road building on high risk soils and steep slopes from the alternatives would be the same as disclosed in the 2016 Forest Plan Amendment EIS due to adherence to Forest Plan standards and guidelines.

Water Quantity and Quality

None of the roadless area management alternatives propose specific actions that would alter water quantity or quality. Impacts to water quantity or quality would be based on site-specific proposals, which are currently unknown, and would be addressed in subsequent project environmental analyses. From a broad standpoint, the impacts to water quantity or quality from the proposed alternatives would be the same as disclosed in the 2016 Forest Plan Amendment EIS due to following Forest Plan standards and guidelines and would use the application of best management practices (BMPs) which are consistent with the Alaska Forest Resources Practices Act, Clean Water Act, Magnuson–Stevens Fishery Conservation and Management Act, and Alaska's Department of Environmental Conservation Water Quality Standards. Overall, effects on water quantity and quality are expected to be lowest under Alternative 1 and slightly higher under the action alternatives, with Alternatives 5 and 6 having the highest effects due to slight increases in miles of road construction and reconstruction relative to Alternative 1. Differences, however, would be localized and insignificant overall.

Air Quality

None of the roadless area management alternatives propose specific actions that would alter air quality. Impacts to air quality would be based on site-specific proposals, which are currently unknown, and would be addressed in subsequent project environmental analyses. From a broad standpoint, the impacts to air quantity from the alternatives would be the same as disclosed in the 2016 Forest Plan Amendment EIS due to following Forest Plan standards and guidelines. Air quality effects could be slightly higher under the action alternatives, especially Alternatives 5 and 6, due to slightly greater road construction, but the differences among the alternatives would be insignificant for air quality.

General Vegetation

None of the roadless area management alternatives propose specific actions that would alter general vegetation. Impacts to general vegetation would be based on site-specific proposals, which are currently unknown, and would be addressed in subsequent project environmental analyses. From a broad standpoint, the impacts to general vegetation from the proposed alternatives would be the same as disclosed in the 2016 Forest Plan Amendment EIS due to the application of Forest Plan standards and guidelines. Slightly more road construction under the action alternatives would slightly increase vegetation clearing; however, these changes would be insignificant.

General Wildlife Species/Habitat

None of the roadless area management alternatives propose specific actions that would alter general wildlife habitat. Impacts to general wildlife habitats would be based on site-specific proposals, which are currently unknown, and would be addressed in subsequent project environmental analyses. From a broad standpoint, the impacts to general wildlife habitat from the alternatives would be similar to those disclosed in the 2016 Forest Plan Amendment EIS due to the application of Forest Plan standards and guidelines. Compared to Alternative 1, the action alternatives would result in small increases in road construction (up to 50 more miles of new road plus reconstruction, 14 more miles of road construction on decommissioned roadbeds, and 19 more miles of reconstruction over 100 years), habitat changes, and increased disturbance to wildlife in areas currently identified as roadless. Since the amount of timber harvest authorized is not increased, the action alternatives may affect the location and distribution of impacts, but are not likely to significantly increase impacts relative to Alternative 1.

General Aquatics Species/Habitat

None of the roadless area management alternatives propose specific actions that would alter general aquatic species. Impacts to general aquatic species would be based on site-specific proposals, which are

currently unknown, and would be addressed in subsequent project environmental analyses. From a broad programmatic standpoint, the impacts to general aquatic species and habitat from the action alternatives would be the similar to those disclosed in the 2016 Forest Plan Amendment EIS (Alternative 1) due to the application of Forest Plan standards and guidelines and the lack of major differences among the alternatives. Although the action alternatives would result in slight increases in impacts relative to Alternative 1, the differences among alternatives are not expected to be significant.

Essential Fish Habitat

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

Invasive Aquatic Species

Executive Order 13112 addresses the prevention of the introduction of invasive species and provides for their control and minimization of the economic, ecological, and human health impacts the invasive species causes. None of the roadless area management alternatives propose specific actions that would introduce invasive aquatic species. Impacts of invasive aquatic species would be based on site-specific proposals, which are currently unknown, and would be addressed in subsequent project environmental analyses. Implementing active management including road building and timber harvest in areas currently designated as roadless areas has the potential for increasing the distribution of aquatic invasive species to areas where they do not currently exist. Forest Plan standards and guidelines as well as BMPs should minimize the potential for this to occur. The potential for this occurrence and any resulting effects from aquatic invasive species would be evaluated more closely during any subsequent project-level analysis. During a project-level analysis, specific project design recommendations may be developed to further reduce the potential impacts.

Wetlands

Executive Order 11990 requires protection of wetlands by mandating federal agencies to avoid, if possible and practicable, adverse impacts to wetlands. Identification, assessment, and protection of wetlands would be based on site-specific proposals, which are currently unknown, and would be addressed in subsequent project environmental analyses. From a broad standpoint, the protection of wetlands from the proposed alternatives would be the same as disclosed in the 2016 Forest Plan Amendment EIS due to application of Forest Plan standards and guidelines.

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

Floodplains

Executive Order 11988 requires federal agencies to avoid, to the extent possible, the long- and short-term adverse impacts associated with the occupancy and modification of floodplains and to avoid direct and indirect support of floodplain development wherever there is a practicable alternative. None of the roadless area management alternatives propose specific actions that would have short- or long-term adverse impacts to floodplains. Identification and assessment of short- and long-term effects would be

based on site-specific proposals, which are currently unknown, and would be addressed in subsequent project environmental analyses. From a broad programmatic standpoint, short- and long-term effects to floodplains from the proposed alternatives would be the same as disclosed in the 2016 Forest Plan Amendment EIS due to Forest Plan standards and guidelines.

National Historic Preservation Act

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

Specific Location Impacts

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

Changes in Timber Markets

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

Tongass Timber Reform Act

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

Below-cost Timber Sales

Financial analyses for the Forest Plan were presented in the 2016 Forest Plan Amendment EIS (pp. 3-516 to 3-519) based on modeling that involved first maximizing young-growth harvest under a non-declining even flow and then adding old-growth volume to reach the annual average harvest of 46 MMBF and maximizing the net present value. Modeling results for the Forest Plan indicated positive discounted net revenues over the 15-, 25-, and 100-year periods. The analyses suggested that individual timber sales offered during the first 25 years of the planning period would likely need to include a mix of old growth and young growth to appraise positive, and to cover both logging and stumpage costs while

providing a normal profit and risk. Under the Further Consolidated Appropriations Act, 2020 P.L. 116-94, 133 Stat. 2751 (Sec. 436), timber sales that do not appraise positive using the current Region 10 RV (Residual Value) appraisal cannot be offered. All the action alternatives would increase availability of suitable old growth and young growth for harvest. More acres of suitable land would provide greater flexibility in the selection of future timber sale areas, as well as the potential for more flexibility in sale design, depending on the planning areas selected which are currently unknown. This improved flexibility could, in turn, improve the Forest Service's ability to offer economic sales that meet industry needs. This greater flexibility could be beneficial during the first two decades of the 2016 Forest Plan (the transition period), which is the period of greater old-growth timber harvest. Potential revenue from future projects would be considered in project-specific analysis.

Changes to the General Mining Act of 1872

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

Irreversible or Irretrievable Commitment of Resources

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

Incorporation by Reference

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

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

Scope and Applicability

Scope of the FEIS

The scope of this FEIS consists of the range of actions, alternatives, and impacts that are considered relevant to the proposed action. The roadless rule is geographically limited to proposed ARAs and existing IRAs established in the 2001 Roadless Rule, or the "analysis area" within the Tongass (see Chapter 3 for a further discussion of the analysis area). The rule is focused on the exceptions of the prohibitions for timber harvest and road construction/reconstruction within designated roadless areas on the Tongass. The final rule would not suspend, revoke, or modify land-use permits, contracts, or other legal instruments issued before the effective date of the final rule. Rulemaking establishes regulations

with which future actions would have to comply, and does not make site-specific decisions or authorize any ground-disturbing activities.

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

While environmental impacts should be disclosed as soon as information is reasonably available and at the earliest practicable stage, it is not reasonable or efficient to develop numerous timber harvest or other project-level scenarios. It is reasonable and efficient to limit detailed site-specific impact analyses to when specific proposals are brought before the agency.

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

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

Applicability

The lands subject to this rulemaking are NFS lands on the Tongass. Therefore, the detailed descriptions and analyses of the affected environment and impacts on resources will be limited to the Tongass. The application of the change and modification provision to the Chugach National Forest considered in the DEIS has been removed from consideration in the FEIS.

CHAPTER 2
ALTERNATIVES INCLUDING THE PROPOSED ACTION

Alternatives Including the Proposed Action

This chapter describes the six alternatives considered in detail in this FEIS. It also describes the alternatives not analyzed in detail. It concludes by comparing the six alternatives.

The terms central to understanding the alternatives described in this chapter are defined below. These terms and others used in the analysis are also defined in the glossary.

Alaska Roadless Areas (ARA) = Areas identified in the set of ARA maps which the Alaska Roadless Rule applies to. These represent new roadless designations and are tied to new roadless rule language.

ARA Designations = Areas identified with varying degrees of exceptions and prohibitions, designed based on land management priority.

Exceptions = Activities that would be allowed in different categories of ARAs.

Prohibitions = Activities that would not be allowed in different categories of ARAs.

Features Common to Multiple Alternatives

Tongass Land and Resource Management Plan

Except for the timber land suitability determinations described below, none of the alternatives would make any changes to the Forest Plan including the following:

- Goals and Objectives;
- Land Use Designations or Management Prescriptions;
- Forest-wide Standards and Guidelines;
- Plan Components developed under the 2012 Planning Rule; and/or
- Projected Timber Sale Quantity (PTSQ), Projected Wood Sale Quantity (PWSQ), and the Young-growth Transition.

None of the alternatives authorize any site-specific projects or other ground-disturbing activities. Specific projects that include timber harvest, road construction, and/or road reconstruction must undergo appropriate site-specific environmental analysis when they are proposed to comply with the NEPA. None of the alternatives considered in this FEIS waive any applicable requirements regarding site-specific environmental analysis, public involvement, consultation with Alaska Native tribes, Alaska Native corporations, and other agencies, or compliance with other applicable laws.

Activities that are not otherwise prohibited are permissible in roadless areas under all alternatives, including the no-action alternative (2001 Roadless Rule).

Timber Suitability

Alternatives 2, 3, 4, 5, and 6 would result in an administrative change to the timber land suitability determinations made in the 2016 Forest Plan Amendment. Specifically, lands identified as suitable for timber production that were deemed unsuitable solely due to implementation of the 2001 Rule would be set aside and redesignated as suitable for timber production. As described in Appendix A to the Forest Plan (USDA Forest Service 2016a), old-growth forest located within Phases 2 and 3 of the Tongass Timber Sale Program Adaptive Management Strategy, within the Tongass 77 (T77) Watersheds and The Nature Conservancy (TNC)/Audubon Conservation Priority Areas, within non-development LUDs, and in other areas designated by the Forest Plan as not suitable, would continue to be not suitable for timber production. This change to the designation of lands suitable for timber production would be accomplished via an administrative change (36 CFR 219.13(c)) and would apply to lands removed from the roadless inventory and to lands identified as "Community Priority" or "Timber Priority" in Alternatives 3 and 4, respectively. This change does not preclude future suitability determinations for other multiple purposes as part of subsequent Forest Plan amendment or revision processes.

Project-Specific Activities

None of the alternatives authorize site-specific projects or ground-disturbing activities. Projects that include timber harvest, road construction, and/or road reconstruction would undergo environmental analysis when they are proposed to comply with the NEPA. None of the alternatives considered in this FEIS waive any applicable requirements regarding environmental analysis, public involvement, consultation with tribes and other agencies, or compliance with other applicable laws.

Ongoing Projects

None of the alternatives would revoke, suspend, or modify any project or activity in which a decision was made prior to the effective date of an Alaska Roadless Final Rule.

Existing Land Use Authorizations

All of the alternatives allow for the continuation of existing land use authorizations for activities in roadless areas. "Authorizations" refer to land uses allowed under a special use authorization, contract, or similar legal instrument. "Existing authorizations" are those that are issued before the effective date of the final rule.

Proposed Definitions

Alternatives 2, 3, 4, and 5 would include definitions for clarity. The following are select definitions of terms that the agency sought specific comments on along with proposed definitions (Appendix G):

- *Alaska Native.* Federally recognized tribes or individuals that are enrolled or eligible to enroll as a member of a federally recognized tribe.
- *Alaska Roadless Areas.* Lands within the Tongass National Forest designated pursuant to this subpart and identified in a set of maps maintained by the national headquarters office of the Forest Service.
- *Commercial Old Growth Timber Harvest*. Trees, portions of trees, and other forest products originating from old growth stands on National Forest System lands that may be sold for the purpose of achieving the policies set forth in the Multiple-Use Sustained-Yield Act of 1960, as amended, the Forest and Rangeland Renewable Resources Planning Act of 1974, as amended, and the Program thereunder. (See 36 CFR 223.1).
- *Public (Community) utility system*. A system that provides a community or communities with services for public use or consumption such as municipal water and wastewater systems, biomass heating and energy systems, transmission lines, and hydroelectric and other renewable energy projects and related infrastructure.

- *Responsible official*. The Forest Service line officer with the authority to make and implement a decision on a proposed action.
- *Road.* As defined at 36 CFR 212.1, the term means a motor vehicle route over 50 inches wide, unless identified and managed as a trail.
- *Road construction and reconstruction.* As defined at 36 CFR 212.1, the terms mean supervising, inspecting, building, and incurrence of all costs incidental to the construction or reconstruction of a road.
- *Roadless Area Characteristics.* Resources or features that are often present in and characterize Alaska Roadless Areas, including

  (1) *Physical Environment*. Roadless areas provide high-quality or undisturbed soil, water, and air.

  (2) *Water*. Roadless areas provide a variety of water resources including public drinking water sources, fish and aquatic resources, and hatchery aquatic resources.

  (3) *Diversity*. Roadless areas support a diversity of plant and animal communities including stands of old-growth forests.

  (4) *Habitat*. Roadless areas are expansive areas where high-quality intact habitat exists and ecosystems function with all their native species and components. Roadless areas may serve as habitat for threatened, endangered, proposed, candidate, and species of conservation concern, and for those species dependent on large, undisturbed areas of land.

  (5) *Remoteness*. Roadless areas provide rich primitive, semi-primitive motorized, and semi-primitive non-motorized classes of dispersed recreation and are a source of ecological, social, and economic benefits.

  (6) *Landscape*. Roadless areas provide reference landscapes of relatively undisturbed areas that serve as a barometer to measure the effects of development on other parts of the landscape.

  (7) *Scenery*. Roadless areas have natural-appearing landscapes with high-scenic qualities that people value.

  (8) *Cultural*. Roadless areas often include traditional cultural properties and sacred sites. In Alaska, indigenous peoples have been on national forests for more than 10,000 years and the forests have cultural significance.

  (9) *Locally-unique characteristics*. Roadless areas represent geographic areas with additional locally-unique characteristics specific to Alaska, including: (a) important source of subsistence resources including terrestrial wildlife, waterfowl, mammals, fish, and plant-based resources; (b) rich habitat that supports multiple species of fish for personal, subsistence, sport, recreation, and commercial harvest; and (c) supports diverse economic opportunity that is especially important for rural community well-being.
- *Timber harvest*. The cutting, removal, or sale of trees.

Proposed Alaska Roadless Boundary Correction and Modification Provisions

Alternatives 2, 3, 4, and 5 include administrative correction and modification provisions for inclusion in the proposed Alaska Roadless Rule to provide for future boundary and classification changes. While the proposed rule and Draft Environmental Impact Statement (DEIS) announced an intention to extend this provision to the Chugach National Forest, in response to public comment, this provision has been adjusted and would apply only to the Tongass National Forest. Administrative corrections would be limited to adjustments that remedy clerical errors, typographical errors, mapping errors, or improvements in mapping technology. Administrative modifications would be limited to conformance to statutory changes, or incorporation of changes due to land adjustments. The proposed rule would have extended this process to the Chugach National Forest, but in response to public input, the correction and modification provision would apply exclusively to the Tongass National Forest under Alternatives 2, 3, 4, and 5. The Chief may issue administrative corrections after a 30-day public notice and opportunity to

comment period. These provisions are not needed for Alternative 6 because the Tongass would be exempt from the 2001 Roadless Rule.

Administrative modifications would be limited to conformance to statutory changes or incorporation of changes due to land adjustments. The Chief would provide at least a 45-day public notice and opportunity to comment period for all modifications.

Alaska Roadless Area Land Management Designations

Alternatives 2, 3, 4, and 5 provide for a variety of management approaches within roadless areas through ARA land management designations, which include Land Use Designation (LUD) II Priority, Watershed Priority, Roadless Priority, Community Priority, and Timber Priority. The management designations prohibit timber harvest, road construction, and road reconstruction with exceptions that are applied differentially across the alternatives (Table 2-2). A brief description of each management designation follows.

LUD II Priority (Alternatives 2, 4, and 5)

LUD II Priority ARAs would be managed in a roadless state to retain their wildland character as defined in the Tongass Timber Reform Act (TTRA; Title II, Section 201) and the National Defense Authorization Act for Fiscal Year 2015 (Public Law 113-291, 128 Stat. 3729, Section 3720(f)).

Approximately 870,000 acres of the Tongass are congressionally designated as LUD II (847,000 acres currently designated as IRA under the 2001 Roadless Rule and 22,000 acres currently not designated as IRA). Alternatives 2 and 4 propose to designate 854,000 LUD II acres as LUD II Priority ARA. Alternative 5 proposes to apply the LUD II Priority ARA only to LUD II areas that are currently designated as IRA.

Notably, Alternative 3 proposes to remove all LUD II areas from roadless designation rather than designating LUD II lands into an ARA. LUD II areas under Alternative 3 would continue to be managed as directed by their congressional designations.

Watershed Priority (Alternatives 2 and 3)

The Watershed Priority ARA is more protective than the 2001 Roadless Rule as it offers fewer exceptions for timber harvest, or road construction/reconstruction. It also provides for activities specific to aquatic habitat improvement. Approximately 3,284,000 acres in Alternative 2 would be managed under this ARA. The Watershed Priority ARA is applied to areas identified in the Forest Plan as Tongass 77 (T77) Watersheds, The Nature Conservancy (TNC)/Audubon Conservation Priority Areas, and high-priority sockeye salmon watersheds.

Additionally, for Alternative 3, commercial old-growth timber harvest would be prohibited on NFS lands in T77 and TNC/Audubon Conservation Areas that extend beyond ARA boundaries (an additional 507,000 acres). A prohibition on old-growth harvesting currently exists through the Forest Plan. However, Alternative 3 examines establishing regulatory continuity between these roadless and watershed management systems given how extensively they overlap (the listed watersheds comprise over half of the Tongass' roadless areas, and approximately 90 percent of the watershed areas are within roadless area boundaries). Thus, the old-growth harvest prohibition would be extended beyond the designated roadless area boundaries in order to maintain the balance and integrity of the watershed protection system. As with all roadless rule provisions, the new prohibition would supersede current and future forest plans, with the plan continuing to provide management direction in other regards. In this manner, Alternative 3 affords high-priority watershed areas greater regulatory protection than under the 2001 Roadless Rule. Young-growth timber harvest outside of ARAs within these high-priority watershed areas is not prohibited.

Roadless Priority (Alternatives 2, 3, 4, and 5)

The Roadless Priority ARA is similar to the 2001 Roadless Rule but is less restrictive and addresses Alaska-specific concerns. Specifically, it provides for infrastructure development to connect and support local communities, and road construction/reconstruction for access to renewable energy sites and leasable minerals. In addition, the Roadless Priority ARA includes specific exceptions that, while they are allowed under the 2001 Roadless Rule, are included to improve overall clarity.

Community Priority (Alternative 3)

The Community Priority ARA allows for small-scale timber harvest (less than one MMBF) and associated road construction/reconstruction. In addition, it allows for infrastructure development to connect and support local communities and traditional Alaska Native cultural uses. In all cases, activities within Community Priority ARAs would have to be consistent with the Forest Plan LUD requirements. Even if a timber harvest, road building, or other activity would be permissible under the Alaska Roadless Rule, it may not be allowable because of Forest Plan direction specific to the LUD that applies to the area, or other suitability criteria as explained in the Forest Plan, Appendix A. This ARA applies to approximately 370,000 acres and is only proposed in Alternative 3 adjacent to seven communities: Hydaburg, Juneau, Kake, Ketchikan, Sitka, Wrangell, and Yakutat.

This ARA was developed to address the desires of these seven communities to retain roadless designations while allowing for small timber operators in the community, infrastructure development to support the communities, and provide for traditional Alaska Native cultural uses.

Timber Priority (Alternative 4)

The Timber Priority ARA allows timber harvest, road construction, and road reconstruction to facilitate timber management and provide economic opportunity. It is only included in Alternative 4, and would apply to approximately 757,000 acres. While management of lands in this ARA management designation would not be subject to any regulatory prohibitions on timber harvest or road construction, retaining them in roadless designation is a means of acknowledging the roadless values of these lands to ensure appropriate consideration in future, site-specific project planning and analysis. Table 2-1 displays the ARAs by alternative.

Table 2-1
Alaska Roadless Areas (ARA) by Alternative and Management Designations

	Alternative					
	1	2	3	4	5	6
ARA Management Categories	No Action	Roaded Roadless	Logical Extension	Partial Dev. LUDs[1]	All Dev. LUDs	Full Exemption
LUD II Priority	N/A	√		√	√	N/A
Watershed Priority	N/A	√	√			N/A
Roadless Priority	N/A	√	√	√	√	N/A
Community Priority	N/A		√			N/A
Timber Priority	N/A			√		N/A

N/A = not applicable
[1] Includes Timber Production and Modified Landscape LUDs, but not Scenic Viewshed.

Table 2-2
Rule Language Associated with Alaska Roadless Areas and for the Alaska Roadless Area Management Designations (see Appendix G for complete language)

Designation	Tree cutting, sale, or removal within Alaska Roadless Areas would be prohibited except for the following:	Road construction and reconstruction within Alaska Roadless Areas would be prohibited except for the following:
Alaska Roadless Areas (common to Alternatives 2 through 5)	(1) Timber harvest conducted pursuant to reserved or outstanding rights or as provided for by statute or treaty, (2) Timber harvest to protect public health and safety in cases of an imminent threat of flood, fire, or other catastrophic event that, without intervention, would cause the loss of life or property, including removal of hazard trees; (3) Timber harvest for personal or administrative use, as provided for in 36 CFR part 223; or (4) Timber harvest incidental to the implementation of a management activity not otherwise prohibited by this subpart, including the construction or reconstruction of a road pursuant to §294.53 or the construction, expansion, or maintenance of authorized fishways, fish hatcheries, and aquaculture facilities.	(1) A mandatory road authorization pursuant to reserved or outstanding rights, or as provided for by statute or treaty. Examples of mandatory statutory authorizations include but are not limited to roads pursuant to the Alaska National Interest Lands Conservation Act (P.L. 96-487), Section 4407 of the Safe, Accountable, Flexible, Efficient Transportation Equity Act (P.L. 109-59); and General Mining Law of 1872 (as amended); (2) A road to conduct a response action under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) or to conduct a natural resource restoration action under CERCLA, Section 311 of the Clean Water Act, or the Oil Pollution Act; (3) A Federal Aid Highway project, authorized pursuant to Title 23 of the United States Code; (4) A road realignment to prevent irreparable resource damage that arises from the design, location, use, or deterioration of a road and cannot be mitigated by road maintenance; (5) A road reconstruction safety improvement project on a classified road; or (6) A road to protect public health and safety in cases of an imminent threat of flood, fire, or other catastrophic event that, without intervention, would cause the loss of life or property.
(Alternative 3 only)	Additionally, except as provided in Watershed Priority exceptions, commercial old-growth timber harvest is prohibited on National Forest System lands as depicted in a map maintained by Chief's Office that identifies high priority watersheds that largely coincide with Alaska Roadless Areas, but can extend beyond Alaska Roadless Area boundaries.	
LUD II Priority (Alternatives 2, 4, and 5 only)	Timber harvest in an Alaska Roadless Area designated as LUD II Priority is allowed if consistent with the legislated management restrictions established in Section 201 of the Tongass Timber Reform Act.	Road construction or reconstruction in an Alaska Roadless Area designated as LUD II Priority is allowed if consistent with the legislated management restrictions established in Section 201 of the Tongass Timber Reform Act.

Table 2-2 (continued)
Rule Language Associated with Alaska Roadless Areas and for the Alaska Roadless Area Management Designations

Category	Tree cutting, sale, or removal within Alaska Roadless Areas would be prohibited except where the Responsible Official determines:	Road construction and reconstruction within Alaska Roadless Areas would be prohibited except where the Responsible Official determines:
Watershed Priority (Alternatives 2 and 3 only)	(1) The cutting, customary trade, and removal of trees for the purposes of Alaska Native customary and traditional uses that does not degrade water quality, fish habitat, fish production, fish passage, aquatic diversity, or soil productivity; (2) Timber harvest for one of the following purposes that will maintain, restore, or improve one or more of the purposes: (i) To maintain, restore or improve fish and wildlife habitat; or (ii) To maintain, restore, or improve the characteristics of ecosystem composition, structure, and processes; or (3) Timber harvest is incidental to trail or recreation development that does not degrade water quality, fish habitat, fish production, fish passage, aquatic biodiversity, or soil productivity.	With the exception of the authorities provided for all Alaska Roadless Areas, a road may not be constructed or reconstructed in an Alaska Roadless Area designated as Watershed Priority.
Roadless Priority	(1) Timber harvest for the cutting, customary trade, and removal of trees for the purposes of Alaska Native customary and traditional uses; (2) Timber harvest for one of the following purposes that will maintain, restore or improve one or more of the following purposes: (i) To maintain, restore, or improve fish and wildlife habitat; or (ii) To maintain, restore, or improve the characteristics of ecosystem composition, structure, and processes; (3) Timber harvest within a designated experimental forest for research or administration; or (4) Timber harvest for the construction, expansion, use, or maintenance of utility systems; or (5) Timber harvest is incidental to trail or recreation development that does not degrade water quality, fish habitat, fish production, fish passage, aquatic biodiversity, or soil productivity.	(1) A road for the construction, expansion, or maintenance of public facilities such as airports, marine access points, and communication equipment; (2) A road to provide access to Alaska Native cultural site(s) if requested by an affected federally-recognized tribe(s); (3) A road for transportation needs identified by the State of Alaska's Southeast Alaska Transportation Plan for the connection of communities and development of the regional transportation system; (4) A road within a designated experimental forest for research or administration or to provide administrative access to a designated experimental forest; (5) A road for the construction, expansion, or maintenance of a community utility system; or (6) A road in conjunction with the construction, expansion, or maintenance of an authorized fishway, hatchery, or aquaculture facility.

Table 2-2 (continued)
Rule Language Associated with Alaska Roadless Areas and for the Alaska Roadless Area Management Designations

Category	Tree cutting, sale, or removal within Alaska Roadless Areas would be prohibited except where the Responsible Official determines:	Road construction and reconstruction within Alaska Roadless Areas would be prohibited except where the Responsible Official determines:
Community Priority (Alternative 3 only)	(d) Community Priority. Notwithstanding the prohibition in paragraph (a) of this section, timber harvest may occur in an Alaska Roadless Area designated as Community Priority shall be authorized if consistent with the following: (1) The cutting, customary trade, and removal of trees is for the purpose of Alaska Native customary and traditional uses; (2) Timber harvest for micro sales, salvage sales, or commercial sales less than one million board feet of timber; (3) Timber harvest for one of the following purposes that will maintain, restore or improve one or more of the following purposes: (i) To maintain, restore, or improve fish and wildlife habitat; or (ii) To maintain, restore, or improve the characteristics of ecosystem composition, structure, and processes; or (4) Timber harvest for the construction, expansion, use, or maintenance of a community utility system.	(1) A road to provide access to Alaska Native cultural site(s) if requested by an affected federally-recognized tribe(s); (2) A road for micro sales, salvage sales, and commercial sales less than one million board feet of timber; (3) A road for the construction, expansion, or maintenance of facilities such as airports, marine access points, and communication equipment; (4) A road for the construction, expansion, or maintenance of a community utility system; (5) A road in conjunction with the construction, expansion, or maintenance of an authorized fishway, fish hatchery, or aquaculture facility; or (6) A road in conjunction with the construction, expansion, or maintenance of a developed recreation site.
Timber Priority (Alternative 4 only)	Timber harvest in an Alaska Roadless Area designated as Timber Priority is allowed.	Permanent or temporary road construction, reconstruction, or maintenance within an Alaska Roadless Area designated as Timber Priority is allowed.

Additional rule language applies; see Appendix G.
Site specific environmental analysis, public involvement, consultation with Tribes and other agencies, or compliance with other applicable laws would still apply.

Alternatives Considered in Detail

Based on information obtained during scoping, Cooperating Agency input, consultation with Alaska Native tribes, and input on the DEIS, the Forest Service has evaluated six alternatives for detailed analysis, including the no action and proposed action alternatives. These alternatives respond to the three key issues identified in Chapter 1. Large-scale color maps showing roadless areas by IRA or ARA (Map 1 to 6) are included on the thumb drive version of the FEIS, in the map packet that accompanies the FEIS paper copy, and on this project's website: https://www.fs.usda.gov/project/?project=54511. In addition, electronic versions of these maps, showing the lands that would be suitable for timber production (Maps 7 to 12), are included on the thumb drive and website.

Alternative 1 – No Action

Alternative 1 is the no action alternative as required by CEQ's NEPA regulations and reflects a continuation of current land management pursuant to the 2001 Roadless Rule (see Map 1 in map packet or on thumb drive). This alternative does not mean that no activities would occur on the Tongass National Forest; rather, it means the activities currently occurring would continue, including implementation of the Tongass timber program at levels defined in the Forest Plan. This alternative continues general prohibitions on tree harvest (and sale), road construction, and road reconstruction within IRAs with limited exceptions (Table 2-3).

Under Alternative 1, roadless areas consist of 110 IRAs identified in the 2001 Roadless Rule. These IRAs were originally mapped in 1996 for the Tongass Forest Plan Revision and the provisions of the 2001 Roadless Rule (as provided for by the Court's reinstatement Order) would apply to those IRAs (summarized below). As a result of ownership changes and boundary alignment corrections recognized during this rulemaking these IRAs actually encompass 9.37 million acres[11] of NFS land. Under this alternative, the prohibitions of the 2001 Roadless Rule would continue to apply across the 110 IRAs, encompassing approximately 56 percent of the Tongass.

Under Alternative 1, the 2001 Roadless Rule IRA boundary modifications (increases and decreases) would continue to require rulemaking except for minor clerical and technical corrections.

Table 2-4 summarizes the key elements of Alternative 1.

[11]The original acreage of inventoried roadless areas on the Tongass was approximately 9.34 million acres. As a result of ownership changes and boundary alignment corrections, noted during this rulemaking, including shoreline mapping adjustments, the actual acreage is 9.37 million acres.

Table 2-3
Roadless Rule Language Associated with the 2001 Roadless Rule (Alternative 1)

	Timber cutting, sale, or removal is prohibited in IRAs except where the Responsible Official determines:	Road construction and reconstruction is prohibited in IRAs except where the Responsible Official determines:
2001 Roadless Rule	(1) The cutting, sale, or removal of generally small diameter timber is needed for one of the following purposes and will maintain or improve one or more of the roadless area characteristics as defined in § 294.11 of the 2001 Roadless Rule. (i) To improve threatened, endangered, proposed, or sensitive species habitat; or (ii) To maintain or restore the characteristics of ecosystem composition and structure, such as to reduce the risk of uncharacteristic wildfire effects, within the range of variability that would be expected to occur under natural disturbance regimes of the current climatic period; (2) The cutting, sale, or removal of timber is incidental to the implementation of a management activity not otherwise prohibited by the 2001 Roadless Rule; (3) The cutting, sale, or removal of timber is needed and appropriate for personal or administrative use, as provided for in 36 CFR part 223; or (4) Roadless characteristics have been substantially altered in a portion of an IRA due to the construction of a classified road and subsequent timber harvest. Both the road construction and subsequent timber harvest must have occurred after the area was designated an IRA and prior to January 12, 2001. Timber may be cut, sold, or removed only in the substantially altered portion of the IRA.	(1) A road is needed to protect public health and safety in cases of an imminent threat of flood, fire, or other catastrophic event that, without intervention, would cause the loss of life or property; (2) A road is needed to conduct a response action under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) or to conduct a natural resource restoration action under CERCLA, Section 311 of the Clean Water Act, or the Oil Pollution Act; (3) A road is needed pursuant to reserved or outstanding rights, or as provided for by statute or treaty; (4) Road realignment is needed to prevent irreparable resource damage that arises from the design, location, use, or deterioration of a classified road and that cannot be mitigated by road maintenance. Road realignment may occur under this paragraph only if the road is deemed essential for public or private access, natural resource management, or public health and safety; (5) Road reconstruction is needed to implement a road safety improvement project on a classified road determined to be hazardous on the basis of accident experience or accident potential on that road; (6) The Secretary of Agriculture determines that a Federal Aid Highway project, authorized pursuant to Title 23 of the United States Code, is in the public interest or is consistent with the purposes for which the land was reserved or acquired and no other reasonable and prudent alternative exists; or (7) A road is needed in conjunction with the continuation, extension, or renewal of a mineral lease on lands that are under lease by the Secretary of the Interior as of January 12, 2001, or for a new lease issued immediately upon expiration of an existing lease. Such road construction or reconstruction must be conducted in a manner that minimizes effects on surface resources, prevents unnecessary or unreasonable surface disturbance, and complies with all applicable lease requirements, land and resource management plan direction, regulations, and laws. Roads constructed or reconstructed pursuant to this paragraph must be obliterated when no longer needed for the purposes of the lease or upon termination or expiration of the lease, whichever is sooner.

Table 2-4
Key Element Summary for Alternative 1

Roadless Areas
• Includes inventoried roadless areas identified in the 2001 Roadless Rule, about 9.37 million acres.
Prohibition on Tree Cutting[1]
• Tree cutting is excepted for generally small-diameter timber that will maintain or improve one or more roadless area characteristics, improve sensitive species habitat, or maintain or restore characteristics of ecosystem composition and structure. • Tree cutting excepted if incidental to the implementation of a management activity not otherwise prohibited. • Tree cutting excepted if needed and appropriate for personal or administrative use. • Tree cutting excepted if roadless characteristics have been substantially altered in a portion of an IRA due to the construction of a classified road and subsequent timber harvest was conducted prior to January 2001.
Prohibition on Road Construction and Reconstruction[1]
• Road construction/reconstruction excepted if needed to protect public health and safety, to conduct Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) response action, pursuant to reserved or outstanding rights, to prevent irreparable resource damage, to implement a road safety improvement project. • Road is needed pursuant to reserved or outstanding rights, or as provided for by statute or treaty; • Road construction/reconstruction is excepted if needed for a Federal Aid Highway project that meets certain criteria and is approved by the Secretary of Agriculture. • Road construction/reconstruction is excepted if needed in conjunction with the continuation, extension, or renewal of a mineral lease on lands that are under lease by the Secretary of the Interior as of January 12, 2001, or for a new lease issued immediately upon expiration of an existing lease.
Tongass Land and Resource Management Plan
• No changes to Goals and Objectives, Land Use Designations, or Management Prescriptions, Forest-wide Standards and Guidelines, Plan Components developed under the 2012 Planning Rule, PTSQ, PWSQ, and the Young-growth Transition. • No change to Lands Suitable for Timber Production.

[1] See detailed descriptions of prohibitions/exceptions in 2001 Roadless Rule.

Alternative 2

Alternative 2 provides limited additional timber harvest opportunity while maximizing roadless area designations. It removes approximately 142,000 acres from roadless designation that have been substantially altered by known prior road construction or timber harvest. These areas are generally known as “roaded roadless” areas but include additional areas considered to be substantially altered. Alternative 2 also adds 110,000 acres as ARAs.

The 110,000 acres of added roadless areas maximize the geographic scope of roadless area designations by including portions of congressionally-designated LUD II areas not included as IRAs under the 2001 Roadless Rule, currently unroaded small islands, and unroaded areas greater than 5,000 acres as identified by prior forest planning efforts. Adding additional roadless designations to unroaded islands provides for long-term, continued recreational and outfitter and guide opportunities on these islands.

After removals and additions, Alternative 2 consists of 9.34 million inventoried roadless acres or about 30,000 fewer roadless acres than under Alternative 1. The 9.34 million acres are designated to three ARA land management categories including LUD II Priority, Watershed Priority, and Roadless Priority (see Map 2 in map packet or on thumb drive).

Alternative 2 applies the most protective ARA, Watershed Priority, to 3.28 million acres, primarily identified as T77 Watersheds, TNC/Audubon Conservation Priority Areas, and high-priority sockeye salmon watersheds. The Watershed Priority ARA is considered most protective because it includes fewer exceptions than the 2001 Roadless Rule, while still allowing activities needed for fisheries protection, maintenance, or improvement.

Under Alternative 2, a net of 20,000 old-growth acres and 11,000 young-growth acres, previously identified as unsuitable timber lands, would revert to suitable timber lands, as they were when the roadless rule did not apply to the Tongass.

Table 2-5 summarizes the key elements of Alternative 2.

Table 2-5
Key Element Summary for Alternative 2

Roadless Areas
• Establishes 9.34 million acres of ARAs, including 5.20 million acres in Roadless Priority, 3.28 million acres in Watershed Priority, and 0.85 million acres in LUD II Priority categories.
Prohibition on Timber Harvest[1]
• Under the Roadless Priority ARA timber harvest exceptions are written slightly broader than under the 2001 Roadless Rule to address Alaska's unique economic development needs. • Under the Watershed Priority ARA, timber harvest exceptions are slightly narrower than under the 2001 Roadless Rule and are designed to address aquatic and terrestrial habitat needs that are unique to Alaska's rural economic conditions and subsistence activities. • Under the LUD II Priority ARA, timber harvest exceptions are slightly broader than under the 2001 Roadless Rule and are designed to align the Alaska Roadless Rule with existing congressional instructions.
Prohibition on Road Construction and Reconstruction[1]
• Under the Roadless Priority ARA road construction/reconstruction exceptions are slightly broader than under the 2001 Roadless Rule. • Under the Watershed Priority ARA road construction/reconstruction exceptions are slightly narrower than under the 2001 Roadless Rule. • Under the LUD II Priority ARA road construction/reconstruction exceptions are slightly broader than under the 2001 Roadless Rule.
Tongass Land and Resource Management Plan
• No changes to Goals and Objectives, Land Use Designations or Management Prescriptions, Forest-wide Standards and Guidelines, Plan Components developed under the 2012 Planning Rule, PTSQ, PWSQ, and the Young-growth Transition. • Change to Timber Land Suitability: A net of 20,000 old-growth acres and 11,000 young-growth acres previously identified as unsuitable timber lands would become suitable timber lands.

[1] See detailed descriptions of prohibitions/exceptions in Table 2-2.

Alternative 3

Alternative 3 provides moderate additional timber harvest opportunities. Alternative 3 establishes roadless designations for T77 Watersheds, TNC/Audubon Conservation Priority Areas inside roadless areas, and high-priority sockeye salmon watersheds and also prohibits old-growth harvest in T77 Watersheds and TNC/Audubon Conservation Priority Areas outside of roadless areas (similar to the Forest Plan). Additional timber harvest opportunity is provided by removing substantially-altered roadless areas (including roaded roadless, similar to Alternative 2) and extending the bounds of these areas to logical end points of existing road and timber harvest systems, generally defined as the nearest watershed boundary (i.e., ridgeline of 14th-field hydrologic unit) from an existing road system. Removing these areas from the roadless inventory represents the logical extensions of substantially altered acres from existing infrastructure and likely encompasses the more economically feasible locations for future timber harvest with the least impact to roadless characteristics. Additional small-scale timber harvest opportunity is provided by the designation of Community Priority[12] ARAs for Hydaburg, Juneau, Kake, Ketchikan, Sitka, Wrangell, and Yakutat.

[12] Timber harvest in Community Priority ARAs would be limited to micro sales, salvage sales, and small commercial sales less than one MMBF in size.

Alternative 3 designates 8.22 million acres as ARAs. It removes approximately 1.25 million acres from roadless designation, including both development and non-development LUD acres, and adds 107,000 acres to ARAs including unroaded small islands and unroaded areas greater than 5,000 acres as identified by prior forest planning efforts. Adding additional roadless designations to unroaded islands provides for continued recreational and outfitter and guide opportunities on these islands.

Alternative 3 applies the most protective ARA, Watershed Priority, to 3.26 million acres primarily identified as T77 Watersheds, TNC/Audubon Conservation Priority Areas, and high-priority sockeye salmon watersheds. The Watershed Priority ARA is considered most protective because it includes fewer exceptions than the 2001 Roadless Rule, while still allowing activities needed for fisheries protection, maintenance, or improvement. The remaining roadless areas include 4.60 million acres in Roadless Priority and 0.37 million acres in Community Priority (see Map 3 in map packet or on thumb drive). Additionally, for Alternative 3, commercial old-growth timber harvest would be prohibited on NFS lands in T77 Watersheds, and TNC/Audubon Conservation Priority Areas that extend beyond ARA boundaries.

Alternative 3 proposes a net decrease of 1.14 million roadless acres, as compared to the no action alternative, and includes both development and non-development LUDs. Roadless area designation would be removed from the 847,000 congressionally-designated LUD II acres that are currently within an IRA. The removal of roadless designation from congressionally-designated LUD II acres represents the majority of the decrease in designated roadless acres proposed under Alternative 3. Removing roadless designation from LUD II acres aligns with congressional intent that LUD II areas be managed “in a roadless state to retain their wildland character” (USDA Forest Service 2016a).

Alternative 3 would revert a net of 85,000 old-growth acres and 15,000 young-growth acres, previously identified as unsuitable timber lands, to suitable timber lands, as they were when the roadless rule did not apply to the Tongass.

Table 2-6 summarizes the key elements of Alternative 3.

Table 2-6
Key Element Summary for Alternative 3

Roadless Areas
• Establishes 8.22 million acres of ARAs, including 4.60 million acres in Roadless Priority, 3.26 million acres in Watershed Priority and 0.37 million acres in Community Priority.
Prohibition on Timber Harvest[1]
• Under the Roadless Priority ARA timber harvest exceptions are written slightly broader than under the 2001 Roadless Rule to better address Alaska’s unique economic development needs. • Under the Watershed Priority ARA, timber harvest exceptions are slightly narrower than under the 2001 Roadless Rule and are designed to address aquatic and terrestrial habitat needs that are unique to Alaska’s rural economic conditions and subsistence activities. • Under the Community Priority ARA, timber harvest exceptions are broader than under the 2001 Roadless Rule and allow for small-scale timber harvest. • Commercial old-growth timber harvest would be prohibited on T77 Watersheds/TNC-Audubon Conservation Priority Areas that largely coincide with ARA, but extend beyond ARA boundaries. This includes all T77 Watersheds, and TNC/Audubon Conservation Priority Areas, both inside and outside of designated roadless areas.
Prohibition on Road Construction and Reconstruction[1]
• Under the Roadless Priority ARA, road construction/reconstruction exceptions are slightly broader than under the 2001 Roadless Rule. • Under the Watershed Priority ARA, road construction/reconstruction exceptions are slightly narrower than under the 2001 Roadless Rule. • Under the Community Priority ARA, road construction/reconstruction exceptions are broader than under the 2001 Roadless Rule.

Table 2-6 (continued)
Key Element Summary for Alternative 3

Tongass Land and Resource Management Plan
• No changes to Goals and Objectives, Land Use Designations or Management Prescriptions, Forest-wide Standards and Guidelines, Plan Components developed under the 2012 Planning Rule, PTSQ, PWSQ, and the Young-growth Transition. • Change to Timber Land Suitability: A net of 85,000 old-growth acres and 15,000 young-growth acres, previously identified as unsuitable timber lands, would become suitable timber lands.

[1] See detailed descriptions of prohibitions/exceptions in Table 2-2.

Alternative 4

Alternative 4 provides substantial additional timber harvest opportunity while maintaining roadless designations for Scenic Viewsheds and T77/TNC-Audubon Conservation Priority Areas that are in roadless areas. Approximately 401,000 acres are removed from roadless designation, including substantially-altered areas and logical extensions of substantially-altered acres (similar to Alternatives 2 and 3), along with selected additional locations for economic timber sales. Protection is maintained for Scenic Viewsheds, and most T77 Watersheds and TNC/Audubon Conservation Priority Areas by designating them as Roadless Priority ARAs.

Additionally, Alternative 4 adds 7,000 acres as LUD II Priority ARA. These added roadless acres are LUD II areas that were not designated as IRA under the 2001 Roadless Rule. No additional lands would be added to ARAs.

The net result of removals and additions under Alternative 4 is 8.98 million roadless acres, which are designated into three categories of ARAs: LUD II Priority, Roadless Priority, and Timber Priority (see Map 4 in map packet or on thumb drive). This alternative was developed to provide for a high level of timber management opportunities thus, timber management is permitted in the Timber Priority ARA, which consists of the Timber Production and Modified Landscape LUDs, as identified in the Forest Plan.

Alternative 4 proposes a net decrease of 394,000 roadless acres as compared to the no action alternative. However, the net increase in suitable timber lands is substantially higher than expected based on the decrease in roadless acres alone. This is because the Timber Priority ARA acres produce a large component of suitable timber. Under Alternative 4, a net of 161,000 old-growth acres and 15,000 young-growth acres, previously identified as unsuitable timber lands, would revert to suitable timber lands, as they were when the roadless rule did not apply to the Tongass.

Table 2-7 summarizes the key elements of Alternative 4.

Table 2-7
Key Element Summary for Alternative 4

Roadless Areas
• Converts inventoried roadless areas to 8.98 million acres of ARAs, including 7.36 million acres in Roadless Priority, 0.76 million acres in Timber Priority, and 0.85 million acres in LUD II Priority categories.
Prohibition on Timber Harvest[1]
• Under the Roadless Priority ARA timber harvest exceptions are written slightly broader than under the 2001 Roadless Rule to better address Alaska's unique economic development needs. • Under the Timber Priority ARA there are no timber harvest prohibitions. • Under the LUD II Priority ARA, timber harvest exceptions are slightly broader than under the 2001 Roadless Rule and are designed to align the Alaska Roadless Rule with congressional instructions.
Prohibition on Road Construction and Reconstruction
• Under the Roadless Priority ARA road construction/reconstruction exceptions are slightly broader than under the 2001 Roadless Rule. • Under the Timber Priority ARA there are no road construction/reconstruction prohibitions. • Under the LUD II Priority ARA road construction/reconstruction exceptions are slightly broader than under the 2001 Roadless Rule.
Tongass Land and Resource Management Plan
• No changes to Goals and Objectives, Land Use Designations or Management Prescriptions, Forest-wide Standards and Guidelines, Plan Components developed under the 2012 Planning Rule, PTSQ, PWSQ, and the Young-growth Transition. • Change to Timber Land Suitability: A net of 161,000 old-growth acres (mostly in Timber Priority ARAs) and 15,000 young-growth acres previously identified as unsuitable timber lands would become suitable timber lands.

[1] See detailed descriptions of prohibitions/exceptions in Table 2-2.

Alternative 5

Alternative 5 provides maximum additional timber harvest opportunity (same as Alternative 6) by removing all Timber Development, Modified Landscape, and Scenic Viewshed LUDs identified by the Forest Plan from roadless designation, including T77 Watersheds and TNC/Audubon Conservation Priority Areas within aforementioned development LUDs. Areas with mineral potential, as identified by the Forest Plan's minerals overlay, are also removed from roadless designation (see Map 5 in map packet or on thumb drive).

Alternative 5 would designate 7.05 million acres as ARAs. About 2.32 million acres would be removed from roadless area designation including mineral overlay acres and development LUDs including T77 Watersheds and TNC/Audubon Conservation Priority Areas. The remaining 7.05 million roadless acres are designated to two ARAs: LUD II Priority (0.85 million acres) and Roadless Priority (6.20 million acres) (see Map 5 in map packet or on thumb drive). Alternative 5 also reverts a net 168,000 old-growth acres and 17,000 young-growth acres previously identified as unsuitable timber lands to suitable timber lands, as they were when the roadless rule did not apply to the Tongass.

Table 2-8 summarizes the key elements of Alternative 5.

Table 2-8
Key Element Summary for Alternative 5

Roadless Areas
• Converts inventoried roadless areas to 7.05 million acres of ARAs, including 6.20 million acres in Roadless Priority and 0.85 million acres in LUD II Priority categories.

Table 2-8 (continued)
Key Element Summary for Alternative 5

Prohibition on Tree Cutting[1]
• Under the Roadless Priority ARA timber harvest exceptions are written slightly broader than under the 2001 Roadless Rule to better address Alaska's unique economic development needs. • Under the LUD II Priority ARA timber harvest exceptions are slightly broader than under the 2001 Roadless Rule.
Prohibition on Road Construction and Reconstruction[1]
• Under the Roadless Priority ARA road construction/reconstruction exceptions are slightly broader than under the 2001 Roadless Rule. • Under the LUD II Priority ARA, timber harvest exceptions are slightly broader than under the 2001 Roadless Rule and are designed to align the Alaska Roadless Rule with congressional instructions.
Tongass Land and Resource Management Plan
• No changes to Goals and Objectives, Land Use Designations or Management Prescriptions, Forest-wide Standards and Guidelines, Plan Components developed under the 2012 Planning Rule, PTSQ, PWSQ, and the Young-growth Transition. • Change to Timber Land Suitability: A net of 168,000 old-growth acres and 17,000 young-growth acres previously identified as unsuitable timber lands would become suitable timber lands.

[1] See detailed descriptions of prohibitions/exceptions in Table 2-2.

Alternative 6 (Preferred Alternative)

Alternative 6 is the preferred alternative and provides maximum additional timber harvest opportunities (same as Alternative 5) as the full exemption alternative, which was requested by the State of Alaska's petition (Appendix A). It removes all 9.37 million inventoried roadless acres on the Tongass from roadless designation. Acres removed from roadless designation would continue to be managed by the Forest Plan and in accordance with applicable statutory instructions (see Map 6 in map packet or on thumb drive). Existing protections to roadless characteristics provided by Forest Plan non-development LUDs (including LUD II, Remote Recreation, Semi-remote Recreation, Old-growth Habitat, Special Interest Area, Wild River, Scenic River, and others) would remain in place.

Alternative 6 would exempt the Tongass from the 2001 Roadless Rule. Alternative 6 would revert a net total of 168,000 old-growth acres and 20,000 young-growth acres, previously identified as unsuitable timber lands, to suitable timber lands, as they were when the roadless rule did not apply to the Tongass. Table 2-9 summarizes the key elements of Alternative 6.

Table 2-9
Key Element Summary for Alternative 6

Roadless Areas
• Removes all 9.37 million acres of inventoried roadless acres on the Tongass from roadless designation.
Prohibition on Timber Harvest[1]
• Roadless Rule prohibitions on timber harvest activities would no longer be applicable.
Prohibition on Road Construction and Reconstruction[1]
• Roadless Rule prohibitions on road construction/reconstruction prohibitions would no longer be applicable.
Tongass Land and Resource Management Plan
• No changes to Goals and Objectives, Land Use Designations or Management Prescriptions, Forest-wide Standards and Guidelines, Plan Components developed under the 2012 Planning Rule, PTSQ, PWSQ, and the Young-growth Transition. • Change to Timber Land Suitability: A net of 168,000 old-growth acres and 20,000 young-growth acres previously identified as unsuitable timber lands would become suitable timber lands.

[1] See detailed descriptions of prohibitions/exceptions in Table 2-2.

Maps

Large-scale color maps showing roadless areas by IRA or ARA (Map 1 to 6) are included on the thumb drive version of the FEIS, in the map packet that accompanies the FEIS paper copy, and on this project's website: https://www.fs.usda.gov/project/?project=54511. Additional maps showing the lands that would be suitable for timber production (Maps 7 to 12) and the lands that would be suitable for timber production by certain outfitter/guide use areas (Maps 13 to 18) are included on the thumb drive and website. Maps showing suitable lands by community use area are for each alternative are included in Appendix D on the thumb drive and website.

Alternatives Considered but Eliminated from Detailed Analysis

Sometimes alternatives are suggested or proposed that on examination do not adequately respond to the purpose of and need for the action, are technically or economically cost prohibitive, are not ripe for consideration, are remote or speculative, are substantially similar in design to an existing alternative, would have substantially similar effects as an existing alternative, or the authority does not exist to approve such actions (Forest Service Handbook 1909.15, Section 14.4). Alternatives that were considered and eliminated from detailed analysis are described below, along with the rationale for their elimination.

- *Giving management of the Tongass to the State of Alaska.* This alternative was eliminated from detailed study because it does not comport with existing legal authorities.
- *Co-management of the Tongass with tribal partners*. This alternative was eliminated from detailed study because it does not comport with existing legal authorities.
- *Congressional changes to 2001 Roadless Rule in Alaska.* This alternative was eliminated because it is outside the authority of the USDA. Legislative proposals to address the 2001 Roadless Rule in Alaska have periodically occurred in the past and have not been enacted. In addition, nothing in any alternative would prevent future legislation addressing application of either the 2001 Roadless Rule or an Alaska state-specific rule.
- *Use of the 2003 or 2008 roadless inventories as ARAs.* Use of alternative inventories was eliminated following review of those inventories and the determination that those inventories contain many areas with difficult shapes and of insufficient size to effectively manage or identify on the ground. Several of the areas identified in the 2003 and 2008 inventory contain roaded roadless lands. Unroaded areas greater than 5,000 acres identified in the 2003 and 2008 roadless inventories were incorporated into Alternatives 2 and 3.

Comparison of the Alternatives

This section compares the environmental consequences of the six alternatives with respect to the key issues described in Chapter 1. This comparison is based on the effects analyses presented in Chapter 3. For reference, Table 2-10 summarizes the acres by ARAs, the acres removed or added from inventoried roadless designation, and the total old-growth acres that are suitable for timber production under Alternative 1 and the five action alternatives. Table 2-12, at the end of this section, summarizes the environmental consequences for each alternative in a comparative format. Nine categories are used for the Qualitative ratings in Table 2-12 as follows (from most adverse to most beneficial):

- Substantial Adverse Effect
- Moderate Adverse Effect
- Small Adverse Effect
- Very Small Adverse Effect
- Neutral/No Effect
- Very Small Beneficial Effect
- Small Beneficial Effect
- Moderate Beneficial Effect
- Substantial Beneficial Effect

Table 2-10
Roadless Areas by Alternative and Management Designation

Roadless Designation (acres)	Alternative 1 No Action	2 Roaded Roadless	3 Logical Extension	4 Partial Dev. LUDs[1]	5 All Dev. LUDs	6 Full Exemption
Total Roadless Area	9,368,000	9,336,000	8,224,000	8,975,000	7,047,000	0
ARA Management Designations						
LUD II Priority	N/A	854,000	0	854,000	847,000	0
Watershed Priority	N/A	3,284,000	3,259,000	0	0	0
Roadless Priority	N/A	5,199,000	4,595,000	7,363,000	6,200,000	0
Community Priority	N/A	0	370,000	0	0	0
Timber Priority	N/A	0	0	757,000	0	0
Change in Roadless Area Acres						
Roadless Area Removed	0	142,000	1,252,000	401,000	2,321,000	9,368,000
Roadless Area Added	0	110,000	107,000	7,000	0	0
Net Change	0	-32,000	-1,144,000	-394,000	-2,321,000	-9,368,000
Old-Growth Acres Suitable for Timber Production						
Total Acres	227,000	247,000	312,000	388,000	395,000	395,000
Net Change	0	20,000	85,000	161,000	168,000	168,000
T77 & TNC/ Audubon Conservation Priority Areas Outside of Roadless given Long-term Regulatory Protection						
Total Acres	0	0	507,000	0	0	0

N/A = not applicable

[1] Includes Timber Production and Modified Landscape LUDs, but not Scenic Viewshed.

Note: Numbers may not appear to sum correctly due to rounding.

Key Issue 1 – Roadless area conservation

Roadless area conservation is analyzed in terms of both the acres designated as roadless and the degree of protection provided by each alternative. In terms of acres designated, Alternatives 1 and 2 provide the highest degree of regulatory protection with approximately 9.37 and 9.34 million acres designated as roadless, respectively, and Alternative 6 provides the lowest with zero acres of designated roadless areas. Alternative 5 removes all regulatory roadless designations within development LUDs[13] and has the second lowest number of acres designated roadless with 7.05 million acres.

Alternatives 3 and 4 are intermediate in terms of the acres designated as roadless with 8.22 and 8.98 million acres designated, respectively. However, the roadless designations by Alternative 4 include 0.76 million acres of Timber Priority ARAs, which allow timber harvest and road construction for timber harvest, and 0.85 million acres of LUD II Priority ARAs, which provide little additional conservation of roadless values over the protection already provided LUD II. In addition, Alternative 3 would designate T77 Watersheds, TNC/Audubon Conservation Priority Areas, and high-priority sockeye salmon watersheds as Watershed Priority ARAs. The removal of roadless designation from LUD II acres accounts for a large share of the reduction in designated roadless area acres under Alternative 3. These acres would retain their specific statutory protections and be managed to preserve roadless area characteristics without roadless designation (Table 2-11). Therefore, protection of roadless characteristics is much greater under Alternative 3 compared with Alternative 4.

The roadless rule language under Alternative 1 would be unchanged from the 2001 Roadless Rule (as reinstated by the District Court). Under Alternative 6, the Tongass would be fully exempted from the 2001 Roadless Rule. The rule language would be modified under Alternatives 2, 3, 4, and 5.

[13] Note that, with the exception of the Timber Priority ARA designation, roadless designation on development LUDs provides the highest degree of protection, because development LUDs are most likely to be developed if they were not designated roadless. Most non-development LUDs have Forest Plan restrictions which limit their potential for development.

For alternatives that involve priority areas, the Roadless Priority and LUD II Priority management categories would be very slightly more permissive than Alternative 1 in terms of road construction, salvage timber harvest, and mineral development, and would be slightly more permissive in terms of energy and transportation project development. The Watershed Priority ARA would be slightly less permissive relative to timber harvest, road construction, and other developments and the Community Priority and Timber Priority categories under Alternatives 3[14] and 4, respectively, would be substantially more permissive of development, especially timber harvest and road construction.

As a result, Alternatives 1, 2, and 3 would provide the greatest protection of roadless characteristics. Alternative 1 would protect the most acres and existing management direction would provide the highest degree of protection, with the existing general prohibitions remaining in place for all areas. Alternative 2 would offer similar levels of protection, with a small reduction in total designated roadless acres. The roaded roadless and other substantially altered areas that would be removed under Alternative 2 have limited roadless characteristics, and increased regulatory protection would be added for the Watershed Priority ARA. Thus, both Alternatives 1 and 2 would allow timber harvest and road construction almost entirely in roaded and altered areas.

Alternative 3 would offer the next most protection of roadless area characteristics. Roaded roadless and other substantially altered areas along with logical extension areas would be removed under Alternative 3 (as well as LUD II areas), and most ARAs would be managed as Roadless Priority or Watershed Priority ARAs. Additionally, T77 Watersheds and TNC/Audubon areas outside of roadless would be given regulatory protection from old-growth harvest. About 3 percent of ARAs under Alternative 3 would be designated as Community Priority, which allows limited timber harvest opportunity. An estimated 8,000 acres of old-growth harvest would occur within the logical extension areas under Alternative 3 over 100 years. The remaining 34,500 estimated acres of old-growth harvest would be in roaded and altered areas.

Alternatives 4 through 6 would provide the least amount of roadless designations, with Alternative 6 removing all acres from regulatory roadless designation. Under these alternatives, an estimated 8,000 acres of old-growth harvest would occur over 100 years within the logical extension areas as with Alternative 3, and an additional 6,000 to 7,000 acres of estimated old-growth harvest would occur in areas more distant from roads that are removed from roadless by these alternatives. The remaining 27,500 to 28,500 acres of estimated old-growth harvest would occur in roaded and altered areas.

In general, harvest and road construction that occurs in roaded and altered areas would have relatively little impact on conserving roadless characteristics, while harvest and road construction that occurs in extension areas and areas more distant from roads would have a greater adverse effect.

Table 2-11
Roadless Area Characteristics

2001 Roadless Rule Characteristics, Modified for Alaska
Biological Values
• Diversity of plant and animal communities and protection of old-growth forests • Habitat – Roadless areas are expansive areas where high-quality intact habitat exists and ecosystems function with all their native species and components. Roadless areas serve as habitat for threatened, endangered, proposed, candidate, and sensitive species and for those species dependent on large, undisturbed areas of land.
Physical Values
• Environment – high-quality or undisturbed soil, water, and air. • Water – Roadless areas provide a variety of water resources including public drinking water sources, fish and aquatic resources, and hatchery aquatic resources.

[14] Timber harvest in Community Priority ARAs would be limited to micro sales, salvage sales, and commercial sales less than one MMBF in size.

Table 2-11 (continued)
Roadless Area Characteristics

2001 Roadless Rule Characteristics, Modified for Alaska
Social Values
• Remoteness – Roadless areas provide economic opportunity due to rich primitive, semi-primitive motorized, and semi-primitive non-motorized classes of dispersed recreation. • Landscape – reference landscapes of relatively undisturbed areas that serve as a barometer to measure the effects of development on other parts of the landscape. • Scenery – natural-appearing landscapes with high-scenic qualities that people value. • Cultural – rich in traditional cultural properties and sacred sites. • Locally-unique characteristics – geographic areas with additional locally-unique characteristics specific to Alaska including: 1) important sources of subsistence resource; 2) rich habitat that supports multiple species of fish for personal, subsistence, sport, recreation, and commercial harvest; and 3) supports diverse economic opportunity that is especially important for rural community well-being.

Source: USDA Forest Service 2000, modified to reflect the unique characteristics of Alaska.

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

Support for Southeast Alaska resource-based industries and local/regional socioeconomic well-being is compared among the alternatives by industry/category in the following subsections.

Forest Products Industry

The Forest Plan, as amended in 2016, established an average annual Projected Timber Sale Quantity (PTSQ) of 46 MMBF prior to the young-growth transition. The old-growth contribution to the PTSQ is expected to start out high and decrease over time as more young growth becomes economic to harvest. During the first decade, an average of about 12 MMBF of young growth and 34 MMBF of old growth was expected to be sold annually. From Year 11 through Year 15 an average of about 28 MMBF of young growth and 18 MMBF of old growth were expected to be sold annually. Old-growth volume offered was projected to decrease until it reaches 5 MMBF per year (expected to occur about Year 16), at which point it is to be stabilized at 5 MMBF per year to support small operators and specialty products such as wood for musical instruments. Young growth sales are expected to continue to increase at a rapid rate after Year 16 and are expected to reach an upper limit of 98 MMBF about Year 18. If less than the average annual PTSQ figure of 46 MMBF is sold in the early years of a decade, the Forest Plan allows the difference to be added to the sale quantity for the remainder of the decade. During the initial two years of implementing the Forest Plan, the total volumes sold were 30.7 MMBF in Fiscal Year 2017 (about 3 percent of which was old growth) and 9.0 MMBF in Fiscal Year 2018 (all of which was old growth).

None of the action alternatives would result in changes to the PTSQ and the timber objectives of the Forest Plan would continue to require transitioning to primarily young-growth harvest. Therefore, harvest levels are not expected to vary significantly among the alternatives. However, the alternatives do vary in terms of the amount and location of acres suitable for timber production. Greater total acreage of suitable land would provide greater flexibility in the selection of future timber sale areas, as well as the potential for more flexibility in sale design, depending on the planning areas selected. This improved flexibility could, in turn, improve the Forest Service's ability to offer economic sales that meet the needs of industry. This greater flexibility could be beneficial during the first two decades of the 2016 Forest Plan (the transition period), when most old-growth harvest would take place.

Under Alternative 1, about 227,000 acres of old growth and 334,000 acres of young growth are currently suitable for timber production. The young-growth suitable acres would increase slightly (3 through 6 percent) under the action alternatives. For old growth, however, the suitable acreage increase would range from 7 percent for Alternative 2 to 74 percent for Alternatives 5 and 6. For Alternatives 3 and 4 the

increase would be 37 percent and 71 percent, respectively. It should be noted, however, that harvest levels and road construction are not expected to change significantly among the alternatives, although harvest and road locations would be more widespread as suitable acres increase.

The additional suitable old-growth acres comprise lands fitting into three broad categories or areas: roaded roadless and other substantially altered areas (Alternatives 2 through 6); logical extension areas and areas adjacent to roads (Alternatives 3 through 6); and areas more distant from existing roads (Alternatives 4 through 6). In addition, suitable old-growth acres would be added in Community Priority ARAs, which are associated with seven communities (Alternative 3).[15] The substantially altered areas removed, the areas immediately adjacent (logical extensions), and the Community Priority ARAs are assumed to be more economical to harvest due to their proximity to existing infrastructure. The additional acres added under Alternatives 4 through 6 are farther from existing infrastructure and thus less likely to be economic to harvest.

Recreation and Tourism

Timber harvest and road construction projects within roadless areas have the potential to affect outfitter/guide operations which provide commercial recreation opportunities on the Forest and are often dependent on high scenic integrity and undisturbed landscapes. Development projects permitted as a result of changes in roadless area designations could also affect outfitter/guide use in other adjacent or nearby areas as outfitter/guides displaced from one location seek other places to take clients. Some use areas are presently at capacity, which could exacerbate potential displacement effects. The Forest's ability to meet outfitter/guide demand, especially for operators seeking more remote areas, could also be affected.

The outfitter/guide analysis prepared for this FEIS used changes in suitable old-growth acres in conjunction with information about existing outfitter/guide use to focus on potentially affected areas. The resulting analysis identified 15 outfitter/guide use areas where potential conflicts between existing outfitter/guide use and future management activities could occur. In most of these areas, existing outfitter/guide use occurs near areas where development has occurred, either near or along shorelines and/or Forest road systems. Similarly, in most cases, timber harvest that could already occur in these areas (under Alternative 1) has the potential to conflict with existing outfitter/guide use.

Viewed in terms of increases in acres suitable for harvest, impacts under Alternatives 2 and 3 would be minimal in all areas, with increases in designated roadless acres and reductions in suitable acres occurring in some areas under these alternatives. By expanding the acres available for harvest, Alternatives 4 to 6 could in some cases add to these potential impacts by increasing the geographic extent of the acres affected, which could also result in an increase in road miles needed.

Commercial Salmon Harvesting and Processing

None of the alternatives are expected to significantly affect the commercial fishing or fish-processing industries. Riparian Management standards and guidelines established in the Forest Plan would remain in place under all of the alternatives. While there would be some variation in the level of protection, these variations are not expected to affect the commercial fishing industry. The future of the commercial fishing industry in Southeast Alaska is more likely to depend upon occurrences outside of the Tongass National Forest such as hatchery production, offshore harvest levels, and changes in ocean conditions.

Mining and Mineral Development

Locatable minerals development is possible within designated roadless areas under all alternatives. The General Mining Act of 1872 authorizes and governs prospecting and mining for locatable minerals on NFS lands, including designated roadless areas. Changes in roadless management are, therefore, not expected to affect existing or future locatable mineral exploration or mining activities on the Forest.

[15] Timber harvest in Community Priority ARAs would be limited to micro sales, salvage sales, and commercial sales less than one MMBF in size.

Under the 2001 Roadless Rule roadbuilding is prohibited for any new leasable mineral projects, including geothermal projects, within IRAs. Changes in management under Alternatives 2 to 6 would allow road development to differing degrees. Within Timber Priority ARAs, roads would be permissible for leasable projects. The Tongass has no recent or current leasable mineral activity and the demand for leasable minerals is expected to remain low. As a result, changes in designated roadless management are expected to have limited impacts on mineral development. Geothermal energy projects could be allowed in Roadless Priority and Community Priority ARAs under exceptions provided for community utility projects.

Infrastructure Development

With some exceptions, discretionary federal road development is limited in IRAs. Examples of exceptions include roading pursuant to reserved or outstanding rights, roads provided for by statute or treaty, or a qualified Federal Aid Highway. Roadless designation would be removed to various degrees under the action alternatives with corresponding implications for regional highway development. In most cases, the alternative rules would be more permissive with respect to regional road systems and infrastructure.

Tree Harvest for Alaska Native Cultural Purposes

Tree harvest for Alaska Native cultural purposes is allowed under the 2001 Roadless Rule (Alternative 1) but road access for the tree harvesting is not. Alternatives 2, 3, 4, and 5 do support Alaska Native culture through explicit rule language that allows increased access to cutting, customary trade, and removal of trees for the purposes of Alaska Native customary and traditional uses. This increased access is provided in the Roadless and Community Priority ARAs. Access for cultural purposes in ARAs has benefits but access as a result of removing roadless area designations or designating them as Timber Priority ARAs may increase competition with the timber industry for trees to be used for traditional or cultural purposes, and this competition is the greater concern from the Tribes.

Based on this rationale, Alternatives 2 and 1 would appear to be best overall, because of the relatively low level of competition with commercial timber harvest they would create. Alternative 2 would rank higher than Alternative 1 because they are almost the same in terms of competition and Alternative 2 includes over 5 million acres of Roadless Priority, which would improve access relative to the 2001 Roadless Rule. Alternatives 4 and 3 would rank in the middle overall. Alternative 4 would rank higher than Alternative 3 because they are very similar in terms of acres opened up for competition, but Alternative 4 includes over 7 million acres of Roadless Priority while Alternative 3 includes less than 5 million acres in Roadless and Community Priority ARAs, combined. Alternatives 5 and 6 would allow road construction for access to Alaska Native cultural sites, but would also allow the most access for commercial timber harvest and other competing uses, which would outweigh the benefits. Potential conflicts between competing uses under Alternatives 5 and 6 would primarily be limited to areas managed as development LUDs.

Rural Subsistence Activities

Potential effects on rural subsistence activities are expected to be similar to the current Forest Plan under all of the action alternatives, with similar effects anticipated with respect to abundance and distribution, access, and competition. Timber harvest levels are expected to remain the same for all alternatives, with similar or only slightly different miles of road construction/reconstruction also anticipated. While there would be some new road access under all alternatives in the long run, nearly all new roads constructed under the alternatives would be closed following harvest, based on current practices. These roads would, therefore, not be available for use by highway vehicles or high-clearance vehicles. They may, however, be available for access by other methods and could, as a result, have the potential to affect existing subsistence patterns. Although overall road miles would be similar, based on the relative distribution of acres suitable for timber production, road miles are expected to be slightly higher for Alternatives 4, 5, and 6. The effects on particular groups of subsistence users or resources are difficult to predict at the programmatic level, but the slight difference in road miles is expected to result in little to no difference to rural subsistence activities between alternatives.

Community Effects

Relative to Alternative 1, no major community effects would be expected under the action alternatives. The largest degree of change would be expected under Alternatives 4, 5, and 6 because these alternatives would result in larger increases in suitable timber (and potential harvest) within many community use areas, especially in those that are more remote (see Appendices D and E).[16] Communities with economies that benefit from timber harvest or seek increased roaded access could see some modest benefits, but communities with economies that are dominated by the visitor industry have expressed concerns (see Table E-2 in Appendix E). Based on an evaluation of employment and business licenses by community, along with the amount of suitable timber within community areas (which serves as an index to potential timber harvest), the following observations can be made:

- Alternatives 1 and 2 are expected to generally result in very little to no effect on communities. However, because this EIS is programmatic in nature, the direct effects associated with project activities on any community cannot be identified until specific projects are proposed.
- Alternative 3 is expected to have very minimal potential for community effects, either adverse or beneficial. Community Priority ARAs in this alternative may be beneficial to communities by increasing flexibility for the communities adjacent to designated roadless areas.
- Alternatives 4, 5, and 6 (especially Alternatives 5 and 6) have an increased potential for effects on communities relative to the other alternatives, especially in those communities where the visitor industry sector is important. This is primarily because those communities rely on undisturbed landscapes within the community areas, which in turn may affect visitor use. The smaller and less diversified communities have a greater risk of effects. In addition, communities influenced by the timber industry may experience minor beneficial effects resulting from flexibility for timber harvest. Because of the programmatic nature of this EIS, the effects on any community cannot be identified until specific projects are proposed, but it is expected that they would range from no effect to a minimal effect for these alternatives.

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

Old-Growth Habitat

Relative to old-growth habitat conservation, all of the alternatives would have old-growth harvest levels similar to the level authorized by the Forest Plan. There may be slightly more high-volume and large-tree POG harvested under the action alternatives than was predicted for the Forest Plan because of the increased options for developing economic timber sales. However, this is speculative and depends on harvest levels reaching predicted decadal levels, which depends on economic access to these stands. In addition, the proportion of high-volume and large-tree POG in the added suitable acres under the action alternatives is lower than the proportion in the Alternative 1 suitable acres.

The transition to young-growth management would continue to slow the long-term decrease in deer habitat capability due to the reduction in POG harvest, under all of the alternatives. Because long-term POG harvest and road densities are not expected to differ significantly among alternatives, effects on old-growth–dependent wildlife species are expected to be almost identical to those predicted under the 2016 Forest Plan Amendment EIS.

[16] Appendix D presents suitable old-growth and young-growth timber maps for the community use areas identified for the 32 communities evaluated in this EIS (see Appendix E). These maps are available electronically only. They are included on the thumb drive accompanying this document and are also available online at: https://www.fs.usda.gov/project/?project=54511

Young Growth in Special Habitats

Young growth suitable for timber harvest occurs in a number of habitats under the Forest Plan, including Riparian Management Areas, Beach and Estuary Fringe, and the Old-growth Habitat LUD. Young growth on specific portions of these areas may be harvested using required silvicultural prescriptions following Forest Plan direction. The suitable acres of young growth on these special habitats would increase slightly under the action alternatives, but only slightly because the majority of existing young-growth stands are not in designated roadless areas. Therefore, little to no difference in effects among the alternatives is expected.

Road Density

Slightly more road miles would be developed under the action alternatives with more acreage removed from roadless. Under current conditions approximately 4,929 miles of road (including decommissioned road) exist on the Tongass and the average road density is approximately 0.19 mile per square mile. Under Alternatives 1 and 2, total road miles after 100 years would equal about 5,922, while total road miles under Alternative 6 would equal about 5,972. The other action alternatives would range from 5,941 to 5,968 miles after 100 years. The overall road density on the Tongass would be approximately 0.23 under all of the alternatives. At present approximately 68 percent of 6th field subwatersheds on the Tongass have no roads. After 100 years, this percentage would drop to 62 percent for Alternative 1, 61 percent for Alternative 2, 60 percent for Alternative 3, 58 percent for Alternatives 4 and 5, and 56 percent for Alternative 6. This pattern would be reversed for watersheds with existing high road densities, although differences would be slight. For example, 0.6 percent of the watersheds would have road densities greater than 3 miles per square mile under Alternatives 1 and 2, but 0.5 percent of the watersheds would have densities this high under Alternatives 3, 4, 5, and 6 (due to roads being more spread out).

Fish Habitat

Overall effects to fish habitat are expected to be negligible under all alternatives, because of the strong protections to fish habitats provided by Forest Plan LUDs, Forest-wide standards and guidelines including the riparian management strategy, and the lack of old-growth harvest or associated road construction allowed in the T77 watersheds and TNC /Audubon Conservation Priority Areas. Alternative 3 provides additional long-term regulatory protection for T77 watersheds and TNC/Audubon Conservation Priority Areas by prohibiting old-growth harvest by regulation. Localized effects on fish habitat may occur, but these are expected to be minimal overall.

Species-Specific Effects

The transition to young-growth management would continue to slow the long-term decrease in deer habitat capability due to the reduction in POG harvest, under all of the alternatives. Because long-term POG harvest and road densities are expected to be similar to those under the Forest Plan, effects on old-growth–dependent or associated wildlife species are expected to be almost identical to those predicted by the 2016 Forest Plan Amendment EIS.

Table 2-12
Comparison of Alternatives

Resource/Category	Unit of Measure	Alternative 1 No Action	2 Roaded Roadless	3 Logical Extensions	4 Partial Dev LUDs	5 Full Dev LUDs	6 Full Exemption
Key Issue 1 – Roadless Area Conservation							
Overall Protection of Roadless Characteristics on the Tongass	Qualitative[1]	Neutral/No Effect	Neutral/No Effect	Very Small Adverse Effect	Small Adverse Effect	Moderate Adverse Effect	Moderate Adverse Effect
Total Roadless Area	Acres	9,368,000	9,336,000	8,224,000	8,975,000	7,047,000	0
Roadless Priority	Acres	N/A	5,199,000	4,595,000	7,363,000	6,200,000	0
LUD II Priority	Acres	N/A	854,000[2]	0	854,000[2]	847,000[2]	0
Watershed Priority	Acres	N/A	3,284,000	3,259,000	0	0	0
Community Priority	Acres	N/A	0	370,000	0	0	0
Timber Priority	Acres	N/A	0	0	757,000	0	0
Roadless Area Removed	Acres	0	142,000	1,252,000	401,000	2,321,000	9,368,000
Roadless Area Added	Acres	0	110,000	107,000	7,000	0	0
Roadless Area in Development LUDs[3]	Acres	2,192,000	2,139,000	1,945,000	1,887,000[4]	33,000[5]	0
Key Issue 2 – Support local and regional socioeconomic well-being, Alaska Native culture, rural subsistence activities, and economic opportunity across multiple economic sectors							
Forest Products Industry	Qualitative	Neutral/No Effect	Very Small Beneficial Effect	Small Beneficial Effect	Small Beneficial Effect	Small Beneficial Effect	Small Beneficial Effect
Recreation/Tourism (Visitor) Industry	Qualitative	Neutral/No Effect	Neutral/No Effect	Very Small Adverse Effect	Small Adverse Effect	Small Adverse Effect	Small Adverse Effect
Fisheries Industry	Qualitative	Neutral/No Effect	Neutral/No Effect	Neutral/No Effect	Neutral/No Effect	Neutral/No Effect	Neutral/No Effect
Minerals Development Potential							
Locatable	Qualitative	Neutral/No Effect	Neutral/No Effect	Neutral/No Effect	Neutral/No Effect	Neutral/No Effect	Neutral/No Effect
Leasable	Qualitative	Neutral/No Effect	Very Small Beneficial Effect	Very Small Beneficial Effect	Moderate Beneficial Effect	Moderate Beneficial Effect	Moderate Beneficial Effect
Renewable Energy Project Development Potential	Qualitative	Neutral/No Effect	Small Beneficial Effect	Small Beneficial Effect	Small Beneficial Effect	Small Beneficial Effect	Small Beneficial Effect
Potential for Development of State Roads and Other Transportation Projects	Qualitative	Neutral/No Effect	Small Beneficial Effect	Small Beneficial Effect	Moderate Beneficial Effect	Moderate Beneficial Effect	Moderate Beneficial Effect

Table 2-12 (continued)
Comparison of Alternatives

		Alternative					
		1	2	3	4	5	6
Resource/Category	Unit of Measure	No Action	Roaded Roadless	Logical Extension	Partial Dev LUDs	Full Dev LUDs	Full Exemption
Land Suitable for Timber Production							
Old Growth	Acres	227,000	247,000	312,000	388,000	395,000	395,000
Young Growth	Acres	334,000	345,000	349,000	349,000	351,000	354,000
Increase in Suitable Old Growth							
In Roaded Roadless	Acres	0	20,000	20,000	20,000	20,000	20,000
In Extensions of Roaded Areas	Acres	0	0	49,000	49,000	49,000	49,000
In Community Priority Areas	Acres	0	0	16,000	0	0	0
In Areas More Distant from Roads	Acres	0	0	0	92,000	99,000	99,000
TOTAL	**Acres**	**0**	**20,000**	**85,000**	**161,000**	**168,000**	**168,000**
Increase in High-Volume Suitable Old Growth							
In Roaded Roadless	Acres	0	7,000	7,000	7,000	7,000	7,000
In Extensions of Roaded Areas	Acres	0	0	19,000	19,000	19,000	19,000
In Community Priority Areas	Acres	0	0	4,000	0	0	0
In Areas More Distant from Roads	Acres	0	0	0	31,000	34,000	34,000
TOTAL	**Acres**	**0**	**7,000**	**30,000**	**57,000**	**60,000**	**60,000**
Estimated OG Harvest over 100 yrs							
In Roaded and Altered Areas[6]	Acres	42,500	42,500	34,400	28,350	27,500	27,500
In Extensions of Roaded Areas[7]	Acres	0	0	8,050	8,050	8,050	8,050
In Areas More Distant from Roads	Acres	0	0	0	6,050	6,850	6,850
TOTAL	Acres	**42,500**	**42,500**	**42,500**	**42,500**	**42,500**	**42,500**
Support for Alaska Native Culture							
Improved Access to Cultural Trees	Acres	Neutral/No Effect	Small Beneficial Effect	Small Beneficial Effect	Small Beneficial Effect	Small Beneficial Effect	Small Beneficial Effect
Increased Competition with Timber Industry	Qualitative	Neutral/No Effect	Neutral/No Effect	Very Small Adverse Effect	Small Adverse Effect	Small Adverse Effect	Small Adverse Effect
Support for Subsistence Activities	Qualitative	Small Adverse and Beneficial Effects	Small Adverse and Beneficial Effects	Small Adverse and Beneficial Effects	Small Adverse and Beneficial Effects	Small Adverse and Beneficial Effects	Small Adverse and Beneficial Effects
Community Effects - overall level of potential change for communities	Qualitative	Neutral/No Effect	Neutral/No Effect	Very Small Adverse and Beneficial Effects	Small Adverse and Beneficial Effects	Small Adverse and Beneficial Effects	Small Adverse and Beneficial Effects

Table 2-12 (continued)
Comparison of Alternatives

Resource/Category	Unit of Measure	Alternative 1 No Action	2 Roaded Roadless	3 Logical Extension	4 Partial Dev LUDs	5 Full Dev LUDs	6 Full Exemption
Key Issue 3 – Protection of terrestrial and aquatic wildlife habitat and ecosystem diversity[8]							
Percent of existing productive old growth harvested after 100 years	Percent[6]	1	Similar to Alt.1	Similar to Alt.1	Similar to Alt.1	Similar to Alt.1	Similar to Alt.1
Percent of original productive old growth remaining after 100 years (92% in 2015)	Percent	91	Similar to Alt.1	Similar to Alt.1	Similar to Alt.1	Similar to Alt.1	Similar to Alt.1
Percent of original high volume productive old growth remaining after 100 years (83% in 2015)	Percent	83	Similar to Alt.1	Similar to Alt.1	Similar to Alt.1	Similar to Alt.1	Similar to Alt.1
Percent of original large-tree productive old growth remaining after 100 years (82% in 2015)	Percent	81	Similar to Alt.1	Similar to Alt.1	Similar to Alt.1	Similar to Alt.1	Similar to Alt.1
YG Harvest in Beach and Estuary Fringe after 100 years (all prescript.)	Acres	3,546	Similar to Alt.1	Similar to Alt.1	Similar to Alt.1	Similar to Alt. 1	Very Minimal Increase
YG Harvest in Riparian Management Areas after 100 years (all prescript.)	Acres	882	Similar to Alt.1	Similar to Alt.1	Similar to Alt.1	Very Minimal Increase	Very Minimal Increase
YG Harvest in Old Growth Habitat LUD after 100 years (all prescript.)	Acres	1,796	Similar to Alt.1	Similar to Alt.1	Similar to Alt.1	Similar to Alt. 1	Minimal Increase
Average road density on NFS lands after 100 years (0.20 mile/square mile in 2016)	Miles/Sq. Mile	0.23	Similar to Alt.1	Similar to Alt.1	Very Minimal Increase	Very Minimal Increase	Very Minimal Increase
Average road density on All lands within Tongass boundary after 100 years (0.33 mile/sq.mi.in 2016)	Miles/Sq. Mile	0.45	Similar to Alt.1	Similar to Alt.1	Very Minimal Increase	Very Minimal Increase	Very Minimal Increase
Percent of WAAs with NFS road density <0.7 mile/sq. mile after 100 years (85% in 2016)	Percent	83	Similar to Alt.1	Similar to Alt.1	Similar to Alt.1	Similar to Alt.1	Similar to Alt.1
% of WAAs with All Lands road density <0.7 mile/sq. mile after 100 years (79% in 2016)	Percent	72	Similar to Alt.1	Similar to Alt.1	Similar to Alt.1	Similar to Alt.1	Similar to Alt.1
Total area/potentially suitable OG in T77 & TNC/Audubon Conservation Priority Areas outside of roadless given long-term protection	Acres	0/0	0/0	507,000/49,000	0/0	0/0	0/0

Table 2-12 (continued)
Comparison of Alternatives

Resource/Category	Unit of Measure	Alternative 1 No Action	Alternative 2 Roaded Roadless	Alternative 3 Logical Extension	Alternative 4 Partial Dev LUDs	Alternative 5 Full Dev LUDs	Alternative 6 Full Exemption
Species-Specific Effects							
Likelihood of maintaining viable, well-distributed populations after 100 years							
Goshawks	Rating[6]	Very High	Very High	Very High	Very High	Very High	Very High
Marten	Rating	Very High	Very High	Very High	Very High	Very High	Very High
Wolf	Rating	Very High	Very High	Very High	Very High	Very High	Very High
Brown Bear	Rating	Very High	Very High	Very High	Very High	Very High	Very High
Endemic Mammals	Rating	Moderate to High	Moderate to High	Moderate to High	Moderate to High	Moderate to High	Moderate to High
Deer habitat capability on NFS Lands after 100 years in Terms of Percent of Original (1954) Habitat Capability (89% currently)	Percent	88	Similar to Alt.1	Similar to Alt.1	Similar to Alt.1	Similar to Alt.1	Similar to Alt.1

Notes:

[1] Nine categories are used for the Qualitative ratings. See the beginning of the *Comparison of Alternatives* section for a complete listing.

[2] Total acres in LUD II Priority for Alternatives 2 and 4 is actually 870,000. The acres listed for LUD II Priority are based on the 2001 Roadless Rule GIS layer, which used a slightly different shoreline and did not include lakes.

[3] Note that, with the exception of the Timber Priority ARA (and the Community Priority ARA to a lesser extent), roadless designation on development LUDs provides the highest degree of protection, because these are areas that are mostly likely to be developed if they were not designated roadless. Most non-development LUDs have Forest Plan restrictions which limit their potential for development. Development LUDs include Timber Management, Modified Landscape, Scenic Viewshed, and Experimental Forest LUDs.

[4] Note the 1,875,000 acres of designated roadless under Alternative 4 includes 749,000 acres of Timber Priority. If Timber Priority is excluded because it does not provide protection from timber harvest, the designated roadless area in development LUDs is 1,125,000 acres.

[5] These roadless development LUD acres in Alternative 5 are mostly in Experimental Forest.

[6] Includes the current harvest base outside of the 2001 inventoried roadless areas plus the roaded roadless areas inside the 2001 inventoried roadless areas.

[7] Includes the Community Priority ARA areas.

[8] Under Key Issue 3, the action alternatives are compared with acres, miles/sq. mile, or percent, from the 2016 Forest Plan Amendment EIS. “Similar to Alternative 1” means “same as Alternative 1 with some very slight variation”. It is essentially the same as no difference or very slight difference.

Under Key Issue 3, the Rating is also from the 2016 Forest Plan Amendment EIS and it relates to the “likelihood of maintaining viable, well-distributed populations after 100 years” for a species or species group. Similar ratings are also given for the action alternatives.

YG=young growth, OG=old growth

Totals may not appear to sum correctly due to rounding.

CHAPTER 3
ENVIRONMENT AND EFFECTS

Environment and Effects

Introduction

This chapter combines the affected environment and environmental consequences discussions required by the NEPA implementing regulations (40 CFR 1500-1508). The discussions are combined so that the environmental consequences (effects) of the alternatives on forest resources and the background information needed to understand these consequences are discussed together for each resource.

Each resource is first described by its current condition, uses, supply, and demand, or expected use, along with an explanation of how each resource is measured and evaluated. The descriptions are limited to providing the background information necessary for understanding how the Final Environmental Impact Statement (FEIS) alternatives may affect the resource. Methodology and scientific accuracy is discussed for most resources.

Existing conditions reflect the extensive changes brought about by long-term human occupancy and use of the forest and represent the present-day condition resulting from past and present actions. Effects include the short- and long-term effects that would result from each of the alternatives considered in this FEIS. Cumulative effects may result when the direct and indirect effects associated with the alternatives are added to the effects associated with other past, present, or reasonably foreseeable actions; in this case there are no direct effects. Cumulative effects analyses are presented in the effects sections for each resource. Analysis of long-term cumulative effects extends at least 25 years into the future and to 100 years in many cases. A list of past, present, and reasonably foreseeable projects considered, is provided in Appendix B, Cumulative Effects.

Many of the relationships established and discussed in the 1997 Tongass Land and Resource Management Plan (Forest Plan) Revision FEIS, the 2003 Supplemental EIS (SEIS), the 2008 Forest Plan Amendment EIS, and the 2016 Forest Plan Amendment EIS are still valid and, therefore, are incorporated by reference in this FEIS. However, this FEIS updates some of this information to better reflect current conditions and focuses on the potential effects most relevant to the potential changes that could occur from this proposed action and the alternatives.

An effort was made to obtain and use the best available information to evaluate and compare the effects of alternatives. NEPA implementing regulations (40 CFR 1502.22) state that when “there is incomplete or unavailable information, the agency shall always make clear that such information is lacking.” This was done where appropriate. The regulation requirement goes on to say that if the incomplete information “is essential to a reasoned choice among alternatives” then considerations, such as the cost of obtaining it, apply. This FEIS, in conjunction with the analyses presented in the 2016 and 2008 Forest Plan Amendments and the 1997 Forest Plan Revision FEIS, along with their planning records, will provide the USDA Secretary or Undersecretary of Agriculture with the “essential” information needed to make a reasoned choice among alternatives.

Analyzing Effects

Following each resource description is a discussion of the potential effects (environmental consequences) to the resource associated with implementation of each alternative. All significant or potentially significant effects, including direct, indirect, and cumulative effects, are disclosed. Effects are quantified, where possible, although qualitative discussions are also included. Mitigation measures are also described, if relevant.

Environmental consequences are the effects of implementing an alternative on the physical, biological, social, and economic environment. Direct environmental effects are defined as those occurring at the same time and place as the initial cause or action. Indirect effects are those that occur later in time or are spatially removed from the activity but could be significant in the foreseeable future.

Potential adverse environmental effects that cannot be avoided are discussed. Unavoidable adverse effects are those resulting from managing the land for one resource, while recognizing impacts on the use or condition of other resources. Some adverse effects can be reduced or mitigated by limiting the extent or duration of effects.

Short-term uses, and their effects, are those that occur annually or within about 10 years. Long-term productivity refers to the capability of the land and resources to continue producing goods and services for 50 years and beyond. Long-term and cumulative effects may be projected out 100 years or more, as needed, to fully analyze the potential consequences for specific resources.

For estimating the effects of alternatives at the programmatic level, the assumption is made that the kinds of resource management activities allowed under the 2016 Forest Plan will in fact occur under each alternative. The actual location, design, and extent of such activities are, however, not known at this time because that is a project-by-project decision. In many cases, the discussions refer to the potential for effects to occur, realizing that in many cases these are only estimates. For example, harvests are assumed to occur at the level authorized by the 2016 Forest Plan, even though this level of harvest may or may not occur. While the assumption of effects could vary if forest plan direction is changed through future amendments or plan revisions, such adjustments are not presently under consideration and projections of hypothetical changes are too speculative to warrant evaluation. To the degree that the Forest Plan could change in the future, the activities allowed would change accordingly, and the estimates presented here do not reflect such changes. The effects of such a change would be attributed to and analyzed as part of the decision-making for that action.

The effects analysis is useful in comparing and evaluating alternatives but should not be applied per se to any specific location within the Forest. Thus, the effects presented here are comparative in nature. Specific effects that can be meaningfully measured and evaluated generally occur at the project and activity stage.

Cumulative Effects

Cumulative effects result from the incremental effects of actions, when added to other past, present, and reasonably foreseeable future actions, regardless of what agency (federal or non-federal) or person undertakes such other actions. For this analysis, the area considered for cumulative effects varies according to the resource being assessed. Cumulative effects are discussed in detail for each resource in this chapter. Appendix B describes the projects considered for cumulative effects analysis.

For most aquatic or watershed-related resources, the area within the proclaimed Forest boundary (approximately 17.9 million acres, including 1.2 million acres of non-National Forest System [NFS] lands) was used and analyses were generally conducted at the watershed scale (sixth-level or 12-digit hydrologic unit).

For wildlife and other terrestrial resources, all of Southeast Alaska from Yakutat Bay southeast to the southeastern end of Alaska (approximately 21.6 million acres, including 4.8 million acres of non-NFS lands) is sometimes used for the analysis, although some analyses will be based on the area within the Forest boundary, depending on the availability and quality of available information. Often, Wildlife Analysis Areas (WAAs) will be used to summarize information. In addition, biogeographic provinces will be used to summarize cumulative effects information for wildlife and other terrestrial resources.

For social, economic, recreation, and related human uses, all of Southeast Alaska and adjacent areas will be given consideration for cumulative effects, especially regarding economic, market, and other factors.

Geographic Information System Database and Quantification for this EIS

The Forest Service has developed an extensive computerized geographic information system (GIS) database that is continually improved and updated and is used for programmatic and project-level analyses. However, the use of newer computer mapping and measurement techniques that are more accurate than earlier methods, and the use of updated data, affects the numbers. In general, the differences between previous documents and the baseline numbers used in this FEIS are small, and do not affect the analysis relationships among these documents.

The ongoing management of the Tongass National Forest and updating of data can affect comparability of baseline numbers. Examples include changes in land ownership, changes in resource conditions resulting from timber harvest and road construction, updating of resource data based on field surveys or other analyses, and forest plan amendments.

It should be noted that in some cases acreages are measured that depend on overlaying of multiple data coverages. The acreage measurements for individual categories may need adjustment to account for the fact that coverages are not registered precisely due to scale and data quality attributes. (e.g., along property boundaries, saltwater shorelines, lake edges). Very slight misalignment of the coverages can result in polygon slivers between the coverages, which can produce acreage differences initially. These differences can amount to tens or hundreds of acres or more, especially because of the large area (17 million acres) under analysis. However, on a percentage basis, these necessary adjustments are insignificant.

The figures presented are generally rounded to the nearest whole acre, whole mile, or whole percent. Sometimes they are rounded to tens, hundreds, or thousands, but when numbers are given to the nearest acre or tenth of a mile, it does not necessarily mean that they are accurate to that level. No attempt has been made to adjust rounded numbers to force their sums to equal the expected totals. Therefore, the sum of rounded individual numbers will often be one digit higher or lower than the expected sum. The sums that are presented are the sums of the unrounded numbers.

Current Forest Plan (2016 Amendment)

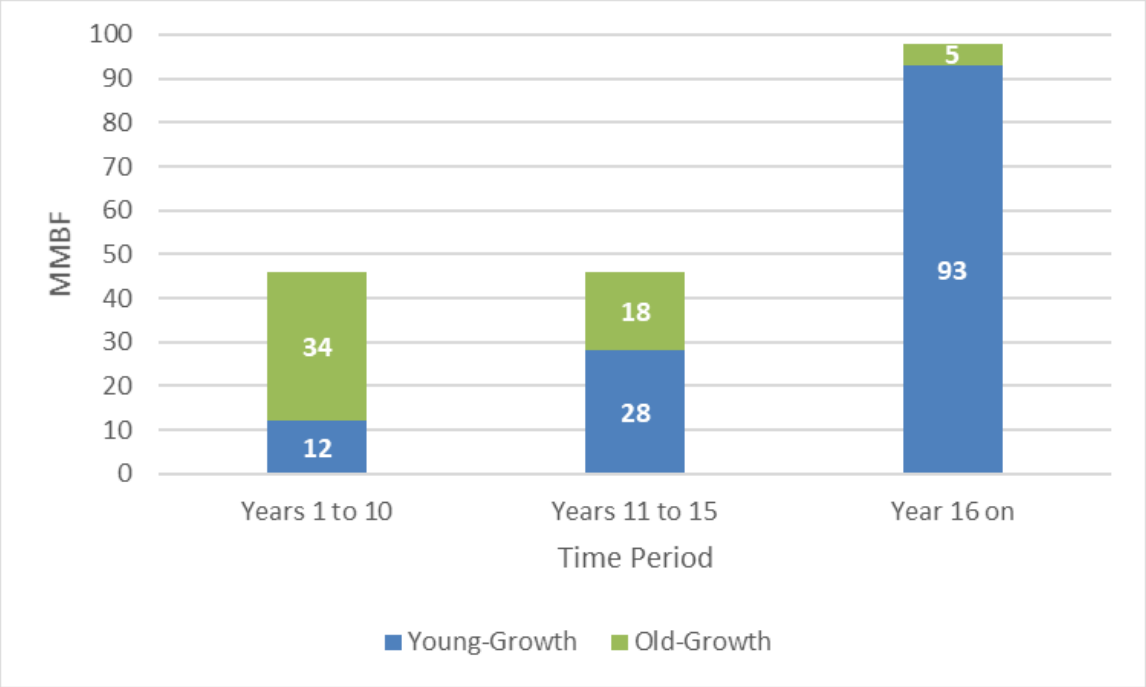
The 2016 Forest Plan amendment responded to a July 2013 Memorandum (1044-009) that directed the Forest Service to transition to a young-growth–based timber management program on the Tongass National Forest within 10 to 15 years, with the goal that at the end of this period the vast majority of timber sold by the Tongass will be young growth. The Secretary's memorandum indicated that this transition to young growth should be implemented in a manner that would preserve a viable timber industry that provides jobs and opportunities for Southeast Alaska residents

Based on the Pacific Northwest Research Station demand projections for 2015 to 2030 (Daniels et al. 2016), the Record of Decision (ROD) for the 2016 Forest Plan Amendment EIS established an annual Projected Timber Sale Quantity (PTSQ) of 46 million board feet (MMBF) prior to the young-growth transition. Under the alternative selected in the ROD, harvest volume would consist of old-growth and young-growth harvest, with old growth decreasing as a share of total volume (46 MMBF) over time as more young growth becomes economic to harvest. Young-growth volume as a share of the total would continue to increase until it reaches 41 MMBF per year (full transition). Under the Forest Plan, the Forest Service expected to sell an average of about 12 MMBF of young growth and 34 MMBF of old growth per year during the first 10 years to reach the estimated quantity of timber expected to be sold during the first decade, 460 MMBF. From Year 11 through Year 15, the Forest Service expected to sell an average of 28 MMBF of young growth and about 18 MMBF of old growth per year. The Forest Plan was expected to reach a full transition of 41 MMBF of young growth around Year 16. Young-growth sales were expected to continue to increase at a rapid rate after Year 16 and reach an upper limit of 93 MMBF around Year 18 (Figure 3-1). Following the transition, old-growth timber would continue to be offered at an average rate of 5 MMBF per year to support small operators and specialty products such as wood for musical instruments (USDA Forest Service 2016c)

Suitable Timber Land Assumptions

Suitable timber lands represent those lands on the Forest that are suitable for timber production based on all multiple-use objectives of the Forest. Appendix A of the 2016 Forest Plan (USDA Forest Service 2016) defines the process for determining timber suitability. The only way to map these lands Forest-wide is to use GIS. Therefore, a GIS model is used that starts with all land on the Forest and, based on many GIS layers, drops out lands that are not suitable based on the criteria identified in Forest Plan Appendix A. The end result is a map of the lands that are estimated to be suitable for timber production. Based on this model, the current Forest Plan (existing conditions) has 227,000 acres of suitable old growth and 334,000 acres of suitable young growth. These acres are outside of existing roadless areas because roadless areas are defined as not suitable for timber production under the current Forest Plan. Under the action alternatives, the roadless designations are removed from some lands and, if these lands are in development Land Use Designations (LUDs) and are not otherwise unsuitable according to the Forest Plan Appendix A, many of these acres become suitable. Therefore, the alternatives with the fewest lands designated as roadless have the most suitable acres.

Figure 3-1
Estimated Maximum Average Annual Harvest under the 2016 Forest Plan Amendment



Source: USDA Forest Service 2016c

Assumptions for Future Harvest

Lands to be harvested are selected from the suitable timber lands. In this EIS, potential harvest acres are the same for all alternatives, even though the suitable acres change. That is because the Forest Plan defines the PTSQ (current Forest Plan [2016 amendment] section) and the acres of harvest is not proportional to the acres of suitable timber lands. Based on Forest Plan modeling (using the Woodstock Model) for the 2016 amendment, the harvest acres allowed by the Forest Plan over the 100-year planning horizon, with harvest at PTSQ were calculated at 42,500 acres for old growth and 284,144 acres for young growth (USDA Forest Service 2016). These are the harvest acres used for assessing effects for each alternative.

Although the acres of harvest do not change, the distribution of that harvest around the Forest is likely to change with each alternative because of shifting patterns of suitable timber lands. In the DEIS, we

assumed that the harvest was distributed evenly across the suitable timber lands. In response to a number of comments and internal discussions, it was decided that we could allocate the old-growth harvest acres in a more realistic pattern (since only 11 to 19 percent of the suitable old growth is harvested over 100 years). For young growth, the even distribution model still works because 80 to 85 percent of the suitable young growth is harvested under each alternative. Thus, for the FEIS, we developed a model to project more accurately the distribution of harvest. It is important to understand that harvest projections are intended to model what might occur in the future over a very long period of time (100 years) to better inform the environmental analysis, show differences and/or similarities between alternatives, and provide additional information for the public and decision maker to consider. Harvest projections are based on assumptions described here and include inherent uncertainties (e.g., unknown changes in future domestic and international markets, harvest and manufacturing technology, and environmental constraints). Harvest projections do not propose or suggest when or where specific activities would occur or identify specific planned or unplanned timber harvests. The lands mapped as suitable for timber production show where harvest could occur.

For the FEIS, we revised our assumptions, in order to make the projected distribution of harvest acres more accurately reflect past practices and contemporary economic conditions related to markets. We developed three assumptions to provide a more realistic allocation of harvest within the suitable lands. These assumptions all relate to timber sale economics and they are described below along with their rationales.

- First, we assigned all projected harvest acres to suitable medium- and high-volume old growth only. This means that about 22 percent of the suitable acres, mapped as low volume, were not candidates for harvest. This assumption is reasonable as the low-volume old growth has been avoided for years and under our current economic situation, it is highly unlikely that economic sales will be developable in this timber during the short-term, and probably even for the long-term, future.
- Second, we reduced the proportion of projected harvest in the northern districts due to the fact that the northern district acres are less desirable to the timber industry because there are no medium-to-large-size sawmills in the northern districts (requiring logs from most sales to be transported long distances by water to reach mills of appropriate size), there is little other industry infrastructure remaining in most areas, and the northern districts generally support forests with smaller logs. Based on reviewing the distribution of harvest among Tongass ranger districts over the past 12 years, about 3 percent of the volume came from the northern districts (Sitka, Hoonah, Juneau, Admiralty, and Yakutat), while about 97 percent came from the southern ranger districts (Thorne Bay, Craig, Ketchikan, Petersburg, and Wrangell). Because the percentage for the north was well below the long-term average, we decided to slightly increase the contribution of the northern districts in the future by restricting projected harvest acres to 5 percent in the north and 95 percent in the south.
- Third, because economics is the major limiting factor for developing viable timber sales, we used generalized economic data to drop those VCUs with the lowest estimated total old-growth stumpage values. These data were generated in 2007 using the Spectrum model for the 2008 Tongass Forest Plan (Henderson 2007). Estimated total old-growth stumpage values by VCU were examined and to focus on the VCUs with the best economic value, we decided to drop all VCUs with estimated total old-growth stumpage values less than -$3,000, which represented about 41 percent of all VCUs considered in 2008. Note that the VCUs considered in 2008 included those in all three phases of the Timber Sale Program Adaptive Management Strategy and only those VCUs in Phase 1 are currently considered suitable for old-growth harvest. The majority of this reduction occurred in the northern districts, which comprised 64 percent to 79 percent of the total reduction, depending on the alternative. The largest contributor to the reduction was the Sitka Ranger District.

We believe that using this model results in a more accurate distribution of old-growth harvest than the even distribution model; however, it too is just an approximation.

Assumptions for Future Road Construction and Reconstruction

Future road construction/reconstruction assumptions were different for old-growth versus young-growth harvest. The ratios derived are based on a review of Big Thorne and other timber sale projects.

For young growth in Alternatives 1 and 2, it was first assumed that 100 percent of all Maintenance Level 1 roads (closed roads) would be reconstructed if all young growth on the Forest were to be harvested. Then the miles of reconstruction for each alternative was extrapolated from this by using the proportion of young-growth to be harvested in that alternative. In addition, it was assumed that in some young-growth stands, construction of new roads would have less impact than reconstruction of old roads; thus, based on past timber sales, an additional one mile of new road per 400 acres of young-growth harvest and one mile of new road over previously decommissioned road per 600 acres of harvest were assumed. Similarly, it was also assumed that 10 percent of new roads and new roads over decommissioned road grades would remain open, while the remaining 90 percent would be closed. It is recognized that many of these roads would be built as temporary roads and some would be fully obliterated after use. However, to be conservative, all roads, including decommissioned roads, closed roads, and open roads, are used in the calculation of road miles and road densities.

For old-growth harvest in Alternatives 1 and 2, future road construction was estimated based on the ratio of one mile of new road construction per 150 acres of harvest plus one mile of new road construction over previously decommissioned road grade per 800 acres of harvest. In addition, one mile of road reconstruction per 300 acres of harvest was assumed. Further, it was assumed that 10 percent of new roads and new roads over decommissioned road grades would remain open, while the remaining 90 percent would be closed.

In addition, for young growth and old growth harvest in Alternatives 3, 4, 5, and 6, the ratios given above (i.e., miles of road per acres harvested) were modified slightly to produce more roads to be developed in alternatives where more of the suitable timber was remote. Consideration was given to the proportion of timber in areas not remote for each alternative. But in general, the higher the proportion of acres of remote suitable timber relative to roaded suitable timber, the more miles of road would be built/reconstructed per hundred acres of harvest.

On non-NFS lands, future increases in road density were projected after examining existing road densities and making reasonable assumptions regarding the additional road density that would be developed in the future. Estimates were conservatively high, in general. All future non-NFS roads were assumed to remain open.

Land Use Designation Groupings

For many resources, the effects and the differences in effects among the alternatives are best identified through the LUD) allocations. While each LUD has a different management prescription, many are similar in the kinds of effects they would potentially create. Based on this and to simplify the identification of effects, the LUDs have been grouped into four categories: Wilderness, Natural Setting, Moderate Development, and Intensive Development. For some analyses, the LUDs are grouped into two categories: Wilderness and Natural Setting LUDs make up the non-development LUDs and Moderate and Intensive development LUDs make up the development LUD category. Therefore, acreages in this EIS generally reflect the underlying LUD acreages. Table 3-1 displays these LUD groupings.

Land Divisions

The land area of the Tongass National Forest has been divided in different ways to describe the different resources and how they are affected by the alternatives. These divisions vary by resource because the relationship of each resource to geographic conditions and zones also varies. Several of these divisions are described briefly here.

Watershed

The 6th-level hydrologic unit code polygons were used for some watershed/fisheries effects. These come from the national Watershed Boundary Dataset.

Geographic Provinces

These are seven large land areas that are distinguished by differences in ecological processes. They are defined by a combination of climatic and geographic features. Geographic provinces are used in the evaluation of Research Natural Areas and Wild and Scenic Rivers. See the *Research Natural Areas* section of the 1997 Forest Plan Revision FEIS for a description of each province.

Table 3-1
Land Use Designation Groupings Used to Discuss Effects

LUD Group	Land Use Designation
Non-development LUDs[3]	
Wilderness LUD Group	Wilderness
	Wilderness National Monument
	Nonwilderness National Monument
Natural Setting LUDs	LUD II
	Remote Recreation
	Semi-Remote Recreation
	Old-Growth Habitat
	Municipal Watershed
	Research Natural Area[1]
	Special Interest Area[1]
	Wild River[1]
	Scenic River
	Recreational River
Development LUDs	
Moderate Development	Experimental Forest[3]
	Scenic Viewshed
	Modified Landscape
Intensive Development	Timber Production
Overlay LUD[2]	
	Minerals

Notes:
[1] These three LUDs function as overlay LUDs (see footnote 2) when they occur within Wilderness, Wilderness National Monument, or LUD II areas.
[2] The Minerals LUD is an overlay LUD. Areas allocated to this LUD are managed according to the underlying LUD until such time that mineral development is approved, if at all. Generally, acreages in this EIS do not include the Minerals, but rather the underlying LUD.
[3] Sometimes Experimental Forest, which is a minor LUD in terms of acreage, is included with Non-development LUDs.

Biogeographic Provinces

Biogeographic provinces are areas within which certain kinds of plants and animals tend to occur together. They are defined by a combination of similarity in species, patterns of distribution of species, and natural characteristics or barriers. Twenty-one biogeographic provinces occur on the Tongass. They are used in the *Biological Diversity, Wildlife,* and *Subsistence* sections.

Wildlife Analysis Areas

WAAs are land divisions used by the Alaska Department of Fish and Game. Approximately 190 WAAs apply to the Tongass National Forest; they average slightly less than 90,000 acres in size. In general, WAA boundaries correspond with Value Comparison Unit (VCU) boundaries, and they typically include three to eight VCUs (averaging just under five). They are used in the *Subsistence* and *Wildlife* sections.

Game Management Unit

Geographical areas defined by the Alaska Department of Fish and Game (ADF&G) to manage wildlife populations. Legal hunting and trapping regulations govern each unit.

Community Use Area

Community use areas represent the general area commonly used or related to by many of the community's residents in their local day-to-day work, recreational, and subsistence activities. These areas do not necessarily define the limits of a community's use or represent traditional use areas or territories.

Traditional Use Areas

Traditional territories are shown in Appendix F, which presents maps from Goldschmidt and Haas' landmark ethnographic study of Alaska Native land use, occupancy, and possession in Southeast Alaska.

Maps

Large-scale color maps showing roadless areas by IRA or ARA (Map 1 to 6) are included on the thumb drive version of the FEIS, in the map packet that accompanies the FEIS paper copy, and on this project's website: https://www.fs.usda.gov/project/?project=54511. Additional maps showing the lands that would be suitable for timber production (Maps 7 to 12) and the lands that would be suitable for timber production by select outfitter/guide use areas (Maps 13 to 18) are included on the thumb drive and website. Maps showing suitable lands by community use area are for each alternative are included in Appendix D on the thumb drive and website.

Organization of Chapter 3

The remainder of Chapter 3 is divided into two parts, key issues and other important issues. Key Issues addresses the three key issues covered in Chapters 1 and 2 and Other Important Issues covers the other 10 issues addressed in detail in this EIS.

Key Issues

Key Issue 1 – Roadless Area Conservation

Affected Environment

Roadless Area Characteristics

In the 2001 Roadless Rule, IRAs were drawn from undeveloped areas typically exceeding 5,000 acres that meet the minimum criteria for wilderness consideration under the Wilderness Act and were inventoried during the Forest Service's Roadless Area Review and Evaluation (RARE) II process and subsequent updates and forest planning analyses. The IRA boundaries associated with the 2001 Roadless Rule (USDA Forest Service 2000), are identified in a set of maps, associated with the Forest Service Roadless Area Conservation, Final Environmental Impact Statement (FEIS), Volume 2, dated November 2000.

The characteristics of the IRAs within the Tongass are described within Appendix C to the 1997 Tongass Land Management Plan Revision, Final Supplemental EIS (SEIS), Roadless Area Evaluation for Wilderness Recommendations (USDA Forest Service 2003a).

In their final report, the Alaska Roadless Rule Citizens Advisory Committee recommended Alaska roadless characteristics based on the unique landscape, remote character, and Alaskan way of life – noting subsistence uses, independent lifestyle, and cultural and spiritual ties to the area. They also noted hardships shared – high energy costs and social and economic hardships. As a result, communities in Alaska often balance between maintaining the characteristics that they value and that make their communities unique, and conserving the resources they use and depend on, while also ensuring economic development and opportunities for employment, economic activity, healthcare, safety, and connections with other communities. They are dependent on the resources that surround them and value preserving the multiple-use capability of the Tongass that is critical to sustaining the regional economy, the welfare of its residents, and the economies, social needs, cultures, and ways of life of Native Alaskans. Table 3.1-1 compares the Alaska roadless characteristics the Committee recommended with the characteristics included in Alternatives 2-5 and those of the 2001 Roadless Rule.

Roadless characteristics (i.e., values or features that make the area meet the minimum criteria for wilderness consideration under the Wilderness Act) are described in the Roadless Area Conservation FEIS (USDA Forest Service 2000, Vol. 1, pp. 3-3 to 3-7). These roadless characteristics have been modified for Alaska conditions and are summarized in Table 3.1-2.

The roadless area inventory displays the extent of the roadless resource and provides data for use by managers, legislators, and others to formulate land management proposals. Roadless areas may retain their roadless character by being managed in a way that emphasizes relatively large undeveloped or natural areas, such as areas usually required for old-growth habitat, scenic backdrops, or primitive recreation.

Table 3.1-4 (in the *Environmental Consequences* section below) provides an overview of the IRAs identified in the 2001 Roadless Rule. These areas consist of approximately 9.34 million acres spread over 110 separate IRAs ranging in size from just 592 acres (Fake Pass IRA 532) to 1.2 million acres (Juneau-Skagway Icefield IRA 301). All but 5 of the 110 IRAs identified in the 2001 Roadless Rule are larger than 5,000 acres.

Ecosystem Services

Ecosystem services are the products of functioning ecosystems that often are available without direct costs to people who benefit from them (Kline 2006).

Table 3.1-1
Roadless Area Characteristics - Comparison

2001 Roadless Rule	Proposed Alaska Roadless Rule (Alternatives 2-5)	Citizen Advisory Committee Recommendation
High quality or undisturbed soil, water, and air. These three key resources are the foundation upon which other resource values and outputs depend. Healthy watersheds catch, store, and safely release water over time, protecting downstream communities from flooding; providing clean water for domestic, agricultural, and industrial uses; helping maintain abundant and healthy fish and wildlife populations; and are the basis for many forms of outdoor recreation.	**Physical Environment**. Roadless areas provide high-quality or undisturbed soil, water, and air.	
Sources of public drinking water. National Forest System lands contain watersheds that are important sources of public drinking water. Roadless areas within the National Forest System contain all or portions of 354 municipal watersheds contributing drinking water to millions of citizens. Maintaining these areas in a relatively undisturbed condition saves downstream communities millions of dollars in water filtration costs. Careful management of these watersheds is crucial in maintaining the flow and affordability of clean water to a growing population.	**Water**. Roadless areas provide a variety of water resources including public drinking water sources, fish and aquatic resources, and hatchery aquatic resources.	**Watersheds that are important sources of public drinking water and water sources for fish and aquatic resources, including hatcheries.** State regulations are currently enforced and applied using the most restrictive standard for water quality criterion as listed in 18 AAC 70. Careful management of these watersheds is crucial in maintaining the flow of clean water to local communities, and to support continued production of fisheries and aquatic food webs.
Diversity of plant and animal communities. Roadless areas are more likely than roaded areas to support greater ecosystem health, including the diversity of native and desired nonnative plant and animal communities due to the absence of disturbances caused by roads and accompanying activities. Inventoried roadless areas also conserve native biodiversity by serving as a bulwark against the spread of nonnative invasive species.	**Diversity.** Roadless areas support a diversity of plant and animal communities including stands of old-growth forests.	**Expansive areas where high quality intact habitat exist and ecosystems function with all of their native species and components; there are no listed or endangered species; and invasive species are generally not present.** These areas function as biological strongholds and refuges for many species, harbor a diversity of plant and animal communities, and serve as a globally significant example of a temperate rainforest ecosystem that is both utilized and conserved by the people that live within and adjacent to it. Species exist in Alaska Roadless Areas that are endangered, threatened, or reduced in other places on the continent.
Habitat for threatened, endangered, proposed, candidate, and sensitive species and for those species dependent on large, undisturbed areas of land. Roadless areas function as Biological strongholds and refuges for many species. Of the nation's species currently listed as threatened, endangered, or proposed for listing under the Endangered Species Act, approximately 25% of animal species and 13% of plant species are likely to have habitat within inventoried roadless areas on National Forest System lands. Roadless areas support a diversity of aquatic habitats and communities, providing or affecting habitat for more than 280 threatened, endangered, proposed, and sensitive species. More than 65% of all Forest Service sensitive species are directly or indirectly affected by inventoried roadless areas. This percentage is composed of birds (82%), amphibians (84%), mammals (81%), plants (72%), fish (56%), reptiles (49%), and invertebrates (36%).	**Habitat.** Roadless areas are expansive areas where high-quality intact habitat exists and ecosystems function with all their native species and components. Roadless areas serve as habitat for a diversity of plant and animal populations and are of particular importance to wide-ranging species, especially predators, which benefit from large, unmanaged forest areas with limited human activity.	**Expansive areas where high quality intact habitat exist and ecosystems function with all of their native species and components; there are no listed or endangered species; and Invasive species are generally not present.** These areas function as biological strongholds and refuges for many species, harbor a diversity of plant and animal communities, and serve as a globally significant example of a temperate rainforest ecosystem that is both utilized and conserved by the people that live within and adjacent to it. Species exist in Alaska Roadless Areas that are endangered, threatened, or reduced in other places on the continent.

Table 3.1-1 (continued)
Roadless Area Characteristics - Comparison

2001 Roadless Rule	Proposed Alaska Roadless Rule (Alternatives 2-5)	Citizen Advisory Committee Recommendation
Primitive, Semi-Primitive Non-Motorized, and Semi-Primitive Motorized classes of dispersed recreation. Roadless areas often provide outstanding dispersed recreation opportunities such as hiking, camping, picnicking, wildlife viewing, hunting, fishing, cross-country skiing, and canoeing. While they may have many Wilderness-like attributes, unlike Wilderness the use of mountain bikes, and other mechanized means of travel is often allowed. These areas can also take pressure off heavily used wilderness areas by providing solitude and quiet, and dispersed recreation opportunities.	**Remoteness.** Alaska roadless areas provide rich primitive, semi-primitive motorized, and semi-primitive non-motorized classes of dispersed recreation, which are a source of ecological, social, and economic benefits.	**Opportunities for economic development of visitor industry products, including remote-setting guided nature tours to view wildlife, hunt, fish, and hike.** Alaska Roadless Areas contribute to a regional resource of undeveloped lands that are an important resource for a segment of the visitor sector – an important component of the matrix of Tongass lands that provide opportunity for medium to larger groups to go ashore in a wilderness-type setting. The intact ecological systems in these areas, with natural settings and iconic fish and wildlife, are a draw for visitors.
Reference landscapes. The body of knowledge about the effects of management activities over long periods of time and on large landscapes is very limited. Reference landscapes of relatively undisturbed areas serve as a barometer to measure the effects of development on other parts of the landscape.	**Landscape.** Roadless areas provide reference landscapes of relatively undisturbed areas that serve as a barometer to measure the effects of development on other parts of the landscape.	**Stands of old growth forests.** These old growth forests are nationally and globally significant because they exist in quantities and extensions in Alaska like few other places on the planet. They support subsistence and traditional hunting and gathering, unique plant and wildlife populations, a significant volume of sequestered carbon and forest/soil processes that mitigate climate change and represent a globally significant reference landscape and intact old growth forest ecosystem.
Natural-appearing landscapes with high scenic quality. High quality scenery, especially scenery with natural-appearing landscapes, is a primary reason that people choose to recreate. In addition, quality scenery contributes directly to real estate values in nearby communities and residential areas.	**Scenery.** Roadless areas have natural-appearing landscapes with high-scenic qualities that people value.	**High-quality scenery, especially scenery with natural-appearing landscapes, is a primary quality that people value in Alaska Roadless Areas.** Quality scenery contributes directly to the quality of life and recreation opportunities for residents, property owners, and visitors.
Traditional cultural properties and sacred sites. Traditional cultural properties are places, sites, structures, art, or objects that have played an important role in the cultural history of a group. Sacred sites are places that have special religious significance to a group. Traditional cultural properties and sacred sites may be eligible for protection under the National Historic Preservation Act. However, many of them have not yet been inventoried, especially those that occur in inventoried roadless areas.	**Cultural.** Roadless areas are rich in traditional cultural properties and sacred sites. In Alaska indigenous peoples have been on national forests for more than 10,000 years and the forests have cultural significance.	**Alaska Native people who have been on this land for more than 10,000 years, and for whom this place has cultural and spiritual significance.** The use of places, sites, waters, structures, resources, and objects are historically significant in the beliefs, customs, practices, and perpetuation of the culture(s) of communities and indigenous peoples of the area. While the Alaska Native people now share this place with other residents, it is critical that they continue to have the ability to sustain their cultures and their communities through economic, social, and cultural opportunities.

Table 3.1-1 (continued)
Roadless Area Characteristics - Comparison

2001 Roadless Rule	Proposed Alaska Roadless Rule (Alternatives 2-5)	Citizen Advisory Committee Recommendation
Other locally identified unique characteristics. Inventoried roadless areas may offer other locally identified unique characteristics and values. Examples include uncommon geological formations, which are valued for their scientific and scenic qualities, or unique wetland complexes. Unique social, cultural, or historical characteristics may also depend on the roadless character of the landscape. Examples include ceremonial sites, places for local events, areas prized for collection of non-timber forest products, or exceptional hunting and fishing opportunities.	**Locally-unique characteristics.** Roadless areas represent geographic areas with additional locally-unique characteristics specific to Alaska including: (a) important source of subsistence resources including terrestrial wildlife, waterfowl, mammals, fish, and plant-based resources; (b) rich habitat that supports multiple species of fish for personal, subsistence, sport, recreation, and commercial harvest; and (c) supports diverse economic opportunity that is especially important for rural community well-being.	**An important source of subsistence resources for Alaskans.** Roadless Areas are rich in important subsistence resources, including game, fish, and foraging resources for those residents whose use and access rights are specifically recognized and guaranteed by the Alaska National Interest Lands Conservation Act (ANILCA). **Multiple species of fish (including salmon) harvested for subsistence and personal use, commercial fisheries, and tourism and guided recreational fishing.** Salmon, trout, char, and hooligan of the Tongass National Forest are harvested in subsistence fisheries and for personal use by local residents. Salmon and trout are also the basis of tourism and guided fisheries enjoyed by thousands of visitors, supporting hundreds of tourism and support businesses. The commercial fisheries derived from Tongass streams and rivers produce a significant proportion of the total Alaska salmon harvest, and support fishing and processing jobs for thousands of local residents and nonresidents. **A major source of economic activity for Southeast Alaskans.** The Tongass National Forest surrounds 34 communities and approximately 73,000 year-round residents. These residents heavily rely on Roadless Areas for economic activities, including mining, visitor products, ocean products, forest products, energy production, and other economic activities.

Table 3.1-2
Roadless Area Characteristics

2001 Roadless Rule Characteristics, Modified for Alaska
Biological Values
• Diversity of plant and animal communities and old-growth forests • Habitat – Roadless areas are expansive areas where high-quality intact habitat exists and ecosystems function with all their native species and components. Roadless areas provide habitat for a diversity of plant and animal populations and are of particular importance to wide-ranging species, such as bears and wolves, which benefit from large unmanaged forest areas with limited human activity.
Physical Values
• Environment – high-quality or undisturbed soil, water, and air. • Water – roadless areas provide a variety of water resources including public drinking water sources, fish and aquatic resources, and hatchery aquatic resources.
Social Values
• Remoteness – Roadless areas provide economic opportunity due to rich primitive, semi-primitive motorized, and semi-primitive non-motorized classes of dispersed recreation. • Landscape – reference landscapes of relatively undisturbed areas that serve as a barometer to measure the effects of development on other parts of the landscape. • Scenery – natural-appearing landscapes with high-scenic qualities that people value. • Cultural – rich in traditional cultural properties and sacred sites. • Locally-unique characteristics – geographic areas with additional locally-unique characteristics specific to Alaska including: 1) important sources of subsistence resource; 2) rich habitat that supports multiple species of fish for personal, subsistence, sport, recreation, and commercial harvest; and 3) supports diverse economic opportunity that is especially important for rural community well-being.

Source: USDA Forest Service 2000, modified to reflect the unique characteristics of Alaska.

These services have been described in a number of different ways including the typology developed by the Millennium Ecosystem Assessment (2005), which is featured on the Forest Service's Ecosystem Services web site (http://www.fs.fed.us/ecosystemservices/) and identifies four general categories of ecosystem services: provisioning, regulating, cultural, and supporting.

Provisioning services include wild food, fresh water, and fiber. Regulating services are the benefits obtained from ecosystem impacts on natural processes, such as air quality, climate stabilization, water quality, and erosion. Cultural services include recreation, aesthetic, educational, and spiritual and religious benefits. Supporting services are the underlying processes that maintain the conditions for life on Earth, such as nutrient cycling and soil formation (Smith et al. 2011).

The concept of ecosystem services has emerged as a way of framing and describing the comprehensive set of benefits that people receive from nature. The Forest Service has been exploring use of these concepts to describe the benefits provided by forests. The Forest Service's Pacific Northwest Research Station issued a technical report that attempts to define an economics research program to describe and evaluate ecosystem services (Kline 2006). More recently, the Pacific Northwest Research Station and the Deschutes National Forest have partnered to develop a place-based application to explore how this type of approach might be implemented by a national forest to enhance forest stewardship. Ecosystem services are discussed at the forest planning level for the Tongass National Forest in the 2008 Forest Plan EIS (USDA Forest Service 2008b, pp. 3-544 to 3-556). The 2008 Forest Plan EIS also discusses non-use values, including existence, option, and bequest values (USDA Forest Service 2008b, pp. 3-551 to 3-552).

Environmental Consequences

The following analysis evaluates roadless area protection in terms of the acres designated as roadless and the degree of regulatory protection provided by the specific variations of the roadless rule language. Variations in the roadless rule language would generally allow more activities to take place, but all management activities on the Forest would remain subject to the 2016 Forest Plan direction that directly and indirectly protects roadless area characteristics.

Comparison of Effects on Roadless Characteristics by Alternative

The following sections provide an overview of the potential effects to the roadless area characteristics identified in the 2001 Roadless Rule, as modified, and summarized above in Table 3.1-2.

Roadless Characteristics: Biological Values

One major category of roadless area characteristics is biological value. Roadless areas are considered high in biological value if they contain a diversity of plant and animal communities, old-growth forests, and/or habitat for threatened, endangered, or sensitive species or wide-ranging species that are dependent on large, undisturbed tracts of land. These values are of special importance on the Alaska national forests and particularly on the Tongass, because it, along with adjacent areas in Canada, represents the largest intact tract of coastal temperate rainforest on earth. In addition, the fish and wildlife on the Tongass are of exceptionally high importance for subsistence, recreation, and the economic well-being of the residents and visitors of Southeast Alaska.

Of primary importance and of highest value in roadless areas on the Tongass are biological diversity, especially associated with old-growth habitats, and sensitive species, endemic species, and the wide-ranging predators of Southeast Alaska. The threatened and endangered fish and wildlife associated with the Tongass National Forest are all marine-oriented species and have only minor associations with the roadless areas of the Tongass (see Key Issue 3, *Fish* and *Wildlife* sections of this FEIS). There are no threatened or endangered plant species known to occur on the Tongass National Forest (see *Sensitive and Invasive Plants* section of this FEIS).

Biological Diversity and Old-Growth Habitat Conservation Strategy

Biological diversity of the Tongass, associated with old-growth forests, is of high importance to residents and visitors to the Tongass and from a national and worldwide perspective. Protection of this resource has been given high priority by the Tongass National Forest through the Old-growth Habitat Conservation Strategy, which was originally developed for the 1997 Forest Plan and has been carried forward through the 2008 and 2016 Forest Plan Amendment EISs (USDA Forest Service 2008a, 2016a).

The effects of the alternatives on biological diversity and the Old-growth Habitat Conservation Strategy are described in detail in the *Biological Diversity* section of this FEIS. Effects related to old-growth harvest acres, under all the alternatives, are the same as those for Alternative 1 under the 2016 Forest Plan Amendment EIS, which prescribes a harvest level much lower than the level originally allowed under the Conservation Strategy (see 1997 Forest Plan and 2008 Forest Plan Amendment). However, effects due to the distribution of harvest, related to fragmentation and connectivity, would vary. Alternatives 1, 2, and 3 would have very low effects, while Alternatives 4, 5, and 6 would have greater effects because of entry into more remote watersheds and roadless areas.

Habitat in Roadless Areas

Roadless areas provide expansive areas of high-quality intact habitat for the full range of native species and ecosystem components. These include threatened, endangered, and sensitive species, endemic species, and wide-ranging species dependent on large, undisturbed areas.

The Tongass National Forest currently has no threatened or endangered species associated with terrestrial habitats. However, it does have 16 plant and 4 bird species designated as sensitive (see *Key Issue 3*, *Fish* and *Wildlife* sections and the *Sensitive and Invasive Plants* section). Of the 16 sensitive plant species, only 4 species have known occurrences expected to be within lands suitable for young-growth or old-growth timber production. For these populations and for previously undocumented populations that are located during project surveys, Forest-wide standards and guidelines under all alternatives would result in protection to minimize impacts to these species. Among the bird species, three are marine or shoreline species and are expected to be protected from almost all adverse effects by Forest Plan LUDs and standards and guidelines. However, the Queen Charlotte goshawk (*Accipiter gentiles laingi*) is a wide-ranging species that seems to prefer mature and old-growth forest habitats for nesting and foraging. This species would be affected under all alternatives; effects would generally be similar among the alternatives but slightly higher for Alternatives 4, 5, and 6 because of more road development and associated fragmentation expected under these alternatives relative to Alternatives 1, 2, and 3.

Endemic species occur in isolated populations and can have limited mobility or specific habitat requirements (see *Key Issue 3, Wildlife* section). Thus, they are vulnerable to the effects of habitat loss and fragmentation, introduced non-natives, pathogens and disease, natural events (i.e., climate change), and overharvesting (Dawson et al. 2007). Although timber harvest levels are the same among all alternatives, Alternatives 4, 5, and 6 would have the greatest potential for effects on endemics because the degree of fragmentation is likely to be higher under these alternatives (landscape connectivity and fragmentation are discussed in detail in the *Biological Diversity* section). Most endemic species would benefit from the transition to young-growth harvest permitted under all alternatives due to the reduced amount of scheduled productive old-growth harvest over the long term.

Roadless areas may be of greatest value to wide-ranging species that require large, undisturbed areas of land. In general, this group consists of predators. Three mammals are included in this category: Alexander Archipelago wolf (*Canis lupus ligoni)*, brown bear (*Ursus arctos*), and American marten (*Martes americana;* see *Key Issue 3, Wildlife* section). These species are of concern because their numbers are relatively low (they are at or near the top of the food chain), they are under harvest pressure (which is affected by access), they are sensitive to disturbance, and they range widely so they are often subject to many disturbances within their home ranges. Remote roadless areas often represent optimum habitats for them and may serve as important refugia for populations under harvest and development pressures. Of greatest concern on the Tongass is the Alexander Archipelago wolf, particularly on Prince of Wales and surrounding islands. Although the alternatives would be similar in terms of overall harvest levels,

Alternatives 4, 5, and 6 would result in the largest adverse effects on these species because of greater road lengths, penetration into remote roadless areas, and habitat fragmentation that they would produce relative to Alternatives 1, 2, and 3.

Roadless Characteristics: Physical Values

The physical values associated with roadless areas include soils, water, and air. The Tongass roadless areas are generally in near pristine condition in terms of soils, water quality, and air quality.

Large acreages of excessive soil erosion, detrimental soil disturbance, or landslides attributed to management activities generally do not exist within roadless areas. However, there are localized areas within the roaded roadless portion that include past management-related soil impacts. During project-level analysis, areas sensitive to surface erosion or landslides are identified and appropriate mitigation measures including the Forest-wide standards and guidelines for Soil and Water (USDA Forest Service 2016a) are used to reduce surface erosion and sediment production. Although timber harvest, energy project development, mining activities, and other development would be similar under each alternative, the potential for adverse impacts on the soil and water resource in roadless areas would differ slightly among the alternatives based on different levels of projected road construction. Alternatives 4, 5, and 6 would have a slightly larger potential for adverse effects, relative to Alternatives 1, 2, and 3, because they are expected to result in slightly more road development. However, the differences among alternatives would be minor because effects from those projected activities would be mitigated through the use of site-specific analysis, Forest-wide standards and guidelines, and other best management practices (BMPs), including post-project rehabilitation of disturbed soil. In addition, actual impacts on water quality anticipated from any alternative would be small in magnitude and scattered over a wide geographic area. Most of the potential effects would be of short duration, with disturbed soil areas rehabilitated after projects are completed in those areas.

Effects on air quality would also not substantially differ among alternatives. Based on the projected land management activities that differ among alternatives, atmospheric emissions in roadless areas are not anticipated to directly, indirectly, or cumulatively increase to a level that would be likely to exceed state or federal air quality standards. Air quality impacts from dust emissions would be negligible and would not vary significantly by alternative.

Roadless Characteristics: Social Values

The social values considered under roadless characteristics include remoteness, scenic quality, traditional cultural areas and sacred sites, reference landscapes, and other locally-unique characteristics. The current condition of most roadless areas on the Tongass is nearly pristine relative to these social values. Exceptions include the roaded roadless areas, where previous road development and timber harvest has taken place and localized areas along the shoreline where historic development has occurred or localized areas where mining-related activities have occurred.

Roadless areas provide recreation opportunity due to rich primitive, semi-primitive motorized, and semi-primitive non-motorized Recreation Opportunity Spectrum (ROS) classes of dispersed recreation. Approximately 95 percent of the 2001 roadless areas on the Tongass consist of primitive and semi-primitive ROS classes, and almost two-thirds of these are primitive. Under Alternative 2, roaded roadless and other substantially altered areas would lose regulatory protection as designated roadless. The net change in roadless designations would result in an increase of 20,000 acres of suitable old growth and 11,000 acres of suitable young growth. The vast majority of the areas removed from roadless would be Roaded Modified and Roaded Natural. Under Alternative 2, approximately 95 percent of Tongass roadless areas would be maintained as primitive and semi-primitive ROS classes, an increase of 1 percent (see *Recreation and Tourism* section for further details).

Under Alternative 3, approximately 96 percent of the roadless areas on the Tongass would be maintained as primitive and semi-primitive ROS classes. The net changes in roadless designations would provide 85,000 more acres of suitable old growth and 15,000 more acres of suitable young growth. Under Alternatives 4 and 5, the remaining roadless areas would maintain approximately 96 and 97 percent of their areas as primitive and semi-primitive ROS classes, respectively. The net change in roadless

designations under these two alternatives would provide 161,000 and 168,000 more acres of suitable old growth and 15,000 and 17,000 more acres of suitable young growth, respectively. With Alternative 6, all regulatory roadless designations would be removed. The areas removed from roadless designation would provide 168,000 additional acres of suitable old growth and 20,000 additional acres of suitable young growth. Under Alternatives 1, 2, 3, 4, and 5, the retained roadless areas would remain similar in terms of their ROS allocations. The exception would be Alternative 6, which would include no retained roadless designations.

Similarly, outfitter-guide use on the Tongass includes activities in more remote areas. The majority of these areas would be retained as roadless under Alternatives 1, 2, and 3. Substantially more lands in the primitive ROS class would be removed under Alternatives 4, 5, and 6.

Scenic Quality

The Tongass National Forest offers a variety of high-quality scenery to its visitors, from spectacular mountain ranges and glaciers to low-lying marine landscapes composed of intricate waterways, bays, and island groups. Scenic quality is based on two definable elements, landscape character and scenic integrity. Tongass roadless areas have natural appearing landscapes and have very high scenic integrity and generally have high value for landscape character as well. The exception for scenic integrity is the roaded roadless areas, which have significantly reduced scenic integrity because of past harvest and road construction. Roadless areas are viewed from a variety of vantage points, including the communities of Southeast Alaska, the Alaska Marine Highway ferry route, cruise ship routes, existing road systems, popular small boat routes and anchorages, small aircraft, and hiking trails.

Road construction and timber harvest can have varying degrees of adverse effects on the scenic integrity of a landscape. In most studied viewsheds, the highest effects on scenery would be associated with Alternatives 5 and 6, followed in order by Alternative 4, Alternative 3, Alternative 2, and Alternative 1. In addition, Alternatives 4, 5, and 6 would likely result in more road development to reach more remote places, which would have a greater adverse effect on scenery than with less road development under Alternatives 1, 2, and 3. Road mileage differences, however, would not be large, because all alternatives would result in essentially the same level of acres harvested and timber volume removed (estimated maximum difference for new road construction of 49 miles among alternatives).

Traditional Cultural Properties and Sacred Sites

All alternatives require compliance with existing laws and regulations; therefore, before any management actions take place, the standard process for considering effects would be conducted as required by the implementing regulations for the National Historic Preservation Act and other relevant law, policy, and guidance provided in agreement documents. In most cases impacts would be avoided or mitigated. Tribal consultation is an integral part of the planning process for management actions; as well as consultations with the State Historic Preservation Officer and other interested parties.

For cultural resources, including historic and traditional cultural properties and sacred sites, prior to management actions taking place on the ground, resource inventories and appropriate mitigation are required by law. Some risk to cultural resources is associated with all alternatives, but increased risk would occur under Alternatives 4, 5, and 6 because of potentially greater road lengths and potential activity in areas currently and previously protected from development associated with harvest activities.

Reference Landscapes and Locally Identified Unique Characteristics

A range of distinctive characteristics occur within the Tongass roadless areas. Many of these are already identified in the Forest Plan and managed as Special Interest Areas. These include Geological Areas, Recreation Areas, Zoological Areas, Botanical Areas, Cultural Areas, and Scenic Areas. Special Interest Areas cover 186,000 acres within 2001 roadless areas. In addition, a number of Research Natural Areas occur within the Tongass roadless areas (21,000 acres). The Research Natural Areas, along with some of the Special Interest Areas, serve as reference landscapes. Further, a number of river corridors are managed under the Forest Plan as wild and scenic rivers. Within 2001 roadless areas, there are 14,000 acres of Recreational River, 16,000 acres of Scenic River, and 48,000 acres of Wild River. Finally, there

are other small areas, not included within these special LUDs, such as areas with unique karst features that occur within roadless areas.

Altogether, these special LUDs cover 285,000 acres within 2001 roadless areas (Alternative 1). Under Alternative 2, these areas would remain at 285,000 acres, and they would be little changed under Alternatives 3, 4, and 5 at 281,000 acres, 279,000 acres, and 283,000 acres, respectively. However, under Alternative 6, the roadless acreage within these special LUDs would decrease to zero.

Another reference landscape adjacent to the Tongass National Forest is Glacier Bay National Park and Wilderness. Commenters on the DEIS expressed concern about deleting the roadless designations on these adjacent lands and the effect on the Park and Wilderness values. The Chilkat Peninsula portion of the Tongass borders the eastern portion of the Park and the northern end of Chichagof Island lies across from the mouth of Glacier Bay. Alternatives 1, 2, and 4 have no effect on these adjacent lands, Alternative 3 would remove roadless designations on the lands to the south on Chichagof Island, Alternative 5 would remove roadless designations on lands nearby, but not adjacent to the Park, and Alternative 6 would remove roadless designations on all adjacent lands.

However, none of the adjacent lands are development LUDs. They consist of Semi-remote Recreation, Old-growth Habitat, and LUD II areas and no timber harvest or related road construction would be allowed under any of the alternatives. It is possible that limited road, mineral, or energy development could occur, but there are no known specific proposals. If specific proposals are made, they would be analyzed through individual site-specific NEPA.

Alternative 1

Under Alternative 1 there would be no change in the boundaries of the IRAs identified in the 2001 Roadless Rule and no changes to current management (Table 3.1-3, Figure 3.1-1). This alternative would continue the general prohibitions on tree cutting, sale, and removal and road construction/reconstruction within IRAs (9.37 million acres), with some of those activities permitted under certain exceptions. There would be no impact to existing Forest-wide roadless characteristics under this alternative. Existing IRA boundaries would not be corrected or modified to address ownership changes and updated mapping.

Viewed relative to the action alternatives, along with Alternative 2, Alternative 1 would protect the most acres and existing management direction would provide the highest degree of protection, with the existing general prohibitions remaining in place.

Alternative 2

Under Alternative 2, there would be a slight decrease in roadless area acres, with 9.34 million acres managed as ARAs (Table 3.1-3, Figure 3.1-1). In addition to gains and losses from ownership changes and updated mapping, gains would include the addition of LUD II acres not designated as roadless in 2001, while losses would include the removal of approximately 142,000 acres from roadless designation that have been substantially altered as identified by prior road construction or timber harvest. These areas are generally known as “roaded roadless” areas and include additional areas considered to be substantially altered. Because roaded roadless areas have been substantially altered, the roadless area characteristics they once had have been greatly diminished.

The removal of roaded roadless acres from roadless designation and other removals and additions would revert a net of about 20,000 acres of previously unsuitable lands to suitable old-growth lands that would be available for harvest. The projected harvest on suitable acres is not expected to change because of Forest Plan limitations, but would be spread over a wider pool of lands. Harvest in the areas converted from roadless would further reduce the limited roadless characteristics that remain in these roaded roadless areas. Estimated old-growth harvest in these roaded roadless areas over 100 years would be approximately 3,750 acres (Table 3.1-4).

Table 3.1-3
Roadless Areas by Alternative and Management Designation

Roadless Designation (acres)	Alternative 1 No Action	2 Roaded Roadless	3 Logical Extension	4 Partial Dev. LUDs[1]	5 All Dev. LUDs	6 Full Exemption
Total Roadless Area	9,368,000	9,336,000	8,224,000	8,975,000	7,047,000	0
ARA Management Designations						
LUD II Priority	N/A	854,000	0	854,000	847,000	0
Watershed Priority	N/A	3,284,000	3,259,000	0	0	0
Roadless Priority	N/A	5,199,000	4,595,000	7,363,000	6,200,000	0
Community Priority	N/A	0	370,000	0	0	0
Timber Priority	N/A	0	0	757,000	0	0
Change in Roadless Area Acres						
Roadless Area Removed	0	142,000	1,252,000	401,000	2,321,000	9,368,000
Roadless Area Added	0	110,000	107,000	7,000	0	0
Net Change	0	-32,000	-1,144,000	-394,000	-2,321,000	-9,368,000
Old-Growth Acres Suitable for Harvest						
Total Acres	227,000	247,000	312,000	388,000	395,000	395,000
Net Change	0	20,000	85,000	161,000	168,000	168,000
T77 & TNC/ Audubon Conservation Priority Areas Outside of Roadless given Long-term Regulatory Protection						
Total Acres	0	0	507,000	0	0	0

[1] Includes Timber Production and Modified Landscape LUDs, but not Scenic Viewshed.
N/A = not applicable; T77 = Tongass 77; TNC = The Nature Conservancy
Note: Numbers may not sum correctly due to rounding.

Figure 3.1-1
Roadless Areas by Alternative and Management Designation

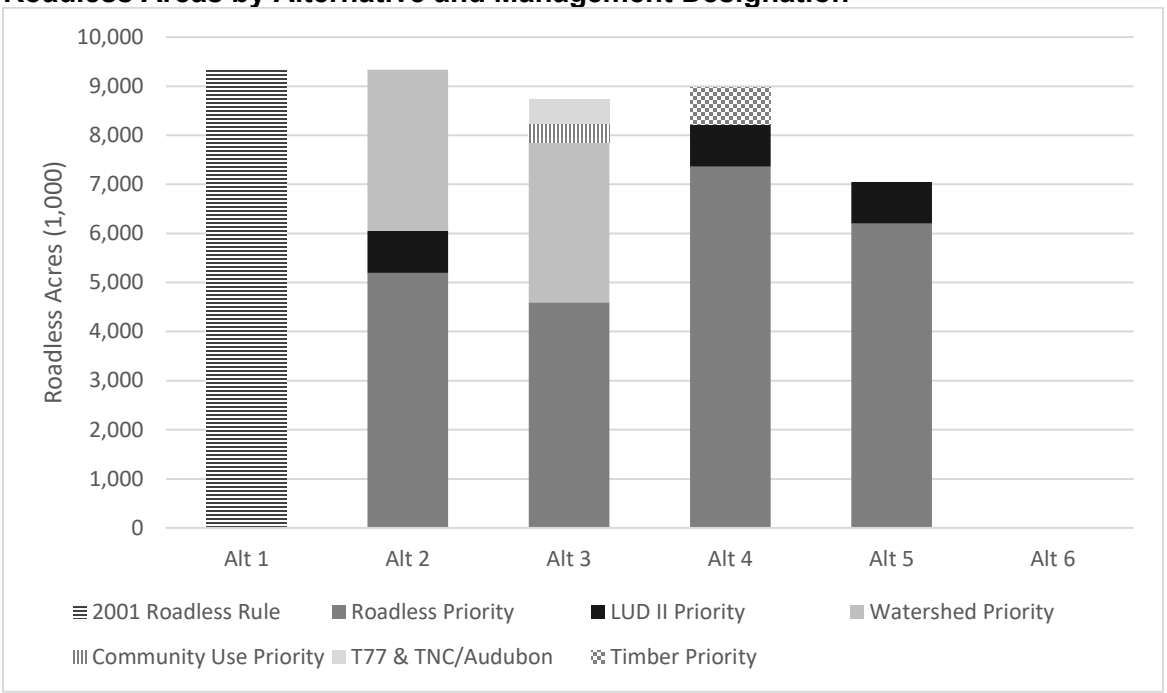


Table 3.1-4
Estimated Old Growth Harvest Acres on Each Ranger District by Stratum and Alternative[1]

Ranger District	Stratum	Estimated Old-Growth Harvest Acres					
		Alt 1	Alt 2	Alt 3	Alt 4	Alt 5	Alt 6
Craig	Existing Roaded	3,100	2,850	2,150	1,600	1,550	1,550
	Roaded Roadless	0	800	800	800	800	800
	Logical Extensions	0	0	950	950	950	950
	Distant from Roads	0	0	0	500	650	650
	Subtotal	**3,100**	**3,650**	**3,900**	**3,850**	**3,950**	**3,950**
Hoonah	Existing Roaded	800	800	700	450	400	400
	Roaded Roadless	0	0	0	0	0	0
	Logical Extensions	0	0	150	150	150	150
	Distant from Roads	0	0		300	300	300
	Subtotal	**42,500**	**42,500**	**42,500**	**42,500**	**42,500**	**42,500**
Juneau	Existing Roaded	300	300	250	150	150	150
	Roaded Roadless	0	0	0	0	0	0
	Logical Extensions	0	0	0	0	0	0
	Distant from Roads	0	0	0	0	50	50
	Subtotal	**800**	**800**	**850**	**900**	**850**	**850**
Ketchikan Misty Fjords	Existing Roaded	6,350	5,750	4,500	3,550	3,400	3,400
	Roaded Roadless	0	900	900	900	900	900
	Logical Extensions	0	0	1,550	1,550	1,550	1,550
	Distant from Roads	0	0	0	1,300	1,450	1,450
	Subtotal	**6,350**	**6,650**	**6,950**	**7,300**	**7,300**	**7,300**
Petersburg	Existing Roaded	12,000	10,900	8,650	6,950	6,700	6,700
	Roaded Roadless	0	1,000	1,000	1,000	1,000	1,000
	Logical Extensions	0	0	2,950	2,950	2,950	2,950
	Distant from Roads	0	0	0	2,000	2,100	2,100
	Subtotal	**12,000**	**11,900**	**12,600**	**12,900**	**12,750**	**12,750**
Sitka	Existing Roaded	1,000	1,000	850	550	500	500
	Roaded Roadless	0	0	0	0	0	0
	Logical Extensions	0	0	200	200	200	200
	Distant from Roads	0	0	0	250	300	300
	Subtotal	**1,000**	**1,000**	**1,050**	**1,000**	**1,000**	**1,000**
Thorne Bay	Existing Roaded	13,450	12,200	9,800	8,200	8,000	8,000
	Roaded Roadless	0	500	500	500	500	500
	Logical Extensions	0	0	1,300	1,300	1,300	1,300
	Distant from Roads	0	0	0	800	900	900
	Subtotal	**13,450**	**12,700**	**11,600**	**10,800**	**10,700**	**10,700**
Wrangell	Existing Roaded	5,400	4,900	3,850	3,150	3,000	3,000
	Roaded Roadless	0	550	550	550	550	550
	Logical Extensions	0	0	950	950	950	950
	Distant from Roads	0	0	0	900	1,100	1,100
	Subtotal	**5,400**	**5,450**	**5,350**	**5,550**	**5,600**	**5,600**
Total Acres[1]	**Existing Roaded**	**42,500**	**38,700**	**30,750**	**24,600**	**23,750**	**23,750**
	Roaded Roadless	**0**	**3,750**	**3,750**	**3,750**	**3,750**	**3,750**
	Logical Extensions	**0**	**0**	**8,050**	**8,050**	**8,050**	**8,050**
	Distant from Roads	**0**	**0**	**0**	**6,050**	**6,850**	**6,850**
	Subtotal	**42,500**	**42,500**	**42,500**	**42,500**	**42,500**	**42,500**

[1] These estimates are very approximate and based on many assumptions. They are intended to provide a realistic, but rough indication of the distribution of harvest.

Although most roadless areas would decrease in size, 15 IRAs would increase more than 100 acres, with increases ranging up to 15,000 acres. Almost two-thirds of the suitable old-growth lands in roaded roadless are located on existing road systems in six 2001 IRAs: North Kupreanof (IRA 211), North Revilla (IRA 526), Twelvemile (IRA 534), Lindenberg (216), South Zarembo (IRA 237), and West Wrangell (IRA 288) (Table 3.1-5). The entire increase in suitable acres would be in the five ranger districts on the south part of the Forest (Craig, Ketchikan Misty Fjords, Petersburg, Thorne Bay, and Wrangell; Table 3.1-6, Figure 3.1-2).

Table 3.1-5
Total Acres by 2001 Inventoried Roadless Area and Net Change in Suitable Old-Growth Acres by IRA and Action Alternative

Ranger District[1]	Roadless Area Number	Roadless Area Name	Total IRA Acres[2]	Increase in Suitable Old-Growth Acres[3]				
				Alt 2	Alt 3	Alt 4	Alt 5	Alt 6
PRD	201	Fanshaw	48,317	0	0	0	0	0
PRD	202	Spires	538,901	115	3,180	6,764	6,772	6,772
WRD	204	Madan	69,608	0	0	0	5	5
WRD	205	Aaron	79,731	0	0	0	0	0
WRD	206	Cone	127,963	0	0	0	0	0
WRD	207	Harding	175,432	0	0	0	0	0
WRD	208	Bradfield	198,115	0	0	0	0	0
WRD	209	Anan	37,876	0	0	0	0	0
WRD	210	Frosty	38,658	122	363	1,710	1,710	1,710
PRD	211	North Kupreanof	114,608	2,903	9,936	10,638	10,640	10,640
PRD	212	Missionary	16,741	815	1,857	2,468	2,553	2,553
PRD	213	Five Mile	19,078	1	1,136	1,279	1,287	1,287
PRD	214	South Kupreanof	217,292	2	1,001	1,001	1,003	1,003
PRD	215	Castle	49,997	0	0	0	0	0
PRD	216	Lindenberg	25,841	2,018	4,265	6,399	6,763	6,763
PRD	217	Green Rocks	10,726	236	259	329	343	343
PRD	218	Woewodski	10,284	0	0	0	1	1
PRD	220	East Mitkof	8,012	1	1	551	551	551
PRD	223	Manzanita	8,394	2	964	966	966	966
PRD	224	Crystal	18,648	6	466	1,868	2,055	2,055
WRD	225	Kadin	2,020	0	0	0	0	0
WRD	227	North Wrangell	7,943	681	2,706	2,706	2,706	2,706
WRD	229	South Wrangell	14,133	0	2,368	2,368	2,369	2,369
WRD	231	Woronkofski	11,101	0	0	0	0	0
WRD	232	North Etolin	41,244	20	1,191	1,337	2,402	2,402
WRD	233	Mosman	53,904	4	168	168	224	224
WRD	234	South Etolin	26,665	11	245	1,496	1,496	1,496
WRD	235	West Zarembo	6,787	11	11	264	264	264
WRD	236	East Zarembo	10,928	237	237	3,030	3,126	3,126
WRD	237	South Zarembo	36,334	1,624	2,577	5,138	5,138	5,138
WRD	238	Kashevarof Islands	4,773	0	0	0	0	0
PRD	239	Keku	9,274	0	5	5	5	5
PRD	240	Security	31,663	34	587	1,418	1,418	1,418
PRD	241	North Kuiu	6,352	-1,433	-1,433	512	513	513
PRD	242	Camden	36,848	26	1,886	1,886	1,886	1,886
PRD	243	Rocky Pass	77,057	11	106	254	254	254
PRD	244	Bay of Pillars	27,408	0	0	0	0	0
PRD	245	East Kuiu	27,050	13	13	608	608	608
PRD	246	South Kuiu	62,268	0	0	0	0	0
WRD	247	East Wrangell	7,263	11	369	369	369	369
WRD	288	West Wrangell	8,823	1,125	1,299	1,299	1,299	1,299
WRD	289	Central Wrangell	13,149	34	2,147	2,147	2,147	2,147
WRD	290	SE Wrangell	18,480	17	822	822	822	822
JRD	301	Juneau-Skagway Icefield	1,204,175	19	19	40	40	40
JRD	302	Taku-Snettisham	696,487	0	0	0	0	0
JRD	303	Sullivan	67,229	0	0	0	0	0
JRD	304	Chilkat-West Lynn Canal	195,334	291	291	3,421	4,350	4,350
JRD	305	Juneau Urban	101,896	0	0	0	29	29
JRD	306	Mansfield Peninsula	53,016	0	0	0	0	0

Table 3.1-5 (continued)
Total Acres by 2001 Inventoried Roadless Area and Net Change in Suitable Old-Growth Acres by IRA and Action Alternative

Ranger District[1]	Roadless Area Number	Roadless Area Name	Total IRA Acres[2]	Increase in Suitable Old-Growth Acres[3]				
				Alt 2	Alt 3	Alt 4	Alt 5	Alt 6
JRD	307	Greens Creek	27,412	0	0	0	0	0
JRD	308	Windham-Port Houghton	159,986	0	0	123	125	126
JRD	310	Douglas Island	24,682	0	0	0	0	0
HRD/SRD	311	Chichagof	556,866	-1,920	201	8,376	8,894	8,895
HRD/SRD	312	Trap Bay	13,296	15	977	977	977	977
JRD	313	Rhine	22,735	0	0	0	13	13
SRD	314	Point Craven	10,742	2	2	2	490	490
HRD	317	Point Augusta	15,483	72	1,411	2,532	2,532	2,532
HRD	318	Whitestone	5,882	0	0	725	876	876
HRD	319	Pavlof-East Point	4,912	47	348	348	414	414
SRD	321	Tenakee Ridge	20,699	68	1,312	3,577	3,577	3,577
HRD/SRD	323	Game Creek	49,842	841	1,128	7,181	7,181	7,181
HRD	325	Freshwater Bay	44,135	105	105	5,367	5,367	5,367
SRD	326	North Kruzof	31,778	0	0	55	55	55
SRD	327	Middle Kruzof	14,766	19	19	2,360	2,360	2,360
SRD	328	Hoonah Sound	79,284	0	0	0	0	0
SRD	329	South Kruzof	54,511	0	0	4	4	4
SRD	330	North Baranof	314,304	127	127	6,608	6,609	6,609
SRD	331	Sitka Urban	113,015	0	0	110	110	110
SRD	332	Sitka Sound	13,185	0	0	0	0	0
SRD	333	Redoubt	68,559	8	8	12	12	12
SRD	334	Port Alexander	125,004	0	0	0	0	0
YRD	338	Brabazon Addition	499,945	0	0	0	0	0
YRD	339	Yakutat Forelands	325,755	0	0	0	0	0
YRD	341	Upper Situk	17,479	2	2	2	2	2
HRD	342	Neka Mountain	6,119	0	0	0	0	0
HRD	343	Neka Bay	6,953	0	0	0	0	0
CRD	501	Dall Island	108,002	0	0	0	0	0
CRD	502	Suemez Island	20,177	-1	-1	1,504	1,505	1,505
CRD	503	Outer Islands	99,051	0	0	0	13	13
CRD	504	Sukkwan	44,551	0	0	0	0	4
CRD	505	Soda Bay	64,067	461	2,719	2,716	2,723	2,723
CRD	507	Eudora	197,359	21	95	1,144	1,152	1,152
TRD	508	Christoval	9,113	150	150	320	320	320
TRD	509	Kogish	64,010	1,003	7,026	7,075	7,075	7,075
CRD	510	Karta	51,976	830	3,506	5,457	6,413	6,413
TRD	511	Thorne River	74,080	533	2,070	2,319	2,666	2,666
TRD	512	Ratz	5,402	47	47	210	210	210
TRD	514	Sarkar	54,005	91	477	513	513	513
TRD	515	Kosciusko	64,560	363	1,566	1,567	1,567	1,567
TRD	516	Calder	8,868	0	0	0	0	0
TRD	517	El Capitan	26,609	137	238	4,430	5,029	5,029
TRD	518	Salmon Bay	24,115	213	449	1,179	1,179	1,179
CRD	519	McKenzie	77,645	642	1,706	2,448	2,450	2,450
TRD	520	Kasaan	7,648	0	0	0	0	0
KRD	521	Duke	45,086	0	0	0	0	0
KRD	522	Gravina	38,265	94	1,032	1,030	1,045	1,045
KRD	523	South Revilla	52,826	227	3,688	3,697	3,710	3,710
KRD	524	Revilla	30,869	8	1,349	1,349	1,349	1,349
KRD	525	Behm Islands	4,351	0	0	0	0	0
KRD	526	North Revilla	217,829	2,637	7,386	14,549	15,232	15,233
KRD	528	Cleveland	187,974	0	0	0	116	116
KRD	529	North Cleveland	109,379	0	0	0	270	270

Table 3.1-5 (continued)
Total Acres by 2001 Inventoried Roadless Area and Net Change in Suitable Old-Growth Acres by IRA and Action Alternative

Ranger District[1]	Roadless Area Number	Roadless Area Name	Total IRA Acres[2]	Increase in Suitable Old-Growth Acres[3]				
				Alt 2	Alt 3	Alt 4	Alt 5	Alt 6
KRD	530	Hyder	122,130	0	0	0	21	21
CRD	531	Nutkwa	42,560	0	0	66	74	74
TRD	532	Fake Pass	592	0	0	0	0	0
CRD	533	Hydaburg	11,130	0	0	0	0	0
CRD	534	Twelvemile	38,275	2,155	3,376	3,376	3,376	3,376
KRD	535	Carroll	11,879	783	2,252	3,145	3,145	3,145
TRD	536	Kasaan Bay	6,244	781	882	882	882	882
KRD	577	Quartz	146,675	0	0	0	0	0
		Total	**9,368,434**	**19,519**	**84,692**	**160,596**	**167,749**	**167,749**

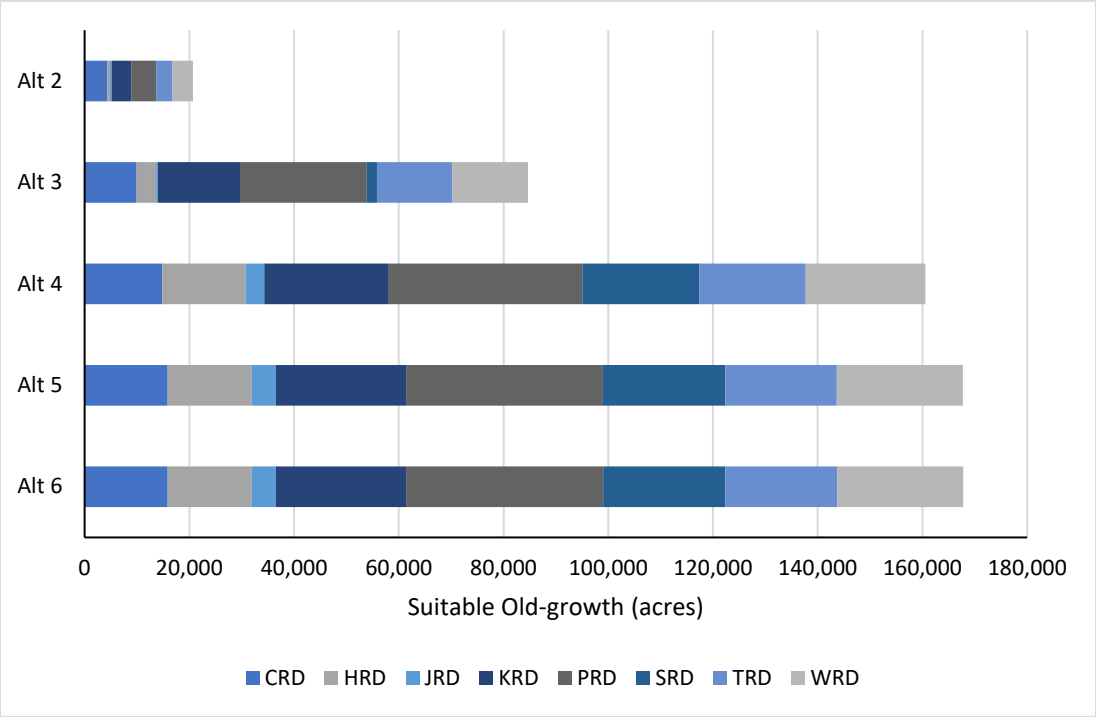
Notes:
IRA = Inventoried Roadless Area
[1] CRD = Craig Ranger District; HRD = Hoonah Ranger District; JRD = Juneau Ranger District; KRD = Ketchikan Misty Fjords Ranger District; PRD = Petersburg Ranger District; SRD = Sitka Ranger District; TRD = Thorne Bay Ranger District; WRD = Wrangell Ranger District; YRD = Yakutat Ranger District
[2] Note that IRA boundaries have been edited to match the shoreline and ownership changes.
[3] Increases in suitable old-growth acres would occur in areas removed from roadless area designation under all five action alternatives.

Table 3.1-6
Percentage Increase in Suitable Old Growth Acres on Each Ranger District by Alternative

Ranger District	Total IRA Acres	Percentage Increase in Suitable Old-Growth Acres[2]				
		Alt 2	Alt 3	Alt 4	Alt 5	Alt 6
Admiralty NM	15,800	0%	0%	0%	0%	0%
Craig	735,200	22%	12%	9%	9%	9%
Hoonah	416,000	3%	4%	10%	10%	10%
Juneau	2,537,100	2%	0%	2%	3%	3%
Ketchikan Misty Fjords	967,300	19%	19%	15%	15%	15%
Petersburg	1,364,700	24%	29%	23%	22%	22%
Sitka	1,133,300	-6%	2%	14%	14%	14%
Thorne Bay	364,800	16%	17%	13%	13%	13%
Wrangell	990,900	20%	17%	14%	14%	14%
Yakutat	843,200	0%	0%	0%	0%	0%
Total Acres[1]	**9,368,400**	**19,500**	**84,700**	**160,600**	**167,800**	**165,800**

Notes:
IRA = 2001 Inventoried Roadless Area; NM = National Monument
[1] Total IRA acres represent the total IRA acres for the Forest. Total acres presented by alternative are the estimated increase in suitable old-growth acres that would be available for harvest under each alternative.
[2] Percent of total increase identifies the share of the total Forest-wide increase in suitable old-growth acres by Ranger District.

Figure 3.1-2
Increase in Suitable Old-Growth Acres Available for Harvest by Ranger District and Alternative



Notes:
CRD – Craig Ranger District; HRD – Hoonah Ranger District; JRD – Juneau Ranger District; KRD – Ketchikan Misty Fjords Ranger District; PRD – Petersburg Ranger District; SRD – Sitka Ranger District; TRD – Thorne Bay Ranger District; WRD – Wrangell Ranger District.
[1] There are no suitable old-growth acres on the Admiralty National Monument, and the increase in suitable old-growth acres available for harvest on the Yakutat Ranger District is 63 acres or less under Alternatives 2 through 6.

Three ARA categories would be designated: LUD II (9 percent), Watershed Priority (35 percent), and Roadless Priority (55 percent) (Table 3.1-3). None of these categories would allow commercial timber harvest or associated road building. The Watershed Priority ARA is more restrictive than the 2001 Roadless Rule. Areas identified as Tongass 77 (T77) Watersheds or The Nature Conservancy (TNC)/Audubon Conservation Priority Areas in the 2016 Forest Plan (USDA Forest Service 2016a) would be designated as Watershed Priority ARAs. Forest-wide, the majority of the ARA acres would allow some forms of infrastructure development and mineral-related road construction, as is the case under Alternative 1, but they would be more explicitly allowed under Alternative 2. The impacts of these types of development are expected to be limited in terms of acreage covered, especially when viewed as a share of total protected acres.

Alternative 3

Under Alternative 3, there would be an overall reduction in roadless area acres, with an estimated total of 1.25 million acres removed from roadless designation, for a net loss of approximately 1.14 million acres due to roadless area additions. A total of 8.22 million acres would be managed as ARAs under this alternative (Table 3.1-3). Like Alternative 2, this alternative would remove “roaded roadless” areas. In addition, areas adjacent to existing road and harvest systems would be removed from roadless designation. These adjacent areas, considered “logical extensions” of the existing road and harvest systems within the same watersheds, would revert acres of previously unsuitable lands to suitable old-growth lands that would be available for harvest. Altogether, the removal of roaded roadless and logical extension acres from roadless designation, along with the gains and losses from ownership changes and updated mapping, would result in a net increase of about 85,000 acres of suitable old-growth lands that

would be available for harvest. The projected harvest on suitable acres is not expected to change because of Forest Plan limitations, but would be spread over a wider pool of lands. Harvest in the areas converted from roadless would reduce the roadless characteristics that are presently protected under Alternative 1.

Table 3.1-4 summarizes the estimated old-growth harvest over 100 years by Ranger District according to the various removal strata. Larger effects on roadless characteristics are generally expected to occur the farther out from existing roads that harvest occurs. Under Alternative 3, approximately 30,750 acres would be harvested in the existing roaded land base, 3,750 acres in the roaded roadless areas, and 8,050 acres in the logical extension areas.

Although most roadless areas would decrease in size, nine IRAs would increase more than 100 acres, with increases ranging up to 10,000 acres. Half of the suitable old-growth lands that would be made available for harvest under this alternative are located in eight IRAs. The largest increases (more than 4,000 acres each) would be in areas that are presently part of the Kogish (IRA 509), North Revilla (IRA 526), North Kupreanof (IRA 211), and Lindenberg (IRA 216) IRAs (Table 3.1-5). Most of the increase in suitable old-growth acres would be in the five ranger districts on the south part of the Forest (91 percent) with these five districts ranging from 12 percent (Craig) to 29 percent (Petersburg) of the total increase (Table 3.1-6).

Roadless designation would also be removed from the 843,000 LUD II acres that are currently within an IRA. This change in management accounts for a large share of the decrease in roadless area acres that would occur under this alternative. Alternative 3 proposes to remove all statutorily designated LUD II areas from the current overlapping administrative roadless classification system as a means of eliminating confusion over governing standards and ensuring management consistent with congressional instructions. As a result, LUD II areas under Alternative 3 would retain their congressional protections and would continue to be managed “in a roadless state to retain their wildland character” as directed by the Tongass Timber Reform Act or other statute (USDA Forest Service 2016b).

ARAs would be designated according to three ARA categories under this alternative. Roadless Priority ARA would receive 4.6 million roadless acres, Watershed Priority would receive 3.3 million roadless acres, and Community Priority would receive 0. 4 million acres. The Roadless Priority ARA is similar to the 2001 Roadless Rule, but less restrictive with respect to some forms of infrastructure development and mineral-related road construction. The Watershed Priority ARA is more restrictive than the 2001 Roadless Rule and the Community Priority, which covers lands around seven communities, is less restrictive. The impacts of developments within this latter designation are expected to be limited in acreage covered and affect a relatively small number of acres. In addition, Alternative 3 would provide long-term regulatory protection from old-growth harvest in all T77 Watersheds and TNC/Audubon Conservation Priority Areas outside of roadless under the Alaska Roadless Rule (507,000 acres). Although these would not be categorized as roadless areas, they would receive some degree of regulatory protection because the Alaska Roadless Rule would designate them as off-limits to old-growth harvesting (with a few exceptions) on a permanent basis.

Alternative 4

Under Alternative 4, there would be an overall reduction in roadless area acres, with an estimated total of 401,000 acres removed from roadless designation, 7,000 acres added, and a net loss of approximately 394,000 acres. A total of 9.0 million acres would be managed as ARAs under this alternative (Table 3.1-3). Altogether, the additions to and deletions from roadless would produce a net increase of about 161,000 acres of suitable old-growth lands that would be available for harvest. In addition, the Timber Priority ARA (see below) would result in the conversion of about 43,000 acres of previously unsuitable lands to suitable old-growth lands that would be available for harvest, resulting in an increase of 161,000 acres of suitable old growth. Additions to roadless designation under this alternative include the LUD II acres not previously designated as roadless in 2001.

Three ARA categories would be designated: LUD II Priority (10 percent), Roadless Priority (82 percent), and Timber Priority (8 percent) (Table 3.1-3). The LUD II Priority and Roadless Priority ARAs, which account for the majority of ARA acres (92 percent) under this alternative, do not allow commercial timber

harvest or associated road building. Forest-wide, most of the ARA acres would allow some forms of infrastructure development and mineral-related road construction, but the impacts of these types of development are expected to be limited in terms of acreage, especially when viewed as a share of total protected acres.

As noted above, the Timber Priority ARA (8 percent of ARA acres) would allow timber harvest and road construction, resulting in the conversion of about 43,000 acres of previously unsuitable lands to suitable old-growth lands that would be available for harvest. The ARA acres that would be managed as Timber Priority are allocated to Timber Development and Modified Landscape LUDs in the 2016 Forest Plan. The Timber Priority ARA often include areas farther from existing road systems, making them more expensive and less likely to be accessed for timber production under the current Forest Plan. If harvest were to occur in these areas, impacts to roadless characteristics would likely be more noticeable than in logical extension areas, which are, by definition, in watersheds where road development and harvest has occurred in the past.

Reductions in roadless areas (roaded roadless and logical extensions) and the allocation of ARA acres to Timber Priority management would result in the total conversion of 161,000 acres of previously unsuitable lands to suitable old growth. The projected harvest on suitable acres is not expected to change because of current Forest Plan limitations, but would be spread over a wider pool of lands. Harvest in the areas converted from roadless would reduce the roadless characteristics that are presently protected under Alternative 1. As a result, Alternative 4 would more likely result in more degradation of roadless area characteristics than Alternatives 1, 2, and 3, but less than under Alternatives 5 and 6.

Table 3.1-4 summarizes the estimated old-growth harvest over 100 years by Ranger District according to the various removal strata. Larger effects on roadless characteristics are generally expected to occur the further out from existing roads that harvest occurs. Under Alternative 4, approximately 24,600 acres would be harvested in the existing roaded land base, 3,750 acres in the roaded roadless areas, 8,050 acres in the logical extension areas, and approximately 6,050 acres in the areas more distant from roads.

Most roadless areas would decrease in size; none would increase. The largest gain in suitable old-growth acres would be in the North Revilla (IRA 526) IRA, followed by the North Kupreanof (IRA 211), Chichagof (IRA 311), Game Creek (IRA 323), and Kogish (IRA 509) IRAs (Table 3.1-5).

About 83 percent of the increase in suitable acres would be from the five south ranger districts (Craig, Ketchikan Misty Fjords, Petersburg, Thorne Bay, and Wrangell), with shares ranging from 9 percent (Craig) to 23 percent (Petersburg) of the total (Table 3.1-6).

Alternative 5

Under Alternative 5, there would be an overall reduction in roadless area acres, with an estimated net loss of approximately 2.3 million acres. A total of 7.0 million acres would be managed as ARAs under this alternative (Table 3.1-3). In addition to roaded roadless and logical extension areas, this alternative would remove all other Timber Production, Modified Landscape, and Scenic Viewshed LUDs identified in the 2016 Forest Plan from roadless designation, including T77 Watersheds and TNC/Audubon Conservation Priority Areas within those development LUDs. Areas with mineral potential as defined by the “minerals overlay” in the Tongass Forest Plan would also be removed.

As with Alternative 6, this alternative would result in the conversion of about 168,000 acres of previously unsuitable old growth to suitable old-growth that would be available for harvest. The projected harvest on suitable acres is not expected to change because of Forest Plan limitations, but would be spread over a wider pool of lands. Harvest in the areas converted from roadless would reduce the roadless characteristics that are presently protected under Alternative 1. As a result, Alternative 5 would more likely result in more degradation of roadless area characteristics than all alternatives except Alternative 6. Suitable old-growth acres would be distributed across the same IRAs and ranger districts as they would be under Alternative 6, as summarized below (see also Tables 3.1-5 and 3.1-6).

Alternative 5 is estimated to have slightly less harvest in the roaded land base compared with Alternative 4, about the same harvest in roaded roadless and logical extension areas, and more harvest in areas more distant from roads (about 800 more acres) than Alternative 4 (Table 3.1-4). Therefore, as noted

above, Alternative 5 is likely to have a greater effect on roadless characteristics compared with Alternative 4. Under Alternative 5, approximately 23,750 acres would be harvested in the existing roaded land base, 3,750 acres in the roaded roadless areas, 8,050 acres in the logical extension areas, and approximately 6,850 acres in the areas more distant from roads.

Two ARA categories would be designated: LUD II Priority (12 percent) and Roadless Priority (88 percent) (Table 3.1-3). The LUD II Priority and Roadless Priority categories do not allow commercial timber harvest or associated road building. Forest-wide, most of the ARA acres (88 percent) would allow some forms of infrastructure development and mineral-related road construction, but the impacts of these types of development are expected to be limited, especially when viewed as a share of total protected acres.

Alternative 6

Alternative 6 is the full exemption alternative, as requested in the State of Alaska's petition. Under this alternative, regulatory roadless designation would be removed from all designated roadless areas on the Tongass, resulting in a net reduction of 9.4 million acres of designated roadless areas (Table 3.1-3). Former roadless areas would be managed in accordance with the 2016 Forest Plan. Existing protections to roadless characteristics provided by Forest Plan non-development LUDs (including LUD II, Remote Recreation, Semi-remote Recreation, Old-growth Habitat, Special Interest Area, Wild River, Scenic River, and others) would remain in place.

Alternative 6 would have the same distribution of harvest acres among the distance strata as Alternative 5, because they both would remove roadless designations on all development LUDs. Therefore, Alternatives 5 and 6 would have the largest effect on roadless characteristics; although the effects would be only slightly greater than with Alternative 4 (800 more harvest acres in areas more distant from roads) (Table 3.1-4). Under Alternative 6, approximately 23,750 acres would be harvested in the existing roaded land base, 3,750 acres in the roaded roadless areas, 8,050 acres in the logical extension areas, and approximately 6,850 acres in the areas more distant from roads.

Viewed in terms of suitable acres, the removal of regulatory roadless area prohibitions would result in the conversion of about 168,000 acres of previously unsuitable old growth to suitable old growth that would be available for harvest. This is similar to the additional old-growth acres that would be suitable under Alternative 4 (161,000 acres). The projected harvest on suitable acres is not expected to change because of Forest Plan limitations, but would be spread over a wider pool of lands. Harvest in the areas converted from roadless would reduce the roadless characteristics that are presently protected under Alternative 1. As a result, Alternative 6 would more likely result in more degradation of roadless area characteristics than any of the other alternatives. Overall increases in suitable old-growth larger than 100 acres would occur within 63 IRAs, with increases ranging up to 15,025 acres. Gains of 5,000 acres or more in suitable old-growth would occur in 12 IRAs. The largest increase would be in in North Revilla (IRA 526), followed by North Kupreanof (IRA 211), Chichagof (IRA 311), Game Creek (IRA 323), and Kogish (IRA 509) IRAs (Table 3.1-5). Slightly less than three-quarters of the increase (73 percent) in suitable acres would be in the five south ranger districts (Craig, Ketchikan Misty Fjords, Petersburg, Thorne Bay, and Wrangell). Increases in suitable old-growth in these five districts would range from 9 percent (Craig) to 22 percent (Petersburg) of the total (Table 3.1-6).

Ecosystem Services

Under the 2016 Forest Plan, timber management activities are governed by a number of rules and regulations designed to protect or mitigate adverse impacts to natural resources that provide ecosystem services. This is discussed further in the 2008 Forest Plan EIS (USDA Forest Service 2008b, pp. 3-553 to 3-556). These rules and regulations would remain in place under all of the alternatives evaluated in this FEIS. The effects of the alternatives on these types of services are assessed in the sections of this FEIS that address fisheries, wildlife and subsistence use, and timber and vegetation, among others. Monetary values are not assigned to these services, but this does not lessen their importance in the decision-making process. Decision-makers will consider the economic values discussed in the *Key Issue 2* section within the context of the information presented elsewhere in this document, much of which cannot readily be translated into economic terms."

Cumulative Effects

Cumulative actions affecting the Roadless Rule have included modifications to the Roadless Rule as it applies to Idaho and Colorado. In addition to modifying the Roadless Rule, Colorado roadless lands were removed from having a roadless designation. In addition, Utah is seeking a state-specific modification to the Roadless Rule.

Table 3.1-7 summarizes the acres affected by modifications of the Roadless Rule, including past projects (Idaho and Colorado) and the alternatives being evaluated in this EIS for the Alaska Rule.

Under Alternative 1, 23 percent of the national roadless acres were modified as a result of the Idaho and Colorado Rule modifications; no modifications would result from the Tongass. The total acres of roadless areas nationally remains at almost 100 percent. Under Alternatives 2, 3, 4, and 5, the percent of national roadless acres modified would be 35 to 39 percent, while about 23 percent would be modified under Alternative 6. The total acres remaining in roadless areas nationally, under Alternatives 1, 2, 3, 4, and 5, would be 96 to almost 100 percent; however, this percentage would decrease to 84 percent under Alternative 6 due to the full elimination of roadless on the Tongass.

Table 3.1-7
Summary of Acres Affected Nationally by Modifications of the Roadless Rule along with the Acres Affected by the Proposed Alaska Rule Modifications by the Alternatives

	Modifications Proposed by Alaska Rule					
Category	**Alt. 1**	**Alt. 2**	**Alt. 3**	**Alt. 4**	**Alt. 5**	**Alt. 6**
Modifications by Idaho Rule	9,306,000	9,306,000	9,306,000	9,306,000	9,306,000	9,306,000
Modifications by Colorado Rule	4,186,000	4,186,000	4,186,000	4,186,000	4,186,000	4,186,000
Colorado Removals from Roadless (Net)	58,000	58,000	58,000	58,000	58,000	58,000
Proposed Alaska Rule Modifications	0	9,336,000	8,224,000	8,975,000	7,047,000	0
Proposed Alaska Removals from Roadless (Net)	0	32,000	1,144,000	394,000	2,321,000	9,368,000
Total Acres Modified	13,492,000	22,828,000	21,716,000	22,467,000	20,539,000	13,492,000
Total Acres Removed	58,000	90,000	1,202,000	452,000	2,379,000	9,426,000
Total Original Acres in Roadless Nationally[1]	58,292,000	58,292,000	58,292,000	58,292,000	58,292,000	58,292,000
Percent of Original National Acres Modified	23.1%	39.2%	37.3%	38.5%	35.2%	23.1%
Percent of Original National Acres Removed	0.1%	0.2%	2.1%	0.8%	4.1%	16.2%
Percent of Original National Acres Remaining in Roadless	99.9%	99.8%	97.9%	99.2%	95.9%	83.8%

Source: National Datasets and Tongass GIS

[1] These acres are adjusted for administrative corrections to account for ownership changes, boundary alignment corrections (shorelines in Alaska), clerical errors, mapping errors, and changes in mapping technologies for Colorado and Alaska. Original acres were 58,453,000 and these adjustments amounted to a net of 161,000 acres.

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Key Issue 2 – Support Local and Regional Socioeconomic Well-being, Alaska Native Culture, Rural Subsistence Activities, and Economic Opportunity Across Multiple Economic Sectors

Affected Environment

The Tongass National Forest stretches roughly 500 miles northwest from Ketchikan to Yakutat and includes approximately 80 percent of the land area in Southeast Alaska. The region is sparsely settled with an estimated 72,915 people living in more than 30 towns and villages located in and around the Forest in 2017, most of which are located on islands or along the narrow coastal strip (Alaska Department of Labor [DOL] 2018). The communities of Southeast Alaska depend on the Tongass National Forest in various ways, including employment in the wood products, commercial fishing and fish processing, recreation, visitor, and mining and mineral development sectors. Many residents depend heavily on subsistence hunting and fishing to meet their basic needs. In addition, natural amenities and recreation activities associated with the Tongass National Forest form an important part of the quality of life for many residents of Southeast Alaska. Since there is very little private land in the region to provide these resources and opportunities, appropriate management of the Tongass National Forest is important to communities and the overall regional economy.

The Tongass National Forest is also an important national and international resource. An estimated 1.2 million people visited Southeast Alaska in 2016, with most of these visitors (86 percent) arriving by cruise ship (McDowell Group 2017). For many, a visit to the Tongass is an once-in-a-lifetime experience and spending by these visitors helps drive the recreation and tourism sector. The Tongass National Forest contains large areas of essentially undisturbed forest lands, which represent increasingly scarce and, therefore, increasingly valuable ecosystems. These lands have value for many people who may never visit Southeast Alaska, but benefit from knowing that the Tongass National Forest is there. This type of value, often referred to as non-use value, includes existence, option, and bequest values. These values represent the value that individuals obtain from knowing that the Forest exists, knowing that it would be available to visit in the future should they choose to do so, and knowing that it will be left for future generations to inherit.

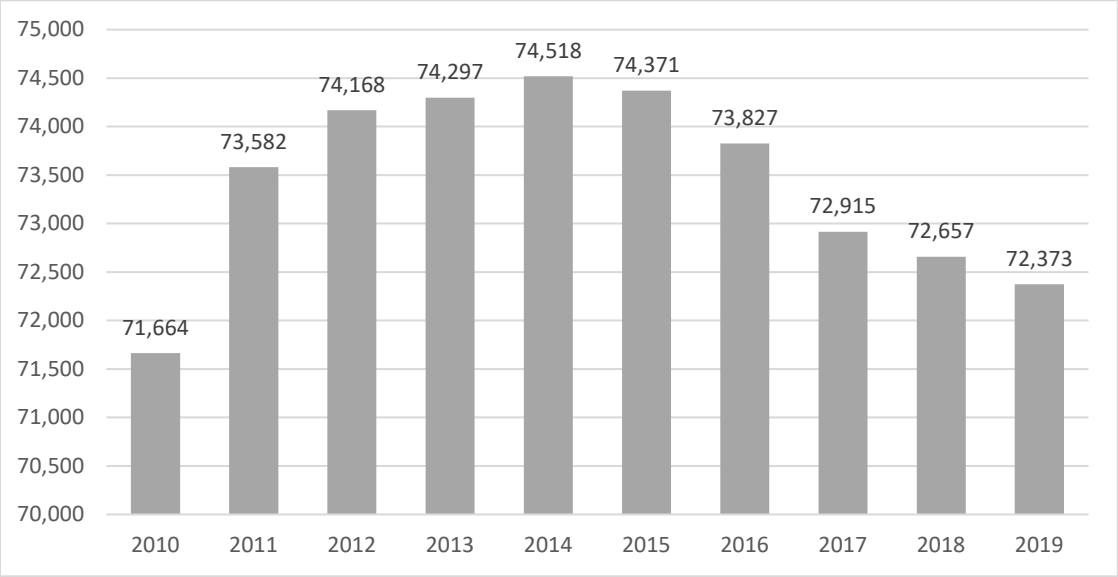
Regional Demographic Overview

Southeast Alaska is divided into eight boroughs and two census areas (CAs). The eight boroughs – Haines, Juneau, Ketchikan Gateway, Petersburg, Sitka, Skagway, Wrangell, and Yakutat – correspond with the county governments found elsewhere in the United States. The remaining areas that are not part of a borough are allocated to two CAs: the Hoonah-Angoon CA and Prince of Wales-Hyder CA. CAs are statistical units that are widely recognized from a data reporting standpoint by federal agencies and most state agencies as county equivalents. Boroughs and CAs are collectively referred to as “boroughs” in the remainder of this section.

Total regional population in Southeast Alaska peaked in 2014 and has since decreased five years in a row, by a combined total of 2,145 people (Figure 3.2-1). Population losses have been most dramatic in Juneau, with recent cuts in state sector employment contributing to a net reduction of 900 residents in 2016 and 2017. Much of these losses appear to be the result of young families moving away, with Juneau losing more than 300 children and 400 age 30 to 40 demographic. These reductions have been matched by a further decrease in K-12 enrollment in Southeast Alaska. Since 1997, annual enrollment has decreased by more than 3,500 students, a 24 percent decline (Southeast Conference 2019). This loss of young families has exacerbated the most pronounced regional demographic shift since 2010: the aging of

the population, with the 60-plus population increasing by more than 40 percent over this period due to aging in place (Southeast Conference 2019).

Figure 3.2-1
Total Population in Southeast Alaska, 2010 to 2019

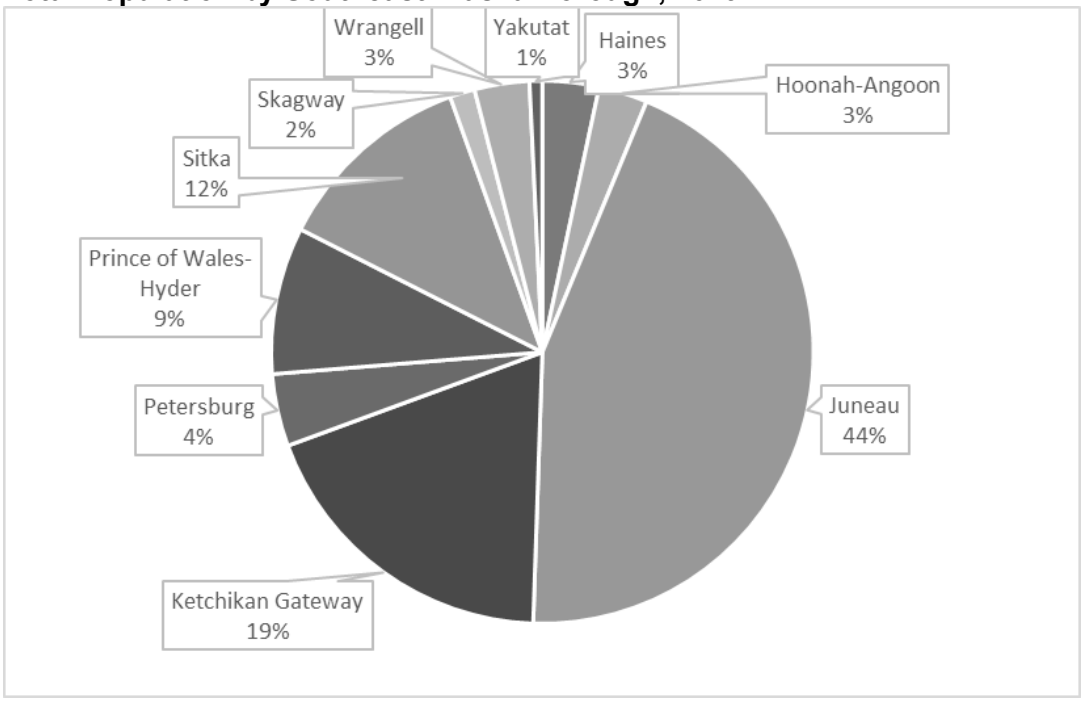


Note:
[1] Data for 2010 are from the 2010 Census (April). Data for 2011 to 2019 are annual estimates.
Source: Alaska DOL 2019

The three largest communities – Juneau, Ketchikan, and Sitka – together accounted for 75 percent of total regional population in 2019 (Figure 3.2-2). Juneau, which is the state capital and a regional trade center, accounted for 44 percent of Southeast Alaska's total population in 2019 (Figure 3.2-2). Ketchikan Gateway Borough, the second largest borough in Southeast Alaska, accounted for about 19 percent of the region's population. Ketchikan is a smaller regional trade center that serves Prince of Wales Island and the surrounding area.

Population is discussed in more detail in the *Subregional Overview and Communities* section of the 2016 Forest Plan Amendment EIS (USDA Forest Service 2016b, pp. 3-525 to 3-535).

Figure 3.2-2
Total Population by Southeast Alaska Borough, 2019



Notes:
Total = 72,373 residents
Boroughs and CAs are collectively referred to as "boroughs" in this figure. Hoonah-Angoon and Prince of Wales-Hyder are CAs.
Source: Alaska DOL 2019

The remote nature of the region is reflected in a population density of approximately two persons per square mile, which is much lower than the United States' average of 92 persons per square mile. Many locations are accessible only by boat or plane, and landing strips or seaplane facilities are located in virtually all communities. The Alaska State ferry system transports people and vehicles between several ports in Southeast Alaska, and Prince Rupert, British Columbia, and Bellingham, Washington. Haines and Skagway, at the northern end of the Forest, and Hyder at the southern end, offer access to interior and Southcentral Alaska via the Alaska Highway, and Canada via the Cassiar Highway.

Regional Economic Overview

The following section is based on the latest data available. These data were compiled prior to the coronavirus pandemic, which is ongoing at the time of writing. The coronavirus is expected to have significant economic impacts throughout the region that are not captured in the following sections. A preliminary analysis of virus-related economic impacts prepared and just released by the Alaska DOL (2020) found that Southeast Alaska will experience significant impacts from the likely cancellation of the 2020 summer cruise ship season. Businesses throughout the region would normally have started hiring in March and April in preparation of the upcoming season. Based on a preliminary analysis of businesses directly tied to summer tourism, they estimate that there will be about 18,000 fewer jobs statewide during the July peak, if there is little or no tourism. The seafood processing sector in April and May is also expected to be impacted because of reduced worker supply (approximately 74 percent of workers in this sector are nonresident), with secondary concerns related to reductions in market demand, and implications for commercial fishermen if seafood processors are unable to operate (Alaska DOL 2020).

Southeast Alaska employment in 2018 is summarized by sector in Table 3.2-1. Government and the visitor sector were the largest employers' accounting for 29 percent and 18 percent of total employment, respectively. The government sector is the main source of year-round employment in all the communities

in Southeast Alaska. In addition to direct employment in government, many of the area's private sector jobs are also dependent on government funding and contracts. Private sector activities dependent on government funding include road construction and health care services.

State government employment has decreased significantly since 2012, with a loss of 850 state jobs in Southeast Alaska from 2012 through July 2018. Three-quarters of these losses occurred in Juneau. These losses have accompanied declining oil production and prices, with state revenues falling by 70 percent from Fiscal Year 2013 to Fiscal Year 2018, and the state budget decreasing by 40 percent. Federal government employment has also declined in Southeast Alaska over the past decade, with the loss of 600 jobs since 2005 (Southeast Conference 2018).

Table 3.2-1
Southeast Alaska Employment by Sector, 2018

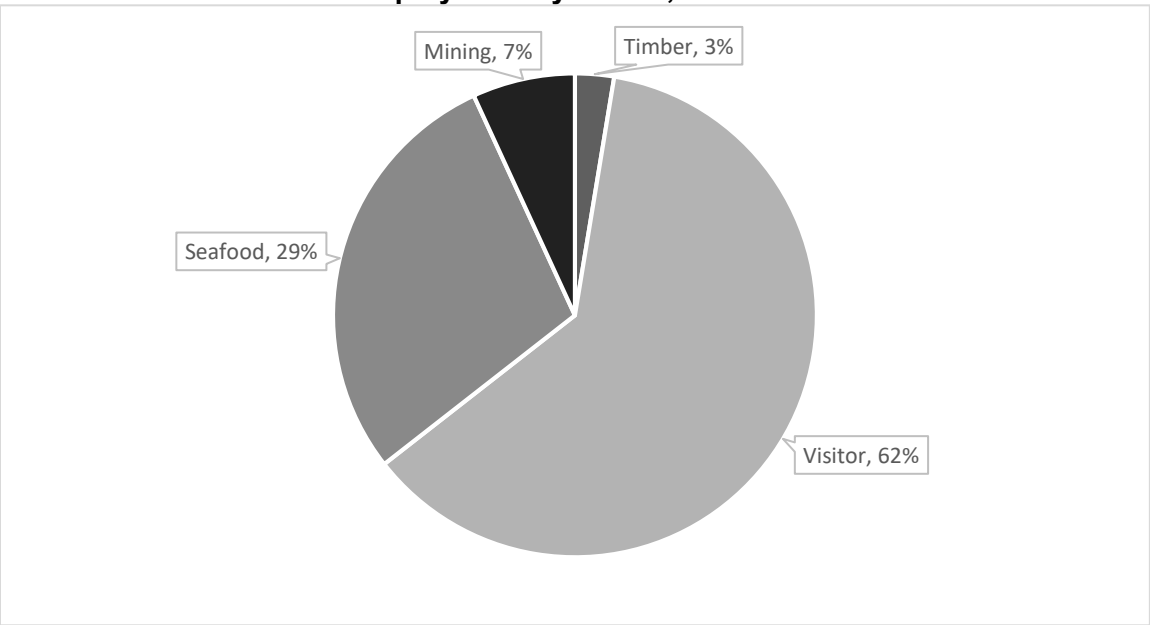
Economic Sector[1]	Total Employment (Jobs)	Total Earnings ($M)[2]	Percent of Total	
			Employment	Earnings
Government (includes Coast Guard)	13,148	776.9	29%	34%
Visitor	8,004	249.3	18%	11%
Seafood	3,711	237.4	8%	10%
Retail and Wholesale Trade	4,490	145.1	10%	6%
Health Care (private only)	2,852	168.6	6%	7%
Construction	1,909	121.6	4%	5%
Financial	1,830	122.2	4%	5%
Professional and Business Services	2,910	123.0	6%	5%
Social Services	1,476	46.4	3%	2%
Mining	889	93.0	2%	4%
Information[3]	541	23.5	1%	1%
Timber	337	18.8	1%	1%
Warehousing, Utilities, Transportation[4]	943	61.8	2%	3%
Other	2,602	94.5	6%	4%
Total	**45,642**	**2,282.0**	**100%**	**100%**

Notes:
[1] These data were compiled on behalf of Southeast Conference based on data collected by the Alaska DOL and the U.S. Census Bureau. The Alaska DOL data are for 2018 for non-agricultural wage and salary employment. These data do not include proprietors or self-employed workers, and are, therefore, supplemented using data from the 2017 US Census Nonemployer Statistics, which specifically count proprietors and the self-employed.
[2] Total earnings are expressed in millions of dollars.
[3] The Information sector, as defined here, includes publishing, broadcasting, and telecommunications.
[4] Includes non-visitor-related transportation only. Visitor-related transportation is included in the visitor sector.
Source: Southeast Conference 2019

Natural Resource-Based Industries

Direct employment in natural resource-based industries – timber, visitor, seafood, and mining – together accounted for an estimated 12,941 jobs in 2018, more than one-quarter (28 percent) of total employment in Southeast Alaska (Table 3.2-1). The estimated distribution of resource-dependent employment is shown by industry in Figure 3.2-3. The visitor industry accounted for more than half (62 percent) of this total, followed by the seafood sector, which accounted for almost one-third (29 percent). Mining accounted for 7 percent and wood products made up 3 percent (Figure 3.2-3).

Figure 3.2-3
Natural Resource-Based Employment by Sector, 2018



Notes:
Total = 12,941 Employees
Source: Southeast Conference 2019

Nonresident and Seasonal Employment

Nonresident and seasonal employment are two important and related aspects of resource-dependent employment in Southeast Alaska. Many nonresidents work a relatively short time in Alaska, often for just two or three months, generally spend the bulk of their earnings elsewhere, and, as a result, contribute less to the regional economy than resident workers.

Nonresidents accounted for more than one-quarter (27 percent) of total estimated employment in Southeast Alaska in 2018 (Krieger et al. 2020). Viewed by borough, the estimated nonresident share of total employment ranged from about 17 percent in Wrangell to 71 percent in Skagway. Seafood processing had the highest percentage of nonresident workers, with 67 percent of the labor force composed of nonresidents. The Arts, Entertainment, and Recreation sector and the Accommodation and Food Services sector in Southeast Alaska also had relatively high nonresident shares, 54 percent and 55 percent, respectively, as did the Mining sector (51 percent) (Krieger et al. 2020).

Southeast Alaska's economy is highly seasonal. This is particularly the case with the salmon-harvesting and seafood-processing sectors. Seasonal variation in the leisure and hospitality sector (used here as a proxy for the visitor industry) is substantially lower than the salmon harvesting and seafood processing sectors, but more than twice the Southeast Alaska average. Annual seasonal variation for mining and logging are lower than the Southeast Alaska average. Nonresident and seasonal employment are discussed in more detail in the 2016 Forest Plan Amendment EIS (USDA Forest Service 2016b, pp. 3-482 to 3-484).

Subsistence Economy

Subsistence use of fish, wildlife, and other natural resources is an important component of the economies of Southeast Alaska communities. Cash income in most Southeast Alaska rural communities is limited and intermittent, and subsistence harvests have been found to fill essential food needs in all rural communities in the region. These harvests are also customarily shared among community residents and between members of different communities. Although some subsistence products are traded and bartered, subsistence harvest is not geared toward market sale or commercial profit. A mixed

subsistence-market economy in which subsistence harvests and cash income are complementary characterizes the economies of most of the region's rural communities and provides the economic basis for a way of life that is highly valued in these communities (Wolfe 2004; Wolfe and Walker 1987). Elements of the subsistence economy are discussed in more detail in the separate *Subsistence* section in this document, see below.

Industry-Specific Descriptions

Forest Products

Employment

Southeast Alaska timber is primarily purchased and harvested from Tongass National Forest lands managed by the USDA Forest Service, from the State of Alaska (Division of Forestry, Alaska Mental Health Trust Land Authority, and University of Alaska Trust Land Office), and Alaska Native Village and Regional corporations (Alaska Native corporations). Sawmill employment has historically been supported by Forest Service timber sales, with state timber harvest also contributing. Logging employment is generated from all ownerships, including Alaska Native corporation lands.

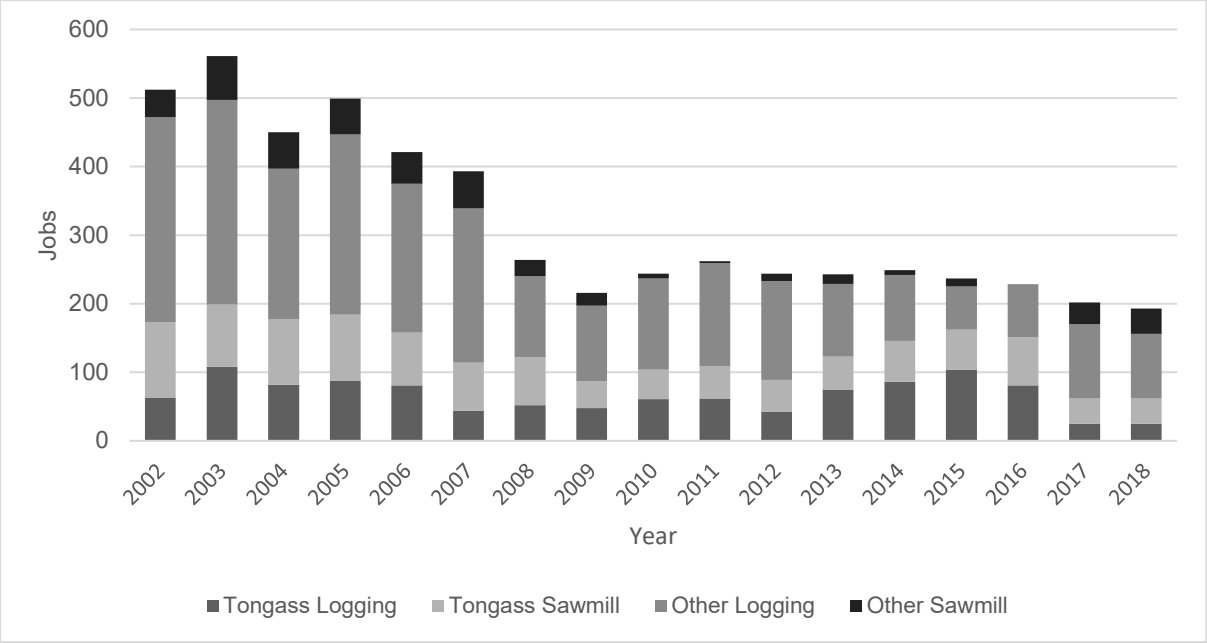
Timber industry employment in Southeast Alaska peaked at the end of the 1980s, before decreasing sharply in the 1990s. Much of this job loss was associated with closure of the large pulp mills in Sitka (1993) and Ketchikan (1997). Timber employment has continued to decline since the 1990s, falling from a recent high of 561 jobs in 2003 to 193 jobs in 2018 (Table 3.2-2; Figure 3.2-4). Tongass National Forest-related employment in logging and sawmilling declined from 199 jobs in 2003 to a low of 62 jobs in 2017 and 2018. Non-Tongass timber employment also declined over this period, falling from a high of 362 jobs in 2003 to 131 jobs in 2018, a decrease of 64 percent (Table 3.2-2). From 2002 to 2018 harvest activities on the Tongass supported about 41 percent of timber jobs in Southeast Alaska, on average. Harvest activities supporting employment have included pre-commercial thinning, generally defined as a silvicultural treatment to reduce stand density, to improve understory habitat (deer), improve the growth characteristics of trees, shorten rotation times, and improve forest health.

Table 3.2-2
Timber Industry Employment in Southeast Alaska, 2002-2017

Year[1]	Tongass Logging	Tongass Sawmill	Total Tongass-Related Employment	Other Logging	Other Sawmill	Total Other Timber Employment	Total Timber Industry Employment
2002	63	110	173	299	40	339	512
2003	108	91	199	298	64	362	561
2004	82	95	177	220	53	273	450
2005	88	96	184	263	52	315	499
2006	81	77	158	217	46	263	421
2007	44	70	114	225	54	279	393
2008	52	70	122	118	24	142	264
2009	48	39	87	110	19	129	216
2010	61	43	104	133	7	140	244
2011	62	47	109	150	3	153	262
2012	42	47	89	144	11	155	244
2013	75	48	123	106	14	120	243
2014	86	60	146	96	7	104	249
2015	104	58	162	63	12	75	237
2016	81	70	151	76	1	77	228
2017	25	37	62	108	32	141	202
2018	25	37	62	94	37	131	193

Note:
[1] Data are presented by calendar year. Source: USDA Forest Service 2018a, 2020

Figure 3.2-4
Timber Industry Employment in Southeast Alaska, 2002-2018



Source: USDA Forest Service 2018a, 2020

Harvest

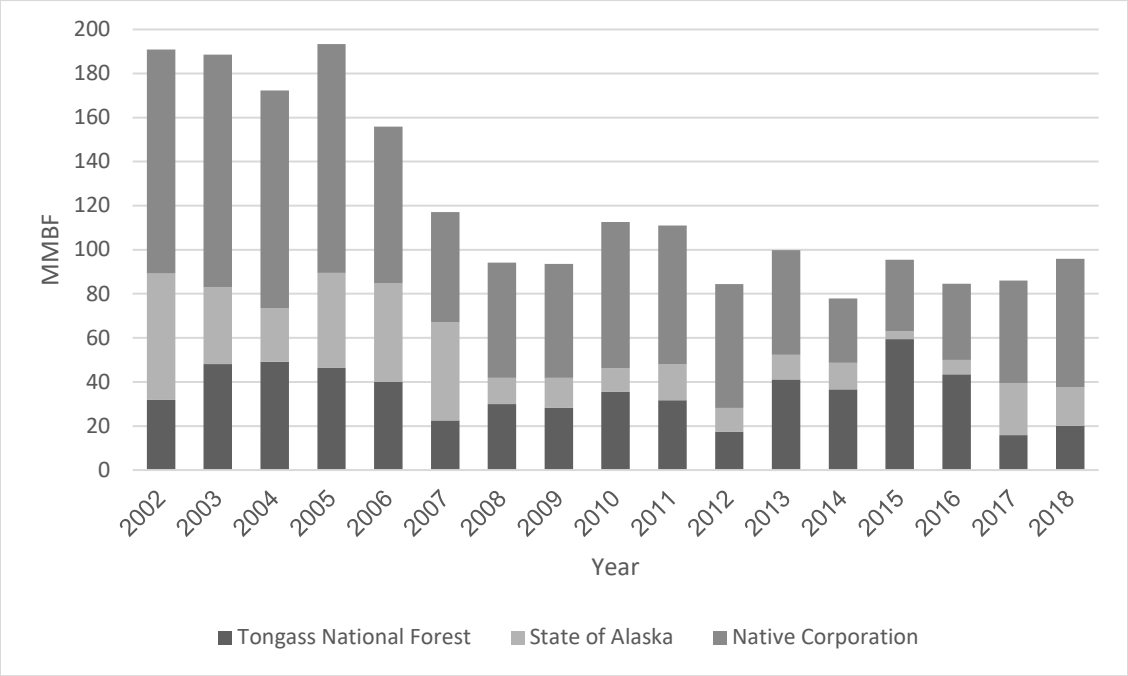
Timber harvest in Southeast Alaska also peaked in the late 1980s, with harvest levels slightly below 1 billion board feet. Total harvest in 2018 was 96.0 MMBF, about 10 percent of peak levels. Harvest on the Tongass accounted for about 21 percent (20.0 MMBF) of this total, with almost two-thirds (61 percent, 58.4 MMBF) of the overall total provided by Alaska Native corporation lands and 18 percent (17.6 MMBF) provided by the State of Alaska (Table 3.2-3; Figure 3.2-5).

Table 3.2-3
Timber Harvest in Southeast Alaska by Ownership, 2002–2018

Year[1]	Tongass National Forest	State of Alaska[2]	Alaska Native Corporation	Total
2002	31.9	57.3	101.7	190.9
2003	48.1	34.8	105.7	188.6
2004	49.2	24.2	98.9	172.3
2005[3]	46.6	42.9	103.9	193.4
2006[3]	40.0	44.6	71.2	155.8
2007[3 4]	22.5	44.6	50.0	117.1
2008	30.0	11.9	52.3	94.2
2009	28.3	13.5	51.8	93.6
2010	35.7	10.5	66.4	112.6
2011	31.6	16.3	63.1	111.0
2012	17.5	10.8	56.1	84.4
2013	41.2	11.2	47.4	99.8
2014	36.7	12.0	29.3	78.0
2015	59.5	6.2	32.4	98.1
2016	43.5	27.5	34.6	105.6
2017	16.0	11.9	46.4	74.2
2018	20.0	17.6	58.4	96.0

Notes:
[1] Timber harvest volume is reported by calendar year in million board feet (MMBF), and includes both sawlog and utility logs. Sawlogs are logs that come from that portion of the tree that is of suitable size and quality to be cut into dimension lumber. Utility logs are logs that cannot be used to produce lumber but are suitable for chips. Note that timber sold in a year is not necessarily harvested in the same year and sales may be harvested over several years.
[2] State of Alaska includes Division of Forestry, Mental Health Trust, and University of Alaska Trust Lands.
[3] The relative increase in State harvest was an effort to provide additional timber to make up for a shortfall in supply from the Tongass.
[4] The relative decrease in Tongass harvest in 2007 was the result of an injunction that stopped Tongass logging over most of the operating season.
Source: USDA Forest Service 2018a, 2020

Figure 3.2-5
Timber Harvest in Southeast Alaska by Ownership, 2002-2018



Source: USDA Forest Service 2018a, 2020

2016 Forest Plan and the Tongass Timber Program

Annual Market Demand

The Tongass National Forest, in compliance with the Tongass Timber Reform Act (1990), seeks to provide an annual (and planning cycle) supply of timber to meet market demand to the extent consistent with providing for multiple use and sustained use of all renewable forest resources and other applicable laws. The formulas and procedures used to forecast annual market demand are described in a Forest Service report titled *Responding to the Market Demand for Tongass Timber: Using Adaptive Management to Implement Section 101 of the 1990 Tongass Timber Reform Act* (Morse 2000). These procedures, known as the "Morse Methodology," are based on the following premises:

- Forest product markets are volatile, especially in the short-term.
- Timber purchasers in Southeast Alaska have few alternative suppliers of timber if they cannot obtain it from the Tongass National Forest. The only adverse economic effects of oversupplying the market are Forest Service expenses to prepare timber sales with no bidders; undersupplying it can have much greater negative consequences.
- It takes years to prepare NFS timber for sale, including completion of EISs.
- It is difficult to estimate demand for timber from the Tongass National Forest, even a year or two in advance.
- Industry must be able to respond to rapidly changing market conditions in order to remain competitive.

Following the 2016 Forest Plan Amendment EIS, the derived demand projections from Daniels et al. (2016) were incorporated into the Morse Methodology and used to develop subsequent annual estimates of the Tongass National Forest timber sale offerings required to meet market demand (Grewe 2017). The resulting estimates for Fiscal Years 2017, 2018, and 2019 were 53 MMBF, 58 MMBF, and 52 MMBF, respectively (USDA Forest Service 2017a, 2018b, 2019a). These estimates are not intended to represent actual timber purchases. Rather, these annual estimates reflect the estimated volume of timber the Forest Service needs to offer to replace the volume expected to be harvested and to help build a 3-year supply

of timber under contract. This 3-year supply allows the industry to respond to market fluctuations. In practice, the actual amount of timber that is offered and sold may be substantially less than the predicted timber purchases in the annual demand calculations. This is because the actual volume of timber offered in any year reflects a combination of factors, including final budget appropriations, completing the NEPA process, and volume affected by litigation. The planned annual timber volume could include a combination of new, previously offered, and reconfigured timber sales. Both old-growth and young-growth green timber and salvage sales are components of this program.

Timber Supply

The Tongass National Forest uses a five-year timber sale schedule for planning and scheduling purposes that is consistent with Forest Service Manual 2430. This five-year plan is based on completed and ongoing environmental analyses and can be adjusted in response to changing market conditions and the NEPA public involvement process on projects. Volumes for future timber sales are estimates that may be adjusted over time. The Tongass National Forest posts the five-year schedule on the public website at: www.fs.usda.gov/tongass/.

For Fiscal Year 2017, the annual demand goal for volume of timber to be offered from the Tongass National Forest was 53 MMBF (USDA Forest Service 2017a). A total of 30.7 MMBF was sold on the Tongass in Fiscal Year 2017, with the Good Neighbor Authority (GNA) Kosciusko Young Growth sale purchased by Alcan Forest Products accounting for 30 MMBF (98 percent) of the total (USDA Forest Service 2017b). The GNA Kosciusko Young Growth sale was the first timber sale awarded under a GNA agreement between the State of Alaska and USDA Forest Service. Under this agreement, the State Division of Forestry and its partners and contractors were authorized to prepare, award, harvest, and administer the sale. The sale area consisted of 1,500 acres of young-growth timber stands composed of approximately 75 percent Sitka spruce and 25 percent western hemlock, with stands to be harvested using a variety of methods (USDA Forest Service 2017c). The remaining volume sold in Fiscal Year 2017 consisted of 9 microsales and two other small sales, which together included less than 1 MMBF of old growth in volume (USDA Forest Service 2017b).

For Fiscal Year 2018, the annual demand goal for volume of timber to be offered from the Tongass National Forest was 58 MMBF (USDA Forest Service 2018b). This was not matched by the proposed sales identified for 2018 in the five-year timber sale plan for 2018, which estimated that a total volume of 32.4 MMBF would be made available for sale (USDA Forest Service 2018c). A total of 9.0 MMBF was sold on the Tongass in Fiscal Year 2018, with the Rough Luck sale purchased by Viking Lumber accounting for 7.6 MMBF (84 percent) of the total. The remaining 15 sales purchased that year consisted together of about 1.4 MMBF (USDA Forest Service 2018d). The FY 2018 sales consisted entirely of old growth.

The Final EIS for the Prince of Wales Landscape Level Analysis Project noted that there has been a lack of economic timber volume available for the Forest Service to offer across the Tongass National Forest (USDA Forest Service 2018e). Under the Further Consolidated Appropriations Act, 2020, timber sales that do not appraise positive using the current Region 10 RV (Residual Value) appraisal cannot be offered (USDA Forest Service 2018e).

Three other sales that were offered in Fiscal Year 2018 did not receive any bids. Combined these sales consisted of an estimated 23.6 MMBF that went unpurchased. The three sales were North Kuiu 2 (13.4 MMBF), Wrangell Island (7.4 MMBF), and GNA Vallenar Young-Growth (2.8 MMBF).

North Kuiu 2 was the largest of the no-bid sales offered in 2018. A timber sale on Kuiu Island was originally authorized by the Forest Supervisor in 2008 and consisted of an estimated 31 MMBF from 1,200 acres of old-growth forest. A version of the sale was first offered in September 2016. This sale consisted of approximately 30 MMBF from 866 acres and did not receive any bids at that time. Following the decision for the 2016 Forest Plan Amendment, the proposed sale area was reduced, and the sale was reoffered in 2018, this time consisting of 13.4 MMBF from 523 acres (Gullufsen 2018). No bids were received in 2018.

The Wrangell Island timber sale consisted of 7.4 MMBF of old-growth timber intended to provide a supply of “bridge” timber that would support local jobs and facilitate the young-growth transition. The project area consisted of approximately 428 acres on Wrangell Island (USDA Forest Service 2017d).

The Vallenar Young-growth Project, which consisted of approximately 2.8 MMBF of young-growth on Gravina Island near the Ketchikan airport, was subsequently sold in 2019 along with 13.2 MMBF of state-owned old-growth. Approximately 2.9 MMBF of old-growth timber was also sold in FY 2019.

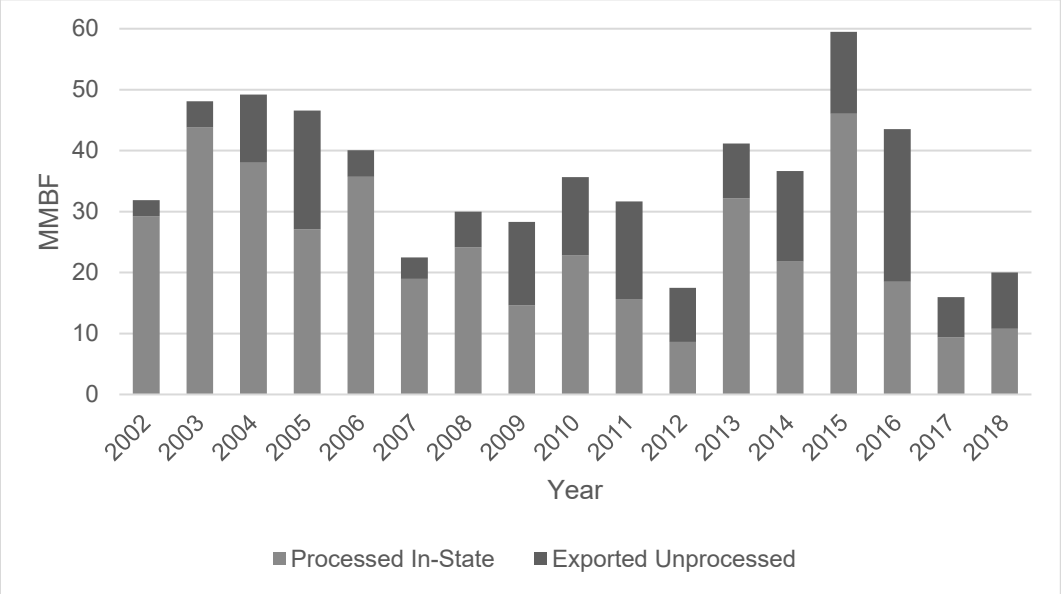
For Fiscal Year 2019, the annual demand goal for volume of timber to be offered from the Tongass National Forest was 52 MMBF (USDA Forest Service 2019a). The five-year timber sale plan for 2019 estimated that a total volume of 56.5 MMBF would be made available for sale, with most of this volume (50 MMBF, 88 percent of the total) to be provided by the Prince of Wales Landscape Level Analysis Project (USDA Forest Service 2019b). A total of 5.3 MMBF was sold on the Tongass in Fiscal Year 2019. No volume was offered from the Prince of Wales Landscape Level Analysis (USDA Forest Service 2019c), which is currently under court-imposed injunction preventing harvest.

R10 Limited Export Shipment Policy

Initially established in 2007, the Limited Export Policy is intended to boost appraised timber values and provide economic sale opportunities and additional processing options for purchasers. The policy has continued since 2007 with modifications designed to provide additional opportunities. The limited export policy is reviewed on an annual basis. The Regional Forester noted in a 2015 review that, while improvements had occurred nationally over the preceding three years, challenges continued for purchasers seeking domestic markets for Alaska timber. The current policy allows the limited export of unprocessed western hemlock and Sitka spruce logs up to 50 percent of the total sale sawtimber volume upon Regional Office approval. In 2012, the Regional Forester agreed to begin reviewing requests to allow increased export of these species on a case-by-case basis, in exchange for purchasers providing an equivalent amount of Alaska yellow-cedar to small business operators who would process the timber locally. The Limited Export Policy is discussed in detail in Appendix H to the 2016 Forest Plan Amendment EIS (USDA Forest Service 2016b).

The share of total harvest on the Tongass exported as logs has varied over time, as shown in Figure 3.2-6. The export amount includes both international exports as well as domestic exports to the lower 48. With the exception of 2016, the majority of timber harvested from the Tongass has remained in-state for processing. In 2018, 9.2 MMBF (46 percent) of the total harvested (20.0 MMBF) was exported, with the majority (95 percent) exported to the Pacific Rim, rather than the lower 48 (USDA Forest Service 2018g).

Figure 3.2-6
Timber Harvest Exports from the Tongass National Forest, 2002-2018



Note: These data represent actual volume cut and processed by year, not volumes sold for the same year.
Source: USDA Forest Service 2019d

Timber Industry

Annual Mill Survey

The wood products industry in Southeast Alaska in its current form consists of individual- and family-owned sawmills and independent logging businesses. The Forest Service has conducted an annual on-site survey of sawmills in the region since 2000. To maintain consistency, the survey includes only those mills assessed in previous survey years. The original list of mills to be surveyed, initially identified in 2000, consisted of 20 sawmills that regularly operated and met established criteria for medium- to large-size classification. This total was subsequently increased to 22 in 2007. The annual survey for 2018 found that seven of these sawmills (32 percent) were still active; two (9 percent) remained installed with significant equipment on site, but were idle during 2018; and the remaining 13 (59 percent) were no longer in production, either decommissioned or uninstalled (Parrent et al. 2019). The seven active and two idle mills included in the survey are identified in Table 3.2-4, from largest to smallest capacity within the two groups.

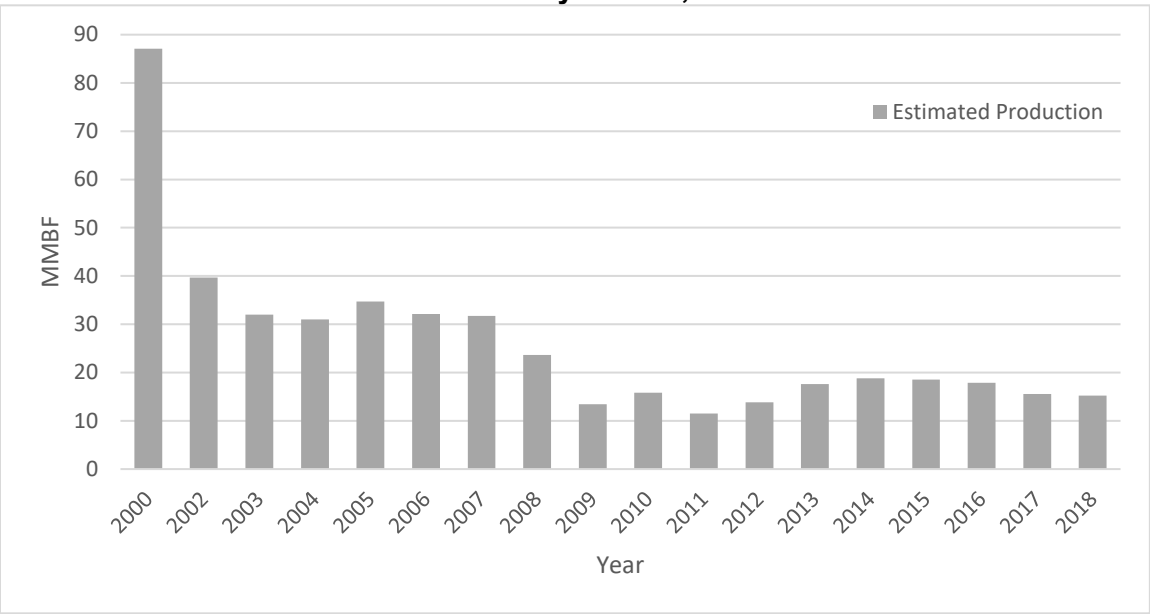
Estimated total production for the mills included in the annual mill survey fell by more than 50 percent from 2000 to 2002, decreasing from 87.1 MMBF to 39.7 MMBF. Production has varied from year-to-year since then, but has generally trended downward (Figure 3.2-7). Total estimated production from the remaining active saw mills was 15.3 MMBF in 2018, approximately 14 percent of total active and idle capacity (Table 3.2-3). The capacity utilization rate of the last operating *medium-sized* sawmill in Southeast Alaska (Viking Lumber) in 2018 was estimated at about 18 percent (Table 3.2-4). By comparison, sawmills in Idaho, Oregon, California, and Montana generally utilize more than 80 percent of their capacity, unless there is a severe economic downturn (USDA Forest Service 2011a).

Table 3.2-4
Forest Service Mill Survey: Estimated Mill Capacity, Production, and Utilization, 2018

Mill Name[1]	Location	Estimated Capacity (MBF)[2]	Estimated Production (MBF)[3]	Percent Utilization
Viking Lumber Co.	Craig	80,000	14,000	18%
Western Gold Cedar Products	Thorne Bay	6,500	700	11%
The Mill	Petersburg	6,000	2.5	<1%
Icy Straits Lumber & Milling Co.[4]	Hoonah	3,000	500	17%
Falls Creek Forest Products[5]	Petersburg	3,000	15	1%
D&L Woodworks	Hoonah	1,000	1.5	<1%
Thuja Plicata Lumber	Thorne Bay	1,000	31	3%
Total Active	**Southeast Alaska**	**100,500**	**15,250**	**15%**
Thorne Bay Wood Products	Thorne Bay	6,250	NA	NA
St. Nick Forest Products[6]	Craig	1,150	NA	NA
Total Idle	**Southeast Alaska**	**7,400**	**NA**	**NA**
Overall Total[7]	**Southeast Alaska**	**107,900**	**15,250**	**14%**

Notes:
MBF = thousand board feet; NA = not applicable
[1] Data are presented for those mills included in the Forest Service's annual on-site survey only.
[2] Estimated mill capacity is an estimate of the processing capability of the mill based on the amount of net sawlog volume (Scribner log scale) that could be utilized by the mill as currently configured, during a standard 250-day per year, two shifts per day, annual operating schedule, not limited by availability of employment, raw materials or market.
[3] Estimated Mill Production is the estimated net sawlog volume used during the year to manufacture sawn products.
[4] Estimated capacity for the Icy Straits mill was reduced from 21 MMBF as a result of a major mill fire in July 2010. Mill production occurred prior to the fire.
[5] Formerly Southeast Alaska Wood Products.
[6] Formerly W.R. Jones & Son Lumber Co.
[7] Totals may not sum due to rounding.
Source: Parrent et al. 2019

Figure 3.2-7
Estimated Sawmill Production for Surveyed Mills, 2000 to 2018



Note: The annual survey was not conducted during 2001.
Source: Parrent et al. 2019

The Tongass National Forest supplied about 7.7 MMBF or 50 percent of the total volume (15.3 MMBF) processed by the mills identified in Table 3.2-4 in 2018, with State lands responsible for most of the remaining volume (Parrent et al. 2019). The Tongass share of timber processed locally (8.4 MMBF) was equivalent to about 52 percent of the total (16.0 MMBF) harvested on the Tongass in 2017 (Table 3.2-3). Viking Lumber processed 14 MMBF, approximately 92 percent of the total (15.3 MMBF) processed in 2018 (Table 3.2-4).

Other Mills

As noted above, the annual Forest Service mill survey is not a comprehensive inventory of all sawmills in Southeast Alaska. While no new sawmills of sufficient size classification to be added to the annual mill survey have been established since 2007, many other smaller sawmills operate across the region, including facilities that operate on a seasonal, part-time, or contingent basis. The number of active mills and timber operators in Southeast Alaska varies at any given time. A review of business licenses in December 2018, for example, identified 22 additional sawmills in Southeast Alaska that are not included in the Forest Service survey (Table 3.2-5). The University of Montana's Bureau of Business and Economic Research (BBER), in conjunction with the PNW Inventory and Analysis Program of the Forest Service, conducted a census of timber processors in Alaska in 2011 and identified 27 sawmills in Southeast Alaska, with almost half this total (12 facilities) located on Prince of Wales Island (Berg et al. 2014). A point-in-time analysis of business license data in 2012 identified a total of 105 forest products businesses including wood products manufacturing businesses (32 percent), timber tract operations (32 percent), forestry support activities (19 percent), and sawmills (17 percent) (Alaska DCCED 2012). A comparable review in December 2018 identified a total of 152 active forest projects business licenses in Southeast Alaska communities (Alaska DCCED 2018).

Table 3.2-5
Additional Sawmills in Southeast Alaska Based on a Review of Business Licenses, 2018

Mill Name[1]	Location
Cedar Street Enterprises	Port Alexander
Chilkat Valley Sawmill	Haines
Crew Lumber	Edna Bay
CSL Farm & Services	Edna Bay
Cutting Edge Wood Products	Ketchikan
D and L Woodworks	Hoonah
Dale R. Bakula Construction	Ketchikan
Dark Horse Lumber	Haines
Fair & Square Milling	Coffman Cove
Falls Creek Forest Products	Petersburg
Glacier Bay Woodcraft	Gustavus
K & D Lumber	Thorne Bay
Mud Bay Lumber Company, LLC	Haines
Peavey Log	Thorne Bay
Pitch Enterprises	Thorne Bay
Seakwood.com	Petersburg
Spruce Point Mill	Petersburg
Tenakee Logging Company	Tenakee Springs
Windy Point Sawmill and Bobcat Service	Craig
Wood Marine	Klawock
The Woodshed	Petersburg
Yakutat Supply	Yakutat

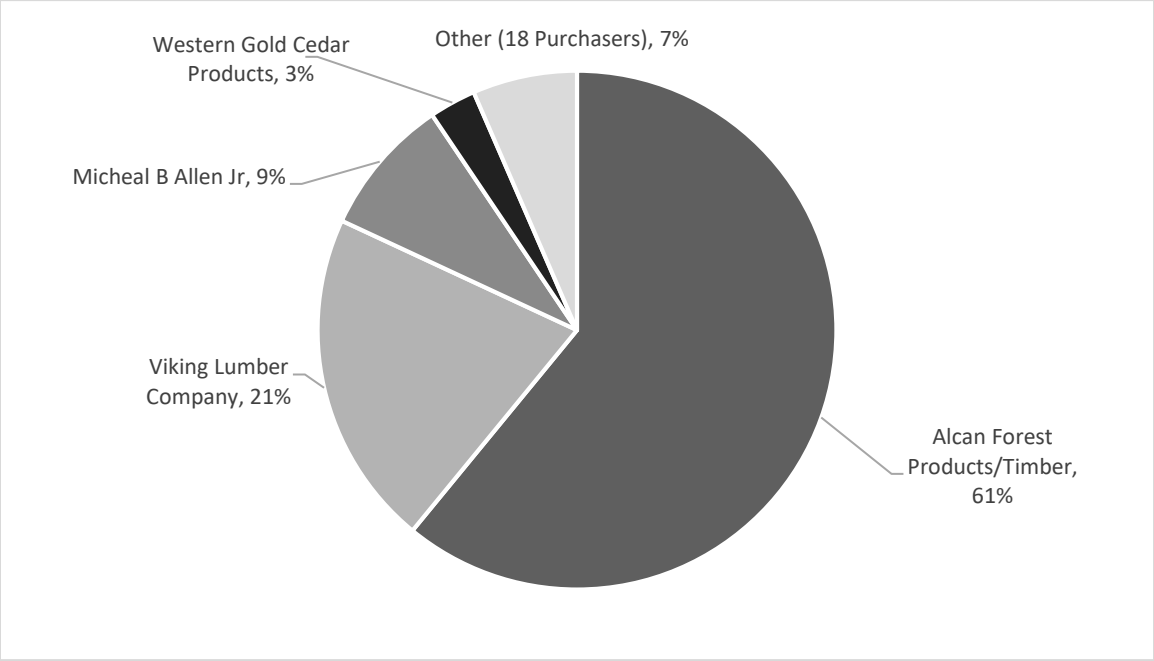
Note:
[1] These businesses were identified through a review of business licenses in December 2018 and include businesses listed as sawmills (North American Industrial Classification System [NAICS] Code 321113 – Sawmills). This table identifies additional sawmills that are not included in the Forest Service's mill survey (see Table 3.2-4), but is not intended to be a comprehensive list of all sawmills in Southeast Alaska.
Source: Alaska DCCED 2018

Volume Under Contract

Volume under contract refers to the volume included in Forest Service timber sales that have been purchased, but not yet logged or only partially logged. Volume under contract is, therefore, essentially a measure of inventory that changes on a regular basis, increasing as timber is sold and added to the total and decreasing when sale volumes are harvested.

Various purchasers had an estimated total of 60.1 MMBF of uncut timber under contract with the Forest Service at the end of December 2019 (USDA Forest Service 2019c). Alcan Forest Products LLP/Timber Inc. had more than half of this total (61 percent; 36.6 MMBF) under contract, followed by Viking Lumber with 21 percent (12.6 MMBF), Micheal B. Allen Jr with 9 percent (5.2 MMBF), and Western Gold Cedar Products with 3 percent (1.8 MMBF) (Figure 3.2-8). Eighteen other purchasers had a combined total of 3.9 MMBF in uncut volume under contract, with less than 1 MMBF under contract in each case (USDA Forest Service 2019c). Alcan Forest Products, based in Ketchikan, does not operate a processing facility in Southeast Alaska, and under the Limited Export Shipment Policy, must sell logs that are not approved for export to a processing facility in the state. The GNA Kosciusko Young Growth sale, which makes up much of the volume Alcan Forest Products has under contract, about 82 percent, was approved for 100 percent export.

Figure 3.2-8
Volume under Contract by Owner, 2019



Source: USDA Forest Service 2019c

Recreation and Tourism (Visitor Industry)

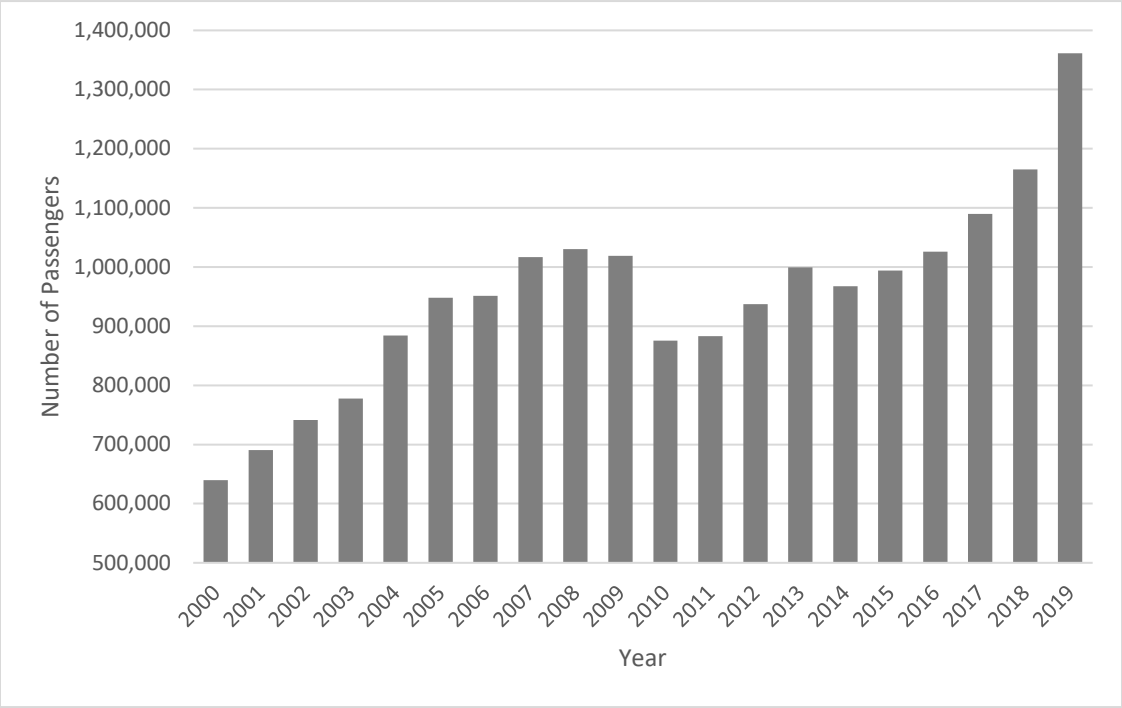
Recreation and Tourism in Southeast Alaska

Trends in Visitation
As noted above, an estimated 1.2 million people visited Southeast Alaska in 2016, with most of these visitors (86 percent) arriving by cruise ship (McDowell Group 2017).

Southeast Alaska Cruise Ship Visitor Volume
From 2000 to 2019, Southeast Alaska's total cruise passenger volume has averaged approximately 950,000 each year, with cruise ships visiting during the summer season (May to September). Cruise visitation to Southeast Alaska initially peaked with more than 1 million visitors per year from 2007 to 2009 before decreasing in 2010, as a result of the national economic recession. Volumes have gradually increased since then peaking with an all-time high of 1,165,000 cruise visitors in 2018, followed by another record year in 2019, with 1,361,400 cruise visitors (Figure 3.2-9). Prior to the coronavirus pandemic, the number of cruise passengers visiting Southeast Alaska was forecast to continue to grow with an estimated 1,441,000 cruise passengers anticipated for 2020 (Southeast Conference 2019). On July 16, 2020 (85 FR 44085) the Center for Disease Control extended its No Sail Order and Suspension of Further Embarkation for cruise ships with the capacity to carry 250 or more individuals until one of the following occurs:

- The expiration of the Secretary of Health and Human Services' declaration that COVID-19 constitutes a public health emergency,
- The CDC Director rescinds or modifies the order based on specific public health or other considerations, or
- September 30, 2020.

Figure 3.2-9
Southeast Alaska Cruise Passengers, 2000-2019



Source: Southeast Conference 2019, USDA Forest Service 2016b

Almost all Southeast Alaska cruise passengers, 98 percent of the total, visited Juneau in 2016. A large share of total Southeast Alaska cruise passengers also visited Ketchikan (92 percent of the total) and Skagway (80 percent) (Table 3.2-6). Hoonah and Sitka each received more than 120,000 cruise visitors in 2016 each (159,132 and 122,944, respectively), with Haines and Wrangell visited by 41,685 and 7,926 cruise passengers, respectively (Table 3.2-6). Trends in cruise visitation in the three communities with the largest number of visitors (Juneau, Ketchikan, and Skagway) mirrored regional trends over time, peaking in the years prior to the national recession, with visitation decreasing sharply in 2010. From lows in 2010 and 2011, visitation has gradually increased in all three communities and was similar to pre-recession levels by 2016 (Table 3.2-6).

Table 3.2-6
Southeast Alaska Cruise Passengers by Community, 2007-2016

Year	Haines	Hoonah	Juneau	Ketchikan	Sitka	Skagway	Wrangell
2007	27,659	161,920	1,017,341	901,595	233,936	820,829	5,192
2008	50,121	126,381	1,032,274	941,910	289,753	781,676	4,002
2009	43,550	134,575	1,019,507	936,220	224,335	785,034	3,842
2010	32,259	122,974	879,310	828,929	144,383	697,060	3,869
2011	27,176	127,866	875,947	844,412	129,380	708,981	4,719
2012	31,007	120,786	927,941	894,320	110,714	755,681	678
2013	32,378	124,320	978,559	948,685	99,920	821,874	6,417
2014	29,133	142,416	953,055	884,503	90,182	819,239	5,171
2015	42,515	150,434	976,367	944,525	117,546	815,541	7,471
2016	41,685	159,132	1,004,774	947,972	122,944	817,308	7,926

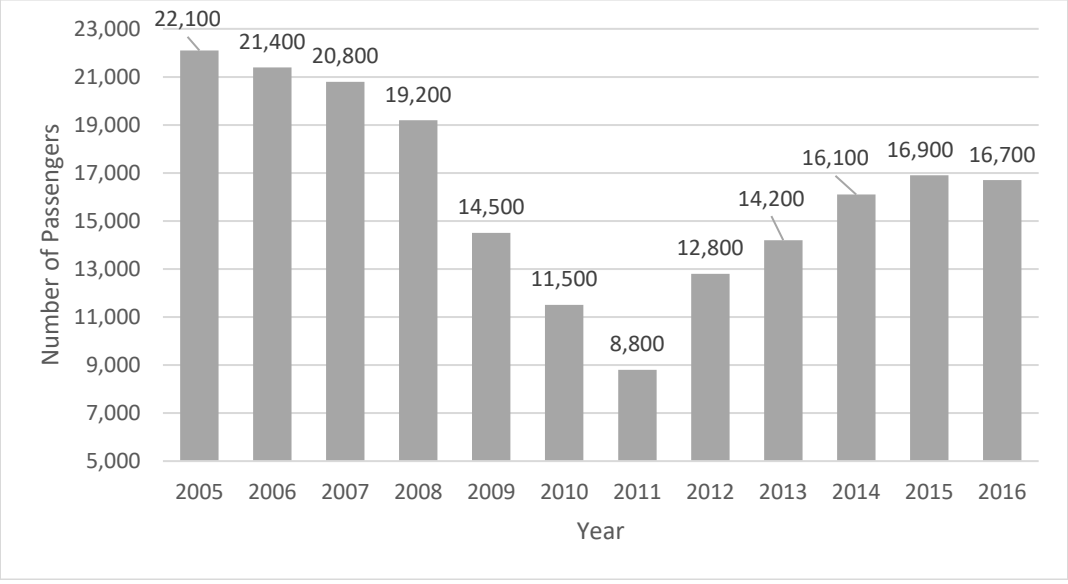
Source: Alaska DCCED 2017

Small Cruise Market

Alongside the international cruise lines, several small- and mid-size cruise operators are active in the region, often taking their customers to smaller places such as Metlakatla and Petersburg in addition to the larger communities. Reliable data regarding the small cruise vessel industry is limited, but the Alaska Department of Economic Development (ADED) (2016) found that small cruise ships accounted for about 1.5 percent of Alaska's cruise passengers in 2015.

Although accounting for a small share of the overall market, this segment of the cruise market is important for smaller communities that do not have the infrastructure to accommodate larger vessels. Overall, small cruise vessel passenger capacity declined from a high of 22,100 passengers in 2005, but capacity has gradually increased since a low of 8,800 estimated passengers in 2011. Capacity remained below 2005 levels in 2016 (Figure 3.2-10). In 2015, Alaska's small cruise vessel fleet included 27 vessels (including vessels carrying fewer than 20 passengers), with a total of 344 scheduled sailings (ADED 2016).

Figure 3.2-10
Southeast Alaska Small Cruise Vessel Passenger Capacity, 2005-2016

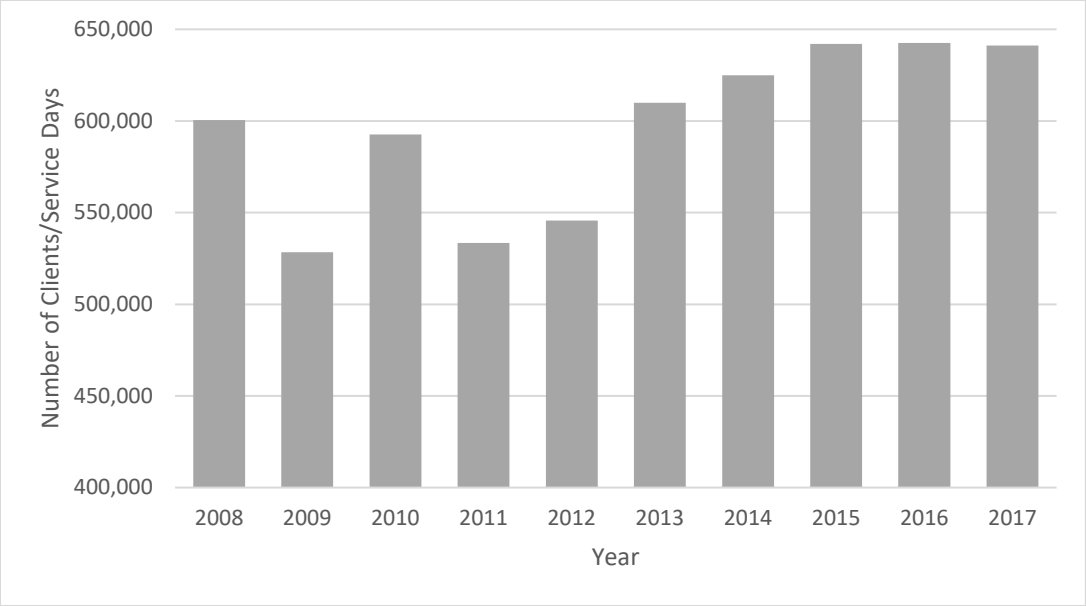


Note:
[1] Small cruise vessels are defined for the purposes of data collection as small, overnight commercial passenger vessels that carry less than 250 passengers. Estimates exclude vessels with capacity for less than 20 passengers.
[2] Data for 2016 was projected. Source: ADED 2016

Outfitter/Guide Use

A total of 242 authorized outfitter/guides provided services to Forest visitors during 2013 to 2017. More than half of these operators (132) uses the Forest consistently (at least four out of the five years). Outfitter/guides reported an annual average of 632,000 clients or service days over this period, with a total of 641,149 clients or service days reported in 2017. A service day is defined as a day or any part of a day for which an outfitter or guide provides service to a client on NFS lands. Figure 3.2-11 shows reported outfitter/guide use on the Forest from 2008 to 2017. Outfitter/guide use is discussed in more detail in the separate *Recreation and Tourism* section of this EIS (see below).[17]

Figure 3.2-11
Tongass National Forest Outfitter/Guide Use, 2008 to 2017



Note:
[1] A service day is defined as a day or any part of a day for which an outfitter or guide provides service to a client on NFS lands.
Source: USDA Forest Service 2017e, 2018g

Employment and Contribution to the Regional Economy. Recreation and tourism-related employment is difficult to accurately quantify because visitors spend their money throughout the local economy. Recreation and tourism is not classified or measured as a standard industrial category. Components of travel and tourism activities are instead partially captured in other economic sectors, such as retail trade (e.g., grocery stores and gift shops), transportation, hotels and other lodging places, and amusement and recreation services. Information presented above for the visitor sector is considered generally representative of recreation and tourism-related employment in Southeast Alaska (see Table 3.2-1 and Figure 3.2-3).

According to the Alaska DOL (Bell 2015), visitor-related jobs in Southeast Alaska are concentrated in Juneau, Ketchikan, and Skagway, which together accounted for more than three-quarters of the regional total in 2014. Transportation is the largest visitor-related economic sector in Southeast Alaska making up about one-third of visitor-related employment, with jobs ranging from whale watching boats, to tour buses, to airlines. The highest paying visitor-related occupations are also in the transportation sector, including captains and mates of water vessels (Bell 2015).

[17] This subsection addresses recreation and tourism in the context of the visitor industry as an economic sector. Recreation and tourism activities and potential impacts are addressed more broadly in a separate section in the *Other Important Issues* part of this chapter. See the separate *Recreation and Tourism* section, below.

A separate study prepared on behalf of the Alaska DCCED found that the visitor industry supported 11,925 jobs and $445 million in labor income in Southeast Alaska from October 2016 through September 2017 based on direct visitor spending of $705 million (McDowell Group 2018a). These estimates are for total employment and labor income, meaning that they include workers employed directly by the visitor industry (direct jobs and income), as well as jobs and income supported elsewhere in the economy (indirect and induced jobs and income).[18] A separate estimate of direct employment developed from Alaska DOL and U.S. Census data identified a total of 8,004 direct jobs supported by the visitor industry in 2018 (Table 3.2-1).

Nature-Based Tourism. A study prepared by the Institute of Social and Economic Research at the University of Alaska Anchorage provides insight into the contribution of nature-based tourism to the regional economy. This study, which involved field research conducted in the summers of 2005, 2006, and 2007, focused on a limited number of communities and sought to provide insight into revenues generated, the types of nature-based activities attracting tourists, and the resulting flows of money through the economy (Dugan et al. 2009). The findings of the study indicate that nature-based tourism generates substantial revenues in the region, with an estimated $277 million generated in annual direct business revenues for the companies surveyed in Sitka, Juneau, Chichagof Island, Prince of Wales Island, Petersburg, and Wrangell (Dugan et al. 2009).

Dugan et al. (2009) also found that nature-based tourism takes a number of different forms and the ratio of cruise ship passengers to independent travelers varies by location. Most nature-based activities that originate in Ketchikan, for example, fell into four general categories: flightseeing, marine charters, adventure experiences, and general sightseeing. In all cases, the majority of clients participating in these activities were cruise ship passengers. Cruise lines contract with other visitor service businesses operating in the Ketchikan area to provide these nature-based activities. Nature-based tourism on Chichagof Island, on the other hand, included a mix of cruise ship passengers and independent travelers, depending on the location and activity involved (Dugan et al. 2009).

Another study, conducted on behalf of ADF&G, estimated that residents and visitors to Southeast Alaska spent $363 million hunting and viewing wildlife in 2011, with visitors viewing wildlife accounting for an estimated 59 percent of this total (ECONorthwest 2014). Based on these estimated expenditures, the study estimated that hunting and wildlife viewing, respectively, supported 390 and 1,390 direct jobs and a combined total of $107 million in labor income in Southeast Alaska in 2011, with additional indirect and induced jobs and income supported elsewhere in the economy (ECONorthwest 2014).

Recreation on the Tongass National Forest

While it is reasonable to assume that the majority of visitor recreation and tourism activity in the region is related to the natural environment, not all of the activity generating this employment can be directly linked to the Tongass National Forest. Many visitors experience the Tongass from the deck of a cruise ship without directly using the forest for recreation purposes. In addition, while the Tongass includes approximately 80 percent of the land area in Southeast Alaska, there are other lands that offer wildland recreation opportunities in the region, including 3.3 million acres of National Park Service (NPS) lands, and recreation lands managed by the State of Alaska. Further, other popular recreation and tourism activities, such as saltwater fishing, sea kayaking, and shopping, do not take place on the Tongass, although the forest may provide a backdrop for these activities.

The Alaska Region of the Forest Service (Region 10) has been participating in the Forest Service's National Visitor Use Monitoring (NVUM) program since 2000. Based on the results of the NVUM program for 2010 to 2014 and coefficients developed by White and Stynes (2010), the Forest Service (2017f) calculated a visitation estimate of 2,874,000 annual visits to the Tongass National Forest. The results of earlier surveys indicated that half of Alaska residents surveyed who live in Southeast Alaska reported using a boat or plane to access the national forest (White and Stynes 2010). Almost half (49.7 percent) of non-resident visits to the Tongass National Forest involved the use of a guide or outfitter at some point, with local cruises, wildlife viewing, and flightseeing reported most frequently. Alaska residents in contrast

[18] Economic activity in one sector generates activity in others as firms purchase services and materials as inputs (termed "indirect" effects) and employees spend their earnings within the local economy ("induced" effects).

were found to very rarely use outfitters or guides (White and Stynes 2010). More detailed information on recreation use on the Tongass is presented in the separate *Recreation and Tourism* section of this EIS (see below).

Spending profiles were estimated for residents and non-residents visiting the Forest based on data compiled during the NVUM surveys. Using coefficients developed by White and Stynes (2010), the Forest Service (2017f) estimated that 2,874,000 annual visits generated about $382 million in spending and supported 3,947 direct jobs and an additional 1,110 jobs elsewhere in the regional economy. This overall estimate is equivalent to about 42 percent of the regional visitor estimate developed for Alaska DCCED in 2017 (McDowell Group 2018a), and the direct component is about 51 percent of the direct visitor jobs estimated by Southeast Conference (2018).

Commercial Fishing and Seafood Processing

In 2018, an estimated 185 million pounds of seafood was harvested in Southeast Alaska with an ex-vessel value of $247 million, which was significantly below the 10-year average, with poor pink salmon and herring returns primarily to blame due to warm sea temperatures between 2013 and 2016 (Southeast Conference 2019). Viewed in terms of value, salmon accounted for more than half (55 percent) of the total commercial catch in Southeast Alaska in 2018, with the remainder divided among black cod (16 percent), halibut (13 percent), crab (7 percent), herring (2 percent), and other (8 percent) (Southeast Conference 2019). Based on data from 2007 to 2018, a recent study found that wild Pacific salmon originating from streams and lakes within the Tongass accounted for a major share of the overall number and value of commercially caught Pacific salmon in Southeast Alaska (Johnson et al. 2019). Additional detail on commercial harvest is provided in the Fish section, which is part of Key Issue 3 below.

Employment in the seafood harvesting and processing sectors varies from year-to-year, but remains relatively stable compared to the fluctuations in the volumes and value of salmon harvested each year. Salmon harvesting employed an estimated 864 people in Southeast Alaska in 2018, with an additional 1,281 people employed harvesting other fish (Alaska DOL 2019b). A further total of 1,300 people were employed in fish processing in 2018 for a combined total of 3,445 jobs (Alaska DOL 2019c). Seafood harvesting and fish processing employment trends are shown for 2000 to 2013 in the 2016 Forest Plan Amendment EIS (USDA Forest Service 2016b, pp. 3-501 to 3-503).

Unlike other basic sectors of Southeast Alaska's economy, components of the seafood industry are spread throughout the region with an important presence in virtually every community. Seafood processing workers, for example, were employed in all of the boroughs in 2017, ranging from 15 workers in Skagway to 1,024 workers in Sitka (Alaska DOL 2019d).

The seafood processing sector is generally characterized by high seasonality and low resident hire, as well as low hourly wages, with a median annual wage of $24,689 in 2013 (Strong 2014). The vast majority of workers, 91 percent, worked two or fewer quarters (Strong 2014) suggesting they may earn additional income elsewhere in the other half of the year. The industry does, however, have a number of higher paid occupations, including ship engineers, captains, mates, boat pilots, and general and operations mangers, which accounted for just 1.2 percent total employment, but 6 percent of wages, with a median annual wage of $66,720 (Strong 2014).

Mining and Mineral Development

Mineral exploration and mining have been a part of life in Southeast Alaska for more than a century. Estimates developed using Alaska DOL data found that a total of 889 workers were employed in the mining sector in Southeast Alaska in 2018 (Table 3.2-1). According to a recent economic impact study prepared for Alaska's mining industry, the Greens Creek and Kensington mines employed 420 workers and 387 workers in 2018, respectively, with the Kensington Mine employing an additional 90 contractors (McDowell Group 2019). Mining jobs are the highest-paying jobs in the region, with average annual wages of $104,650 in 2018 (Southeast Conference 2019). The high wages in this sector reflect the skilled nature of the job, as well as the demands of working in remote locations (Abrahamson 2013). The region's two large mines (Greens Creek and Kensington) accounted for the majority of the mining employment in Southeast Alaska in 2018 (Southeast Conference 2019).

Both the Greens Creek and Kensington mines are located in the City and Borough of Juneau, mostly on Tongass NFS lands. Greens Creek Mine is a silver, lead, and zinc mine located on Admiralty Island; Kensington Mine is a gold mine located on the mainland approximately 45 miles north of Juneau. Alaska residents make up about two-thirds of the total labor force at each mine, 66 percent at Greens Creek and 67 percent at Kensington. Alaska resident employees of both mines live throughout the region. More than two-thirds of Greens Creek's Alaska resident employees live in Juneau. The other third live in other Southeast Alaska communities or elsewhere in the region (McDowell Group 2018b).

Two proposed underground mine projects on NFS lands on Prince of Wales Island received approval for financial assistance through the Alaska Industrial Development and Export Authority in June 2014 (Bradner 2014). Alaska Senate Bill 99 authorized $145 million and $125 million in infrastructure and construction financing, respectively, for the proposed Bokan Mountain and Niblack projects. The Bokan Mountain project is a rare earth mine that would include on-site ore processing facilities. The McDowell Group (2013) in a study prepared for the Bokan Mountain project estimated that construction of the project would last 2 years and employ an average construction workforce of 200, with peak employment potentially reaching 300 workers. Operation would be expected to employ 190 workers with approximately $18 million in annual payroll (McDowell Group 2013). The governor of Alaska asked that the White House CEQ designate the Bokan Mountain project as a high-priority infrastructure project in August 2019 (Southeast Conference 2019). The Niblack project is a proposed underground copper-gold-zinc-silver mine. The project owners estimate that the construction and operation phases of the project would both employ approximately 200 workers (Niblack Project LLC 2015). No exploration activity was reported for either project in 2016 and 2017 (McDowell Group 2018b).

Payments to the State

Prior to 2000, in states with national forests, 25 percent of the returns to the U.S. Treasury from revenue producing Forest Service activities such as timber sales, were returned to each state for distribution back to counties (or in Alaska, boroughs) having acreage within a national forest. Those payments were called the "25 percent fund payments" and were dedicated by law to be used for roads and schools. In October 2000, the *Secure Rural Schools and Community Self Determination Act of 2000* was enacted to stabilize federal payments to states in response to declining federal receipts.

The legislation was authorized for implementation for Fiscal Years 2001 through 2007 and allowed counties and/or boroughs to choose between 25 percent of current receipts or a full payment amount based on the average of the highest three payments made to the state during the 14-year period between 1986 and 1999. Alaska boroughs and communities have elected to receive a full payment amount rather than 25 percent of receipts since enactment of this legislation.

Those annual full payment amounts are primarily dedicated to roads and schools, with provisions for special project funding under certain conditions. Under the full payment approach, Forest Service payments to the State of Alaska have been based on the high 3-year historic average, rather than linked to annual Forest Service revenue.

The Secure Rural Schools Act has been reauthorized since 2008, most recently in March 2018. The program was not reauthorized for Fiscal Year 2016, resulting in a substantial decrease in payments. Tongass-related secure rural schools payments to Southeast Alaska by borough for 2013 through 2018 are presented in Table 3.2-7.

Table 3.2-7
Federal Secure Rural Schools Payments to Southeast Alaska Boroughs, 2013 to 2018[1]

Borough/Area	2013	2014	2015	2016	2017	2018
Haines	$131,581	$124,386	$145,551	$30,166	$376,567	$277,344
Juneau	$670,595	$637,211	$624,947	$43,275	$555,618	$517,412
Ketchikan Gateway	$1,045,870	$1,059,007	$993,053	$91,316	$905,127	$882,032
Petersburg	$1,255,586	$1,204,494	$577,743	$41,876	$544,597	$546,414
Sitka	$800,509	$752,083	$544,967	$49,389	$567,243	$529,232
Skagway	$22,105	$21,595	$17,122	$2,664	$18,625	$19,845
Wrangell	$1,117,867	$1,052,610	$922,953	$47,826	$845,691	$986,580
Yakutat	$560,798	$539,527	$623,842	$36,682	$473,738	$513,767
Unorganized[2]	$3,253,421	$3,125,381	$2,674,447	$110,116	$2,476,673	$2,474,268
Total	**$8,858,332**	**$8,516,294**	**$7,124,625**	**$453,310**	**$6,763,879**	**$6,746,894**

Note:
[1] Payments are in nominal values
[2] Unorganized represents payments to the Hoonah-Angoon and Prince of Wales-Hyder CAs.
Sources: USDA Forest Service 2015a, 2015b, 2016d, 2018g, 2018h, 2019e

Environmental Consequences

Forest Products

This FEIS provides an assessment of the potential impacts that may result from the alternatives considered for a proposed Alaska Roadless Rule. This analysis is programmatic, meaning that it examines potential effects of alternative forms of management direction for broad land areas, rather than specific activities scheduled for specific locations. Specific timber sales would be developed over time in accordance with established Forest Service procedures, with site-specific impacts evaluated through project-level environmental analysis, as appropriate. Overall timber harvest levels and general composition (old-growth versus young-growth) are expected to remain unaffected by the final rule. Timber program output levels are expected to remain constant and involve a similar number of acres under all alternatives, varying only by the location of timber harvest.

Factors Affecting the Economics of Timber Offers

In practice, many factors can influence the cost of timber harvest, adding economic risks for potential purchasers and affecting the ability of the Forest Service to offer timber sales. Road construction, helicopter yarding, complex silvicultural prescriptions, setting size, and other factors may increase costs, which then decrease the value of the offering. The value of the timber offered must be sufficient to cover costs and include profit for the purchaser. Under the Further Consolidated Appropriations Act, 2020, timber sales that do not appraise positive using the current Region 10 RV (Residual Value) appraisal cannot be offered (USDA Forest Service 2018d). Estimated costs per thousand board feet vary substantially across the Forest. Transportation infrastructure costs and haul distances are typically higher in more remote areas, i.e., those areas that are further from existing infrastructure and markets. In this context, a market may include a mill or export yard.

None of the action alternatives would result in changes to the PTSQ, and the timber objectives of the Forest Plan would continue to involve the transition to primarily young-growth harvest. While harvest levels are not expected to vary significantly among the alternatives, the alternatives do vary in terms of the amount and location of acres suitable for timber production. Young-growth suitable acres would increase only slightly (3 to 6 percent) under the action alternatives (Table 3.2-8) and, as a result, the following assessment focuses on changes in old-growth suitable acres. Summary information is, however, also provided for changes in young-growth suitable acres by alternative.

The Record of Decision for the 2016 Forest Plan estimated that a total of approximately 24,000 old-growth acres would be harvested Forest-wide after 25 years, with a total of 42,500 old-growth acres harvested after 100 years (USDA Forest Service 2016c). These estimates represent an approximate

upper ceiling of the number of roadless acres that could be potentially harvested under any of the alternatives. The 2016 Forest Plan Amendment EIS estimated that approximately 5 MMBF of small and micro-sales of old-growth timber is required each year to meet the needs of existing small old-growth mills that produce high value products such as appearance grade lumber and cedar shingles. This annual small and micro-sale demand (5 MMBF) is anticipated to be met for the duration of the planning period under all of the alternatives, including Alternative 1 – No Action.

For larger sales, more acres of suitable old-growth land would allow the Forest Service greater flexibility in the selection of future timber sale areas, as well as the potential for more flexibility in sale design, depending on the project areas selected. This improved flexibility could, in turn, potentially improve the Forest Service's ability to offer economic sales that meet the needs of industry. This greater flexibility could be especially beneficial during the first two decades of the 2016 Forest Plan (the transition period), when most old-growth harvest would take place. While many factors can influence the cost of timber harvest, as noted above, areas along existing roads are typically more economically efficient, followed by areas where existing roads can be easily extended. Transportation infrastructure costs can include road construction, reconditioning, reconstruction, and maintenance, as well as log transfer facility (LTF) development. Road construction, reconditioning, reconstruction, and maintenance involve substantial costs and have the potential to strongly influence timber sale economics.

Areas closer to markets, either a mill or export facility, are also more likely to offer more economic timber sale options. Existing old-growth mills in Southeast Alaska are primarily located in the south part of the region, with a concentration of mills, including the last remaining medium-sized mill (Viking Lumber), on Prince of Wales Island. Sales on the south part of the Forest are, therefore, more likely to appraise positive. In cases where the Regional Forester allows 100 percent export, which is permissible on a case-by-case basis (as discussed above), proximity to an export facility may also result in sales being more likely to appraise positive.

Areas not covered by existing NEPA decisions require additional NEPA analysis, adding cost, as well as several years planning time. The projects identified in the most recent 5-year timber sale plan for the Tongass (2019 to 2023) are assumed to be made available to meet short-term (4- to 5-year) demand under all alternatives (USDA Forest Service 2019b).

Factors Common to the Action Alternatives

Additional timber harvest opportunities under the action alternatives would primarily be provided by removing regulatory roadless prohibitions for areas that are currently designated under the 2001 Roadless Rule (i.e., the removal of acres from roadless in the transition from 2001 Inventoried Roadless Areas [IRAs] to Alaska Roadless Areas [ARAs]).[19] Timber harvest would also be allowed in Timber Priority and Community Priority ARAs.[20] With the removal of prohibitions for either of these priorities areas of previously identified unsuitable lands would revert to suitable lands that would be available for harvest.

Suitable old-growth lands would be incrementally added by alternative, with total net increases ranging from about 20,000 acres (Alternative 2) to 168,000 acres (Alternatives 5 and 6) (Table 3.2-8, Figure 3.2-12). Viewed as a share of existing suitable old growth, these increases would range from 9 percent (Alternative 2) to 74 percent (Alternatives 5 and 6). Suitable old-growth acres would be added in three broad categories or areas: roaded roadless (Alternatives 2 to 6); logical extension areas (Alternatives 3 to 6); and areas more distant from roads (Alternatives 4 to 6). In addition, suitable old-growth acres would be added in Community Priority ARAs (Alternative 3). For the locations of suitable areas, refer to the Timber Suitability maps (see Maps 7 through 12 on thumb drive or website).

[19] Alternative 6 would remove all regulatory roadless prohibitions on the Tongass, which would be exempt from the 2001 Roadless Rule under this alternative.

[20] Timber harvest in Community Priority ARAs would be limited to micro sales, salvage sales, and small commercial sales less than 1 MMBF in size.

Roaded Roadless. All action alternatives would remove roadless designations for 142,000 acres that currently have roads (i.e., "roaded roadless"). These areas are considered likely locations for future timber harvest. The removal of roaded roadless acres from roadless designation would revert about 20,000 acres of previously identified unsuitable lands to suitable old-growth lands that would be available for harvest, including an estimated 7,000 acres of high-volume old growth (Table 3.2-8). High volume old-growth acres are based on the size-density model (SDM), as described in the *Timber Resources* section, below. In addition, an estimated 11,000 acres of previously unsuitable lands would revert to suitable young-growth lands that would be available for harvest.

Logical Extensions. Alternatives 3 to 6 would also remove roadless designations for "logical extension areas." These are areas that are considered the logical extension of existing road and harvest systems, and typically include areas within the same watershed (7th field or 14-digit hydrologic unit) as an existing road system. These areas were identified by forest staff as the most likely locations for future timber harvest, following roaded roadless. The removal of logical extension acres from roadless designation would revert an estimated 49,000 acres of previously identified unsuitable lands to suitable old-growth lands, including an estimated 19,000 acres of high-volume old growth (Table 3.2-8). In addition, an estimated 2,000 acres of previously unsuitable lands would be revert to suitable young-growth lands.

More Distant Areas. Alternatives 4 to 6 would also remove roadless areas considered more distant from existing road systems (i.e., roadless areas outside the "roaded roadless" and "logical extension" areas). These acres are added in different ways, as discussed below, by alternative. However, when viewed in terms of changes in suitable old-growth acres that would be available for harvest, the alternatives are very similar. This is especially true for Alternatives 5 and 6, which would result in the same increase in areas more distant from roads, about 99,000 acres, including 33,000 acres of high-volume old growth (Table 3.2-8). Changes in suitable young-growth acres in areas more distant from roads would range from approximately 3,000 acres (Alternative 4) to 8,000 acres (Alternative 6).

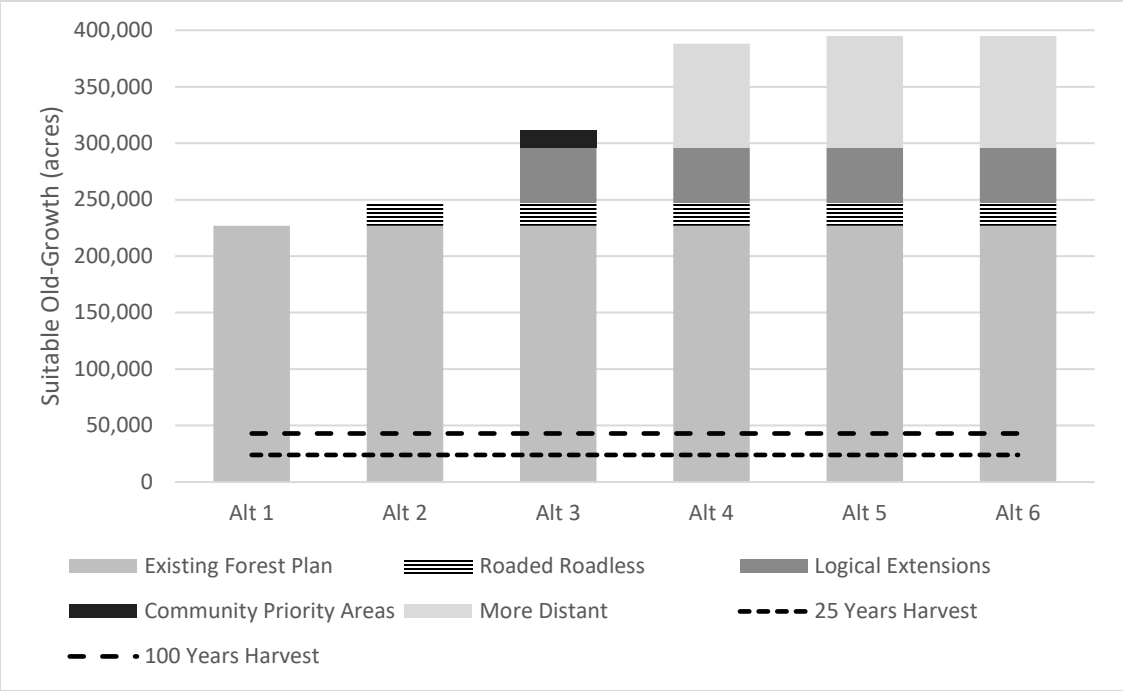
In addition, 16,000 suitable old-growth acres, including 4,000 acres of high-volume old growth, and 2,000 suitable young-growth acres would be added in Community Priority ARAs (Alternative 3) (Table 3.2-8).

Table 3.2-8
Suitable and High Volume Suitable Old-Growth Acres by Geographic Area and Alternative

	Alternative					
	1	2	3	4	5	6
Forest Land Suitable for Timber Production	No Action	Roaded Roadless	Logical Extension	Partial Dev LUDs[1]	All Dev LUDs	Full Exemption
Old Growth	227,000	247,000	312,000	388,000	395,000	395,000
Young Growth	334,000	345,000	349,000	349,000	351,000	354,000
Increase in Suitable Old Growth						
In Roaded Roadless Areas	0	20,000	20,000	20,000	20,000	20,000
In Logical Extension Areas	0	0	49,000	49,000	49,000	49,000
In Community Priority Areas	0	0	16,000	0	0	0
In More Distant Areas	0	0	0	92,000	99,000	99,000
Total[2]	**0**	**20,000**	**85,000**	**161,000**	**168,000**	**168,000**
Increase in High-Volume Suitable Old Growth						
In Roaded Roadless Areas	0	7,000	7,000	7,000	7,000	7,000
In Logical Extension Areas	0	0	19,000	19,000	19,000	19,000
In Community Priority Areas	0	0	4,000	0	0	0
In More Distant Areas	0	0	0	30,000	33,000	33,000
Total[2]	**0**	**7,000**	**28,000**	**56,000**	**59,000**	**59,000**

[1] Includes Timber Production and Modified Landscape LUDs, but not Scenic Viewshed.
[2] Totals may not sum due to rounding.

Figure 3.2-12
Suitable Old-Growth Acres by Alternative



Note:
[1] Harvest levels for 25 years and 100 years represent the total estimated old-growth acres that would be harvested to meet the PTSQ established for the 2016 Forest Plan.

Alternative 1 – No Action

Under Alternative 1 there would be no change in the boundaries of the IRAs identified in 2001 Roadless Rule and no changes in the availability of suitable old-growth acres for harvest. Under the current Forest Plan, there are an estimated 227,000 acres of suitable old growth available for harvest, almost 10 times the area expected to be harvested over the next 25 years (Table 3.2-8, Figure 3.2-12).

Alternative 2

Under Alternative 2, additional timber harvest opportunities would be provided in roaded roadless areas, with an estimated net gain of about 20,000 acres of suitable old-growth, including 7,000 acres of high-volume suitable old-growth (Table 3.2-8, Figure 3.2-12). This estimated gain (20,000 acres) is equivalent to about 9 percent of the acres available under Alternative 1 and 83 percent of old-growth acres expected to be harvested over the next 25 years (24,000 acres). The added suitable acres would be in areas where roads already exist and are, therefore, generally considered relatively economic to harvest. Further, the majority of the added acres would be located on the south part of the Forest, with more than one-third (38 percent) on Prince of Wales Island (Craig and Thorne Bay Ranger Districts) (Table 3.2-9).

Alternative 2 would also result in an estimated net gain of about 11,000 acres of suitable young-growth, the majority of which (87 percent) would be located on the south part of the Forest. These acres would also be in areas where roads already exist.

Table 3.2-9
Increase in Suitable Old-Growth Acres by Ranger District and Alternative

Ranger District	Alternative				
	2	3	4	5	6
South					
Craig	4,300	9,900	14,800	15,800	15,800
Ketchikan Misty Fjords	3,700	15,700	23,800	24,900	24,900
Petersburg	4,800	24,200	36,900	37,600	37,600
Thorne Bay	3,100	14,400	20,400	21,300	21,300
Wrangell	3,900	14,500	22,900	24,100	24,100
Subtotal[1]	***19,800***	***78,700***	***118,800***	***123,700***	***123,700***
North					
Hoonah	500	3,700	15,900	16,100	16,100
Juneau	300	300	3,600	4,600	4,600
Sitka[2]	-1,200	1,900	22,300	23,400	23,400
Yakutat	0	0	0	0	0
Subtotal[1]	***-400***	***5,900***	***41,800***	***44,100***	***44,100***
Overall Total[1]	**19,400**	**84,600**	**160,600**	**167,800**	**167,800**

Note:
[1] Totals may not sum due to rounding.
[2] Alternative 2 provides limited additional timber harvest opportunity while maximizing roadless area designations by adding 110,000 acres as ARAs. In the Sitka Ranger District, more suitable old growth acres would be removed than added under this alternative.

Alternative 3

Under Alternative 3, additional timber harvest opportunities would be provided in roaded roadless and logical extension areas, with an estimated net gain of about 85,000 acres of suitable old-growth, including 28,000 acres of high volume suitable old-growth (Table 3.2-8, Figure 3.2-12). This estimated gain (85,000 acres) is equivalent to about 37 percent of the acres available under Alternative 1 and more than three and a half times the old-growth acres expected to be harvested over the next 25 years (24,000 acres). The added suitable acres would be in areas where roads already exist or could be logically extended and are, therefore, generally considered relatively economic to harvest. Alternative 3 also includes a net increase of approximately 16,000 acres in Community Priority ARAs. Similar to Alternative 2, the majority (93 percent) of the added acres would be located on the south part of the Forest, with almost one-third (29 percent) on Prince of Wales Island (Table 3.2-9).

Alternative 3 would also result in an estimated net gain of about 15,000 acres of suitable young-growth, the majority of which (76 percent) would be located on the south part of the Forest. These acres would also be in areas where roads already exist or could be logically extended.

Alternative 4

Alternative 4 would provide additional timber harvest opportunities in roaded roadless and logical extension areas, as well as areas more distant from roads, with an estimated net gain of about 161,000 acres of suitable old growth, including 56,000 acres of high-volume suitable old growth (Table 3.2-8, Figure 3.2-12). This estimated gain (161,000 acres) is equivalent to about 71 percent of the acres available under Alternative 1 and almost seven times the old-growth acres expected to be harvested over the next 25 years (24,000 acres). Although the increase in the high-volume suitable old growth relative to Alternative 1 is not expected to change as to either the number of acres harvested or the volume of timber harvested, it would allow increased flexibility in where harvest could occur.

This alternative makes available all Timber Production and Modified Landscape LUDs that were in roadless, outside of T77 Watersheds and TNC/Audubon Conservation Priority Areas. On average, these areas are more distant from roads compared with Alternative 3 and would include extensive areas designated as Timber Priority ARA. Approximately 92,000 acres of the previously identified unsuitable

lands that would revert to suitable old-growth lands are located in more distant areas. Because these areas are more distant from existing road systems, on average, they are likely to be relatively expensive to harvest and less likely to be accessed for timber production under the current Forest Plan. Almost three-quarters (74 percent) of the acres added under this alternative would be located on the south part of the Forest, with 22 percent on Prince of Wales Island (Table 3.2-9).

Alternative 4 would also result in an estimated net gain of about 15,000 acres of suitable young-growth, including 3,000 acres more distant from roads. The majority of the total added young-growth suitable acres (77 percent) would be located on the south part of the Forest.

Alternative 5

Alternative 5 would provide additional timber harvest opportunities in roaded roadless and logical extension areas, as well as areas more distant from roads (Table 3.2-8, Figure 3.2-12). In addition to roaded roadless and logical extension areas, this alternative would remove all Timber Production, Modified Landscape, and Scenic Viewshed LUDs identified in the 2016 Forest Plan from roadless designation, along with T77 Watersheds and TNC/Audubon Conservation Priority Areas within those development LUDs. In addition, areas with mineral potential as defined by the “minerals overlay” defined in the Tongass Forest Plan would be removed from roadless designation. Viewed in terms of suitable old-growth acres, this alternative would have the same effect as removing regulatory roadless designation from all lands (Alternative 6).

Alternative 5 would also result in an estimated net gain of about 17,000 acres of suitable young-growth, including 5,000 acres more distant from roads. Because these areas are more distant from existing road systems, on average, they are likely to be relatively expensive to harvest and less likely to be accessed for timber production under the current Forest Plan. The majority of the total added young-growth suitable acres (78 percent) would be located on the south part of the Forest.

Alternative 6

Under Alternative 6, the full exemption alternative, regulatory roadless designations would be removed from all inventoried roadless areas on the Tongass, resulting in a net reduction of 9.34 million acres of designated roadless (Table 3.2-8, Figure 3.2-12). Former inventoried roadless areas would be managed in accordance with the 2016 Forest Plan, with an estimated net gain of about 168,000 acres of suitable old growth, including 59,000 acres of high-volume suitable old growth (Table 3.2-8, Figure 3.2-12). This estimated gain (168,000 acres) is equivalent to about 74 percent of the acres available under Alternative 1 and seven times the old-growth acres expected to be harvested over the next 25 years (24,000 acres). As with Alternative 4, much of the gain in suitable old-growth acres relative to Alternative 3 would be in areas more distant from roads (approximately 99,000 acres) and would provide additional opportunities for harvest. These more distant areas would be relatively expensive to harvest and less likely to be accessed under the current Forest Plan. Almost three-quarters (74 percent) of the acres added under this alternative would be located on the south part of the Forest, with 22 percent on Prince of Wales Island (Table 3.2-9).

Alternative 6 would also result in an estimated net gain of about 20,000 acres of suitable young-growth, including 8,000 acres more distant from roads. Because these areas are more distant from existing road systems, on average, they are likely to be relatively expensive to harvest and less likely to be accessed for timber production under the current Forest Plan. The majority of the total added young-growth suitable acres (71 percent) would be located on the south part of the Forest.

Employment and Income

Timber program output levels are expected to remain constant and involve a similar number of acres under all alternatives, varying only by the location of timber harvest. The proportion of cutting activity occurring within versus outside of roadless areas would vary by alternative, but overall regional economic impacts are assumed to remain constant. These impacts were estimated for the first decade following implementation in the 2016 Forest Plan Amendment EIS (USDA Forest Service 2016b), with all six alternatives based on an annual average harvest of 46 MMBF. In the 2016 Forest Plan Amendment EIS,

the ratio of young growth to old growth varied by alternative and over time in the years prior to the transition to young growth (defined as the time that the young-growth supply reaches 41 MMBF).

Alternative 1 within this FEIS and all alternatives are assumed to support a similar range of direct jobs and income. Based on the 2016 Forest Plan Amendment EIS assessment, all of the alternatives would support an estimated 92 jobs in logging, 49 to 100 jobs in sawmilling, and 29 to 46 jobs related to transportation and other services, with direct income ranging from $9.8 million to $10.4 million.

The local sawmilling and transportation-related employment estimates presented in the 2016 Forest Plan Amendment EIS were based on a range, from maximum possible shipment out of state (export of all Alaska yellow-cedar and western redcedar plus hemlock and Sitka spruce export equal to 50 percent of total sale net sawlog volume), to no shipment of western redcedar, hemlock, or Sitka spruce, and export of 100 percent Alaska yellow cedar. Transportation and other services include water transportation, independent trucking, stevedoring (e.g., process of loading/offloading of a ship or cargo), scaling, and export marking and sort yard employment for export volume, and water transportation, scaling, and independent trucking for locally sawn volume. Export employs more workers in transportation and other services per million board feet harvested than domestic production, which is reflected in the range of values estimated for transportation and related services.

Actual employment and income in Southeast Alaska would depend on choices made by purchasers that exist outside the context of roadless restrictions; those choices may change as markets and prices shift. Under current market conditions, purchasers are likely to export as much as they can while processing enough material locally to keep manufacturing facilities open and take advantage of opportunities to produce high-value sawn material in Southeast Alaska. In addition, the Regional Forester has allowed increased export on a case-by-case basis, as discussed above and explained in Appendix H of the 2016 Forest Plan (USDA Forest Service 2016a). If purchasers were allowed on a case-by-case basis to export a larger share of a particular sale in unprocessed form, there would be a commensurate reduction in sawmilling jobs and an increase in transportation-related jobs.

Recreation and Tourism (Visitor Industry)

Potential impacts to recreation and tourism are assessed in the separate *Recreation and Tourism* section of this EIS (see below). Potential impacts are evaluated with respect to ROS settings, recreation places, and recreation use. The *Recreation and Tourism* section also assesses impacts to outfitter/guide businesses and clients.

Under Alternative 1, most projected harvest is expected to occur in ROS settings where some modification of the natural environment is expected. Less than 1 percent of the acres currently allocated to Primitive (P), Semi-Primitive Non-Motorized (SPNM), and Semi-Primitive Motorized (SPM) ROS settings would be harvested after 100 years, assuming the maximum allowable levels of harvest were to occur. Assuming that the estimated total number of acres harvested would be the same for each alternative, harvest projections by alternative indicate that Roaded Modified (RM) as a share of the estimated total would decrease relative to Alternative 1 under all alternatives, decreasing from 91 percent under Alternative 1 to 72 percent under Alternatives 4 to 6. Much of this decrease would be made up by an increase in SPNM acres. SPNM as a share of the estimated total would range from about 4 to 5 percent under Alternatives 1 and 2 to 18 percent under Alternatives 4 to 6. This analysis is discussed further in the *Recreation and Tourism* section of this EIS.

Changes in land management have the potential to affect outfitter/guide operations that provide commercial recreation opportunities on the Forest. Impacts to existing outfitter/guide use are likely to be greatest where changes in roadless designations allow development in remote areas that are used for outfitter/guide activities dependent on high scenic integrity and undisturbed landscapes. Changes in roadless area designations could also affect outfitter/guide use in other adjacent or nearby areas as outfitter/guides displaced from one location seek other places to take clients. Some use areas are presently at capacity, which could serve to exacerbate potential displacement effects. Long-term changes in roadless area management could affect the Forest's ability to meet future outfitter/guide demand, especially for operators seeking more remote areas.

The outfitter/guide analysis prepared for this EIS used changes in suitable old-growth acres in conjunction with information on existing outfitter/guide use to help focus on potentially affected areas. The resulting analysis identified 15 outfitter/guide use areas where potential conflicts between existing outfitter/guide use and future management could occur. In most of these areas, existing outfitter/guide use occurs near areas where management activities have occurred in the past, either near or along shorelines and/or Forest road systems. Similarly, in most cases, harvest that could already occur in these areas (under Alternative 1) has the potential to conflict with existing outfitter/guide use. Viewed in terms of increases in acres suitable for timber production, impacts under Alternatives 2 and 3 would be minimal in all areas, with increases in roadless acres and reductions in suitable acres occurring in some areas under these alternatives. By expanding the acres available for harvest, Alternatives 4 to 6 could add to these potential impacts by increasing the number and geographic extent of the acres affected. The analysis also considered the projected distribution of old-growth and young-growth harvest acres over 100 years of implementation. Old-growth harvest is not expected to occur in 8 of the 15 outfitter/guide use areas considered, specifically those located on the north part of the Forest where old-growth harvest has historically accounted for less than 5 percent of the total Forest-wide harvest. Allowing road construction could create new opportunities for operators who use Forest roads for access. However, nearly all new roads constructed would be closed following harvest. These potential impacts are discussed in more detail in the *Recreation and Tourism* section.

Salmon Harvesting and Processing

None of the alternatives are expected to have a significant change to the commercial fishing or fish-processing industries over the planning period. Riparian Management standards and guidelines established in the 2016 Forest Plan would remain in place under all of the alternatives. While there would be some variation in the level of protection, these variations are not expected to affect the fishing industry. The future of the fishing industry in Southeast Alaska is more likely to depend upon occurrences outside of the Tongass National Forest such as hatchery production, offshore harvest levels, and changes in ocean conditions (USDA Forest Service 2016b).

The 1997 FEIS (USDA Forest Service 1997a) noted that the amount of acreage of timber harvest was at most less than 20,000 acres per year, representing approximately 0.5 percent of the total remaining productive old growth (or 5 percent over the next decade) and less than 0.02 percent of the entire Forest. That EIS concluded that this was not expected to result in a significant change to commercial fishing employment. All of the alternatives that are presently being evaluated in this EIS would allow considerably less timber harvest and new road construction than the alternatives evaluated in the 1997 FEIS. Total annual old-growth harvest allowed over the 100-year planning period would be approximately 42,500 acres, substantially lower than the maximum proposed in the 1997 FEIS. Impacts to fish are discussed in detail in the *Key Issue 3* section of this EIS.

Mining and Mineral Development

The Forest Service divides minerals resources into three groups: locatable minerals, leasable minerals, and salable minerals. Locatable minerals are those minerals that may be located and removed from Federal lands under the authority of the General Mining Law of 1872, as amended. Examples of locatable minerals on the Tongass include gold, silver, copper, molybdenum, iron, nickel, lead, and zinc. The General Mining Law of 1872, as amended, grants every United States citizen the right to prospect and explore public domain lands open to mineral entry. The right of reasonable access is guaranteed and is not at the discretion of the Forest Service. Exploration, mining, and mineral processing activities, including road construction and reconstruction, are presently allowed to the extent provided by statute in IRAs and would continue to be allowed under all alternatives. Changes in roadless management are, therefore, not expected to affect existing or future locatable mineral exploration or mining activities on the Forest.

Leasable minerals are certain types of minerals, primarily energy resources (e.g., oil, gas, coal, and geothermal resources) that are not subject to mining claim location but are available for exploration and development under provisions of the Mineral Leasing Act of 1920 and other mineral leasing laws. Roadbuilding is currently prohibited for any new leasable projects, including geothermal projects, within

IRAs. For Alternatives 2, 3, 4, and 5, this prohibition would continue in Watershed Priority (Alternative 2), Roadless Priority, and LUD II Priority ARAs. Following project-specific analyses, roads could be approved for leasable projects within Timber Priority (Alternative 4) ARAs. Geothermal energy projects could be allowed in Roadless Priority and Community Priority ARAs under exceptions provided for community utility systems. The Tongass has three current geothermal leases; however, no development has occurred, and the probability of development is low. No other current leases exist. The anticipated demand for leasable minerals is expected to remain low. As a result, changes in roadless management are expected to have limited impacts on related economic activity.

Salable minerals on the Forest are mainly used to construct NFS roads. Since road construction is not expected to vary much between alternatives, there would be little difference in salable mineral development between the alternatives.

Infrastructure Development

With some exceptions, Federal and state road development is presently limited in IRAs. Exceptions include roads with reserved or outstanding rights, roads provided for by statute or treaty, or road development related to a Federal Aid Highway. Roadless designation would be removed to various degrees under the action alternatives with corresponding implications for regional highway development. In most cases, changes in roadless management, as well as changes in the number of acres managed as roadless, would be more permissive with respect to regional road systems. In addition to those roads presently excepted, Roadless Priority ARAs would also allow roads needed for the connection of communities and development of the regional transportation system as identified in the State of Alaska's Southeast Alaska Transportation Plan. Timber Priority ARAs and areas removed from roadless designation would not have roadless rule-related prohibitions on road building. More areas would be available for additional types of regional road development under Alternatives 4 to 6. Future road projects would be subject to funding constraints and evaluated in detail on a project-by-project basis. Potential transportation effects are discussed in more detail in the *Transportation, Energy, Communications, and Infrastructure* section of this EIS.

None of the alternatives are expected to substantially affect the development of energy projects or related infrastructure. Removing roadless designations in areas under Alternatives 2 through 6 would simplify the process for projects but would not necessarily result in an increase in the number of projects developed.

In areas where new roadless areas are added or expanded, the permitting process could be more complex, but projects would not be prohibited. An exception for utility systems in Roadless Priority ARAs under Alternatives 2, 3, 4, and 5 and Community Priority ARAs (Alternative 3) would allow for timber harvest and road construction. Under Alternative 4, Roadless Areas with timber priority would not prohibit timber harvest or road construction at all. Where restrictions are removed, or exceptions added, the greatest effect may be in making the permitting process for developers less burdensome, resulting in a more efficient permitting process rather than an increase in the number of sites developed.

Tree Harvest for Alaska Native Cultural Purposes

Timber cutting, sale, or removal is prohibited in IRAs (Alternative 1), with some exceptions if the Regional Forester or designated Forest Officer determines that one of a limited number of circumstances exists (as specified in 66 FR 3244 § 294.13). These circumstances include the provision of trees, portions of trees, or forest products to Indian tribes free of charge for traditional and cultural purposes (36 CFR part 223.15; FSH 2409.18, chapter 80, section 82.5). However, roads may not be constructed or reconstructed in IRAs and, while there are some exceptions, they do not include access for timber cutting, sale, or removal (66 FR 3244 § 294.12).

Alternatives 2, 3, 4, and 5 provide for a variety of management approaches within roadless areas through ARA land management designations, which include LUD II Priority, Watershed Priority, Roadless Priority, Community Priority, and Timber Priority. In areas where roadless designation is removed, there would be no roadless-related limitations and only Forest Plan-defined limitations would exist (in addition to other existing statutory requirements). The timber cutting, sale, or removal exception for the provision of trees

to Indian tribes for traditional and cultural purposes would remain in place under all ARAs, as well as under Alternative 6.

As with IRAs, roads may not be constructed or reconstructed in an ARA, with some exceptions which vary by type of ARA. Exceptions related to access for Indian tribes for tree harvest for traditional and cultural purposes may be summarized by ARA as follows:

- The Roadless Priority and Community Priority ARAs include specific exceptions for roads "to provide access to Alaska Native cultural site(s) if requested by an affected federally-recognized tribe(s)."
- LUD II Priority and Watershed Priority ARAs do not provide the above exception or other timber-related exceptions to the restriction on road construction and reconstruction.
- The Timber Priority ARA allows road construction for timber harvest and other uses, with no specific exception required for access to Alaska Native cultural sites. Road construction in the Timber Priority ARA would be managed in accordance with the Forest Plan.

Alternatives 2, 3, and 4 would remove roadless designations on a portion of current roadless lands. Alternative 5 would remove the roadless designation from all development LUDs in all current roadless areas, thereby allowing the maximum level of road construction for timber harvest and related uses. Alternative 6 would remove regulatory roadless designation from all designated roadless areas on the Tongass and would allow the maximum level of road construction for timber harvest and all other uses. As with the Timber Priority ARA, no specific exception would be required for access to Alaska Native cultural sites or trees important for cultural purposes, and areas removed from roadless protection would be managed under the Forest Plan.

Management designations (including removal of regulatory roadless designation) that would allow road access to Alaska Native cultural sites are summarized by alternative in Table 3.2-10. Management designations are divided into two categories: 1) the Roadless Priority and Community Priority ARAs, which each provide a specific exception for access to Alaska Native cultural sites; and 2) the Timber Priority ARA and full exemption, which both allow roads, with no specific exception required for Alaska Native cultural sites. Management under the Roadless Priority and Community Priority ARAs is generally assumed to be more beneficial in this context than management under the Timber Priority ARA or full exemption because it potentially allows access for Alaska Native cultural purposes without also allowing access for commercial timber harvest and other competing uses. Under the Timber Priority ARA and full exemption, timber harvest and other development activities would be managed in accordance with the Forest Plan, with old-growth harvest limited to areas in development LUDs.

With the above assumptions in mind, the alternatives can be ranked for access and competition. For access, Alternatives 5 and 6 would rank highest, but Alternative 4 would be close behind. Alternatives 2, 3, and 1 would rank lowest, in that order. For competition, the best alternative would be Alternative 1, followed closely by Alternative 2, and then 3, 4, 5, and 6, in that order. Access for cultural purposes has benefits but may increase competition with the timber industry for trees to be used for traditional or cultural purposes, and competition is the greater concern from the Tribes. As noted above, the type of access created by the Roadless Priority and Community Priority ARAs is preferable to the access created by the Timber Priority ARA or full exemption.

Based on this rationale, Alternatives 2 and 1 would appear to be best overall, because of the relatively low level of competition with commercial timber harvest they would create. Alternative 2 would rank higher than Alternative 1 because they are almost the same in terms of competition and Alternative 2 includes over 5 million acres of Roadless Priority, which would improve access relative to the 2001 Roadless Rule. Alternatives 4 and 3 would rank in the middle overall. Alternative 4 would rank higher than Alternative 3 because they are very similar in terms of acres opened up for competition, but Alternative 4 includes over 7 million acres of Roadless Priority while Alternative 3 includes less than 5 million acres in Roadless and Community Priority ARAs, combined. Alternatives 5 and 6 would allow road construction for access to Alaska Native cultural sites, but would also allow the most access for commercial timber harvest and other competing uses, which could outweigh the benefits. Potential conflicts between competing uses under Alternatives 5 and 6 would primarily be limited to areas managed as development LUDs.

Table 3.2-10
Access to Alaska Native Cultural Sites by Management Designation and Alternative

	Alternative					
Management Designation	**1**	**2**	**3**	**4**	**5**	**6**
Alaska Native Cultural Exceptions[1]						
Roadless Priority ARA	0	5,199,000	4,595,000	7,363,000	6,200,000	0
Community Priority ARA	0	0	370,000	0	0	0
Subtotal	**0**	**5,199,000**	**4,965,000**	**7,363,000**	**6,200,000**	**0**
Removal of Roadless Requirements[2]						
Timber Priority ARA	0	0	0	757,000	0	0
Full Exemption (net change)	0	32,000	1,144,000	394,000	2,321,000	9,368,000
Subtotal	**0**	**32,000**	**1,144,000**	**1,151,000**	**2,321,000**	**9,368,000**
No Change in Access[3]						
LUD II Priority	0	854,000	0	854,000	847,000	0
Watershed Priority	0	3,284,000	3,259,000	0	0	0
2001 Roadless Rule	9,368,000	0	0	0	0	0
Subtotal	**9,368,000**	**4,138,000**	**3,259,000**	**854,000**	**847,000**	**0**
Grand Total[4]	**9,368,000**	**9,368,000**	**9,368,000**	**9,368,000**	**9,368,000**	**9,368,000**

[1] The Watershed Priority and Community Priority ARAs include specific exceptions for roads "to provide access to Alaska Native cultural site(s) if requested by an affected federally-recognized tribe(s)."
[2] Timber Priority ARA and full exemption allow all roads, with no specific exception required for Alaska Native cultural sites. Timber harvest and other development activities would be managed in accordance with the 2016 Forest Plan.
[3] The LUD II Priority and Watershed Priority ARAs and the 2001 Roadless Rule allow cultural trees to be taken by Alaska Native tribes, free of charge, but do not allow roads to be constructed or reconstructed for accessing them.
[4] Totals may not sum due to rounding.

Rural Subsistence Activities

Potential effects on rural subsistence activities are expected to be similar to the current Forest Plan under all of the action alternatives, with similar effects anticipated with respect to abundance and distribution, access, and competition. Impacts to subsistence are discussed in more detail in the separate *Subsistence* section, below. Subsistence impacts are also assessed by community and alternative in Appendix E.

Payments to the State

As noted in the *Affected Environment* discussion, the Secure Rural Schools Act has been reauthorized since 2008, most recently in March 2018. The amount of these payments would not be affected by any of the alternatives considered in this EIS.

Key Issue 3 – Conserve Terrestrial Habitat, Aquatic Habitat, and Biological Diversity

Biological Diversity

Affected Environment

This section provides a summary of the Old-growth Habitat Conservation Strategy, ecosystem-based landscape delineations or biogeographic provinces on the Tongass, and past timber harvest. Landscape connectivity and fragmentation and invasive species are also discussed. Additional information on the background of the Old-growth Habitat Conservation Strategy and its components can be found in the 2016 Forest Plan Amendment EIS (USDA Forest Service 2016b, Appendix D).

Ecosystem Classification

Southeast Alaska is divided into 23 biogeographic provinces (21 of which coincide with the Tongass) and characterized by 1) similarities in terrestrial wildlife species composition, 2) similarities in distributional patterns for many of these species, 3) geologic and water barriers stemming from past events, such as glaciation, and 4) generally similar climatic conditions and physiographic characteristics (USDA Forest Service 2003a). Biogeographic provinces provide an appropriate scale for the analysis of impacts to biological diversity because they are ecosystem-based and vary in the level of resource development that has taken place and is allowed within them (see the Suitable Land maps in the Map Packet for the distribution of suitable old growth and young growth across the Planning Area). Biogeographic provinces in Southeast Alaska are described in Table 3.3-1 and shown on Figure 3.3-1.

Cover Types

The vegetation of Southeast Alaska and the Tongass is dominated by temperate coastal rain forests at lower elevations (less than about 2,000 feet). Interspersed within the forest are muskegs, other wetlands, and other non-forest types. At higher elevations, alpine vegetation, rock, glaciers, and snowfields dominate. Table 3.3-2 summarizes the breakdown of cover types by biogeographic province. Each of these cover types is described below.

Approximately 60 percent of the Tongass consists of forest land (including harvested areas). Approximately 5.6 million acres of the forest land is considered “productive forest land,” defined as land capable of producing at least 20 cubic feet of wood fiber per acre per year or having greater than 8,000 board feet per acre of standing volume (see the *Timber* section for additional discussion). The remaining 4.4 million acres of forest lands are considered unproductive forest because they do not meet the above criteria.

Productive forest land is divided into POG and young growth. Young growth includes those stands resulting from past timber harvest, as well as natural young growth (e.g., created by wind, fire, or glacial retreat).

Table 3.3-1
Biogeographic Provinces in Southeast Alaska and the Tongass National Forest

No.	Province	Description
1.	Yakutat Forelands	A very young, nearly flat landscape with extensive flooding and active isostatic rebound (uplifting of the ground after glaciers recede). Most surfaces vary from 200 to 1,500 years old. Dune formation and succession are ongoing processes due to glacial rebound and wave action. Plant community patterns reflect a diverse mosaic of naturally occurring older and young forests, shrublands, bogs, and meadows. Sitka spruce, alder, and cottonwood are abundant on well drained, recently deglaciated, and active fluvial surfaces. Most of the province is inside the Tongass Forest boundary, but the southern lobe that extends into Glacier Bay National Park is not.
2.	Yakutat/ Glacier Bay Upland	The climate varies from very wet hyper-maritime along the coast to very wet maritime inland. Mountains abruptly rising more than 10,000 feet from sea level, extensive active glaciers, and fiords dominate this landscape. Sitka spruce, alder, and cottonwood are abundant at lower elevations; alpine and lichen over rock plant communities dominate the land from 2,000 to over 10,000 feet elevation.
3.	East Chichagof Island	This province is drier and colder than the outer coast of Chichagof Island; the winter snow pack is generally greater. Chichagof Island is deeply dissected into three peninsulas, which may be functioning biologically more like separate islands. Vegetation in this province represents a modal condition similar to the Admiralty Island Province.
4.	West Chichagof Island	This province is dominated by a very wet hyper-maritime climate and exposure to outer coastal storms. Hundreds of small islands dot the coast. Topography is gentle when compared to the mountains of Baranof Island and the coastline is highly irregular. The Sitka spruce/Pacific reedgrass plant association is abundant along the outermost coastal fringe; otherwise, vegetation is similar to the other northern islands.
5.	East Baranof Island	This province is colder than West Baranof or East Chichagof Island. Mountain glaciers occur along the divide between east and west Baranof. Topography is rugged and steep to saltwater, with little flat land. Plant associations on East Baranof are similar to much of the mainland due to the steep topography and cold environment. Spruce, devil's club, salmonberry forest associations are common on avalanche and steep erosional slopes; alpine and rock/lichen plant communities are abundant.
6.	West Baranof Island	This province is similar to the West Chichagof Island Province with the exception of southern Baranof, where precipitation exceeds 250 inches per year. Topographically, Baranof Island is the most rugged of all the islands in Southeast Alaska. The southern half of this province is highly dissected by steep-sided fiords; the outer coast is dotted with hundreds of small islands. All forest plant associations except those in the Western red-cedar series and those found around large mainland rivers occur in this province. Kruzof Island has some unique vegetation communities, which have not been classified.
7.	Admiralty Island	This province is represented by relatively gentle topography and moderate rainfall. Winter conditions are moderated by the surrounding marine environment. Winds from Chatham and Icy Straits, Lynn Canal, and off the mainland are often severe. All forest plant associations but those in the Western red-cedar series, those found around large mainland rivers, and those occurring only on outer coastal areas occur in this province. Forest productivity is high. Fresh and saltwater marshes in the numerous bays and inlets, and alpine and bog communities, are abundant.
8.	Lynn Canal	Rain shadows and the dominating influence of the continental climate make this the driest and seasonally warmest province in Southeast Alaska. Precipitation is generally less than 60 inches per year. The topography is rugged and glaciated. The southern portion of the Chilkat Peninsula is more similar to the East Chichagof Island Province. Western and mountain hemlock and Sitka spruce plant associations are common. Alpine tundra and extensive rock/lichen communities dominate much of the land from 2,000 to over 8,000 feet elevation.
9.	Northern Coast Range	This province has little maritime influence. Topography is rugged and glaciated. The Taku and Whiting Rivers extend into Canada. All forest plant associations except those in the Western red-cedar series and those occurring only on outer coastal areas occur in this province.
10.	Kupreanof/ Mitkof Islands	The climate is cooler and the winter snow pack greater than on the islands to the south. The eastern edge of this province is strongly influenced by wind-born loess (silt) coming from the Stikine River and the mainland. All forest plant associations except those in the Western red-cedar series and those occurring only on outer coastal areas occur in this province. This province contains the highest percentage of muskeg wetlands within the Tongass.
11.	Kuiu Island	Kuiu Island is deeply dissected, creating several prominent peninsulas. The topography is gentle compared to neighboring Baranof Island or the mainland. The climate is cooler and winter snow pack greater than on islands to the south, yet milder than the mainland or islands nearer the mainland. The western portion of Kuiu Island is subject to severe windstorms from both the ocean and Chatham Strait. Most forested plant associations occur here, but those found in outer coastal environments dominate.

Table 3.3-1 (continued)
Biogeographic Provinces in Southeast Alaska and the Tongass National Forest

No.	Province	Description
12.	Central Coast Range	This province is warmer than the Northern Coast Range Province. The topography is similar, but overall less precipitous. The Stikine River system is located in the center of this province and has a major continental influence, providing a migration corridor for plant and animal species. Plant associations found along saltwater are similar to those occurring elsewhere in northern Southeast Alaska except for those near the mouth of the Stikine River. Here, unique plant associations subject to high loess-carrying winds can be found.
13.	Etolin Island and Vicinity	Similar to the Kupreanof/Mitkof Islands Province, this province is also subject to continental influence from the mainland and the Stikine River. Glacial flour (very finely ground particles of rock, silt, or clay created by a glacier when its rock-filled ice scrapes over bedrock and which flow out from beneath a glacier in the meltwater) is present in the marine environment in the northern part of this province nearly year-round. All forest plant associations except those occurring only on outer coast areas are present.
14.	North Central Prince of Wales Island	Topography is relatively gentle, limestone is common, and precipitation is relatively low due to interception by lands to the south and southwest. All forest plant associations except those found around the mainland river systems occur in this province. Overall forest productivity is high. Karst topography and numerous caves are present.
15.	Revilla Island/ Cleveland Peninsula	Climate is variable with warm and wet conditions predominating on land nearest the outer coast; much colder conditions occur near the mainland. Revilla, Gravina, and Annette Islands are influenced by human activities and populations, whereas the Cleveland Peninsula and Duke Island are generally in a natural condition. Revilla Island has many exceptional estuaries. Muskeg ponds are common on Duke Island, attracting many wintering and migratory birds.
16.	Southern Outer Islands	These islands are isolated and are subject to strong oceanic influences. Temperatures are moderate year-round. The topography is low-lying and gentle. These islands are relatively rich in endemic vertebrate species, including dusky shrew, long-tailed vole, and ermine. Major coastal seabird colonies are present.
17.	Dall Island and Vicinity	These islands are subject to strong oceanic influences. Temperatures are moderate year-around. The topography is rugged and dissected, with abundant limestone outcrops. Dall Island appears to be a glacial refugia but inventories of plants and animals are limited. Major coastal seabird colonies are present on Dall Island.
18.	South Prince of Wales Island	The climate is warm and wet, and deep snow is rare or highly transient. The topography is steep and rugged and the coastline is highly dissected. The vegetation in this province is strongly influenced by southeasterly storms; mixed conifer and western hemlock-red-cedar plant associations dominate.
19.	North Misty Fiords	Compared to South Misty Fiords, this province has considerable topographic relief and characterized as having a colder, mainland-type climate with many glaciers. Vegetation occurs in long, narrow strips along the valleys and lower slopes of fiords. Much of the vegetation is muskeg, with cottonwoods in some of the river bottoms and subalpine fir along the Canadian border.
20.	South Misty Fiords	South Misty Fiords is typical of the other mainland provinces and is the warmest. Topographic relief is lower in comparison with North Misty. Forest plant associations are more diverse than the other coastal provinces, and the vegetation is less fragmented by rock and ice than in North Misty Fiords. The southwestern portion of this province is rolling, nearly continuous muskeg with conifer forests in the bottoms and flats. This province is the northern limit of Pacific silver fir, yew, and honeysuckle.
21.	Ice Fields	Permanent ice fields, active glaciers (some advancing and some receding), and nunataks (mountain peaks between glaciers) dominate this province.
22.	Chilkat River Complex	The Chilkat River Complex lies at the northern end of the Inside Passage and is outside the Tongass Forest boundary. It consists of tall ridge systems, large glacial rivers, and includes glaciers and snowfields. Many of the rivers and drainage basins extend across the international boundary into Canada. Because of the overlap of coastal and interior floras and faunas, the province contains Alaska's highest vascular plant species richness and the highest mammalian diversity in Southeast Alaska (Carstensen et al. 2007).
23.	Glacier Bay/ Fairweather Range	This is the largest province in Southeast Alaska (2.5 million acres) and is located outside the Tongass Forest boundary. The vast majority is high mountains and glaciers and the majority is non-vegetated. The highest peaks are in the Fairweather Range along the western edge of the province, with Mt. Fairweather at over 15,000 feet. A large flat, foreland, the Gustavus Foreland, occurs in the area around Gustavus and to the north in the Bartlett River valley. Lowlands are also fairly extensive along the Dundee River and other smaller drainages on the southwest side of Glacier Bay. Glacier Bay National Park protects virtually the entire province (97 percent), except for about 75,000 acres in the vicinity of Gustavus.

Figure 3.3-1
Map of Biogeographic Provinces of Southeast Alaska

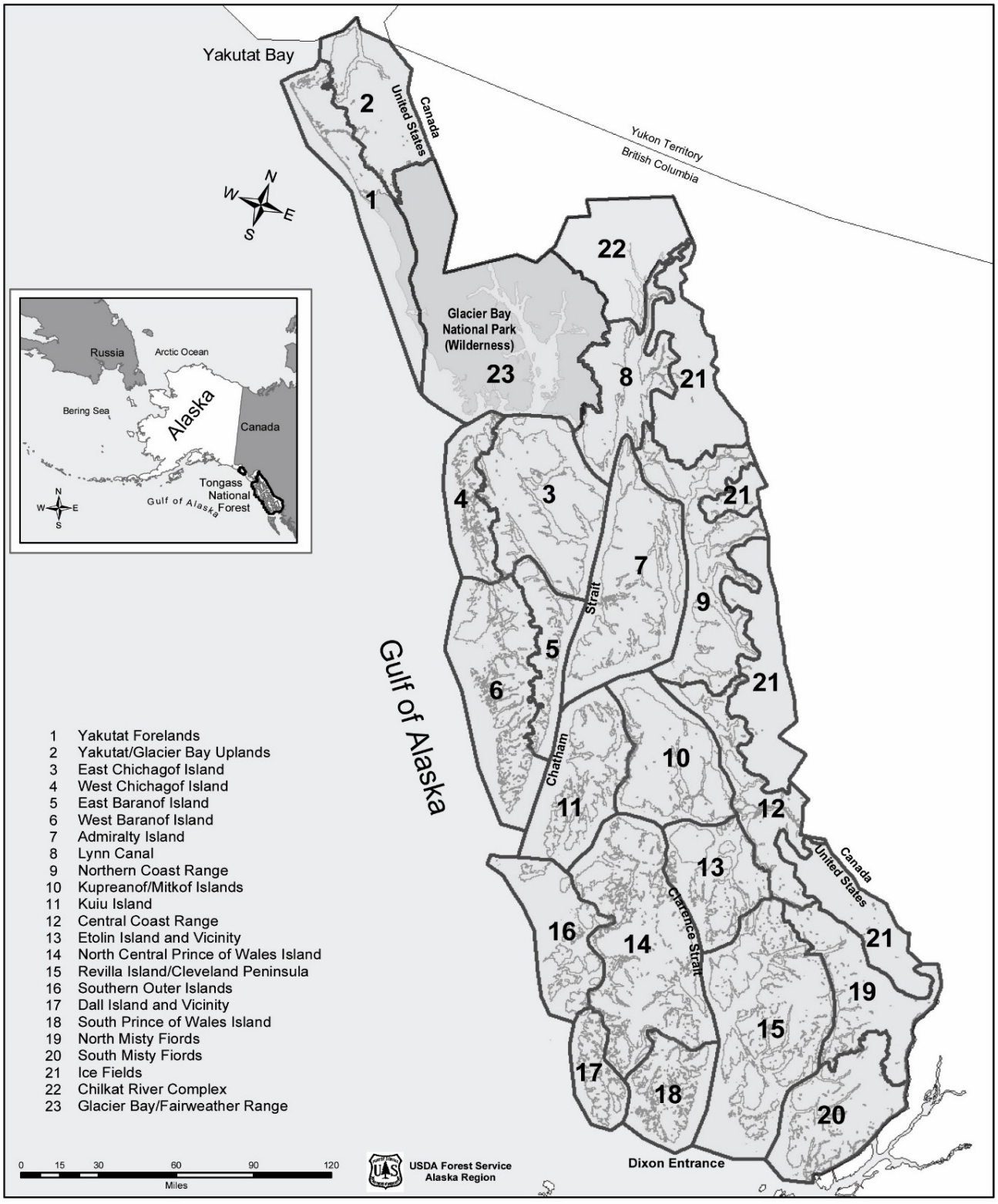


Table 3.3-2
Major Cover Types on the Tongass National Forest by Biogeographic Province (NFS Lands Only)

		Productive Forest (acres)			Unproductive Forest (acres)			Non-Forest (acres)			Unmapped
Biogeographic Province		POG[3]	Young-growth[1,3]	Total Productive Forest	Forested Muskeg[3]	Other Unproductive Forest[3]	Total Unproductive Forest	Land[2,3]	Water[3]	Total Non-Forest	Other
1	Yakutat Forelands	94,847	40,356	135,203	101,775	25,807	127,583	29,549	5,486	35,035	7,763
2	Yakutat Uplands	43,838	13,212	57,049	5,244	14,752	19,995	814,444	23,866	838,310	1,926
3	East Chichagof Island	399,152	47,332	446,484	108,731	203,783	312,514	275,325	6,800	282,126	4,295
4	West Chichagof Island	72,614	329	72,943	45,206	82,655	127,861	72,496	8,430	80,927	1,028
5	East Baranof Island	88,669	14,341	103,010	12,204	90,074	102,278	177,553	6,323	183,876	1,698
6	West Baranof Island	214,429	17,715	232,143	70,538	193,739	264,277	241,642	19,679	261,322	3,221
7	Admiralty Island	595,616	25,860	621,475	85,114	190,246	275,361	147,866	13,292	161,158	4,874
8	Lynn Canal	158,009	8,322	166,331	20,617	100,250	120,868	347,557	2,736	350,293	4,046
9	North Coast Range	322,663	5,960	328,623	19,694	159,364	179,058	477,154	15,559	492,713	3,911
10	Kupreanof/Mitkof Island	308,046	39,157	347,203	176,597	212,250	388,847	14,252	3,821	18,073	3,803
11	Kuiu Island	292,304	30,967	323,271	44,128	88,421	132,549	18,504	2,567	21,071	3,711
12	Central Coast Range	246,229	9,309	255,538	27,232	152,657	179,890	267,080	10,612	277,691	4,114
13	Etolin Island	220,998	42,103	263,101	71,848	130,203	202,051	20,948	4,836	25,783	5,062
14	North Central Prince of Wales	485,142	171,051	656,193	152,229	270,990	423,219	44,291	21,198	65,489	9,462
15	Revilla Island/ Cleveland Peninsula	503,404	48,322	551,726	174,203	307,539	481,742	87,069	35,620	122,689	6,375
16	Southern Outer Islands	112,109	18,184	130,293	27,176	44,396	71,573	4,654	895	5,549	3,265
17	Dall Island and Vicinity	66,880	1,298	68,179	6,467	26,547	33,014	9,585	2,962	12,547	1,621
18	South Prince of Wales	150,860	4,256	155,116	45,275	105,831	151,106	27,156	10,910	38,065	2,667
19	North Misty Fjords	198,187	6,554	204,741	21,227	264,633	285,860	458,713	14,424	473,137	5,125
20	South Misty Fjords	309,058	2,405	311,463	80,097	292,245	372,342	2,222	14,715	216,937	3,794
21	Ice Fields	116,895	10,004	126,899	8,628	171,811	180,439	2,535,268	10,561	2,545,829	149,236
Forest-wide		**4,999,950**	**557,036**	**5,556,986**	**1,304,231**	**3,128,192**	**4,432,423**	**6,273,330**	**235,291**	**6,508,620**	**230,998**

[1] Includes 83,000 acres of natural young growth, 430,000 acres of even-aged harvested stands, and about 45,000 acres of partial harvested stands.
[2] Non-forest land classes primarily include alder brush, brush, alpine, ice and snow fields, muskeg meadow, recurrent slide, and rock.
[3] Totals may not sum or match exactly to other tables in this section due to rounding.

Source: Data are from USDA Forest Service 2018 GIS.

The remaining 40 percent of the Tongass National Forest (about 6.7 million acres) is classified as non-forest land and includes shrub and herbaceous habitats (e.g., muskeg, alpine, estuaries), sparsely vegetated and non-vegetated areas (e.g., snow, rock, ice), and aquatic habitats (e.g., streams, ponds, and lakes).

Productive Old-Growth Forest

Old-growth forests support biological diversity due to their structural and ecological complexity. In Southeast Alaska, old-growth forests are greater than 150 years old, and are characterized by multiple canopy layers; an interspersion of trees of multiple age classes; the presence of snags, decadent trees, and fallen trees; presence of forbs; and variation in the amounts and distribution of live trees (USDA-FS R10-TP-28). These features create intricate habitat niches that support many plant and animal species (Spies 2004). In Southeast Alaska, old-growth forests have been the focus of past timber harvest making them the most susceptible ecosystem to changes caused by forest management activities.

The Size-Density Model (SDM), which uses a combination of tree sizes and tree densities to classify forest structure (Caouette and DeGayner 2005) into Size Density classes (SD classes), is used by the Tongass to map POG and assess impacts to old-growth habitat. This classification system builds on the timber volume-based classification system (volume strata) for POG used developed prior to the 2008 Land and Resource Management Plan (Forest Plan) (low-, medium-, and high-volume strata), which used hydric soils and steep slopes as measures of productivity and growth. While timber volume may be a good indicator of the overall productivity of a forested stand, volume fails to recognize key differences in forest structures. Forest structure is important because it reflects the complex spatial and temporal interactions between plant growth (e.g., dispersal and competition), environmental gradients (e.g., geology, soils, slope, aspect, elevation, and climate), and disturbance (e.g., wind and logging) (Caouette and DeGayner 2005). To move beyond the limitations of timber volume, the SDM was developed as a means to produce a classification system based on forest structure. By modeling forest structure patterns using two measurable forest attributes: tree sizes and densities, the SDM is more applicable in assessing biodiversity, estimating timber values, and describing wildlife habitat than using timber volume alone (Caouette and DeGayner 2005). Seven POG types have been defined, which were used to develop a hierarchical mapping model for predicting tree sizes and densities on the Tongass National Forest. Figure 3.3-2 presents a description of each of the categories and illustrates the most probable forest type on the Tongass National Forest based on land form and forest condition.

From a biological diversity standpoint, high-volume POG and large tree POG are thought to have the highest importance for diversity. High-volume POG is defined as the grouping of the three tree size and density classes that represent the highest volume strata—SD5S, SD5N, and SD67 types. Large-tree POG is defined as the SD67 class, representing the most productive of the POG types, and typically containing the highest density of large trees.

There are approximately 5 million acres of POG forest on the Tongass. Of this amount, approximately 16 percent is low-volume POG (SD4H type), 42 percent is medium volume POG (SD4N, 4S, and 5H types), and 42 percent is high-volume POG (SD5S, 5N, and 67 types). Large-tree POG (SD67 type) makes up almost 11 percent of all POG. Table 3.3-3 provides the distribution of existing POG forest by biogeographic province and POG type.

Elevation is considered a landscape variable influencing the distribution and availability of POG forest. Lower elevation stands (at or below 800 feet) hold the highest value for many wildlife species because they remain relatively accessible during winter (see the *Wildlife* section for additional discussion). Forest-wide, only approximately 60 percent of POG forest occurs at low elevations, but 64 percent of high-volume POG and 74 percent of large-tree POG occurs at low elevations, respectively (see Table 3.3-4).

Figure 3.3-2
Tree Size and Density Model used to Describe Forested Conditions across the Tongass National Forest

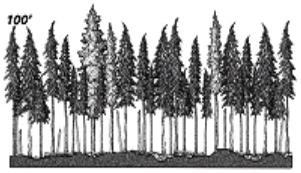
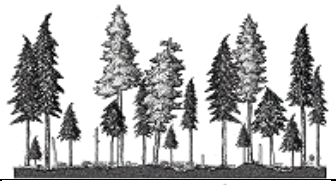
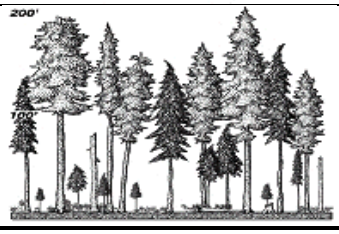
SD Class	*Land and Forest Condition* Most Probable Forest Type	*Tree Sizes and Densities* Most Probable Forest Type 1	*Illustration* Most Probable Forest Type
4H	Low productive older forests associated with wet, poorly drained land types (e.g., muskegs, fens, rolling hills, broken mountain slopes, plateaus, glacial outwash zones). Canopy closure is variable. Trees are small, old, and defective. Stand volume is low.	Low densities **(SDI < 280)** of small-diameter trees **(QMD < 17 inches)**. Tree size distribution and spacing is variable and patchy. Tree diameters greater than 40 inches are generally not present.	
4N	Low to moderately productive older upland forests. Canopy characteristics are variable and patchy, with moderate canopy closure and relatively coarse canopy texture. Stand volume is low to moderate.	Low densities **(SDI < 280)** of medium diameter trees **(17 < QMD < 21 inches)**. Tree size distribution and spacing is variable and patchy. Tree diameters greater than 40 inches are rare.	
4S	Highly productive younger upland forests. Stand volume is moderate, but increasing rapidly. Crown competition is high. Canopy characteristics tend to be uniform, with high canopy closure and fine canopy texture.	High densities **(SDI > 280)** of medium-diameter trees **(17 < QMD < 21 inches)**. Tree size distribution and spacing tends to be more uniform. Tree diameters greater than 40 inches are rare.	
5H	Moderately productive older forests associated with wet, somewhat poorly drained land types. Canopy closure, texture, and structure tend to be variable and patchy. Stand volume and annual growth is also variable and patchy.	Low densities **(SDI < 280)** of medium-diameter trees **(17 < QMD < 21 inches)**. Tree diameters greater than 40 inches are somewhat common, but not uniformly distributed throughout the stand.	
5N	Moderately productive older upland forests. Stand volume is moderate to high. Canopy characteristics tend to be variable, with moderate canopy closure and coarse canopy texture.	Low densities **(SDI < 280)** of medium-to-large diameter trees **(17< QMD < 21 inches)**. Tree size distribution and spacing is variable and patchy. Tree diameters greater than 40 inches are common, but not uniformly distributed throughout the stand.	
5S	Highly productive upland forests. Stand volume is high. Canopy characteristics tend to be uniform, with moderate to high canopy closures.	High densities **(SDI > 280)** of medium-diameter trees (**17 < QMD < 21 inches)**. Tree size distribution and spacing tends to be uniform. Tree diameters greater than 40 inches are somewhat common, but not uniformly distributed throughout the stand.	
67	Highly productive forests associated with riparian areas, alluvial fans, colluvial toe slopes, karst geology, and wind-protected uplands. Stand volume is high. Stand age can vary. Canopy closure is low to moderate and canopy texture is coarse.	Low densities **(SDI < 280)** of large-diameter trees **(QMD > 21 inches)**. Tree diameters greater than 40 inches are common and uniformly distributed throughout the stand.	

Table 3.3-3
Distribution of Productive Old-Growth Forest on the Tongass National Forest by Biogeographic Province (NFS Lands Only)

		POG Type							
		Low Vol.	Medium Vol.			High Vol.			
	Biogeographic Province	SD4H	SD4N	SD4S	SD5H	SD5N	SD5S	SD67 (Large-tree)	Total POG[1]
1	Yakutat Forelands	7,236	9,426	17,639	2,025	4,791	9,755	43,976	94,847
2	Yakutat Uplands	2,777	6,323	19,523	939	2,926	7,933	3,417	43,838
3	East Chichagof Island	62,546	53,412	102,313	22,106	45,281	79,254	34,241	399,152
4	West Chichagof Island	14,421	12,837	24,938	1,950	6,245	10,202	2,021	72,614
5	East Baranof Island	10,256	15,069	28,722	4,566	12,150	15,938	1,969	88,669
6	West Baranof Island	32,282	38,895	80,394	7,187	19,566	32,011	4,093	214,429
7	Admiralty Island	86,695	53,062	110,613	43,383	64,515	139,688	97,659	595,616
8	Lynn Canal	21,199	20,586	46,128	9,058	13,010	36,075	11,953	158,009
9	North Coast Range	35,540	38,172	88,216	23,435	42,808	72,153	22,340	322,663
10	Kupreanof/ Mitkof Island	84,024	32,116	63,684	21,824	30,168	56,625	19,606	308,046
11	Kuiu Island	42,763	19,535	41,776	24,865	44,668	84,106	34,591	292,304
12	Central Coast Range	30,454	27,195	66,024	12,945	27,070	62,504	20,037	246,229
13	Etolin Island	49,879	24,836	53,972	11,856	25,057	42,970	12,428	220,998
14	North Central Prince of Wales	103,164	27,783	64,535	64,216	43,537	80,281	101,626	485,142
15	Revilla Island/ Cleveland Peninsula	78,575	43,712	94,155	54,564	70,041	130,895	31,463	503,404
16	Southern Outer Islands	17,373	10,276	26,714	9,305	15,631	20,355	12,454	112,109
17	Dall Island and Vicinity	7,440	5,716	16,801	3,455	10,987	14,578	7,904	66,880
18	South Prince of Wales	25,374	11,132	32,206	10,301	11,023	22,011	38,813	150,860
19	North Misty Fiords	13,545	35,207	78,978	3,861	18,998	34,874	12,724	198,187
20	South Misty Fiords	52,833	40,463	104,900	11,392	29,513	55,869	14,088	309,058
21	Ice Fields	4,940	21,671	50,564	1,479	10,427	21,940	5,875	116,895
Forest-wide		**783,314**	**547,425**	**1,212,796**	**344,711**	**548,412**	**1,030,016**	**533,276**	**4,999,950**

[1] Totals may not sum or match exactly to other tables in this section due to rounding.
Source: Data are from USDA Forest Service 2018 GIS.

Young-Growth Forest

There are approximately 557,000 acres of young-growth forest on the Tongass, of which approximately 84 percent is a result of past timber harvest and approximately 15 percent a result of natural processes (e.g., wind, fire, glacial retreat). Over 90 percent of the harvested young growth is from even-age harvest. Approximately 20 percent of young growth from even-age harvest is 25 years old or younger, in the stand initiation stage. Of this age class, stands up to about 10 years tend to have high species diversity, in particular their shrub layer, which expands as a result of the open canopy after harvest. The remaining approximately 80 percent of young growth is older and mostly in the stem exclusion stage. This type of stand condition has very low species diversity.

Some of these older young-growth stands are considered suitable for timber harvest, and could help support the Tongass transition to young-growth harvest (see the *Timber* section for additional discussion of young-growth harvest and suitability). Approximately 90,000 acres of young-growth (harvested and natural) occur in Riparian Management Areas (RMAs) and an additional 68,000 acres occur in Beach and Estuary Fringe outside of RMAs. In addition, approximately 32,000 acres of young growth (harvested and natural) occur within the Old-growth Habitat LUD and outside of RMAs and Beach and Estuary Fringe.

Unproductive Forest and Non-Forested Lands

Approximately 26 percent of the Tongass is classified as unproductive forest (Table 3.3-2). Many unproductive forest stands meet the definition of old growth, but the trees are typically small and stunted (under 40 feet in height) and the canopy is open (10 to 40 percent canopy closure). Hemlock, cedar, and lodge pole pine are the most common trees; blueberry and rusty menzesia are the most common shrubs. Past disturbance to this habitat type has occurred primarily as a result of road construction, which has resulted in some permanent reduction in total acres of these unproductive forest types.

Non-forest ecosystems provide valuable habitat types that include wetland and other areas of shrub and herbaceous types (e.g., muskegs, alder and willow brush, alpine, estuaries), non-vegetated areas (e.g., snow, rock, ice), and aquatic sites (e.g., streams, ponds, and lakes) and contribute greatly to the species diversity on the Tongass National Forest by providing unique microsites and openings that contain shrub and herbaceous vegetation within forested stands.

Approximately 39 percent of the Tongass National Forest consists of non-forest lands (Table 3.3-2).

Overview of Existing Levels of POG Forest on NFS Lands

This section provides a brief summary of past timber harvest as provided in the 2016 Forest Plan Amendment EIS (USDA Forest Service 2016b) and focuses on the amount of POG forest compared to the amount present in 1954 prior to large-scale commercial timber harvest because management activities are most likely to affect productive forest. Other habitat types are expected to be maintained and will contribute toward overall biological diversity.

Approximately 91 percent of the estimated original (prior to 1954) 5.5 million acres of POG that occurred on Tongass remains today (Table 3.3-4). Forest-wide, 86 percent of the original high-volume POG and 79 percent of the original large-tree POG remains (Table 3.3-4). The greatest amount of timber harvest has occurred in the North Central Prince of Wales biogeographic province (74 percent of the total original POG forest remaining), followed by Etolin Island, Southern Outer Islands, East Baranof, Kupreanof/Mitkof Islands, and East Chichagof Island biogeographic provinces (85, 86, 87, 89, and 90 percent of the original total POG forest remaining, respectively; Table 3.3-4).

These biogeographic provinces, in addition to West Baranof Island biogeographic province, have also had the most harvest of high-volume and large-tree POG forest harvested. The Revilla Island/Cleveland Peninsula province also ranks among the highest when considering large-tree POG harvest. For additional discussion of past harvest on the Tongass, see the *Timber* section in this EIS and Appendix C in USDA Forest Service (2016b).

Table 3.3-4
Original and Percent Remaining Total POG, High-Volume POG (SD5S, SD5N, SD67) Total and Below 800 feet, and Large-Tree POG (SD67) Total and Below 800 feet by Biogeographic Province (NFS Lands Only)

		Acres Original POG[1, 2]					% Original POG remaining				
	Biogeographic Province	Total POG	High-Volume POG	High-Vol. POG <800 ft	Large-tree POG	Large-tree POG <800 ft	Total POG	High-Vol. POG	High-Vol. POG <800 ft	Large-tree POG	Large-tree POG <800 ft
1	Yakutat Forelands	98,443	61,218	61,071	45,054	44,965	96%	96%	96%	98%	98%
2	Yakutat Uplands	45,211	15,306	14,810	3,829	3,597	97%	93%	93%	89%	89%
3	East Chichagof Island	443,189	191,803	125,424	47,452	36,951	90%	83%	78%	72%	70%
4	West Chichagof Island	72,614	18,467	14,902	2,021	1,927	100%	100%	100%	100%	100%
5	East Baranof Island	102,142	40,161	31,750	6,010	5,508	87%	75%	71%	33%	33%
6	West Baranof Island	231,279	68,308	53,701	9,149	8,591	93%	81%	77%	45%	43%
7	Admiralty Island	616,194	317,296	192,198	103,833	70,389	97%	95%	93%	94%	92%
8	Lynn Canal	163,380	65,066	39,236	13,564	9,563	97%	94%	91%	88%	86%
9	North Coast Range	323,340	137,808	67,237	22,543	13,831	100%	100%	99%	99%	99%
10	Kupreanof/Mitkof Island	345,548	134,526	84,572	30,856	23,147	89%	79%	74%	64%	62%
11	Kuiu Island	319,805	183,991	131,810	42,841	28,611	91%	89%	86%	81%	75%
12	Central Coast Range	252,770	114,517	70,929	21,999	16,925	97%	96%	93%	91%	89%
13	Etolin Island	259,670	109,459	68,920	24,030	16,417	85%	74%	69%	52%	47%
14	North Central Prince of Wales	656,064	353,636	239,489	152,903	113,309	74%	64%	58%	66%	65%
15	Revilla Island/ Cleveland Peninsula	551,164	268,219	141,142	45,791	27,447	91%	87%	82%	69%	63%
16	Southern Outer Islands	130,013	61,869	45,797	17,825	13,458	86%	78%	75%	70%	66%
17	Dall Island and Vicinity	68,179	34,442	24,210	8,293	6,197	98%	97%	96%	95%	94%
18	South Prince of Wales	155,116	75,039	53,004	40,090	31,356	97%	96%	95%	97%	96%
19	North Misty Fjords	204,462	71,302	42,097	14,606	10,880	97%	93%	91%	87%	85%
20	South Misty Fjords	311,463	101,274	63,891	14,810	11,597	99%	98%	98%	95%	96%
21	Ice Fields	123,567	43,245	21,269	7,876	5,523	95%	88%	81%	75%	70%
Forest-wide		**5,473,634**	**2,466,951**	**1,587,454**	**675,375**	**500,192**	**91%**	**86%**	**82%**	**79%**	**77%**

[1] To determine amount of high-volume POG, assumed 75% of total past harvest consisted of high-volume POG. To determine amount of large-tree POG (SD67 type), assumed 30 percent of total past harvest consisted of large-tree POG.

Source: Data are from USDA Forest Service 2018 GIS.

Of the 922 VCUs, or large watersheds, with POG forest on the Tongass, 71.5 percent are considered intact (for NFS lands only) and are thus likely to maintain a high degree of biological diversity. Although landscapes with higher amounts of past harvest likely remain functional, this index represents areas that are in relatively pristine conditions and thus have the highest ecological integrity. Intact watersheds are defined here as those large watersheds that have less than 5 percent of their POG forest harvested.

Landscape Connectivity and Fragmentation

The Tongass is characterized by an inherent level of fragmentation due to its island geography. The natural distribution of POG forest is also patchy and linear in many areas, as a result of the mosaic condition of the landscape created by muskeg, forested wetlands, alpine areas, other unproductive forest, and other non-forested habitats. This section provides an overview of the concepts of landscape connectivity and fragmentation and existing conditions on the Tongass.

Landscape connectivity has been defined as the degree to which the structure of a landscape helps or hinders the movement of wildlife species (Taylor et al. 1993). A landscape with a high degree of connectivity is one in which wildlife and other species can move readily between habitat patches over the long term (USDA Forest Service 2008a). On the Tongass, connectivity between areas of similar habitats (for example, between two patches of old-growth forest) or between high and low elevation habitats is important to maintaining well-distributed, viable wildlife populations and thus contributing to the ecological integrity of the landscape. Empirical studies to date suggest that habitat loss has large, consistently negative effects on overall biological diversity. Fragmentation, both natural (e.g., windthrow, landslides, insects and diseases, and avalanches) and human-caused (e.g., timber harvest, road building, and powerline development), reduces landscape connectivity by breaking apart larger contiguous blocks of habitat into smaller patches. The degree to which impacts to some species habitat requisites depends on species-specific dispersal capabilities, the distance between habitat patches, and conditions within the matrix between habitat patches.

When fragmentation occurs, there is an increase in the amount of forest edge habitat and a decrease in the amount of interior old-growth forest habitat with which many wildlife species are associated (see the *Wildlife* section).

Fragmentation is often accompanied by a decline in native species diversity because habitat conditions along the edge (edge effects) may favor some species over others. Edge effects may include changes to vegetation structure, species composition (both plants and animals), predation rates, and disturbance (Murcia 1995; Nilon et al. 1995; As 1999). Although the number of species may be higher along edges (often favoring invasive species), the number of habitat specialists (such as those associated with interior old growth forest conditions and those that tend to be more sensitive or at-risk) decreases (As 1999; Nilon et al. 1995; Kissling and Garton 2008).

Past analysis has looked at biological diversity at the large watershed scale. Intact, undeveloped landscapes, even at this scale, are assumed to function in a way that maintains plant communities, unique habitat, and other supporting ecological processes for increased biological diversity. Intact watersheds are defined as those having less than 5 percent of their POG harvested, which is consistent with a similar analysis conducted by Audubon Alaska and The Nature Conservancy (Albert and Schoen 2007). Based on this definition, a VCU, roughly equivalent to a large watershed, with at least 95 percent of the original POG remaining would be considered to be intact.

Forested corridors along streams and between old-growth habitats at different elevations have been reduced in size by past harvest in many areas of the Tongass. Remaining patches of old-growth forest may serve as the only habitat in a landscape for many lichens, fungi, bryophytes, plants, and small-bodied animals, all of which contribute to the biological diversity and productivity of the old-growth forest ecosystem. These patches may be critical for species that are locally endemic, occur only in very specific conditions of forest structure or soil type, or have limited dispersal capabilities. Biogeographic provinces with the greatest levels of past timber harvest (Table 3.3-2) are at a higher risk of not maintaining a full range of natural biological diversity (ecological integrity) and have the greatest reductions in overall landscape connectivity. Other biogeographic provinces are naturally fragmented by unproductive forest and non-forest habitats. Detailed analyses of landscape connectivity and fragmentation are typically

conducted at the project level where individual patches of contiguous old-growth forest habitat and movement corridors can be identified. For this FEIS, landscape connectivity and fragmentation are discussed qualitatively at the biogeographic province scale.

Tongass Forest Plan Old-growth Habitat Conservation Strategy

The Tongass Forest Plan Old-growth Habitat Conservation Strategy was developed to maintain the integrity of the old-growth forest ecosystem, and thereby conserve biological diversity across the Forest, by retaining intact, largely undisturbed habitat. This strategy, initially incorporated into the 1997 Forest Plan, was reviewed and amended for incorporation into the 2008 and 2016 Forest Plans. The Old-growth Habitat Conservation Strategy includes two major components: (1) a forest-wide network of variably sized old-growth reserves (OGRs) allocated to the Old-growth Habitat LUD plus other non-development LUDs and all small islands less than 1,000 acres, and (2) a series of standards and guidelines applicable to lands where timber harvest is permitted, also known as the matrix (USDA Forest Service 2008a, 2008b).

The reserve network was designed to maintain habitats of the species that have the highest viability concerns (USDA Forest Service 2008b), particularly those associated or dependent upon old-growth forest characteristics. The reserve network includes other non-development LUDs such as Wilderness, LUD II, Remote, and Semi-Remote Recreation. These non-development LUDs contribute to maintaining a variety of habitats important for species not necessarily dependent on old growth ecosystems. The intent of the reserve system is to help ensure the maintenance of well-distributed viable populations of all old-growth associated wildlife species across the Tongass, with focus on those species that are most sensitive to habitat loss and fragmentation. For a complete review of the Old-growth Habitat Conservation Strategy, including assumptions underlying the design of the OGR system, refer to Appendix D of the 2008 Forest Plan Amendment EIS (USDA Forest Service 2008b).

Within the matrix areas outside of reserves, components of the old-growth ecosystem are maintained through standards and guidelines designed to provide for important ecological functions such as dispersal of organisms, movement between forest stands, and maintenance of ecologically valuable structural components such as down logs, snags, and large trees. Matrix lands where commercial timber harvest occurs include Modified Landscape, Scenic Viewshed, and Timber Production LUDs.

Matrix management complements the reserve system by providing habitat at smaller spatial scales, increasing the effectiveness of reserves, and maintaining landscape connectivity (USDA Forest Service 2008b). Standards and guidelines applicable to these lands include maintenance of the 1,000-foot beach and estuary buffer, variable-width stream buffers, project-level legacy forest structure retention requirements, high-hazard soils, steep slopes, karst terrain, and visually sensitive travel routes and use areas, and requirements for connectivity. These are all considered contributing elements of the Old-growth Habitat Conservation Strategy. Finally, a number of species-specific standards and guidelines, such as raptor nest and wolf den buffers, set aside old growth buffers, are implemented to avoid impacts to these species. These standards and guidelines are also addressed in the *Wildlife* section of this FEIS. Table 3.3-5 shows the distribution of POG and young-growth forest within the reserve system and matrix lands.

Table 3.3-5
Distribution of Existing POG and Young Growth within the Reserve System and Matrix Lands[1] (NFS Lands Only)

Biogeographic Province	Within Reserves (Non-Development LUDs; acres)				Within Matrix (Development LUDs; acres)			
	Productive Old-growth				Productive Old-growth			
	Total	High-volume (SD 5N, 5S, 67)	Large-tree (SD 67)	Young-growth[2]	Total	High-volume (SD 5N, 5S, 67)	Large-tree (SD 67)	Young-growth[1]
1	74,204	42,760	30,850	24	20,643	15,761	13,125	3,571
2	43,017	13,821	3,181	254	821	455	236	1,119
3	230,168	94,749	23,190	10,340	168,985	64,027	11,051	33,696
4	72,609	18,467	2,021	0	5	0	0	00
5	53,760	16,450	1,213	1,783	34,909	13,606	755	11,690
6	181,286	47,505	3,555	6,327	33,143	8,165	539	10,524
7	595,616	301,862	97,659	20,579	0	0	0	0
8	109,436	41,085	7,817	1,094	48,599	19,953	4,135	4,277
9	215,993	90,833	14,542	354	106,670	46,468	7,798	323
10	136,464	50,115	9,571	6,105	171,582	56,285	10,035	31,396
11	201,938	108,144	18,382	5,538	90,366	55,222	16,210	21,962
12	172,244	76,832	13,096	768	73,985	32,780	6,940	5,773
13	102,925	37,721	6,124	4,277	118,073	42,733	6,304	34,395
14	268,394	130,333	61,538	30,595	216,748	95,110	40,088	140,327
15	342,848	160,788	20,990	9,353	160,556	71,612	10,473	38,407
16	89,520	36,698	8,473	4,089	22,589	11,742	3,981	13,815
17	57,605	29,747	7,541	1,268	9,275	3,722	363	30
18	105,909	50,135	27,764	1,665	44,952	21,712	11,049	2,591
19	184,642	61,321	11,524	5,271	13,545	5,275	1,200	1,003
20	309,058	99,470	14,088	2,405	0	0	0	0
21	97,621	32,693	5,390	4,474	19,274	5,549	485	2,197
Forest-wide	**3,645,258**	**1,541,530**	**388,508**	**116,565**	**1,354,718**	**570,176**	**144,768**	**357,097**

[1] Matrix includes all Development LUDs including Timber Production, Modified Landscape, and Scenic Viewshed; Experimental Forest is also included. Reserves include all other LUDs, which are considered Non-Development LUDs.
[2] Previously harvested young growth, which could help contribute to the transition to young-growth harvest.
Source: Data are from USDA Forest Service 2018 GIS.

Environmental Consequences

Effects Common to All Alternatives

Effects on the Old-Growth Forest Ecosystem

A functional and interconnected old-growth ecosystem is essential to maintaining ecological integrity of several biological diversity components, including: structural complexity (within-stand and landscape level); connectivity (unfragmented contiguous blocks of old growth, as well as functional connectivity within the matrix); stand age and species composition; and various ecological functions (tree establishment, disturbance, and nitrogen fixation [USDA Forest Service 2008b]). Timber harvest in POG may reduce biological diversity by shifting the age-structure of the forest by replacing old growth trees with younger trees (Franklin et al. 1997); changing the composition of understory vegetation (Deal and Tappeiner 2002); and removing key habitat features such as large decadent trees, snags, and downed logs.

Although many other cover types contribute to the overall biological diversity on the Tongass, the emphasis throughout this section is placed on old-growth forest because this is the focus of the Old-growth Habitat Conservation Strategy, and the cover type that has been most affected by timber management activities on the Tongass. The amount of POG remaining and its distribution across the landscape provides a method to estimate the effects of the alternatives on biological diversity and was analyzed in detail in the 2016 Forest Plan Amendment EIS (USDA Forest Service 2016b).

Within matrix lands, there may be slightly more high-volume and large-tree POG harvested under the action alternatives than was predicted for the Forest Plan because of the increased options for creating positive timber sales. However, this is speculative and depends also on harvest levels reaching predicted decadal levels. In addition, the proportion of high-volume and large-tree POG in the added suitable acres under the action alternatives is lower than in the Alternative 1 suitable acres (see *Effects Specific to Each Alternative*). Regardless, potential impacts would be analyzed at the project level and under a separate NEPA process.

Young-growth harvest, depending on treatment type and rotation, may reduce the range of habitats that support diverse plant and animal communities and alter the ecological functions supported by the old-growth ecosystem. However, treatments such as pre-commercial and commercial thinning can result in benefits to biological diversity by increasing understory growth over the short term, and by promoting the development of old-growth stands over the long term when stands are allowed to mature. The effects of young-growth harvest discussed throughout this section, as well as in the *Wildlife* section*,* represent the trade-off associated with the proposed transition to predominantly young-growth harvest.

Young growth suitable for timber harvest occurs in a number of special habitats under the Forest Plan, including RMAs, beach and estuary fringe, and the Old-growth Habitat LUD. Young growth on specific portions of these areas may be harvested under required prescriptions and following specific guidelines. The suitable acres of young growth on these special areas will increase slightly under the action alternatives, but only slightly because the vast majority of existing young-growth stands are not in roadless areas. Therefore, little to no difference among the alternatives is expected.

Effects on the Old-growth Habitat Conservation Strategy

Under all of the alternatives, long-term protection of POG would continue to occur under the Old-growth Habitat Conservation Strategy. The system of OGRs and other non-development LUDs is intended to maintain the ecological integrity of the old-growth ecosystem; all non-development LUDs would remain intact across all alternatives. Within the matrix, old-growth between reserves is maintained through Forest-wide standards and guidelines for stream buffers, the beach and estuary fringe, legacy forest structure, and other features that preclude or limit POG timber harvest under all alternatives (USDA Forest Service 2016b).

Collectively, these measures would facilitate organism dispersal and maintain the functionality and interconnectedness of the old-growth ecosystem (USDA Forest Service 2008b). In addition, the substantial reduction in old-growth harvest relative to the 1997 Forest Plan (under which the Old-growth Habitat Conservation Strategy was developed) through the transition to predominantly young-growth harvest would enhance biological diversity and the functioning of the Old-growth Habitat Conservation Strategy over the long-term. No changes to these Forest Plan features are proposed under any of the alternatives.

Effects Specific to Each Alternative

Alternative 1 (No Action)

Alternative 1 represents continued implementation of the Forest Plan under the 2001 Roadless Rule. Under Alternative 1, there would be no effects related to additional or modified Forest Plan components because none are proposed.

Alternative 1 would maintain the current Forest Plan harvest levels consisting of about 42,500 acres of old growth and 284,000 acres of young growth over 100 years. The total suitable acres of young growth

would be about 334,000 acres and suitable old-growth acres would be about 227,000 acres. Suitable high-volume POG and suitable large-tree POG would be about 96,000 acres and 31,000 acres, respectively.

Harvest of young growth in RMAs, beach fringe, and Old-growth Habitat LUD would remain restricted to the first 15 years and under restrictive harvest prescriptions. Suitable young growth in RMAs consist of about 27,000 acres; in beach fringe about 29,000 acres; and in Old-growth Habitat LUDs about 26,000 acres. Harvest is limited to a maximum of 10-acre openings or commercial thinning. RMA harvest is only allowed outside of TTRA buffers, and beach fringe harvest is only allowed outside of a 200-foot buffer along the shoreline. A one-time entry stipulation is also implemented. Because of the restrictive prescriptions required in these areas, they are harvested at a lower rate than other young-growth areas. Forest Plan modeling projected harvest levels of 1,089 acres in RMAs, 3,903 acres in beach fringe, and 1,811 acres in Old-growth Habitat LUDs after 100 years (USDA Forest Service 2016b, Table 2-18).

Table 3.3-6 shows the projected harvest by biogeographic province over the next 100 years of Forest Plan implementation. Assuming full implementation of the Forest Plan after 100 years, approximately 91 percent of the original total POG, 85 percent of the original high-volume POG, and 78 percent of the original large-tree POG would be maintained on the Tongass (Tables 3.3-7, 3.3-8, and 3.3-9). By biogeographic province, approximately 72 to 100 percent of the original total, 61 to 100 percent of the original high-volume, and 33 to 100 percent of the original large-tree POG would be maintained. The reduction of biological diversity associated with old-growth forest and fragmentation would be greatest in the Kupreanof/Mitkof Island, Etolin Island & Vicinity, and North Central Prince of Wales biogeographic provinces, where the amount of POG remaining is estimated to be reduced by 2 percent over 100 years.

As noted previously, fragmentation can be caused by timber harvest, road building, and powerline and facility development. Under Alternative 1, overall impacts due to fragmentation and on the Old-growth Habitat Conservation Strategy are expected to be minor and consistent with the existing Forest Plan. Under the current Forest Plan, there would be a slight reduction in the number of intact watersheds, and acreage within intact watersheds, over the planning horizon. After 100+ years of Alternative 1 implementation, there would be two fewer intact watersheds considering NFS lands only. This means 71.3 percent of the 922 large watersheds containing POG forest would remain intact.

Table 3.3-6
Projected Harvest of Young Growth[1] and Old Growth Over 100 Years by Biogeographic Province by Alternative

		Alternative 1		Alternative 2		Alternative 3		Alternative 4		Alternative 5		Alternative 6	
No.	Biogeographic Province	Young Growth	Old Growth	Young Growth	Old Growth	Young Growth	Old Growth	Young Growth	Old Growth	Young Growth	Old Growth	Young Growth	Old Growth
1	Yakutat Forelands	4,320	7	4,477	7	5,744	6	5,522	4	5,462	4	5,673	4
2	Yakutat Uplands	949	0	918	0	1,158	0	1,157	0	1,050	0	1,141	0
3	East Chichagof Island	30,597	1,717	29,898	1,714	29,599	1 ,777	29,718	1,716	29,649	1,704	30,216	1,704
4	West Chichagof Island	0	0	0	0	0	0	0	0	0	0	0	0
5	East Baranof Island	9,622	109	9,271	110	9,172	93	9,205	204	9,158	195	9,078	195
6	West Baranof Island	8,983	0	8,724	0	8,638	0	8,634	6	8,590	5	8,549	5
7	Admiralty Island	0	0	0	0	0	0	0	0	0	0	0	0
8	Lynn Canal	3,778	292	4,222	293	4,177	248	4,217	194	4,521	214	4,617	214
9	North Coast Range	137	0	138	0	136	0	155	1	248	2	394	2
10	Kupreanof/Mitkof Island	23,075	7,294	24,782	7,947	24,593	8,409	24,571	8,058	24,581	8,023	24,448	8,023
11	Kuiu Island	17,810	4,107	17,238	3,361	17,067	3,190	17,154	3,393	17,096	3,331	16,974	3,331
12	Central Coast Range	4,102	605	3,968	579	3,926	884	3,924	1,320	3,956	1,296	4,069	1,296
13	Etolin Island & Vicinity	26,839	5,128	27,417	5,196	27,265	5,134	27,321	5,170	27,546	5,264	27,592	5,264
14	North Central Prince of Wales	109,286	14,491	108,932	14,383	108,639	13,861	108,609	12,835	108,122	12,883	107,352	12,883
15	Revilla Island/ Cleveland Pen.	27,520	6,613	27,389	6,923	27,438	7,190	27,312	7,656	27,525	7,660	27,444	7,660
16	Southern Outer Islands	11,374	1,367	11,034	1,279	10,917	1,041	10,923	1,164	10,872	1,145	10,826	1,145
17	Dall Island and Vicinity	0	0	0	0	0	0	0	0	20	0	23	0
18	South Prince of Wales	1,904	735	2,014	675	1,993	557	2,017	656	2,041	647	2,043	647
19	North Misty Fjords	847	1	819	1	811	1	810	1	830	5	855	5
20	South Misty Fjords	0	0	0	0	0	0	0	0	0	0	0	0
21	Ice Fields	3,002	12	2,904	11	2,873	89	2,892	102	2,878	102	2,852	102
Totals[1]	**Forest-wide**	**284,144**	**42,479**	**284,144**	**42,479**	**284,144**	**42,479**	**284,144**	**42,479**	**284,144**	**42,479**	**284,144**	**42,479**

[1] Numbers may not appear to sum correctly due to rounding.

Table 3.3-7
Estimated Percent of Original POG Remaining (Total and in Reserves[1]) after 100 Years by Biogeographic Province and Alternative (NFS lands only)[2]

No.	Biogeographic Province	Original POG Acres	% Remaining in 2018	% Original POG Remaining after 100+ Years (Total / In Reserves) by Alternative					
				Alt 1	Alt 2	Alt 3	Alt 4	Alt 5	Alt 6
1	Yakutat Forelands	98,443	96%	96 / 75	96 / 75	96 / 75	96 / 75	96 / 75	96 / 75
2	Yakutat Uplands	45,211	97%	97 / 95	97 / 95	97 / 95	97 / 95	97 / 95	97 / 95
3	East Chichagof Island	443,189	90%	90 / 52	90 / 52	90 / 52	90 / 52	90 / 52	90 / 52
4	West Chichagof Island	72,614	100%	100 / 100	100 / 100	100 / 100	100 / 100	100 / 100	100 / 100
5	East Baranof Island	102,142	87%	87 / 53	87 / 53	87 / 53	87 / 53	87 / 53	87 / 53
6	West Baranof Island	231,279	93%	93 / 78	93 / 78	93 / 78	93 / 78	93 / 78	93 / 78
7	Admiralty Island	616,194	97%	97 / 97	97 / 97	97 / 97	97 / 97	97 / 97	97 / 97
8	Lynn Canal	163,380	97%	97 / 67	97 / 67	97 / 67	97 / 67	97 / 67	97 / 67
9	North Coast Range	323,340	100%	100 / 67	100 / 67	100 / 67	100 / 67	100 / 67	100 / 67
10	Kupreanof/Mitkof Island	345,548	89%	87 / 39	87 / 39	87 / 39	87 / 39	87 / 39	87 / 39
11	Kuiu Island	319,805	91%	90 / 63	90 / 63	90 / 63	90 / 63	90 / 63	90 / 63
12	Central Coast Range	252,770	97%	97 / 68	97 / 68	97 / 68	97 / 68	97 / 68	97 / 68
13	Etolin Island & Vicinity	259,670	85%	83 / 40	83 / 40	83 / 40	83 / 40	83 / 40	83 / 40
14	North Central Prince of Wales	656,064	74%	72 / 41	72 / 41	72 / 41	72 / 41	72 / 41	72 / 41
15	Revilla Island/ Cleveland Pen.	551,164	91%	90 / 62	90 / 62	90 / 62	90 / 62	90 / 62	90 / 62
16	Southern Outer Islands	130,013	86%	85 / 69	85 / 69	85 / 69	85 / 69	85 / 69	85 / 69
17	Dall Island and Vicinity	68,179	98%	98 / 84	98 / 84	98 / 84	98 / 84	98 / 84	98 / 84
18	South Prince of Wales	155,116	97%	97 / 68	97 / 68	97 / 68	97 / 68	97 / 68	97 / 68
19	North Misty Fiords	204,462	97%	97 / 90	97 / 90	97 / 90	97 / 90	97 / 90	97 / 90
20	South Misty Fiords	311,463	99%	99 / 99	99 / 99	99 / 99	99 / 99	99 / 99	99 / 99
21	Ice Fields	123,567	95%	95 / 79	95 / 79	95 / 79	95 / 79	95 / 79	95 / 79
	Forest-wide	**5,473,612**	**91%**	**91 / 67**	**91 / 67**	**91 / 67**	**91 / 67**	**91 / 67**	**91 / 67**

[1] Reserves include all Non-Development LUDs, which are considered all LUDs other than Timber Production, Modified Landscape, Scenic Viewshed, and Experimental Forest.

[2] Numbers may not appear to sum correctly due to rounding.

Source: Data are from USDA Forest Service 2018 GIS and modeled projected harvest.

Table 3.3-8
Estimated Percent of Original High-Volume POG Remaining (Total and in Reserves[1]) after 100 Years by Biogeographic Province and Alternative (NFS lands only)[2]

No.	Biogeographic Province	Original High-Vol. POG Acres	% Remaining in 2018	% Original High-Volume POG Remaining after 100+ Years (Total / In Reserves) by Alternative					
				Alt 1	Alt 2	Alt 3	Alt 4	Alt 5	Alt 6
1	Yakutat Forelands	61,218	96%	96 / 70	96 / 70	96 / 70	96 / 70	96 / 70	96 / 70
2	Yakutat Uplands	15,306	93%	93 / 90	93 / 90	93 / 90	93 / 90	93 / 90	93 / 90
3	East Chichagof Island	191,803	83%	82 / 49	82 / 49	82 / 49	82 / 49	82 / 49	82 / 49
4	West Chichagof Island	18,467	100%	100 / 100	100 / 100	100 / 100	100 / 100	100 / 100	100 / 100
5	East Baranof Island	40,161	75%	75 / 41	75 / 41	75/ 41	75/ 41	75/ 41	75/ 41
6	West Baranof Island	68,308	81%	81 / 70	81 / 70	81 / 70	81 / 70	81 / 70	81 / 70
7	Admiralty Island	317,296	95%	95 / 95	95 / 95	95 / 95	95 / 95	95 / 95	95 / 95
8	Lynn Canal	65,066	94%	94 / 63	94 / 63	94 / 63	94 / 63	94 / 63	94 / 63
9	North Coast Range	137,808	100%	100 / 66	100 / 66	100 / 66	100 / 66	100 / 66	100 / 66
10	Kupreanof/Mitkof Island	134,526	79%	76 / 37	76 / 37	76 / 37	76 / 37	76 / 37	76 / 37
11	Kuiu Island	183,991	89%	88 / 59	88 / 59	88 / 59	88 / 59	88 / 59	88 / 59
12	Central Coast Range	114,517	96%	95 / 67	95/ 67	95 / 67	95 / 67	95 / 67	95 / 67
13	Etolin Island & Vicinity	109,459	74%	71 / 34	71 / 34	71 / 34	71 / 34	71 / 34	71 / 34
14	North Central Prince of Wales	353,636	64%	61 / 37	61 / 37	62 / 37	62 / 37	62 / 37	62 / 37
15	Revilla Island/ Cleveland Pen.	268,219	87%	85 / 60	85 / 60	85 / 60	85 / 60	85 / 60	85 / 60
16	Southern Outer Islands	61,869	78%	77 / 59	77 / 59	77 / 59	77 / 59	77 / 59	77 / 59
17	Dall Island and Vicinity	34,442	97%	97 / 86	97 / 86	97 / 86	97 / 86	97 / 86	97 / 86
18	South Prince of Wales	75,039	96%	95 / 67	95 / 67	95 / 67	95 / 67	95 / 67	95 / 67
19	North Misty Fiords	71,302	93%	93 / 86	93 / 86	93 / 86	93 / 86	93 / 86	93 / 86
20	South Misty Fiords	101,274	98%	98 / 98	98 / 98	98 / 98	98 / 98	98 / 98	98 / 98
21	Ice Fields	43,245	88%	88 / 76	88 / 76	88 / 76	88 / 76	88 / 76	88 / 76
	Forest-wide	**2,466,951**	**86%**	**85 / 62**	**85 / 62**	**85 / 62**	**85/ 62**	**85 / 62**	**85 / 62**

[1] Reserves include all Non-Development LUDs, which are considered all LUDs other than Timber Production, Modified Landscape, Scenic Viewshed, and Experimental Forest.

[2] Numbers may not appear to sum correctly due to rounding.

Source: Data are from USDA Forest Service 2018 GIS and modeled projected harvest.

Table 3.3-9
Estimated Percent of Original Large-Tree POG Remaining (Total and in Reserves[1]) after 100 Years by Biogeographic Province and Alternative (NFS lands only)[2]

No.	Biogeographic Province	Original Large-Tree POG Acres	% Remaining in 2018	% Original Large-Tree POG Remaining after 100+ Years (Total / In Reserves) by Alternative					
				Alt 1	Alt 2	Alt 3	Alt 4	Alt 5	Alt 6
1	Yakutat Forelands	45,054	98%	98 / 68	98 / 68	98 / 68	98 / 68	98 / 68	98 / 68
2	Yakutat Uplands	3,829	89%	89 / 83	89 / 83	89 / 83	89 / 83	89 / 83	89 / 83
3	East Chichagof Island	47,452	72%	72 / 49	72 / 49	72 / 49	72 / 49	72 / 49	72 / 49
4	West Chichagof Island	2,021	100%	100 / 100	100 / 100	100 / 100	100 / 100	100 / 100	100 / 100
5	East Baranof Island	6,010	33%	33 / 20	33 / 20	33 / 20	33 / 20	33 / 20	33 / 20
6	West Baranof Island	9,149	45%	45 / 39	45 / 39	45 / 39	45 / 39	45 / 39	45 / 39
7	Admiralty Island	103,833	94%	94 / 94	94 / 94	94 / 94	94 / 94	94 / 94	94 / 94
8	Lynn Canal	13,564	88%	88 / 58	88 / 58	88 / 58	88 / 58	88 / 58	88 / 58
9	North Coast Range	22,543	99%	99 / 65	99 / 65	99 / 65	99 / 65	99 / 65	99 / 65
10	Kupreanof/Mitkof Island	30,856	64%	59 / 31	58 / 31	58 / 31	59 / 31	59 / 31	59 / 31
11	Kuiu Island	42,841	81%	79 / 43	79 / 43	79 / 43	79 / 43	79 / 43	79 / 43
12	Central Coast Range	21,999	91%	90 / 60	91 / 60	90 / 60	90 / 60	90 / 60	90 / 60
13	Etolin Island & Vicinity	24,030	52%	47 / 25	47 / 25	48 / 25	48 / 25	48 / 25	48 / 25
14	North Central Prince of Wales	152,903	66%	64 / 40	65 / 40	65 / 40	65 / 40	65 / 40	65 / 40
15	Revilla Island/ Cleveland Pen.	45,791	69%	66 / 46	66 / 46	66 / 46	66 / 46	66 / 46	66 / 46
16	Southern Outer Islands	17,825	70%	68 / 48	68 / 48	69 / 48	69 / 48	69 / 48	69 / 48
17	Dall Island and Vicinity	8,293	95%	95 / 91	95 / 91	95 / 91	95 / 91	95 / 91	95 / 91
18	South Prince of Wales	40,090	97%	96 / 69	96 / 69	97 / 69	97 / 69	97 / 69	97 / 69
19	North Misty Fiords	14,606	87%	87 / 79	87 / 79	87 / 79	87 / 79	87 / 79	87 / 79
20	South Misty Fiords	14,810	95%	95 / 95	95 / 95	95 / 95	95 / 95	95 / 95	95 / 95
21	Ice Fields	7,876	75%	75 / 68	74 / 68	74 / 68	74 / 68	74 / 68	74 / 68
	Forest-wide	**675,375**	**79%**	**78 / 58**	**78 / 58**	**78 / 58**	**78 / 58**	**78 / 58**	**78 / 58**

[1] Reserves include all Non-Development LUDs, which are considered all LUDs other than Timber Production, Modified Landscape, Scenic Viewshed, and Experimental Forest.

[2] Numbers may not appear to sum correctly due to rounding.

Source: Data are from USDA Forest Service 2018 GIS and modeled projected harvest.

Alternative 2

This alternative would remove roadless designation from areas identified as roaded roadless, which would allow access to areas that already have a road system for harvest of old growth and existing young growth. In addition, although 142,000 acres would have the roadless designation removed, about 110,000 acres would have the roadless designation added, resulting in a net decrease in roadless area of 32,000 acres.

Suitable high-volume POG and suitable large-tree POG base would increase by about 7,000 acres (8 percent) and 900 acres (3 percent), respectively (relative to Alternative 1). However, the proportion of high-volume and large-tree POG in the added suitable acres under Alternative 2 is lower than in the Alternative 1 suitable acres.

Implementation of the Forest Plan under Alternative 2 would have harvest levels similar to the level projected under Alternative 1, the current Forest Plan, about 42,500 acres of old growth and 284,000 acres of young growth over 100 years. The total suitable acres of young growth would increase by about 11,000 acres or about 3 percent relative to Alternative 1 and medium-to-high-volume old-growth suitable acres would increase by about 14,000 acres or about 9 percent.

Harvest of young growth in RMAs, beach fringe, and Old-growth Habitat LUD would remain restricted to the first 15 years and under restrictive harvest prescriptions. The suitable young-growth acres in these three special areas would change by 1 to 3 percent, relative to Alternative 1. Because of the restrictive prescriptions required in these areas, they are harvested at a lower rate than other young-growth areas. Therefore, there would be little to no difference in the amount of young-growth harvest in RMAs, beach fringe, or Old-growth Habitat LUDs under Alternative 2.

Table 3.3-6 shows the projected harvest by biogeographic province over the next 100 years of Forest Plan implementation. Assuming full implementation of the Forest Plan after 100 years, approximately 91 percent of the original total POG, 85 percent of the original high-volume POG, and 78 percent of the original large-tree POG would be maintained on the Tongass National Forest (Tables 3.3-7, 3.3-8, and 3.3-9). By biogeographic province, 72 to 100 percent of the original total, 61 to 100 percent of the original high-volume, and 33 to 100 percent of the original large-tree POG would be maintained. The reduction of biological diversity associated with old-growth forest and fragmentation would be greatest in the Kupreanof/Mitkof Island, Etolin Island & Vicinity, and North Central Prince of Wales biogeographic provinces, where the amount of POG remaining is estimated to be reduced by 2 percent over 100 years. Under Alternative 2, the overall harvest level would be maintained, but the distribution of harvest could be slightly different. Based on our projected harvest for Alternative 2, the provinces where old-growth harvest is likely to increase by 200 acres or more over 100 years (relative to Alternative 1) are Kupreanof/Mitkof Island and Revilla Island/Cleveland Peninsula. Harvest in seven provinces is expected to decline. Because the projected increases in harvest over 100 years are less than 700 acres in each province, overall effects are not expected to be significantly different from Alternative 1.

As noted previously, fragmentation can be caused by timber harvest, road building, and powerline and facility development. Under Alternative 2, there would be little change in the distribution of timber harvest, roads, and other facilities relative to Alternative 1. After 100+ years of Alternative 2 implementation, there would be two fewer intact watersheds considering NFS lands only. This means 71.3 percent of the 922 large watersheds containing POG forest would remain intact or the same percentage as under Alternative 1. Therefore, overall, impacts due to fragmentation and the Old-growth Habitat Conservation Strategy are expected to be minor and are not expected to be noticeably different from Alternative 1 (existing Forest Plan).

Alternative 3

This alternative would remove roadless designation from areas identified as roaded roadless and include areas identified as logical extensions of existing roads. Alternative 3 would be less protective because it would result in a net reduction of approximately 1.1 million total acres of roadless designations but would still rank relatively high overall because it would maintain substantial roadless designations within development LUDs. Approximately 3.3 million acres would be managed under a Watershed Priority ARA, 4.6 million acres would be managed under a Roadless Priority designation, and 0.4 million acres would be managed under a Community Priority ARA. In addition, Alternative 3 would designate 0.5 million acres of T77 and TNC/Audubon Conservation Priority Areas outside of roadless to have long-term protection from old-growth harvest under the ARA. The majority of lands removed from roadless designation are managed as LUD II lands, which are intended to be managed in a roadless state to retain their wildland character (see current Forest Plan, Land Use Designation II goal description). Therefore, the roadless designation on LUD II lands provides little additional protection of roadless characteristics.

Implementation of the Forest Plan under Alternative 3 would have harvest levels similar to the levels projected under Alternative 1, the current Forest Plan; about 42,500 acres of old growth and 284,000 acres of young growth over 100 years. The total suitable acres of young growth would increase by about

15,000 acres or about 4 percent relative to Alternative 1, and suitable old-growth acres would increase by about 85,000 acres or about 34 percent relative to Alternative 1.

Suitable high-volume POG and suitable large-tree POG would increase by about 30,000 acres (31 percent) and 5,000 acres (15 percent) relative to Alternative 1, respectively. There could be a very slight increase in high-volume and large-tree POG harvested under Alternative 3 than was predicted for the Forest Plan because of increased options for creating positive timber sales. However, this is speculative and also depends on harvest levels reaching predicted decadal levels, as well as on being able to economically access these stands. In addition, the proportion of high-volume and large-tree POG in the added suitable acres under Alternative 3, is lower than the proportion in the Alternative 1 suitable acres.

Harvest of young growth in RMAs, beach fringe, and Old-growth Habitat LUD would remain restricted to the first 15 years and under restrictive harvest prescriptions. The suitable young growth acres in these three special areas would increase by 1 to 5 percent, relative to Alternative 1. Because of the restrictive prescriptions required in these areas, they are harvested at a lower rate than other young-growth areas. Therefore, there would be little to no difference in the amount of young-growth harvest in RMAs, beach fringe, or Old-growth Habitat LUDs under Alternative 3.

Table 3.3-6 shows the projected harvest by biogeographic province over the next 100 years of Forest Plan implementation. Assuming full implementation of the Forest Plan for 100 years, approximately 91 percent of the original total POG, 85 percent of the original high-volume POG, and 78 percent of the original large-tree POG would be maintained on the Tongass National Forest under Alternative 3 (Tables 3.3-7, 3.3-8, and 3.3-9). By biogeographic province, 72 to 100 percent of the original total POG, 62 to 100 percent of the original high-volume POG, and 33 to 100 percent of the original large-tree POG would be maintained. The reduction of biological diversity associated with old-growth forest and fragmentation would be greatest in the Kupreanof/Mitkof Island, Etolin Island & Vicinity, and North Central Prince of Wales biogeographic provinces, where the amount of POG remaining is estimated to be reduced by 2 percent over 100 years. Under Alternative 3, the overall harvest level would be maintained, but the distribution of harvest could be different. The provinces where harvest is likely to increase more than 200 acres over 100 years relative to Alternative 1 include Kupreanof/Mitkof Island, Central Coast Range, and Revilla Island/Cleveland Peninsula. Harvest in eight provinces is expected to decline. The projected increases in harvest acres over 100 years relative to Alternative 1 are less than 600 acres in every province except for Kupreanof/Mitkof Islands, which would have an increase of 1,100 acres. Therefore, overall effects are expected to be relatively minor, with greater effects in the Kupreanof/Mitkof Islands province.

As noted previously, fragmentation can be caused by timber harvest, road building, and powerline and facility development. Under Alternative 3, there would be little change in the distribution of timber harvest, roads, and other facilities relative to Alternative 1. After 100+ years of Alternative 3 implementation, there would be three fewer intact watersheds considering NFS lands only. This means 71.1 percent of the 922 large watersheds containing POG forest would remain intact; one less watershed than under Alternative 1. Therefore, overall, impacts due to fragmentation and on the Old-growth Habitat Conservation Strategy are expected to be relatively minor and are not expected to be noticeably different from Alternative 1 (existing Forest Plan).

Alternative 4

This alternative would remove the roadless designation on areas identified as roaded roadless, on areas identified as logical extensions of existing roads, and on some additional acres of development LUDs. Alternative 4 would be substantially less protective than Alternative 3 but would still include a high number of roadless acres within development LUDs. However, 757,000 of these roadless acres are designated as Timber Priority, which provides little or no protection of roadless characteristics; timber harvest and road construction and reconstruction to facilitate timber management and provide economic opportunity are allowed with few additional constraints.

Implementation of the Forest Plan under Alternative 4 would have harvest levels similar to the level projected under Alternative 1, the current Forest Plan, about 42,500 acres of old growth and 284,000 acres of young growth over 100 years. The total acres of suitable young growth would increase by about

15,000 acres or about 5 percent relative to Alternative 1 and suitable old-growth acres would increase by about 161,000 acres or about 71 percent.

Suitable high-volume POG and suitable large-tree POG base would increase by about 57,000 acres (49 percent) and 9,000 acres (30 percent) relative to Alternative 1, respectively,. There could be a slight increase in high-volume and large-tree POG harvested under Alternative 4 than was predicted for the Forest Plan because of increased options for creating positive timber sales. However, this is speculative and also depends on harvest levels reaching predicted decadal levels, as well as on being able to economically access these stands. In addition, the proportion of high-volume and large-tree POG in the added suitable acres under Alternative 4, is lower than the proportion in the Alternative 1 suitable acres.

Harvest of young growth in RMAs, beach fringe, and Old-growth Habitat LUD would remain restricted to the first 15 years and under restrictive harvest prescriptions. The suitable young growth acres in these three special areas would change by 1 percent to 4 percent, relative to Alternative 1. Because of the restrictive prescriptions required in these areas, they are harvested at a lower rate than other young-growth areas. Therefore, there would be little to no difference in the amount of young-growth harvest in RMAs, beach fringe, or Old-growth Habitat LUDs under Alternative 4.

Table 3.3-6 shows the projected harvest by biogeographic province over the next 100 years of Forest Plan implementation. Assuming full implementation of the Forest Plan for 100 years, approximately 91 percent of the original total POG, 85 percent of the original high-volume POG, and 78 percent of the original large-tree POG would be maintained on the Tongass National Forest under Alternative 4 (Tables 3.3-7, 3.3-8, and 3.3-9). By biogeographic province, 72 to 100 percent of the original total, 62 to 100 percent of the original high-volume, and 33 to 100 percent of the original large-tree POG would be maintained. The reduction of biological diversity associated with old-growth forest and fragmentation would be greatest in the Kupreanof/Mitkof Island, Etolin Island & Vicinity, and North Central Prince of Wales biogeographic provinces, where the amount of POG remaining is estimated to be reduced by 2 to over 100 years. Under Alternative 4, the overall harvest level would be maintained, but the distribution of harvest could be different. The provinces where harvest is likely to increase more than 200 acres over 100 years relative to Alternative 1 include Kupreanof/Mitkof Islands, Central Coast Range, and Revilla Island/Cleveland Peninsula. Harvest in the other provinces would remain at the same level or decline. The projected increases in old-growth harvest acres relative to Alternative 1 are 1,000 acres or less in each province.

As noted previously, fragmentation can be caused by timber harvest, road building, and powerline and facility development. Under Alternative 4, there would be some change in the distribution of timber harvest, roads, and other facilities relative to Alternative 1. Under this alternative, roads and timber harvest are likely to penetrate further into currently roadless areas than under Alternatives 1, 2, or 3, resulting in a greater degree of fragmentation. After 100+ years of Alternative 4 implementation, there would be five fewer intact watersheds considering NFS lands only. This means 70.9 percent of the 922 large watersheds containing POG forest would remain intact, three fewer watersheds than under Alternative 1. Nevertheless, because overall harvest levels would not change relative to Alternative 1, the effects due to fragmentation and on the Old-growth Habitat Conservation Strategy are expected to be relatively low and slightly greater than expected under Alternative 1 (existing Forest Plan).

Alternative 5

Under Alternative 5, approximately 7.0 million acres would be maintained and managed as Roadless Priority or LUD II Priority. Roadless designations would be removed on all development LUDs and mineral overlay areas and, as a result, it would rank the second lowest in terms of roadless designations. However, it would still be moderate in terms of overall protection due to the degree of protections provided by the underlying Forest Plan LUDs and Forest Plan standards and guidelines, which would not change.

Implementation of the Forest Plan under Alternative 5 would have harvest levels similar to the level projected under Alternative 1, the current Forest Plan, about 42,500 acres of old growth and 284,000 acres of young growth over 100 years. The total suitable acres of young growth would increase by about

17,000 acres or about 5 percent relative to Alternative 1 and suitable old-growth acres would increase by about 96,000 acres or about 62 percent.

Suitable high-volume POG and suitable large-tree POG would increase by about 60,000 acres (62 percent) and 10,000 acres (32 percent), respectively, relative to Alternative 1. There could be a slight increase in high-volume and large-tree POG harvested under Alternative 5 than was predicted for the Forest Plan because of increased options for creating positive timber sales. However, this is speculative and also depends on harvest levels reaching predicted decadal levels, as well as on being able to economically access these stands. In addition, the proportion of high-volume and large-tree POG in the added suitable acres under Alternative 5 is lower than the proportion in the Alternative 1 suitable acres.

Harvest of young growth in RMAs, beach fringe, and Old-growth Habitat LUD would remain restricted to the first 15 years and under restrictive harvest prescriptions. The suitable young-growth acres in these three special areas would increase by 3 to 5 percent, relative to Alternative 1. Because of the restrictive prescriptions required in these areas, they are harvested at a lower rate than other young-growth areas. Therefore, there would be little to no differences in the amount of young-growth harvest relative to Alternative 1 in RMAs, beach fringe, or Old Growth Habitat LUDs under Alternative 5.

Table 3.3-6 shows the projected harvest by biogeographic province over the next 100 years of Forest Plan implementation. Assuming full implementation of the Forest Plan for 100 years, approximately 91 percent of the original total POG, 85 percent of the original high-volume POG, and 78 percent of the original large-tree POG would be maintained on the Tongass under Alternative 1 (Tables 3.3-7, 3.3-8, and 3.3-9). By biogeographic province, 72 to 100 percent of the original total, 62 to 100 percent of the original high-volume, and 33 to 100 percent of the original large-tree POG would be maintained. The reduction of biological diversity associated with old-growth forest and fragmentation would be greatest in the Kupreanof/Mitkof Island, Etolin Island & Vicinity, and North Central Prince of Wales biogeographic provinces, where the amount of POG remaining is estimated to be reduced by 2 percent over 100 years. Under Alternative 5, the overall harvest level would be maintained, but the distribution of harvest could be different. Assuming harvest patterns follow the distribution of suitable old growth, the provinces where harvest is likely to increase more than 200 acres over 100 years include Kupreanof/Mitkof Islands, Central Coast Range, and Revilla Island/Cleveland Peninsula. The projected increases in old-growth harvest acres relative to Alternative 1 are 1,000 acres or less in each province. As noted previously, fragmentation can be caused by timber harvest, road building, and powerline and facility development. Under Alternative 5, there would be some change in the distribution of timber harvest, roads, and other facilities relative to Alternative 1. Under this alternative, roads and timber harvest are likely to penetrate much farther into currently roadless areas than under Alternatives 1, 2, or 3, resulting in a greater degree of fragmentation. After 100+ years of Alternative 5 implementation, there would be five fewer intact watersheds considering NFS lands only. This means 70.9 percent of the 922 large watersheds containing POG forest would remain intact, three fewer watersheds than under Alternative 1. Nevertheless, because overall harvest levels would not change relative to Alternative 1 and because the broader Old-growth Habitat Conservation Strategy for the Tongass was developed prior to the roadless rule and would be maintained under the Forest Plan, the effects due to fragmentation and on the Old-growth Habitat Conservation Strategy are expected to be relatively low and slightly greater than projected under Alternative 1 (existing Forest Plan).

Alternative 6

Whereas the roadless rule language under Alternatives 2, 3, 4, and 5 would be modified, all regulatory roadless designations would be removed from the Tongass under Alternative 6 and, therefore, it would rank the lowest in terms of roadless designations and any additional protections due to roadless. However, it would still be moderate in terms of overall protection due to the underlying Forest Plan LUDs and Forest Plan standards and guidelines, which would not change.

Implementation of the Forest Plan under Alternative 6 would have harvest levels similar to the level projected under Alternative 1, the current Forest Plan, about 42,500 acres of old growth and 284,000 acres of young growth over 100 years. The total suitable acres of young growth would increase by about

20,000 acres or about 6 percent relative to Alternative 1 and suitable old-growth acres would increase by about 168,000 acres or about 74 percent.

Suitable high-volume POG and suitable large-tree POG would increase by about 60,000 acres (62 percent) and 10,000 acres (32 percent), respectively, relative to Alternative 1. There could be a slight increase in high-volume and large-tree POG harvested under Alternative 6 than was predicted for the Forest Plan because of increased options for creating positive timber sales. However, this is speculative and also depends on harvest levels reaching predicted decadal levels, as well as on being able to economically access these stands. In addition, the proportion of high-volume and large-tree POG in the added suitable acres under Alternative 6 is lower than the proportion in the Alternative 1 suitable acres.

Harvest of young growth in RMAs, beach fringe, and Old-growth Habitat LUD would remain restricted to the first 15 years and under restrictive harvest prescriptions. The suitable young-growth acres in these three special areas would increase by 6 percent in RMAs and beach fringe relative to Alternative 1, but by 12 percent in Old-growth Habitat LUDs, which is the largest increase among the action alternatives. Because of the restrictive prescriptions required in these areas, they are harvested at a lower rate than other young-growth areas. Therefore, there would be minor differences in the amount of young-growth harvest relative to Alternative 1 in RMAs, beach fringe, or Old-growth Habitat LUDs under Alternative 6.

Table 3.3-6 shows the projected harvest by biogeographic province over the next 100 years of Forest Plan implementation. Assuming full implementation of the Forest Plan for 100 years, approximately 91 percent of the original total POG, 85 percent of the original high-volume POG, and 78 percent of the original large-tree POG would be maintained on the Tongass under Alternative 1 (Tables 3.3-7, 3.3-8, and 3.3-9). By biogeographic province, 72 to 100 percent of the original total, 62 to 100 percent of the original high-volume, and 33 to 100 percent of the original large-tree POG would be maintained. The reduction of biological diversity associated with old-growth forest and fragmentation would be greatest in the Kupreanof/Mitkof Island, Etolin Island & Vicinity, and North Central Prince of Wales biogeographic provinces, where the amount of POG remaining is estimated to be reduced by 2 percent over 100 years. Under Alternative 6, the overall harvest level would be maintained, but the distribution of harvest could be different. The provinces where harvest is likely to increase more than 200 acres over 100 years include Kupreanof/Mitkof Islands, Central Coast Range, and Revilla Island/Cleveland Peninsula. The projected increases in old-growth harvest acres relative to Alternative 1 are 1,000 acres or less in each province.

As noted previously, fragmentation can be caused by timber harvest, road building, and powerline and facility development. Under Alternative 6, there would be some change in the distribution of timber harvest, roads, and other facilities relative to Alternative 1. Under this alternative, roads and timber harvest are likely to penetrate much farther into currently roadless areas than under Alternatives 1, 2, or 3, resulting in a greater degree of fragmentation. After 100+ years of Alternative 6 implementation, there would be five fewer intact watersheds considering NFS lands only. This means 70.9 percent of the 922 large watersheds containing POG forest would remain intact; three fewer watersheds than under Alternative 1. Nevertheless, because overall harvest levels would not change relative to Alternative 1 and because the broader Old-growth Habitat Conservation Strategy for the Tongass was developed prior to the roadless rule and would be maintained under the Forest Plan, the effects due to fragmentation and on the Old-growth Habitat Conservation Strategy are expected to be relatively low and slightly greater than projected under Alternative 1 (existing Forest Plan).

Cumulative Effects

The cumulative effects analysis for old-growth ecosystem biological diversity takes into account all of Southeast Alaska, including all lands within the Tongass boundary from the Yakutat area to the south of Ketchikan, the area of Glacier Bay National Park, and the areas around Haines and Skagway, as well as non-NFS lands. A list of all projects considered in the cumulative effects analysis is provided in Appendix B of this FEIS.

Approximately 874,000 acres of POG have been harvested across the Tongass, including both NFS lands and non-NFS lands, resulting in a reduction to 86, 78, and 67 percent of the original total, high-volume, and large-tree POG in Southeast Alaska, respectively (Tables 3.3-10, 3.3-11, and 3.3-12). Approximately 82 percent of the original POG would remain on the Tongass after full implementation of

the 2016 Forest Plan (Alternative 1) and future non-NFS harvest in 100+ years. Future representation of high-volume POG and large-tree POG would be expected to be approximately 75 and 62 percent of the original amount, respectively, after 100+ years under the 2016 Forest Plan. These same percentages of original POG, high-volume POG, and large-tree POG would result under all of the other actions alternatives as well (Tables 3.3-10, 3.3-11, and 3.3-12).

Harvest associated with all action alternatives would contribute to the cumulative reduction in POG and associated increase in fragmentation and loss of connectivity, which has the potential to reduce biological diversity. Timber harvest on non-NFS lands would result in similar effects; however, it would not contribute above what was analyzed for the current Forest Plan. Collectively, the implementation of the Forest Plan under all of the alternatives in combination with ongoing and foreseeable projects would increase the number of smaller patches on the landscape, reducing the amount of interior forest and increasing the occurrence of forest edge habitat. Edge effects such as shifts in species composition may reduce natural biological diversity over time by favoring some species over others; however, effects would be lessened by the Forest Plan, including the action alternatives, which continue to propose a transition to predominantly young-growth harvest. This would reduce the long-term cumulative effects to old-growth ecosystem diversity by reducing the total amount of POG harvest and associated fragmentation. Note that the actual amount of timber harvest that has occurred on the Tongass since the 2016 Forest Plan was adopted is less than that projected under the Forest Plan Amendment EIS, and may continue to be less under all of the alternatives (see the *Timber* section of this FEIS for additional discussion).

Overall, biological diversity on the Tongass and in Southeast Alaska remains in good condition and the landscape continues to be dominated by old-growth forest ecosystems. As development continues through timber harvest and associated activities such as road building, mining activities, energy development, and community expansion, particularly in areas where extensive development has already occurred (i.e., Prince of Wales Island), maintaining connectivity and roadless refugia will become increasingly important, particularly for wide-ranging species whose distribution depends on some level of connectivity across the landscape. In addition, the management of human resources will continue to play a role in maintaining biological diversity across the Tongass. Within the Tongass boundary, the Old-growth Habitat Conservation Strategy was designed to address the more extensive harvest on non-NFS lands through the OGR system and Forest-wide standards and guidelines, both of which were intended to maintain ecological components needed to maintain the ecological integrity important to a variety of organisms and maintain connectivity across the landscape, with or without much contribution from non-NFS lands. The overall Old-growth Habitat Conservation Strategy approach was developed prior to roadless designations and would be maintained regardless of the alternative selected.

Table 3.3-10
Cumulative Percent of Original Total POG Remaining on All Land Ownerships after 100 Years of Forest Plan Implementation by Biogeographic Province and Alternative (NFS and Non-NFS Lands)

No.	Biogeographic Province	Estimated Original Total POG (Acres)	% Original Total POG Remaining	Percent Total POG Remaining after 100+ Years[1,2]					
				Alternative					
				1	2	3	4	5	6
1	Yakutat Forelands	123,462	85%	80%	80%	80%	80%	80%	80%
2	Yakutat Uplands	45,250	97%	97%	97%	97%	97%	97%	97%
3	East Chichagof Island	507,906	84%	81%	81%	81%	81%	81%	81%
4	West Chichagof Island	72,949	100%	100%	100%	100%	100%	100%	100%
5	East Baranof Island	103,105	87%	86%	86%	86%	86%	86%	86%
6	West Baranof Island	247,391	92%	89%	89%	89%	89%	89%	89%
7	Admiralty Island	646,813	94%	93%	93%	93%	93%	93%	93%
8	Lynn Canal	180,194	97%	91%	91%	91%	91%	91%	91%
9	North Coast Range	382,563	94%	88%	88%	88%	88%	88%	88%
10	Kupreanof/Mitkof Island	407,318	82%	76%	76%	76%	76%	76%	76%
11	Kuiu Island	328,197	91%	89%	89%	89%	89%	89%	89%
12	Central Coast Range	259,656	97%	95%	95%	95%	95%	95%	95%
13	Etolin Island	276,170	85%	80%	80%	80%	80%	80%	80%
14	North Central Prince of Wales	905,793	63%	56%	56%	56%	56%	56%	56%
15	Revilla Island/ Cleveland Peninsula	646,595	88%	81%	81%	81%	81%	81%	81%
16	Southern Outer Islands	141,253	83%	80%	80%	80%	80%	80%	80%
17	Dall Island and Vicinity	135,694	68%	57%	57%	57%	57%	57%	57%
18	South Prince of Wales	192,225	88%	82%	82%	82%	82%	82%	82%
19	North Misty Fiords	207,639	96%	96%	96%	96%	96%	96%	96%
20	South Misty Fiords	311,749	99%	99%	99%	99%	99%	99%	99%
21	Ice Fields	123,674	95%	95%	95%	94%	94%	94%	94%
	Total for Southeast Alaska[3]	**6,245,598**	**86%**	**82%**	**82%**	**82%**	**82%**	**82%**	**82%**

[1] The estimate assumes all scheduled suitable POG is harvested; does not account for Model Implementation Reduction Factor (MIRF).
[2] Based on an inventory of existing harvest on non-NFS lands and the estimation of future harvest by major landowner category. To estimate the future harvest of POG on non-NFS lands, it was assumed that 60 percent of the remaining POG would be harvested on non-NFS lands over the life of the Forest Plan (100 years).
[3] Does not include land area in biogeographic provinces 22 and 23 which are almost exclusively non-NFS land.

Table 3.3-11
Cumulative Percent of Original High-Volume POG Remaining on All Land Ownerships after 100 Years of Forest Plan Implementation by Biogeographic Province and Alternative (NFS and Non-NFS Lands)

No.	Biogeographic Province	Estimated Original High-Volume POG (Acres)	% Original High-Volume POG Remaining	Percent Total POG Remaining after 100+ Years[1,2]					
				Alternative					
				1	2	3	4	5	6
1	Yakutat Forelands	74,593	83%	80%	80%	80%	80%	80%	80%
2	Yakutat Uplands	15,320	93%	93%	93%	93%	93%	93%	93%
3	East Chichagof Island	225,206	75%	72%	72%	72%	72%	72%	72%
4	West Chichagof Island	18,585	100%	100%	100%	100%	100%	100%	100%
5	East Baranof Island	40,498	75%	74%	74%	74%	74%	74%	74%
6	West Baranof Island	74,713	81%	77%	77%	77%	77%	77%	77%
7	Admiralty Island	334,413	91%	91%	91%	91%	91%	91%	91%
8	Lynn Canal	71,131	94%	89%	89%	89%	89%	89%	89%
9	North Coast Range	165,333	91%	86%	86%	86%	86%	86%	86%
10	Kupreanof/Mitkof Island	167,093	69%	63%	63%	63%	63%	63%	63%
11	Kuiu Island	187,270	89%	87%	87%	87%	87%	87%	87%
12	Central Coast Range	117,401	95%	94%	94%	94%	93%	93%	93%
13	Etolin Island	116,474	73%	68%	68%	68%	68%	68%	68%
14	North Central Prince of Wales	489,790	52%	47%	47%	47%	47%	47%	47%
15	Revilla Island/ Cleveland Peninsula	309,870	83%	77%	77%	77%	77%	77%	77%
16	Southern Outer Islands	67,840	74%	71%	71%	71%	71%	71%	71%
17	Dall Island and Vicinity	70,526	60%	53%	53%	53%	53%	53%	53%
18	South Prince of Wales	93,825	83%	79%	79%	79%	79%	79%	79%
19	North Misty Fiords	72,749	93%	92%	92%	92%	92%	92%	92%
20	South Misty Fiords	101,374	98%	98%	98%	98%	98%	98%	98%
21	Ice Fields	43,283	88%	88%	88%	88%	88%	88%	88%
	Total for Southeast Alaska[3]	**2,857,286**	**78%**	**75%**	**75%**	**75%**	**75%**	**75%**	**75%**

[1] The estimate assumes all scheduled suitable POG is harvested; does not account for Model Implementation Reduction Factor (MIRF).

[2] Based on an inventory of existing harvest on non-NFS lands and the estimation of future harvest by major landowner category. To estimate the future harvest of POG on non-NFS lands, it was assumed that 60 percent of the remaining High-Volume POG would be harvested on non-NFS lands over the life of the Forest Plan (100 years).

[3] Does not include land area in biogeographic provinces 22 and 23 which are almost exclusively non-NFS land.

Table 3.3-12
Cumulative Percent of Original Large-tree POG Remaining on All Land Ownerships after 100 Years of Forest Plan Implementation by Biogeographic Province and Alternative (NFS and Non-NFS Lands)

No.	Biogeographic Province	Estimated Original SD67 POG (Acres)	% Original SD67 POG Remaining	Percent SD67 POG Remaining after 100+ Years[1,2]					
				Alternative					
				1	2	3	4	5	6
1	Yakutat Forelands	52,435	87%	85%	85%	85%	85%	85%	85%
2	Yakutat Uplands	3,836	89%	89%	89%	89%	89%	89%	89%
3	East Chichagof Island	65,766	60%	55%	55%	55%	55%	55%	55%
4	West Chichagof Island	2,079	100%	98%	98%	98%	98%	98%	98%
5	East Baranof Island	6,179	35%	33%	33%	33%	33%	33%	33%
6	West Baranof Island	12,466	52%	40%	40%	40%	40%	40%	40%
7	Admiralty Island	113,351	88%	87%	87%	87%	87%	87%	87%
8	Lynn Canal	16,624	89%	79%	79%	79%	79%	79%	79%
9	North Coast Range	37,325	77%	67%	67%	67%	67%	67%	67%
10	Kupreanof/Mitkof Island	48,782	49%	41%	41%	40%	41%	41%	41%
11	Kuiu Island	44,532	81%	77%	77%	77%	77%	77%	77%
12	Central Coast Range	23,512	89%	86%	86%	86%	86%	86%	86%
13	Etolin Island	27,723	53%	44%	44%	44%	44%	44%	44%
14	North Central Prince of Wales	228,293	51%	46%	46%	46%	46%	46%	46%
15	Revilla Island/ Cleveland Peninsula	67,855	64%	51%	51%	51%	51%	51%	51%
16	Southern Outer Islands	21,117	63%	59%	59%	59%	59%	59%	59%
17	Dall Island and Vicinity	28,203	44%	34%	34%	34%	34%	34%	34%
18	South Prince of Wales	50,353	83%	79%	79%	79%	79%	79%	79%
19	North Misty Fiords	15,380	85%	84%	84%	84%	84%	84%	84%
20	South Misty Fiords	14,860	95%	95%	95%	95%	95%	95%	95%
21	Ice Fields	7,895	75%	74%	74%	74%	74%	74%	74%
	Total for Southeast Alaska[3]	**888,563**	**67%**	**62%**	**62%**	**62%**	**62%**	**62%**	**62%**

[1] The estimate assumes all scheduled suitable POG is harvested; does not account for Model Implementation Reduction Factor (MIRF).
[2] Based on an inventory of existing harvest on non-NFS lands and the estimation of future harvest by major landowner category. To estimate the future harvest of SD67 POG on non-NFS lands, it was assumed that 60 percent of the remaining SD67 POG would be harvested on non-NFS lands over the life of the Forest Plan (100 years).
[3] Does not include land area in biogeographic provinces 22 and 23 which are almost exclusively non-NFS land.

Wildlife

Affected Environment

Wildlife species and their habitat on the Tongass were described in the 2016 Forest Plan Amendment EIS (USDA Forest Service 2016b). This section summarizes the wildlife resources, but updates that information to characterize the current affected environment and refers the reader to that document where relevant. The following subsections summarize the old-growth conservation strategy; threatened, endangered, and candidate species; Management Indicator Species (MIS); Alaska Region Sensitive Species; migratory birds; endemic species; and invasive species. Consumptive uses of wildlife on the Tongass are discussed in the *Subsistence* section.

Old-Growth Habitat and the Old-growth Habitat Conservation Strategy

Typical of Southeast Alaska, vegetation on the Tongass is dominated by temperate coastal rain forests at lower elevations (less than 2,000 feet elevation), with interspersed muskegs, other wetlands, and other non-forest types. At higher elevations, alpine vegetation, rock, glaciers, and snowfields dominate. Although many wildlife species on the Tongass are associated with more than one habitat type, most inhabit old-growth forests or prey on species that inhabit old-growth forests. Therefore, this analysis focuses on the old-growth forest ecosystem.

The reserve system of the Tongass Old-growth Habitat Conservation Strategy was first designed and implemented for the 1997 Forest Plan to maintain habitats of the old-growth associated and dependent species in a well-distributed and viable manner across the Tongass (see USDA Forest Service 2016b, Appendix D). This strategy is described in greater detail, along with the Forest Plan standards and guidelines and the management of the matrix lands outside of reserves, in the *Biological Diversity* section of this FEIS.

There are currently approximately 5.0 million acres of POG forest on the Tongass, of which 2.1 million acres are high-volume POG including 0.53 million acres of large-tree POG. These existing acreages represent 91, 86, and 79 percent, respectively, of these forest types that existed in 1954, prior to the beginning of industrial-scale timber harvest (see *Biological Diversity* section; Table 3.3-4). There are approximately 0.56 million acres of young-growth forest on the Tongass, of which about 85 percent are a result of past harvest and 15 percent are natural young-growth. The *Biological Diversity* section briefly describes POG and other cover types and provides a discussion of past timber harvest on the Tongass (see also the *Timber* section).

Landscape Connectivity and Fragmentation

The concepts of landscape connectivity and fragmentation are described in the *Biological Diversity* section but are summarized here as they relate to wildlife and their habitat requirements. On the Tongass, connectivity between areas of similar habitats (i.e., old-growth forest) or between high- and low-elevation habitats is important to maintaining well-distributed, viable wildlife populations of some species.

Fragmentation of suitable habitats across the landscape through both natural and human-caused actions reduces larger contiguous blocks of habitat into smaller patches, which may cause some species populations to become isolated, and therefore may pose a greater risk of local extirpation.

Wildlife Species

The following sections summarize information on threatened and endangered species, candidates for listing, MIS (1982 planning rule), Alaska Region sensitive species, and other species of interest that were analyzed in detail for the 2016 Forest Plan (USDA Forest Service 2016a). Table 3.3-13 provides a comprehensive list of the threatened, endangered, candidate, and sensitive bird, mammal and reptile species and identifies any updates of species listing status or occurrences since the completion of the 2016 Forest Plan Amendment EIS. Threatened and endangered fish species are identified in the fish section of this analysis. Some species are grouped based on habitat similarities where possible or

referenced back to the 2016 Forest Plan Amendment EIS, and corresponding Biological Assessment (BA), or Biological Evaluation (BE) for Wildlife and Fish as appropriate.

Threatened, Endangered, and Candidate Species

Federally listed threatened and endangered species are those plant and animal species formally listed by the U.S. Fish and Wildlife Service (USFWS) or National Marine Fisheries Service (NMFS) under authority of the Endangered Species Act of 1973 (ESA), as amended. Some federally-listed species in the table are not addressed further because the Tongass is outside of their known range or suitable habitat is not present (Table 3.3-13). Informal programmatic consultation was completed for the 2016 Tongass Plan Amendment. The NMFS reviewed the biological assessment for threatened and endangered species under their regulatory jurisdiction and concluded that the 2016 Forest Plan Amendment EIS was "not likely to adversely affect" threatened or endangered species occurring on the Tongass (NMFS 2016).

Also listed in the table are listed fish species that are addressed in the *Fish* section of this EIS. Currently, no candidates for federal listing occur within the boundary of the Tongass (Table 3.3-13).

Short-tailed Albatross

The short-tailed albatross is a pelagic seabird species that forages offshore and in shelf-break waters throughout the North Pacific Ocean and Bering Sea and is listed under the ESA as Endangered. The short-tailed albatross primarily breeds in Japan, but single nest sites have been documented on Midway Island, Hawaii.

Previously, the waters adjacent to the Tongass were thought to be outside of the range of this species; however, more recent satellite tracking indicates that albatrosses, particularly juveniles and sub-adult birds, travel to the west coast, including the outer coast of Southeast Alaska (USFWS 2014). This species may forage in nearshore waters adjacent to the outer coastal islands of the Tongass, particularly where the continental shelf break is close to shore. Changes to the roadless rule for Alaska are not the source of causation for any potential effects and will have no effect to the short-tailed albatross.

Threatened and Endangered Marine Mammals

The federally listed marine mammals that may occur in the waters adjacent to the Tongass National Forest include the sei whale (E), fin whale (E), humpback whale (T), sperm whale (E), and the Western DPS of the Stellar sea lion (E). The sei, fin, and sperm whales more typically occur in offshore marine waters of the Bering Sea, Chukchi Sea, North Pacific Ocean and/or Gulf of Alaska (NMFS 2009a) and are rare visitors to the waters surrounding the Tongass (Dahlheim et al. 2009).

The ESA for the State of Alaska authorizes the Commissioner of ADF&G to list Alaska endangered species. Species listed as endangered by the State of Alaska include humpback whale, right whale, and blue whale. With the exception of the humpback whale, none of these species occur in Southeast Alaska and therefore are not considered further here. Pursuant to Section 7 of the ESA, a BA was prepared to assess the effects of the 1997, 2008, and 2016 Forest Plans on endangered or threatened species and ensure that proposed actions would not jeopardize the continued existence of listed species (specifically, humpback whale and the Steller sea lion). Only the humpback whale and Steller sea lion will be addressed further in this document.

Table 3.3-13
Federally Listed Threatened and Endangered Species and Candidate Species under the ESA, Forest Service Alaska Region Sensitive Bird, Mammal, and Reptile Species with Potential for Occurrence on the Tongass National Forest[1]

Common Name	Scientific Name	Habitat Association	Potential for Occurrence in the Analysis Area	Status[2]
ESA Species Under USFWS Jurisdiction				
Eskimo curlew	*Numenius borealis*	Arctic tundra.	No, outside of species' range.	E
Short-tailed albatross	*Phoebastria albatrus*	Winters in waters of the Bering Sea, Aleutian Islands, and Gulf of Alaska; breeds in Japan (USFWS 2012a).	Yes, may occur in nearshore waters near islands and mainland coastlines of Southeast Alaska.	E
Spectacled eider	*Somateria fischeri*	Coastal waters in northern and western Alaska (USFWS 2012b).	No, outside of species' range.	T
Steller's eider	*Polysticta stelleri*	Occurs in northern and western Alaska (USFWS 2012c).	No, outside of species' range.	T
Polar bear	*Ursus maritimus*	Sea ice and coastlines of western Alaska and along the North Slope.	No, outside of species' range.	T
ESA Species Under NMFS Jurisdiction				
Blue whale	*Balaenoptera musculus*	Off-shore (pelagic) marine waters of the Bering Sea, Chukchi Sea, North Pacific Ocean and/or Gulf of Alaska (NMFS 2009a). Critical habitat designated for North Pacific right whales in the Bering Sea and the Gulf of Alaska (NMFS 2009a).	No, very rarely observed in Southeast Alaska.	E
Beluga whale	*Delphinaperus leucas*			
Bowhead whale	*Balaena mysticetus*			
Northern Pacific right whale	*Eubalaena japonica*			
Sei whale	*Balaenoptera borealis*			
Humpback Whale	*Megaptera novaeangliae*	Common in the inside waters of the Alexander Archipelago and are regularly sighted in the Inside Passage and coastal waters of the Southeast Alaska panhandle (NMFS 1991; Muto et al. 2018).	Yes, likely to occupy marine waters surrounding the Tongass. May occur in shallow coastal areas.	E
Fin whale	*Balaenoptera physalus*	Typically, off-shore (pelagic) marine waters of the Bering Sea, Chukchi Sea, North Pacific Ocean and/or Gulf of Alaska (NMFS 2009a); two more recent sightings in lower Clarence Strait (Dahlheim et al. 2009).	Yes, may occur seasonally in marine waters surrounding the Tongass, but in proximity to the open ocean.	E
Sperm whale	*Physeter macrocephalus*	Typically, off-shore marine waters of the Bering Sea, Gulf of AK, Southeast AK and Aleutian Islands (Allen and Angliss 2014).	Yes, may occur seasonally in marine waters around Tongass, but in proximity to the open ocean.	E

Table 3.3-13 (continued)
Federally Listed Threatened and Endangered Species and Candidate Species under the ESA, Forest Service Alaska Region Sensitive Bird, Mammal, and Reptile Species with Potential for Occurrence on the Tongass National Forest[1]

Common Name	Scientific Name	Habitat Association	Potential for Occurrence in the Analysis Area	Status[2]
Threatened or Endangered Species				
Bearded seal Ringed Seal	*Erignathus barbatus* *Phoca hispida*	Sea-ice habitats in Bering Sea, Chukchi Sea, Beaufort seas (77 FR 76740-76768, 77 FR 76706-76738).	No, outside of species' range.	T – bearded seal; T – ringed seal
Northern sea otter, SW Alaska population	*Enhydra lutris kenyoni*	Coastal marine habitats.	No, outside of species range.	T
Steller sea lion – Western AK DPS[3]	*Eumetopias jubatus*	Marine and terrestrial areas from Prince William Sound westward (west of 144° west longitude).	Yes, DPS occurs in waters surrounding the Tongass. Critical habitat has also been designated.	E
Green sea turtle	*Chelonia mydas*	Occur in the Gulf of Alaska and some species are found as far west as the Aleutian Islands. Adults are highly migratory, but the details and locations of migrations are largely unknown (NMFS 2009b).	No, only rarely observed in Southeast Alaska.	T
Loggerhead sea turtle	*Caretta*			T
Olive Ridley sea turtle	*Lepidochelys olivacea*			T
Leatherback sea turtle	*Dermochelys coriacea*			E
Forest Service Alaska Region Sensitive Species[4]				
Steller sea lion – Eastern AK DPS[3]	*Eumetopias jubatus*	Marine and terrestrial areas in Southeast Alaska (east of 144° west longitude).	Yes, occurs in waters surrounding the Tongass.	S
Queen Charlotte goshawk	*Accipiter gentiles laingi*	Mature/old-growth forests.	Yes, known to occur on the Tongass.	S
Aleutian Tern	*Sterna aleutica*	Nests on islands, shrub-tundra, grass or sedge meadows and freshwater and coastal marshes.	Yes, known to occur on the Tongass.	S
Black oystercatcher	*Haematopus bachmani*	Rocky shorelines along the coast; forages in sheltered areas where low-sloping gravel or rock beaches with abundant prey occur.	Yes, known to occur on the Tongass.	S
Kittlitz's murrelet	*Brachyramphus brevirostris*	Breeds in the vicinity of glaciers and cirques in high elevation alpine areas with little or no vegetative cover; northern Gulf of Alaska and Bering Sea coast (Day et al. 1999).	Yes, known to occur on the Tongass.	S

[1]Special status fish species are identified in the fisheries section of the analysis.
[2]T = Federally threatened; E = Federally endangered; C = candidate for Federal listing; S = Alaska Region Sensitive Species
[3] DPS = Distinct Population Segment.
[4] Regional Forester's Sensitive Species List (February 2009). The Steller sea lion Eastern DPS was added as a sensitive species after federal ESA delisting. The Western DPS remains federally endangered.

Humpback whales are currently listed as endangered under the ESA and have been protected since 1965. Humpback whales generally migrate between temperate and tropical waters in the winter and spring where they mate and calve, and cooler northern coastal waters where they feed. Feeding occurs near the highly productive fjords of the Southeastern Alaskan panhandle and Prince William Sound, from

approximately May through December, although some individuals can be seen every month of the year (Calkins 1986). Peak numbers of whales are usually found in nearshore waters during late August and September, but substantial numbers usually remain until early winter.

Humpbacks summering in Southeast Alaska have been linked to three wintering areas: the coastal waters along Baja California and mainland Mexico, the main islands of Hawaii, and the islands south of Japan (NMFS 1991). Those whales that feed in Southeast Alaska and migrate to Hawaii are referred to as the central North Pacific stock (Muto et al. 2018). The local distribution of humpbacks in Southeast Alaska appears to be correlated with the density and seasonal availability of prey, particularly herring (*Clupea harengus*) and euphausiids (small shrimp-like crustaceans such as krill), and adults consume up to 3,000 pounds a day outside the breeding season. Important feeding areas include Glacier Bay and adjacent portions of Icy Strait, Stephens Passage/Frederick Sound, Seymour Canal, and Sitka Sound.

Glacier Bay and Icy Strait appear to be an important feeding area early in the season, when whales prey heavily on herring and other small, schooling fishes. Frederick Sound is important later in summer, when whales feed on swarming euphausiids. During autumn and early winter, humpbacks move out of the Sound to areas where herring are abundant, particularly Seymour Canal. Other areas of Southeastern Alaska may also be important for humpbacks and need to be evaluated. These include Cape Fairweather, Lynn Canal, Sumner Strait, Dixon Entrance, the west coast of Prince of Wales Island, and offshore banks such as the Fairweather Grounds.

Recent estimates of the Central North Pacific stock of humpback whales found 1,115 unique identifications in Southeast Alaska and 583 in northern British Columbia, for a total of 1,669 individual whales (Calambokidis et al. 2008 [referred to as the SPLASH study]; Muto et al. 2018). From the SPLASH study, the estimates of abundance for Southeast Alaska/northern British Columbia ranged from 2,883 to 6,414. The estimates from SPLASH are considerably larger than previous estimates. The population rate of increase was estimated at 7 percent for Pacific humpback whales (Muto et al. 2018).

Although the final rule for humpback whale ESA listing (81 FR 62259, 8 September 2016) established 14 Distinct Population Segments (DPSs) with different listing statuses, the DPSs that occur in waters under the jurisdiction of the United States do not equate to the existing Marine Mammal Protection Act (MMPA) stocks. Some of the listed DPSs partially coincide with the currently defined Central North Pacific stock. Because NMFS cannot manage one portion of an MMPA stock as ESA-listed and another portion of a stock as not ESA-listed, until such time as the MMPA stock delineations are reviewed in light of the DPS designations and Bettridge et al. (2015), NMFS will continue to use the existing MMPA stock structure and considers this stock to be endangered and depleted for MMPA management purposes. As a result, the Central North Pacific stock continues to be classified as a strategic stock.

Humpback whales are regularly sighted in the Inside Passage and coastal waters of the Southeastern Alaska panhandle from Yakutat Bay south to Queen Charlotte Sound (USDA Forest Service 1997a). Because the humpback inhabits shallow coastal areas, it is increasingly exposed to human activity. Consequently, these whales may be more susceptible to confrontational disturbance, displacement, and loss of habitat from environmental degradation than some other whale species. Specifically, the greatest threats to humpback whales today are entanglements in fishing gear, ship strikes, and coastal habitat pollution.

Marine mammals are protected under the MMPA as well as the Forest Plan standards and guidelines that ensure protection and maintenance of whale habitats and that permitted or approved activities are conducted in a manner consistent with the MMPA, ESA, and NMFS regulations for approaching whales, dolphins, and porpoise. Changes to the roadless rule for Alaska are not the source of causation for any potential effects and will have no effect to the humpback whale.

Steller Sea Lion, Western and Eastern DPS

The Steller sea lion (*Eumetopias jubatus*) was emergency-listed as threatened under the ESA in April 1990 by NMFS due to rapid population declines in the western portion of its range (55 FR 12645). In 1997, the NMFS designated two DPSs, occurring west and east of 144 degrees west longitude, respectively. The western DPS includes Steller sea lions that originate from rookeries west of 144° west longitude (Cape Suckling): those in the Gulf of Alaska, the Aleutian Islands, the Bering Sea, and Asia.

The eastern DPS includes sea lions originating from rookeries in Southeast Alaska, British Columbia, Washington, Oregon, and California. Due to persistent decline, the western DPS was reclassified as endangered, while the increasing eastern DPS was delisted in November 2013. On November 4, 2013, NMFS issued a final rule (78 FR 66140) to remove the eastern DPS of Steller sea lion from the List of Endangered and Threatened Wildlife. A species removed from listing under the ESA because recovery criteria have been met will be automatically added to the Alaska Region Sensitive Species list for at least 5 years (FSM 2672.11, R-10 2600-2005-1). Until the Alaska Region Sensitive Species list is updated, the Steller sea lion will continue to be analyzed as a sensitive species. The western DPS is analyzed as an endangered species.

Steller sea lions are widely distributed over the continental shelf and throughout the coastal waters of the Gulf of Alaska. The Eastern DPS is known to occur in the waters surrounding the Tongass, although inter-migration between the eastern and western populations has been documented, particularly north of Frederick Sound.

Critical habitat was designated for the Steller sea lion (western DPS) by NMFS in 1993 and represents areas considered essential for the continued survival and recovery of this species (50 CFR 226.202). None of this critical habitat occurs in Southeast Alaska. Adult Steller sea lions congregate at rookeries for breeding and pupping which are generally located on relatively remote islands, often in exposed areas that are not easily accessed by humans or mammalian predators. These rookeries, as well as haulouts, have been officially designated as critical habitat in Southeast Alaska (50 CFR 226.202).

To date, 3 major rookeries and 11 major haulouts have been identified as critical habitat on or adjacent to the Tongass. Two additional haulouts have been identified in Southeast Alaska (Cape Fairweather and Graves Rock) but these locations are within Glacier Bay National Park. In light of the delisting of the Eastern DPS and listing of the Western DPS as endangered, as well as availability of new science, NMFS is currently conducting a review of critical habitat for this species.

Steller sea lions are sensitive to disturbance and harassment or displacement from haulouts and rookeries. Human activities such as boating, recreation, aircraft, log transfer facilities (LTFs), and log raft towing are concerns related to the long-term conservation of the sea lion in Southeast Alaska (Muto et al. 2018). Forest Plan standards and guidelines for Steller sea lions provide protection to sea lion habitats and regulate activities in proximity to this species (USDA Forest Service 2016a; WILD 1-Section X and WILD 4-Section A). Steller sea lions are also protected by the MMPA.

Changes to the roadless rule for Alaska are not the source of causation for any potential effects and will have no effect to the western DPS of the Steller sea lion or designated critical habitat.

Alaska Region Sensitive Species

The Alaska Region Sensitive Species list was updated in 2009 and supersedes previous lists (USDA Forest Service 2009a). The current Alaska Region Sensitive Species list for animal species that occur on the Tongass includes the Queen Charlotte goshawk, Kittlitz's murrelet, black oystercatcher, Aleutian tern, and Steller sea lion (Eastern DPS), which was discussed above.

Although not on the 2009 list, the Steller sea lion (Eastern DPS) is now an Alaska Region Sensitive Species. On November 4, 2013, NMFS issued a final rule (78 FR 66140) to remove the Eastern DPS of Steller sea lion from the List of Endangered and Threatened Wildlife and, therefore, it continues to be analyzed as a sensitive species.

Queen Charlotte Goshawk

The Queen Charlotte goshawk (*Accipiter gentilis laingi*) is recognized as a distinct subspecies of the northern goshawk (*Accipiter gentilis*) that occurs only in coastal areas of British Columbia and in Southeast Alaska. The British Columbia DPS of the Queen Charlotte goshawk was listed as threatened under the ESA (FR 45870-45893) in August 2012; however, the Alaska DPS was not listed in part due to the protections provided by the Old-growth Habitat Conservation Strategy.

The goshawk is a year-round resident in Southeast Alaska and may occupy different or overlapping breeding and winter territories. Goshawk breeding territories can be described hierarchically in terms of

the nest site, the nest area, post-fledging area, and foraging area (see Reynolds et al. 1992 and USDA Forest Service 2008b). Goshawks in Southeast Alaska typically nest in large patches of tall, mature, and old trees with dense canopies. When mature and old-growth habitats are not available, they will nest in maturing young growth with sufficient structure (Reynolds et al. 2006; Boyce et al. 2006). Nesting in mature young growth is less common, and occurs in proportion to the amount of this habitat available on the landscape, suggesting goshawks neither prefer nor avoid its use (USFWS 2007).

Goshawk foraging areas typically consist of mature and old-growth forest stands, though they will also forage in young forest as well as along edges and in openings as long as suitable perches from which to observe and attack prey are present (Iverson et al. 1996; Bosakowski et al. 1999; McClaren 2004; Boyce et al. 2006; Reynolds et al. 2006). Prey species vary geographically, and include blue grouse, red squirrels, and a variety of forest-dwelling birds (spruce grouse, Steller's jay, and ptarmigan; Lewis 2001). High-volume POG represents optimal nesting and foraging habitat for goshawks due to the presence of large trees and snags. Existing amounts of this forest type on the Tongass are discussed in the *Biological Diversity* section. Approximately 86 percent of the original high-volume POG existing in 1954 remains on the Tongass (see Table 3.3-4).

Kittlitz's Murrelet

The Kittlitz's murrelet (*Brachyramphus brevirostris*) was retained as a 2009 sensitive species because it was a USFWS candidate for ESA listing. On October 3, 2013, the USFWS issued a 12-month finding (78 FR 61763) that listing the Kittlitz's murrelet was not warranted. However, until the Alaska Region Sensitive Species list is updated, the Kittlitz's murrelet will continue to be analyzed as a sensitive species (USDA Forest Service 2016b).

More than 95 percent of the global population is estimated to breed in Alaska, with the remainder occurring in the Russian Far East. The largest breeding populations are believed to be in Glacier Bay National Park and Preserve, Prince William Sound, Kenai Fjords, and Icy Bay (Kendall and Agler 1998 as cited in Day et al. 2000). Breeding season core population centers adjacent to the Tongass include Icy Bay, Malaspina Forelands, and Yakutat Bay where the species is closely associated with glacial habitats (Kissling et al. 2011). The Forest Plan contains direction to "provide for the protection and maintenance of known Kittlitz's murrelet nesting habitat."

Black Oystercatcher

The black oystercatcher (*Haematopus bachmani*) was added to the Alaska Region Sensitive Species list in 2009. The Alaska Shorebird Conservation Plan also notes it as a species of high concern due to concerns with population size, breeding and nonbreeding threats, and nonbreeding distribution (Alaska Shorebird Group 2008). It is also a Bird of Conservation Concern, and is on the Audubon Society's Watch List (Tessler et al. 2007).

The black oystercatcher occurs along the North American Pacific coast from the Aleutian Islands to Baja California (Andres and Falxa 1995), with over half of the global population residing in Alaska primarily in Prince William Sound and the Kodiak Archipelago (Tessler et al. 2007). Historically, they have been documented in Sitka Sound/Necker Islands, the Myriad Islands, the outer coast of Baranof Island, and the Forrester Island group but breeding birds are generally sparsely distributed (Tessler et al. 2007). They favor rocky shorelines and forage exclusively on intertidal macroinvertebrates (e.g., limpets and mussels).

Breeding oystercatchers are highly territorial and breeding pairs tend to be widely distributed but Kodiak Island is currently the only documented area in Alaska that supports large concentrations of black oystercatchers (Tessler et al. 2007). Limited surveys specifically targeting black oystercatchers in Alaska have occurred, but they have been observed and are known to nest in low densities along shorelines and intertidal areas adjacent to the Tongass. After breeding, black oystercatchers aggregate into winter flocks ranging from tens to hundreds of individuals. Winter flocks typically concentrate on protected, ice-free tidal flats or rocky islets with dense mussel beds. Because black oystercatchers solely use the intertidal zone, where they may congregate in large numbers, they are especially vulnerable to disturbance from marine industrial pollution and human disturbance from tourism and fishing. Threats include predation, recreational disturbances, flooding, vessel wakes, and shoreline contamination (Tessler et al. 2007).

Aleutian Tern

The Aleutian tern (*Sterna aleutica*) is a migratory seabird that breeds exclusively in Alaska and eastern Siberia. It is a USFWS Bird of Conservation Concern and is protected under the Migratory Bird Treaty Act (MBTA) and is listed as an Alaska Region sensitive species by the Forest Service. In Alaska, Aleutian tern colonies are located throughout the Aleutian Islands, north to the southeastern Chukchi Sea and east to the Alaska Peninsula, Yakutat, and Glacier Bay (USFWS 2012d).

Aleutian terns are ground nesters that breed in loose colonies, often in association with Arctic terns, in coastal sites located at the heads of bays, reefs, island, estuaries, and river mouths (USFWS 2012d). One of the largest breeding colonies of Aleutian terns occurs on Black Sand Spit in the Yakutat Forelands, which supports approximately one third of Alaska's population. Due to its importance as a breeding colony, Black Sand Spit has been identified as an Audubon Important Bird Area and is included in conservation priority areas identified by TNC and Audubon Alaska (Audubon Alaska and The Nature Conservancy 2007).

Management Indicator Species

The 1982 Planning Rule directed the use of MIS in forest planning to help display the effects of forest management. The 1997 Forest Plan selected 13 wildlife MIS which carried through to the 2008 Forest Plan Amendment. Because the 2016 Forest Plan Amendment EIS analyzed an amendment to the 2008 Forest Plan done under the 1982 Planning Rule, these species were carried forward and analyzed even though the 2012 Planning Rule does not use MIS for evaluating effects. MIS are also addressed in this EIS, which summarizes, where appropriate, the detailed analysis completed for the 2016 Forest Plan Amendment EIS (USDA Forest Service 2016b). Most of these species are associated with POG forests of Southeast Alaska either directly or rely on prey species associated with these habitats.

Sitka Black-Tailed Deer

Sitka black-tailed deer (*Odocoileus hemionus sitkensis*) are indigenous to the coastal regions of Southeast Alaska and northwest British Columbia. They are an important big game hunting and subsistence species. They are also an important prey species for the Alexander Archipelago wolf (discussed below).

Sitka black-tailed deer use lower elevation (below 800 feet elevation) POG forest habitats during the winter period. The quantity, quality, distribution and arrangement of winter habitat are considered the most important limiting factors for Sitka black-tailed deer in Southeast Alaska. However, spring, summer, and fall habitats (non-winter) are also important for deer reproduction and population recovery following severe winters, and for building up pre-winter body reserves. During these seasons, and during mild winters, deer will forage in young-growth stands less than about 25 years old and other open non-forested habitats. High-volume POG below 800 feet elevation is generally considered to be the habitat of highest importance for deer during the winter period, especially during severe winters, because of forage availability and snow interception capability. The Tongass currently provides 1.3 million acres of high-volume POG below 800 feet. This represents 82 percent of the original amount of high-volume POG below 800 feet on the Tongass (see Table 3.3-4).

However, spring, summer, and fall habitats (non-winter) are also important for deer reproduction and population recovery following severe winters, and for building up pre-winter body reserves. During these seasons, and during mild winters, deer will forage in young-growth stands less than about 25 years old and other open non-forested habitats.

As part of the 2016 Forest Plan Amendment EIS, the interagency deer habitat capability model was used to assess existing habitat capability within the planning area (see USDA Forest Service 2016b; *Wildlife* section). Table 3.3-14 summarizes the modeled deer habitat capability by biogeographic provinces. Forest-wide, approximately 89 percent of the original (1954) habitat capability remains, ranging from 72 to 100 percent depending on the biogeographic province. The greatest reductions in deer habitat capability have occurred in provinces where timber harvest has been concentrated (the North Central Prince of Wales, East Baranof, and Etolin Island and vicinity biogeographic provinces).

In addition to the interagency deer model, the Forage Resource Evaluation System for Habitat (FRESH) model developed by the USDA Forest Service Pacific Northwest Research Station (Hanley et al. 2012; http://cervid.uaa.alaska.edu/deer/Home.aspx) was also used to quantify the relative value of available deer forage under different alternatives (described in detail in the 2016 Forest Plan Amendment EIS). The output of the model provides a "snapshot" of habitat conditions based on estimated food availability and quality at one point in time, which was used to make a relative comparison of conditions within a habitat patch or landscape under different conditions (i.e., before and after implementation of a management activity). More detailed information on the FRESH model inputs and results can be found in the 2016 Forest Plan Amendment EIS, *Wildlife* section, and the model is not discussed further here.

Table 3.3-14
Existing Forest-wide Deer Habitat Capability Using the Interagency Deer Model (NFS Lands Only)[1]

	Biological Province[2]	Existing Habitat Capability 2015 (Deer per Square Mile)	Original (1954) Habitat Capability (Deer per Square Mile)	% Original Habitat Capability Remaining	No. WAAs with Modeled Deer Density of at least 18 Deer per Square Mile[3]
1	Yakutat Forelands	13.3	13.7	97%	2
2	Yakutat Uplands	2.3	2.4	98%	0
3	East Chichagof Island	11.7	13.7	86%	1
4	West Chichagof Island	14.5	14.5	100%	1
5	East Baranof Island	7.0	8.5	82%	0
6	West Baranof Island	12.2	13.7	89%	4
7	Admiralty Island	17.6	17.9	98%	10
8	Lynn Canal	5.5	5.8	95%	1
9	North Coast Range	6.2	6.2	100%	0
10	Kupreanof/Mitkof Island	16.9	19.2	88%	7
11	Kuiu Island	25.5	28.1	91%	7
12	Central Coast Range	9.0	9.5	96%	1
13	Etolin Island	15.7	18.9	83%	3
14	North Central Prince of Wales	17.7	24.5	72%	11
15	Revilla Island/Cleveland Peninsula	13.5	15.0	90%	7
16	Southern Outer Islands	28.1	32.1	88%	9
17	Dall Island and Vicinity	30.4	30.6	99%	3
18	South Prince of Wales	21.8	22.2	98%	5
19	North Misty Fjords	3.7	3.8	99%	2
20	South Misty Fjords	8.4	8.4	100%	0
21	Ice Fields	0.7	0.8	94%	0
	Forest-wide	**10.1**	**11.3**	**89%**	**57**

[1] Note that the model treats harvested stands in the stem exclusion stage (25 years old or older) the same value regardless of thinning treatments that are implemented.
[2] Note that wolves very rarely occur on Admiralty, Baranof, and Chichagof Islands.
[3] For WAAs that overlap a biological province boundary only the overlapping portion counted toward the total.
Source: USDA Forest Service 2016

Mountain Goat

Mountain goats (*Oreamnos americanus*) inhabit alpine and subalpine areas and adjacent POG forests on the mainland portions of the Tongass and have been introduced to several islands. Steep glacial valleys and peaks provide escape terrain from predation by wolves and bears. Adjacent meadows provide forage and, at lower elevations, POG forests provide cover as well as evergreen shrubs and forbs for winter forage (Porter 2010).

Mountain goats are sensitive to human disturbance, which can cause the temporary or permanent abandonment of habitat, increased stress, altered behaviors, and potentially excess energy expenditure (Goldstein et al. 2005; Olliff et al.1999). Industrial activities such as timber harvest, mining, road construction, and hydroelectric development have the potential to have adverse effects on mountain goat populations through disturbance or removal of habitat. However, this species spends much of its time outside of areas where timber harvest has occurred or are likely to occur in the future. Existing Forest Plan standards and guidelines were developed to reduce the impacts of other activities (e.g., helicopter over-flights for recreation) and impacts associated with facilities.

Black Bear

Black bears are an important species for hunting, recreation, and tourism. In Southeast Alaska, black bears are present throughout the mainland and on the islands south of Frederick Sound. Black bears in Southeast Alaska are part of a population (Alexander Archipelago black bears) endemic to coastal British Columbia and Southeast Alaska, except Admiralty, Baranof, and Chichagof islands (Stone and Cook 2000; Peacock et al. 2007). Black bears will use habitats from sea level to the alpine but appear to prefer estuarine, riparian, and forested coastal habitats (USDA Forest Service 2008b). Black bears use small openings and areas such as wetlands, clearcuts, and subalpine meadows for foraging.

Past timber harvest, especially in areas adjacent to salmon streams, has decreased black bear habitat suitability through the removal of POG forest. While early successional habitats may provide abundant food (berries), over the long term dense young-growth stands provide poor habitat for black bears due to the lack of forage and large hollow trees for denning. Also, over the long term, reduction of den sites may result from a lack of availability of large tree root structures (Davis et al. 2012). Approximately 90,000 acres of young-growth (harvested and natural) occur in RMAs and an additional 68,000 acres occur in Beach and Estuary Fringe outside of RMAs. Small OGRs and other Non-development LUDs provide some connectivity on a local scale to shoreline and riparian habitats preferred by black bears.

Timber harvest may also impact black bears through increased human access on roads. This can result in increased harvest-related mortality; however, it should be noted that black bear harvest risk has not been linked to a particular road density level.

River Otter

River otter (*Lutra canadensis*) are associated with coastal and freshwater aquatic environments and the immediately adjacent (within 100 to 500 feet) upland habitats. River otters are distributed throughout Southeast Alaska, and across the Tongass, along coastal and inland waters (MacDonald and Cook 2007).

Old-growth forests have the highest habitat value for river otters, providing canopy cover, large-diameter trees and snags, and burrow and den sites. River otters rest in cavities or beneath the roots of large conifers or snags in POG forests with open understories (high-volume POG forest; Ben-David et al. 1996; Bowyer et al. 2003). Young-growth forests provide lower quality habitat. There are approximately 2.1 million acres of high-volume POG forest on the Tongass. Approximately 90,000 acres of young-growth (harvested and natural) occur in Riparian Management Areas (RMAs) and an additional 68,000 acres occur in Beach and Estuary Fringe outside of RMAs. Protection under the Forest Plan is provided through standards and guidelines for beaches, estuaries, and riparian areas (USDA Forest Service 2016a).

American Marten

The American marten (*Martes americana*) is an important furbearer that is associated with old-growth forests. Coastal habitats (beach fringe) and riparian areas have the highest habitat value for marten, followed by upland forested habitats below 1,500 feet in elevation (USDA Forest Service 2008a). Marten favor large- and medium-sized old-growth forests because they intercept snow, provide cover and denning sites, and provide habitat for marten prey species (Flynn and Schumacher 2001; Flynn et al. 2004). The quantity and quality of winter habitat is a limiting factor for marten in Southeast Alaska. Therefore, the availability of deep-snow marten habitat, defined as high-volume POG below 800 feet in elevation, provides a measure of habitat quality for marten. There are approximately 1.3 million acres of high-volume POG forest below 800 feet elevation on the Tongass and 82 percent of the original POG in this category remains on the Tongass (see Table 3.3-4).

Old-growth timber harvest reduces habitat quality for marten through the removal of forest cover, fragmentation of old-growth habitat (reductions in travel corridors and/or functional connectivity between spatially isolated populations), and reductions in habitat for some prey species. Increased human access associated with new roads may result in increased marten harvest-related mortality.

Although closed roads still facilitate access (e.g., off-highway vehicle, pedestrian), open roads that receive the highest and most consistent use are likely to have the greatest effect on martens by facilitating access for trappers. Existing road densities (all elevations included) on the Tongass are listed in Table 3.3-15.

Table 3.3-15
Existing Estimated Average Road Densities and Percentage of WAAs in Road Density Categories on NFS Lands and All Lands Combined for All Roads and Open Roads Only within the Tongass National Forest Boundary (All Elevations)

Road Density Category (miles per square mile)	Existing Road Densities (percentage of WAAs)	
	NFS Lands	All Lands[1]
All Roads		
0	55.0%	50.8%
0 to 0.7	31.9%	30.9%
0.7 to 1.0	6.3%	5.8%
1.0 to 2.0	6.3%	9.9%
2.0 to 3.0	0.5%	2.6%
>3.0	0.0%	0.0%
Total	100%	100%
Average Total Road Density – All WAAs	0.19	0.32
Open Roads[2]		
0	60.2%	56.0%
0 to 0.7	37.7%	34.6%
0.7 to 1.0	1.6%	4.2%
1.0 to 2.0	0.5%	5.2%
2.0 to 3.0	0.0%	0.0%
>3.0	0.0%	0.0%
Total	100%	100%
Average Open Road Density – All WAAs	0.08	0.21

[1] Percentages are based on all 191 Wildlife Analysis Areas (WAAs) inside the Forest boundary.
[2] Open roads on NFS land were calculated using Maintenance Levels 2, 3, 4, and 5 (see *Transportation* section for maintenance level description).
Source: Tongass National Forest GIS layer, 2018, and modeling of alternatives.

Roadless areas and OGRs and other non-development LUDs provide refugia for marten from trapping pressure. However, marten home ranges are well-distributed across the landscape and include areas with timber harvest and roads, emphasizing the importance of habitat within matrix lands. Legacy Forest Structure standards and guidelines, in combination with the beach fringe and riparian buffers, aid in providing habitat and connectivity for marten on NFS lands.

Brown Bear

Southeast Alaska is home to one of the highest concentrations of brown bears (*Ursus arctos*) in the world (ADF&G 2000). Brown bears are present on the mainland and on most the islands north of Frederick Sound. They are occasionally reported on Mitkof, Etolin, Revillagigedo, and Wrangell Islands south of Frederick Sound, but are not found on any of the other islands in Southeast Alaska. Admiralty, Baranof, Chichagof, Kruzof, Yakobi, and neighboring islands consistently support the highest densities of brown bears on the Tongass (Game Management Unit [GMU] 4).

Brown bears are important both for hunting (including both outfitter guided and non-guided hunting) and to the recreation and tourism industry of Southeast Alaska. On the Tongass, ADF&G permits harvest of

brown bears in GMUs 1, 3, 4, and 5. As tourism grows in Southeast Alaska, there is increasing demand for more bear viewing opportunities such as those provided by Pack Creek and Anan Creek.

Brown bears use areas from sea level to the alpine and are habitat generalists. The late-summer season has been identified as the most critical or limiting period for brown bears when they must build up energy reserves that are adequate to survive the winter and successfully reproduce (Hilderbrand et al. 1999). During this season, many brown bears concentrate along low elevation valley bottoms and salmon streams, with most use occurring within 500 feet of streams (Schoen and Beier 1990; Titus and Beier 1999), where their efforts focus on consuming large quantities of fish in order rebuild their body condition and lay on essential fat reserves. These are often the same areas of highest human use and most intense resource development activities (Flynn et al. 2007).

Roads and other human developments can also be detrimental to bears because they increase the opportunity for human-induced mortality of bears through legal hunting, defense of life or property kills, and illegal killing. Additionally, poorly maintained or constructed roads can affect water quality and productivity of salmon streams.

Alexander Archipelago Wolf

The Alexander Archipelago wolf (*Canis lupus ligoni*) is thought to be a subspecies of gray wolf endemic to Southeast Alaska and British Columbia. It inhabits the mainland of Southeast Alaska and coastal British Columbia west of the Coast Mountain Range, and larger islands (those south of Frederick Sound) except Admiralty, Baranof, Chichagof islands, and all of the Haida Gwaii or the Queen Charlotte Islands (USFWS 2015). Approximately 38 percent of the range-wide population of Alexander Archipelago wolves inhabits Southeast Alaska, where population trends are largely unknown, except for the population on Prince of Wales Island and the surrounding islands (collectively GMU 2), which appears to have declined in abundance over the past 20 years. A portion of Prince of Wales Island was sampled, and estimates expanded to the entire GMU 2 suggesting an apparent decline of potentially 75 percent. However, because GMU 2 constitutes approximately 4 percent of the range of the Alexander Archipelago wolf and 6 percent of the range-wide population, negative population impacts in GMU 2 likely do not affect the range-wide population significantly (USFWS 2015). The majority (62 percent) of the Alexander Archipelago wolf population occurs in coastal British Columbia and is thought to be stable (USFWS 2015). Although some research suggests that wolves inhabiting Prince of Wales Island may be genetically isolated from other populations in Southeast Alaska (Person 2001; Weckworth et al. 2005, 2010, 2011), there remains uncertainty about the degree of isolation (see the Alexander Archipelago Wolf Species Status Assessment [USFWS 2015] for more information).

In August 2011 and more recently in July 2020, the USFWS received petitions to list the subspecies as threatened or endangered, and to recognize Prince of Wales Island as a significant portion of its range (Center for Biological Diversity and Greenpeace 2011). The 2011 petition also requested that the USFWS consider those wolves found on Prince of Wales Island and adjacent islands (including Kosciusko, Tuxekan, Heceta, Suemez, Dall, and others proximate to Prince of Wales) as a DPS based on unique genetic, physical, and ecological characteristics. In March 2014, the USFWS issued a 90-day finding that the petition to list the subspecies presented substantial information indicating that listing may be warranted (79 FR 17993). A status review of the Alexander Archipelago wolf to determine if listing is warranted was published in November 2015. In January 2016, the USFWS published a 12-Month finding that listing of the subspecies was not warranted. The 2016 amended Forest Plan facilitates a transition from harvesting old-growth forest to predominantly harvesting young-growth forest. After the USFWS decision in 2016 that listing was not warranted, and based on continued GMU 2 wolf population concerns, Forest Service leadership within the Tongass and Alaska Region directed staff to proceed with developing the Wolf Habitat Management Program and wolf management recommendations for GMU 2 (see Wolf Technical Committee 2017).

Wolves feed primarily on deer in certain areas (especially in GMUs 1, 2, 3, and 4), though waterfowl, beaver, spawning salmon, sea otter, squirrels, mountain goat, and black bear represent important prey when available (Lafferty et al. 2014; Darimont and Reimchen 2002; Szepanski et al. 1999; ADF&G 2017). Wolves in Southeast Alaska also prey on moose and elk where available. Suitable habitats for wolves are those capable of supporting this prey base. Therefore, wolves in Southeast Alaska use a wide variety of prey habitats but spend most of their time in productive and unproductive old-growth forests at low elevations (below 270 feet); young-growth forests and clearcuts are typically avoided (Person 2001).

Dens on Prince of Wales Island are located in root wads of large living or dead trees within old-growth forest stands less than 495 feet (150 meters) from freshwater (Person and Russell 2009). Roffler and Gregovich (2018) monitored 13 radio-collared wolves between 2012 and 2016 and documented 11 den sites. Although the mean minimum and maximum distance from the core area edge to the active den site (0.73 mile – 3.93 miles) varied widely, it was smaller for breeding wolves (0.46 mile – 1.43 miles), and all distances exceeded the existing recommended den buffer distance (1,200 feet or 0.23 mile).

Deer winter habitat was considered by Person et al. (1996) and Person (2001) to be a good measure of habitat quality for wolves in southern Southeast Alaska. Black-tailed deer are present in all Southeast Alaska GMUs where wolves occur. Forest Plan standards and guidelines state that, where possible, sufficient deer habitat capability should first be maintained to sustain wolf populations, and then to consider meeting estimated human deer harvest demands. This is generally considered to equate to the habitat capability to support a minimum of 18 deer per square mile (using interagency deer habitat capability model outputs; USDA Forest Service 2008a). However, other factors (e.g., local knowledge of habitat conditions, inherent capability of the landscape, spatial extent of the analysis) are to be considered by the biologist, as well, rather than solely relying upon model outputs (USDA Forest Service 1997b, Appendix N; 2016a).

The interagency deer habitat capability model was used to evaluate wolf habitat capability based on modeled deer habitat capabilities (see the 2016 Forest Plan Amendment EIS for discussion of model limitations and assumptions). Table 3.3-16 summarizes existing conditions by biogeographic province. Forest-wide approximately 89 percent of the original (1954) habitat capability remains, ranging from 72 to 100 percent by biogeographic province.

Table 3.3-16
Modeled Deer Habitat Capability Using the Interagency Deer Model for Comparison to Forest Plan 18 Deer per Square Mile Standard and Guideline (NFS Lands Only)

	Biological Province	Existing Habitat Capability 2015 (Deer per Square Mile)	Original (1954) Habitat Capability (Deer per Square Mile)	% Original Habitat Capability Remaining	No. WAAs with Modeled Deer Density of at least 18 Deer per Square Mile[1]	No. WAAs with >100 acres in Province[4]
1	Yakutat Forelands	13.3	13.7	97%	2	5
2	Yakutat Uplands	2.3	2.4	98%	0	5
3	East Chichagof Island	11.7	13.7	86%	1	22
4	West Chichagof Island	14.5	14.5	100%	1	7
5	East Baranof Island	7.0	8.5	82%	0	6
6	West Baranof Island	12.2	13.7	89%	4	11
7	Admiralty Island	17.6	17.9	98%	10	18
8	Lynn Canal	5.5	5.8	95%	1	17
9	North Coast Range	6.2	6.2	100%	0	10
10	Kupreanof/Mitkof Island	16.9	19.2	88%	7	10
11	Kuiu Island	25.5	28.1	91%	7	6
12	Central Coast Range	9.0	9.5	96%	1	14
13	Etolin Island	15.7	18.9	83%	3	7
14	N. Central Prince of Wales	17.7	24.5	72%	11	22
15	Revilla Island/Cleveland Peninsula	13.5	15.0	90%	7	22
16	Southern Outer Islands	28.1	32.1	88%	9	9
17	Dall Island and Vicinity	30.4	30.6	99%	3	3
18	South Prince of Wales	21.8	22.2	98%	5	6
19	North Misty Fjords	3.7	3.8	99%	2	12
20	South Misty Fjords	8.4	8.4	100%	0	6
21	Ice Fields	0.7	0.8	94%	0	33
	Forest-wide	**10.1**	**11.3**	**89%**	**57**	**250**

[1] For WAAs that overlap a biological province boundary only the overlapping portion counted toward the total.
[2] Note that the model treats harvested stands in the stem exclusion stage (25 years old or older) the same value regardless of thinning treatments that are implemented.
[3] Note that wolves very rarely occur on Admiralty, Baranof, and Chichagof Islands.
[4] Note that deer abundance varies naturally, with much lower abundance in the northern portion of the Forest and in higher elevation WAAs. Also note that many WAAs in this column occur in more than one province.
Source: Data from 2016 Tongass GIS.

Wolves are also a furbearer in Southeast Alaska. Harvesting of wolves is regulated by the Federal Subsistence Board and the State of Alaska Board of Game. Harvest regulations, both subsistence and sport, are intended to help ensure sustainable wolf populations. The ADF&G works cooperatively with the Alaska Board of Game and with federal land managers, including the Forest Service, to identify and address conservation concerns and propose regulation changes as needed for all wildlife in Southeast Alaska, including wolves.

Although wolves are often harvested by hunters and trappers working from boats (approximately 59 percent of harvest in GMU 2), harvest-related wolf mortality (both legal and illegal) is correlated with roads and other habitat features, which influence their vulnerability to harvest (Person and Russell 2008; Person and Logan 2012).

A road density of 0.7 to 1.0 mile per square mile or less may be necessary to reduce harvest-related mortality risk where locally unsustainable wolf mortality has been identified through interagency analysis (USDA Forest Service 2008a, p. 4-95; Person et al. 1996). Existing road densities are presented in Table 3.3-15. For NFS lands, approximately 13 percent of WAAs exceed the 0.7 mile per square mile guideline; however, approximately 18 percent exceed the guideline when all lands are considered, including non-NFS lands. When only open roads are considered, these percentages drop to 2 and 9 percent, respectively. Approximately 7 percent of WAAs exceed 1.0 mile per square mile for NFS lands only and 13.5 percent exceed this density for all lands (Table 3.3-15). Current Standards and Guidelines provide protection for active den sites through the establishment of a 1,200-foot forested buffer and avoid road construction within established buffer where feasible (USDA Forest Service 2016a).

Bald Eagle

The bald eagle (*Haliaeetus leucocephalus*) is associated with beach, estuary fringe, and riparian habitats. Bald eagles typically nest in large trees in spruce-hemlock forest, and over 90 percent of the nests are within 500 feet of a saltwater beach. Nests are located within beach, estuary fringe, and riparian habitats. Since 1967, the USFWS has monitored, via aerial surveys, bald eagle populations along the north Pacific coast from southern British Columbia to the Alaska Peninsula (Hodges 2011). In Southeast Alaska, the population increased until the 1980s, but since then has remained stable, with an adult population of approximately 13,000 to 26,000 birds (Hodges 2011).

Bald eagles are especially sensitive to disturbance early in the breeding season. Activities associated with timber harvest can result in reproductive failure or cause bald eagles to abandon their nests completely (Fraser et al. 1985 as cited in Isaacs et al. 2005). They are also susceptible to water quality impacts that adversely impact their prey populations (e.g., herring, flounder, pollock, and salmon). Under the 2016 Forest Plan, the availability of nesting habitat is not seen as a significant limiting factor, in part due to the current protection of the 1,000-foot shoreline beach buffer on the Tongass (Hodges 2011). Further protection to bald eagles is afforded by Forest-wide standards and guidelines that require the maintenance of estuarine and riparian buffers, raptor nest protection standards and guidelines (USDA Forest Service 2016a). Bald eagles are managed by the USFWS under the National Bald and Golden Eagle Protection Act and through the Bald Eagle Take Permit Program (74 [175] FR 46836).

Red Squirrel

The red squirrel is abundant on many of the islands and mainland and are an important prey species for American marten and goshawk. It is an MIS because of its preference for cone-producing trees and tree cavities and snags, which they use for denning and nesting (USDA Forest Service 2016b). Red squirrels are abundant on many of the islands in the Alexander Archipelago and the mainland.

Red squirrels use POG forests, but may also use young-growth stands once cone production begins about 40 years after timber harvest (USDA Forest Service 2016b). There are approximately 10 million acres of forested land, including all age classes and types of conifer forests (5.6 million acres of productive forest land and 4.4 million acres of unproductive forest land) on the Tongass that provide potential habitat for red squirrels (see *Biological Diversity* section; Table 3.3-2).

Old-growth timber harvest reduces habitat quality for red squirrels through the removal of forest cover and fragmentation of forest habitats. However, recovery of habitat capability after timber harvest is much faster for red squirrels than other species because although post-harvest formation of structures favored

for nesting and food storage (cavities) takes longer, the majority of habitat capability (food availability) is restored quickly as cone production typically begins 40 years after harvest. Commercial even-aged young-growth harvest returns stands to an early seral condition so would also delay development of habitat capability for red squirrels. Forest Plan Reserve Tree/Cavity-Nesting Habitat and Legacy Forest Structure standards and guidelines maintain habitat for this species.

Red-breasted Sapsucker, Hairy Woodpecker, and Brown Creeper

The red-breasted sapsucker (*Sphyrapicus ruber*), hairy woodpecker (*Leuconotopicus villosus*), and brown creeper (*Certhia americana*) are old-growth associated and snag-dependent species. Hairy woodpeckers and red-breasted sapsuckers are primary cavity excavators that require snags and dying trees for foraging and nesting. Although they may be found in a variety of forested habitats, the brown creeper prefers large diameter old-growth trees (Hejl et al. 2002). Although no historic population estimates exist, it is likely that timber harvest and associated activities have reduced populations from historic levels (Hejl et al. 2002). North American Breeding Bird Survey data collected between 2003 and 2013 suggest populations of all three species are increasing within the Northern Pacific Rainforest region, though none of the trends were statistically significant (Sauer et al. 2014).

All three species are associated with interior old-growth forest conditions (Kissling and Garton 2008). Old-growth timber harvest activities that remove large, live trees and dead or dying trees reduce nesting and foraging habitat for these species and may reduce local habitat quality by creating fragmented forest patches and thereby reducing the amount of interior old-growth forest habitat with which these species are associated.

Past timber harvest has reduced and altered the habitat used by the red-breasted sapsucker, hairy woodpecker, and brown creeper. Of the 5.0 million acres of POG forest on the Tongass, approximately 2.1 million acres are high-volume POG, and 780,000 acres are low-volume POG that provide potential habitat for these species (see *Biological Diversity* section; Table 3.3-3). Maintenance of habitat for these species under the Forest Plan is provided through the reserve tree and legacy standards and guidelines, beach and riparian buffers, and the Old-growth Habitat Conservation Strategy (USDA Forest Service 2016a).

Vancouver Canada Goose

The Vancouver Canada goose (*Branta canadensis fulva*) is associated with wetlands (both forested and non-forested) in the estuary, riparian, and upland areas of the Forest (USDA Forest Service 2016a). The Vancouver Canada goose is primarily a non-migratory subspecies of Canada goose that occurs year-round throughout Southeast Alaska, with an estimated resident population of 25,000 birds (Hupp et al. 2010). This species nests in forested habitats associated with beach and estuary buffers, and riparian habitats. Hupp et al. (2010) documented nests in forests adjacent to muskegs. During winter, marine grasses and salt marsh plants commonly found in intertidal areas are important forage resources, and Vancouver Canada geese exhibit strong fidelity, returning repeatedly to such winter sites.

Timber harvest activities may result in disturbance to geese, particularly if they occur in the vicinity of nest sites or brood rearing areas, and habitat removal. However, timber harvest in these areas has generally been minimal because these sites are fairly unproductive. Modifications to shoreline and riparian habitats can occur in association with young-growth harvest and roads and utility corridors if these habitats are crossed. Protection from direct impact to habitat is provided by Forest Plan Standards and Guidelines for waterfowl and shorebird, wetland, and riparian standards and guidelines; overall goose habitat is provided by the Old-growth Habitat Conservation Strategy (USDA Forest Service 2016a).

Other Species

Migratory Birds

Executive Order 13186 provides for the conservation of migratory birds and their habitats and requires the evaluation of the effects of Federal actions on migratory birds, with an emphasis on species of concern. The Executive Order directs agencies to take certain actions to further comply with the migratory bird conventions, the MBTA, the Bald and Golden Eagle Protection Act, and other pertinent statutes. Agencies are required to support the conservation and intent of the migratory bird conventions by

integrating bird conservation principles, measures, and practices into agency activities and by avoiding or minimizing, to the extent practicable, adverse impacts on migratory bird resources when conducting agency actions.

Birds protected under the MBTA include all common songbirds, waterfowl, shorebirds, hawks, owls, eagles, ravens, crows, native doves and pigeons, swifts, martins, swallows, and others, including their body parts (e.g., feathers, plumes), nests, and eggs. The Tongass is located in the Northern Pacific Rainforest Bird Conservation Region (BCR 5). The Northern Pacific Rainforest BCR is one of five BCRs designated in Alaska to provide a framework to facilitate coordinated conservation efforts (U.S. NABCI Committee, September 2000; Rich et al. 2004).

Priority migratory bird species identified in the Landbird Conservation Plan (BPIF 1999; Rich et al. 2004; Rosenberg 2016) for Southeast Alaska with the potential to occur on the Tongass are listed in Table 3.3-17 and discussed in detail in the 2016 Forest Plan Amendment EIS (USDA Forest Service 2016b, *Wildlife* section). Migratory birds are likely to be present in upland forest, riparian, and coastal habitat. There are 5.0 million acres of POG on the Tongass that provide primary or secondary habitats for these species (note that many of these species are also shrub nesters and may use young-growth as well as unproductive forest types).

The main management issue for migratory birds in BCR 5 is the harvest of old-growth coniferous forests. Timber harvest directly removes perching, foraging, and nesting habitat and results in habitat fragmentation, which may reduce the suitability of remaining forest stands for species associated with old-growth interior forest conditions. Fragmentation may increase the exposure of birds to edge-related predators and parasites. As the landscape becomes more fragmented, forest buffers become increasingly important for migratory birds to mitigate the effects of habitat loss (Kissling 2003). There is already an existing level of fragmentation on the Tongass, both natural in association with the distribution of forested and non-forested cover types, and in association with past timber harvest and other development activities. Timber harvest and related activities may also directly impact migratory birds through disturbances of adults or young through the removal of active bird nests or by causing nest abandonment. Protection under the Forest Plan is provided by beach fringe and riparian buffers and standards and guidelines for waterfowl, shorebirds, raptors, legacy forest structure, and the Old-growth Habitat Conservation Strategy.

Table 3.3-17
Migratory and Resident Birds Identified as Species of Concern in Southeast Alaska[1]

Common Name	Scientific Name	General Habitat	Preferred Habitat[2]	Abundance and Occurrence
Sooty Grouse	*Dendragapus fuliginosus*	Habitat affinities vary by season and region. Coastal birds tend to remain in old-growth or recently logged forests all year. Inland birds prefer forest edges in summer, coniferous forests in winter (Kaufman 1996). Found in coniferous and mixed forests in Southeastern Alaska; also in dwarf conifer forests at treeline.	2, 3	Rare; breeding, winter

Table 3.3-17 (continued)
Migratory and Resident Birds Identified as Species of Concern in Southeast Alaska[1]

Common Name	Scientific Name	General Habitat	Preferred Habitat[2]	Abundance and Occurrence
Western Screech-Owl	*Megascops kennicottii*	Open coniferous and deciduous forests and along rivers, creeks, ponds and bogs. Also forest edges and in suburban areas in parks, orchards and gardens. Often nest near water (Campbell et al. 1990). In southern part of range in mesquite groves and saguaros (Kaufman 1996). Probably non-migratory in Alaska due to sufficient habitat to meet year-round requirements (P. Schempf, pers. comm.). In Yakutat, appears to favor riparian spruce (B. Andres, pers. comm.).	2	Uncommon; breeding, winter
Black Swift	*Cypseloides niger (borealis*)	Appear to be restricted to river valleys with steep unvegetated cliffs. Although nesting has not been confirmed in Southeastern Alaska, summer sightings in adequate habitat suggest Black Swifts are a probable breeder.	5	Rare; breeding
Vaux's Swift	*Chaetura vaux*i	Nests in coniferous and mixed forests, especially old growth. Often observed foraging over lakes, rivers, open country and clearcuts. Many records from Southeastern Alaska are along rivers and estuaries.	2	Uncommon; migration, breeding
Rufous Hummingbird	*Selasphorus rufu*s	Found in a variety of habitats throughout breeding range including old growth, young growth, thickets, and shrubby hillsides	2	Common; migration, breeding
Red-Breasted Sapsucker	*Sphyrapicus rube*r	Often associated with mature stands, especially hemlock and/or spruce in Pacific Northwest and Southeastern Alaska, but may not be an obligate old-growth species.	2	Abundant; breeding
Olive-sided Flycatcher	*Contopus cooper*i	In Central Alaska, most often found in open conifer forest. Usually associated with openings (muskegs, meadows, burns, and logged areas) and water (streams, beaver ponds, bogs, and lakes). Apparently requires an uneven canopy or openings for aerial hawking, and wet areas productive of insect prey.	3	Uncommon; breeding
Western Wood-Pewee	*Contopus sordidulu*s	In Southeastern Alaska, occurs along large mainland rivers, much less common on islands.	3	Uncommon; breeding
Hammond's Flycatcher	*Empidonax hammondii*	In Southeastern Alaska, found in riparian deciduous forests.	2, 3	Uncommon; breeding
Pacific-slope Flycatcher	*Empidonax difficili*s	Prefers old-growth coniferous forests, especially near streams.	2, 3	Common; breeding
Steller's Jay	*Cyanocitta stelle*ri	In Alaska, found predominately in coniferous forests.	2	Abundant; breeding, winter
Northwestern Crow	*Corvus caurinu*s	Coastal beaches, rocky shores, estuaries, coastal ponds and inshore islands.	2, 6, 7, 8	Abundant; breeding, winter
Chestnut-backed Chickadee	*Poecile rufescens*	In Southeastern Alaska, common in mature hemlock/spruce forests and also in pole and sawtimber stages of successional forests.	2	Abundant; breeding, winter
American Dipper	*Cinclus mexicanus*	Dippers are a riparian-obligate species and are totally dependent on the productivity of streams and rivers.	4, 5	Fairly common; breeding
Varied Thrush	*Ixoreus naevius*	Found mostly in thick, wet, coniferous forests of the coast.	1, 2, 3	Abundant; migration,

Table 3.3-17 (continued)
Migratory and Resident Birds Identified as Species of Concern in Southeast Alaska[1]

Common Name	Scientific Name	General Habitat	Preferred Habitat[2]	Abundance and Occurrence
				breeding, winter
Townsend's Warbler	*Dendroica townsend*i	Largely restricted to mature forests with tall coniferous trees throughout its breeding range. Most abundant in large undisturbed tracts of contiguous forest, but will also use forests in late successional stages.	2, 3	Common; breeding
Blackpoll Warbler	*Dendroica striat*a	Habitat preference variable, but usually found in tall shrubs (riparian woodland) or in coniferous or deciduous forest or woodland	2	Rare; migration
MacGillivray's Warbler	*Oporornis tolmiei*	In southeastern Alaska, it is found in shrubs along hemlock/spruce edges, deciduous woodlands with shrubs, clearcuts, and riparian shrubs.	1	Uncommon; breeding
Golden-crowned Sparrow	*Regulus satrap*a	Prefers low to tall alder and willow scrub on hillsides and near tundra. Commonly found in proximity to lakes, streams, and bogs. In winter prefers uninterrupted brushland, streamside thickets, and chaparral.	1	Fairly common; breeding, winter
Golden-crowned kinglet	*Zonotrichia atricapilla*	Found in coniferous forests (spruce, fir, and hemlock) all times of year; also in mixed forests in south coastal and central Alaska. In winter and migration, can be found in other trees and shrubs.	1, 3	Common; breeding, winter

[1] Source: BPIF 1999; Rich et al. 2004; Rosenberg 2016
[2] 1=shrub thicket; 2=hemlock/Sitka spruce/cedar forest; 3=mixed deciduous/spruce woodland; 4=fluvial waters; 5=cliffs, bluffs, and screes; 6=moraines, alluvia, and barrier islands; 7=beaches and tidal flats; 8=rocky shores and reefs.

Bats

There are seven species of bats that are known to occur in Alaska (Parker et al. 1996; Olson et al. 2014). Of the bat species that occur in Southeast Alaska, the little brown bat (*Myotis lucifugus*) is the most common and wide spread. Others include the silver-haired bat (*Lasionycteris noctivagans*), Keen's myotis (*M. keenii)*, California myotis (*M. californicus*), the long-legged myotis (*M. californicus*), Yuma myotis (*M. yumanensis*), and the big brown bat (*Eptesicus fuscus*). All species are associated with mature forested habitats which provide roosting, breeding, and foraging sites, and bat activity appears rare, for most species, in second-growth forest (Tessler et al. 2014; Walton et al. 2013a-e; Parker et al. 1996). Tree-roosting species, such as the Keen's myotis and silver-haired bat, often roost in mature forest patches with large numbers of suitable cavity trees. Other species, such as the little brown bat, roost in caves associated with the karsts systems. Foraging activities vary depending on vegetation density, and studies have found higher foraging activity from bats in intact forest patches and along the patch edges, with less activity in clear-cut areas (Patriquin and Barclay 2003). Throughout its range, the little brown bat has undergone dramatic declines due to white-nose syndrome (a fungal infection that affects bats while in hibernation) and is of particular management interest as white-nose syndrome has not yet been detected in Alaska. Bats are relatively uncommon in Alaska and reproductive rates for bats in higher latitudes are generally lower than farther south. These factors may make these species more susceptible to habitat loss and other factors; however, further research is needed to better understand current bat populations and how they respond to habitat loss and other factors (Boland et al. 2009). Timber harvest, particularly even-aged harvest, has the potential to remove roosting and foraging habitat for bats.

Marbled Murrelet

In March 2006, a status review for the marbled murrelet was initiated by the USFWS for the northern part of the species range to support ESA deliberations over the listing of the species as threatened in the southern part of its range (California, Oregon, and Washington; Piatt et al. 2007). Genetic analysis conducted as part of the review identified three distinct population segments: one in the central and

western Aleutian Islands; one ranging from the eastern Aleutians to northern California; and one in central California.

Marbled murrelets are widely distributed across marine waters in Southeast Alaska. They spend the majority of their lives at sea, but travel inland up to 50 miles to nest in old-growth forest stands (Piatt et al. 2007). Marbled murrelets typically nest on mossy-limbed branches of large, mature coniferous trees within stands of structurally complex, coastal high-volume old-growth forest (DeGange 1996; Kuletz et al. 1995; Ralph and Miller 1995). However, on some treeless islands in Southeast Alaska marbled murrelets lay eggs on bare talus slopes in mountainous areas (Piatt et al. 2007).

Timber harvest, through the removal of POG forest, can directly remove nest trees, and also increases habitat fragmentation and associated edge effects, such as increased rates of nest predation (Andren 1994; Chalfoun et al. 2002). Some avian predators of murrelets, especially corvids (i.e., ravens, crows, jays), are known to increase with both forest fragmentation and proximity to human activity (Burger 2002). In a study of the edge effects and nest predation risk on marbled murrelets, Malt and Lank (2007) found that disturbances by avian predators at nests were significantly more frequent at hard edges (clearcuts) relative to interiors, but less frequent at soft edges (regenerating forest); there were no edge effects at natural-edged (riparian) sites. Thus, edge-associated predation risk may subside with the progression of forest succession. Forest Plan standards and guidelines pertaining to marbled murrelets include maintaining a 600-foot radius no-cut buffer zone around identified murrelet nests; however, habitat protection is also provided through beach and estuary fringe buffers and riparian standards and guidelines (USDA Forest Service 2016a), as well as the overall system of OGRs and other non-development LUDs.

Amphibians

There are eight species of amphibians known to occur in Southeast Alaska, two of which, the Pacific chorus frog *(Pseudacris regilla)* and the red-legged frog *(Rana Aurora),* are introduced (MacDonald and Cook 2007). Native species include the western toad (*Bufo boreas*), wood frog (*Rana sylvatica*), Columbia spotted frog (*Rana luteiventris*), rough-skinned newt (*Taricha granulosa*), long-toed salamander (*Ambystoma macrodactylum*), and northwestern salamander (*Ambystoma gracile*). Within Alaska, most of these species are confined to the southeast, with the exception of the western toad which ranges as far north as Prince William Sound (MacDonald and Cook 2007), and the wood frog, which is widespread throughout Alaska, and persists north of the arctic circle (Lee-Yaw et al. 2008). Amphibians have specific requirements for both aquatic and terrestrial habitats in order to complete their life-cycle. This makes them useful indicator taxa of forest change and effects on habitat elements such as canopy shade, soil moisture, and coarse woody material. Clearing of trees can result in increased solar radiation to the forest floor, resulting in changes in moisture and soil temperatures; these effects can be reduced using selective thinning (Verschuyl et al. 2011). Amphibians are often vulnerable to road construction and increased road traffic as many species migrate from streams and other waterbodies to upland habitats.

Endemism

The USFWS defines endemic as “a species native and confined to a certain region; having comparatively restricted distribution” (http://www.fws.gov/endangered/about/glossary.html). The 2016 Forest Plan standards and guidelines for endemic mammals direct the Forest to “maintain habitat to support viable populations and improve knowledge of habitat relationships of rare or endemic terrestrial mammals that may represent unique populations with restricted ranges.” Likewise, the National Forest Management Act (NFMA) directs that management prescriptions “provide for diversity of plant and animal communities.”

Centers of endemism (areas with the presence of a high number of endemic species) have been identified in Southeast Alaska which are thought to have been refugia during the last glacial event (Cook et al. 2001, 2006). Some of these locations coincide with areas that have also experienced high levels of timber harvest and which may be ready for young-growth harvest.

Due to their restricted ranges, specific habitat requirements, and sensitivity to human activity, insular endemic species (i.e., those restricted to islands or groups of islands) are highly susceptible to extirpation and eventually extinction (Reid and Miller 1989; Burkey 1995). Species tied to island archipelagos are more sensitive to the effects of introduced non-natives, including pathogens and disease, and natural events, such as climate change, than other managed landscapes due to their limited mobility and

isolation from other subpopulations (Cook et al. 2006). The 2016 Forest Plan Amendment EIS (USDA Forest Service 2016b) provides a detailed discussion on endemism and its implications on the Tongass.

There are 24 known endemic wildlife species (mammals and birds) on the Tongass (Table 3.3-18) (also see USDA Forest Service 2016b, *Wildlife* section; ISLES 2013). The Alaska Natural Heritage Program (AKNHP) has established a working web-based interactive range map and list of endemic species for Alaska. Two of the more well-studied species, the Prince of Wales flying squirrel and Prince of Wales spruce grouse, are endemic to portions of the Tongass where much of the past timber harvest has been concentrated and are described in more detail below. Other species include the Coronation Island long-tailed vole, Admiralty Island ermine and vole, and the Warren Island red-backed vole, which occur where little to no past harvest has occurred. The Alexander Archipelago wolf and Alexander Archipelago black bear are also thought to be endemic taxa and are described above.

Old-growth timber harvest has the potential to remove habitat used by some endemic species, such as snags and hollow trees used by the Keen's myotis and the Prince of Wales flying squirrel, but may also create habitat for some species e.g., regenerating forest stands for spruce grouse. Fragmentation of habitat patches could limit the ability of some species, e.g., flying squirrels, to disperse between areas of suitable habitat. In addition, for those species that are hunted, roads have the potential to increase hunter access and thus may increase harvest rates along the road system and the areas that these roads access (note that there are no known road thresholds relative to road density for these species).

Prince of Wales Flying Squirrel

The Prince of Wales flying squirrel is endemic to the Prince of Wales Island complex (Demboski et al. 1998; Smith 2005). Due to its close association with old-growth forest structure and processes and because of its specific habitat requirements for efficient movement, some authors have expressed concern about the long-term viability of this species because much of its range overlaps areas that have been affected by old-growth timber harvest (Carey 2000; Scheibe et al. 2006; Pyare et al. 2010).

Prince of Wales flying squirrels are associated with POG forest and den sites are typically located in areas with lower levels of fragmentation than elsewhere on the landscape (Pyare et al. 2010). Thus, successful dispersal of the species depends on the functional connectivity of the landscape (Smith et al. 2005).

Table 3.3-18
Endemic Wildlife Species Documented on the Tongass National Forest

Species	Known Distribution
Prince of Wales spruce grouse (*Falcipennis canadensis isleibi*)	Prince of Wales Island and nearby island including Heceta, Suemez, Warren, Kosciusko, Zarembo, and Mitkof
Admiralty Island beaver (*Castor canadensis phaeus*)	Admiralty Island
Prince of Wales flying squirrel (*Glaucomys sabrinus griseifrons*)	Prince of Wales Archipelago
Pacific marten (*Martes caurina*)	In Southeast Alaska, restricted to Admiralty and Kuiu islands
Coronation Island long-tailed vole (*Microtus longicaudus coronarius*)	Coronation, Warren, and Forrester islands
Sitka root vole (*Microtus oeconomus sitkensis*)	Baranof and Chichagof islands complex
Admiralty Island meadow vole (*Microtus pennsylvanicus admiraltiae*)	Admiralty Island
Baranof Island ermine (*Mustela ermine initis*)	Baranof and Chichagof islands
Admiralty Island ermine (*Mustela erminea salva*)	Admiralty Island
Revillagigedo Island red-backed vole (*Myodes gapperi solus*)	Revillagigedo Island
Warren Island red-backed vole (*Myodes gapperi wrangeli*)	Wrangell and Sergief islands
Keen's myotis (*Myotis keenii*)	Records from Juneau south
Alexander Archipelago mink (*Neovison vison nesolestes*)	Admiralty Island
Forrester Island deermouse (*Peromyscus keeni oceanicus*)	Forrester Island

Table 3.3-18 (continued)
Endemic Wildlife Species Documented on the Tongass National Forest

Species	Known Distribution
Sitka deermouse (*Peromyscus keeni sitkensis*)	Baranof, Chichagof, Warren, Coronation, and Duke islands
Insular dusky shrew (*Sorex monticolus elassodon*)	Alexander Archipelago and Haida Gwaii
Warren Island dusky shrew (*Sorex monticolus malitiosus*)	Warren Island
Alexander Archipelago black bear (*Ursus americanus pugnax*)	Throughout Southeast Alaska, except Admiralty, Baranof, and Chichagof islands
"Glacier bear" (*Ursus americanus emmonsii*)	Yakutat/Glacier Bay region
Yakutat brown bear (*Ursus arctos dallli*)	North mainland from Yakutat to Glacier Bay
Sitka brown bear (*Ursus arctos sitkensis*)	Alexander Archipelago and northern mainland

Source: ISLES 2013

Under the Old-growth Habitat Conservation Strategy, the system of small OGRs was designed to provide for the distribution of flying squirrels in every major watershed and facilitate functional connectivity between larger reserves (USDA Forest Service 1997a). However, some biologists suggest that many reserves on Prince of Wales Island may be too small or spaced too far apart to support populations of Prince of Wales flying squirrels over the long term or maintain functional connectivity to support a back-and-forth exchange between flying squirrel populations (Pyare and Smith 2005; Smith et al. 2011). In addition to the system of OGRs, connectivity between reserves for flying squirrels is also provided by the legacy forest structure, stream, lake, and beach and estuary buffer standards and guidelines. These features represent significant structural elements providing functional connectivity among landscape elements.

Prince of Wales Spruce Grouse

The Prince of Wales spruce grouse (spruce grouse) is a subspecies endemic to Prince of Wales and nearby islands in southern Southeast Alaska. The spruce grouse is associated with muskegs, high-volume POG, and mixed conifer (scrub) habitats but will also use young-growth forest (15-30 years following timber harvest) with a well-developed middle story; they avoid clearcuts (Russell 1999). Though they are closely associated with conifer forests, the highest densities of spruce grouse are supported by areas with a mosaic of older coniferous habitats interspersed with regenerating patches of dense trees. Spruce grouse are poor long-distance flyers and are generally sedentary, with some limited migratory movement (typically less than a mile; Dickerman and Gustafson 1996) between summer and winter habitats (Boag and Schroeder 1992; Williamson et al. 2008).

Spruce grouse are an important prey species for goshawks and marten. Forest birds, including spruce grouse, comprised a larger proportion of goshawk diets during the breeding season on Prince of Wales Island than elsewhere in Southeast Alaska (Lewis et al. 2006). Thus, impacts to spruce grouse could also impact goshawk and marten populations. Spruce grouse are managed as a game species by ADF&G.

Timber harvest and associated fragmentation may lead to population declines if open areas are too large or forested patches are spread too far apart to enable spruce grouse to move between them (greater than 1 mile). Clearcuts may also present a dispersal barrier to this species due to the thick logging debris often present which could inhibit walking, this species' preferred method of movement (Russell 1999).

Spruce grouse are a small game species that are particularly vulnerable to hunting along road systems, and thus are susceptible to overexploitation near roads and human populations (Williamson et al. 2008; Rabe 2009). Existing total road densities are provided in Table 3.3-15. The current season for grouse is August 1 through May 15 with a bag limit of five per day in GMU 2 (ADF&G 2018a). The Old-growth Habitat Conservation Strategy maintains connectivity within matrix lands that will help facilitate dispersal and interchange between spruce grouse populations.

Environmental Consequences

This section describes effects on wildlife resources in the analysis area.

The Tongass Forest Plan Old-growth Habitat Conservation Strategy provides the platform to manage wildlife habitat across the planning area to maintain viable and well distributed populations. For this analysis, the evaluation of viability includes considerations of the island archipelago environment as well as the best available science related to each species.

This section begins with an analysis of effects on the overall Old-growth Habitat Conservation Strategy, which is addressed in detail in the 2016 Forest Plan Amendment EIS Appendix D and discussed in the *Biological Diversity* section of this FEIS. The use of the word "wildlife" occurs frequently in this discussion without referencing a particular species because the intent is to consider each of the contributing elements of the conservation strategy and their ability to function as intended with respect to old-growth associated species under the alternatives. Modifications to various Forest Plan standards and guidelines occurred through interagency technical workgroups, workshops, and advisory groups during revisions to the 1997, 2008, and 2016 Forest Plans. Monitoring on the Tongass has helped to inform the management actions taken under the standards and guidelines to protect wildlife resources in the Tongass. The current Forest Plan considered the past actions related to timber harvest and other activities that have affected wildlife and their habitat. This Alaska Roadless Rule EIS evaluates how the alternatives would affect wildlife and their habitat under the current 2016 Forest Plan.

Following this discussion, impacts to individual species are addressed.

Indirect Effects

Old-growth Habitat Conservation Strategy

The Tongass Old-growth Habitat Conservation Strategy was designed to maintain well-distributed, viable wildlife populations across the Forest in the context of past and anticipated old-growth timber harvest. Since 1997, timber harvest rates have been far below those assumed in the 1997 Forest Plan Final EIS, the 2008 Forest Plan EIS, and the 2016 Forest Plan Amendment EIS (USDA Forest Service 1997a, 2008a, 2016b). Under all of the alternatives, long-term protection of POG would continue to occur under the Conservation Strategy. The system of OGRs and other non-development LUDs is intended to maintain the ecological integrity of the old-growth ecosystem; all non-development LUDs would remain intact across all alternatives. Within the matrix, old-growth between reserves is maintained through Forest-wide standards and guidelines for stream buffers, the beach and estuary fringe, legacy forest structure, and others that preclude or limit POG timber harvest for other resources under all alternatives (USDA Forest Service 2016a). Collectively, these measures would facilitate and maintain connectivity and functionality of the old-growth ecosystem (USDA Forest Service 2016a).

Common to all alternatives, young-growth harvest within the reserve system, beach and estuary fringe, or RMAs has the potential to affect the integrity of the Old-growth Habitat Conservation Strategy under the Forest Plan. Effects can include reduced functionality of these areas, reduced or fragmented buffers, and increased edge effects. However, the Forest Plan only allows RMA harvest outside of TTRA buffers, and beach fringe harvest is only allowed outside of a 200-foot buffer along the shoreline. Additional Forest Plan restrictions on harvest of young growth apply within these areas (created openings must be less than 10 acres and less than 35 percent of stand can be removed) and harvest is limited to a one-time entry within the first 15 years of Forest Plan implementation. Because of these strong limitations on harvest, modeling results for the Forest Plan presented in the 2016 Forest Plan Amendment EIS (USDA Forest Service 2016b) estimated that only approximately 3,900 acres of young-growth within the beach and estuary fringe, 1,100 acres in riparian management areas, and 1,800 acres in Old-growth Habitat LUD would be harvested over 100 years. The analysis assumed application of the 2001 Roadless Rule and is represented by Alternative 1 in this EIS. For the action alternatives, the acres of suitable young growth in these special areas would not increase that much because most young growth occurs outside of roadless areas and is already captured under Alternative 1. The maximum increase in suitable young growth in these special areas under the action alternatives would occur under Alternative 6 and is 6 percent for RMA and beach fringe suitable and 12 percent for Old-growth Habitat LUD suitable. It is likely that any increase in harvest in these areas under the action alternatives, if any, would be a lower percentage than the percent increase in suitable. In addition, the effects of harvest in these areas would be localized. Ultimately, the substantial reduction in old-growth harvest through the transition to young-growth harvest under the Forest Plan would enhance biological diversity and further support the overall

function of the Conservation Strategy over the long-term, and would not change under any of the alternatives.

General Effects – POG and Roads

Relative to old-growth habitat conservation, all of the alternatives would allow old-growth harvest at levels similar to the level predicted in the Forest Plan Amendment EIS (USDA Forest Service 2016b) though more areas would be available to choose from. For Alternative 1 with maximum timber harvest over the planning horizon (100 years), approximately 91 percent of the original total POG, 85 percent of the original high-volume POG, and 78 percent of the original large-tree POG would be maintained (see Tables 3.3-7, 3.3-8, and 3.3-9). By biogeographic province, 72 to 100 percent of the original total, 61 to 100 percent of the original high-volume, and 33 to 100 percent of the original large-tree POG would be maintained. Overall, under the action alternatives, effects on wildlife resulting from these POG reductions are not expected to be substantially different from Alternative 1 (implementation of the Forest Plan under the 2001 Roadless Rule) (see Tables 3.3-7, 3.3-8, and 3.3-9). By biogeographic province, 72 to 100 percent of the original total, 61 or 62 to 100 percent of the original high-volume, and 33 to 100 percent of the original large-tree POG would be maintained.

Timber harvest in newly opened areas and associated road construction or reconstruction has the potential to decrease the value of these roadless areas to wildlife through increased habitat fragmentation and reduced landscape connectivity. Additionally, species that are vulnerable to overharvest (e.g., wolf, marten, and spruce grouse) would be affected by potential increased hunter and trapper access along new or reconstructed roads, whether for young-growth or old-growth harvest or renewable energy projects. Regulated/coordinated game harvest management would help improve flexibility for land management. These indirect human effects can be a primary driver of population sizes over land management. As with all alternatives, the specific magnitude of effects and where these would occur would be evaluated at the project level through a separate NEPA process. Total road miles to be constructed under each alternative are expected to be similar because the harvest levels are the same (see Table 3.3-21). However, Alternatives 3, 4, 5, and 6 are expected to result in more roads being built because these alternatives result in suitable timber in progressively more remote areas than under Alternatives 1 and 2. New road construction under all alternatives is expected to range from 994 miles under Alternative 1 to 1,043 miles under Alternative 6. Likewise, road construction over decommissioned roadbeds would range from an estimated 527 miles to 541 miles, and road reconstruction would range from an estimated 1,104 miles to 1,123 miles, respectively (see Table 3.3-21).

Comparison of Action Alternatives

Although IRAs were not part of the original 1997 Old-growth Habitat Conservation Strategy, they add value by providing larger expanses of roadless refugia, which are important to wide-ranging wildlife species such as wolves, brown bears, marten, and less mobile species such as flying squirrels and amphibians. Alternative 2, would remove roadless designation from areas identified as roaded roadless (e.g., roaded or altered before the 2001 Roadless Rule or during the 2001 Roadless Rule exemption period) which would allow slightly more access to harvest forest stands than under the current Forest Plan (Alternative 1), but would be limited to areas that already have a road system. Young-growth harvest within the Old-growth Habitat LUD, Beach Fringe, and RMAs would remain restricted to the first 15 years and under the additional harvest restrictions addressed earlier. There would be no difference in the amount of harvest under Alternative 2 relative to Alternative 1.

Similar to Alternative 2, Alternative 3 would open up areas identified as roaded-roadless but would also include areas identified as logical extensions of existing roads. Alternative 3 would be less protective because it would result in a net reduction of approximately 1.1 million total acres of roadless designations; however, 0.8 million of these acres are LUD II areas, which already have statutorily protection. Alternative 3 would still rank relatively high overall because it would maintain substantial roadless designations within development LUDs and 4.6 million total acres would be managed under a Roadless Priority designation, 3.3 million acres would be managed under a Watershed Priority ARA, and 0.4 million acres would be managed under a Community Priority ARA. Although suitable acres would increase for old growth and young growth, there would be no difference in the overall amount of harvest under this alternative relative to Alternative 1. An additional benefit of Alternative 3 is that T77 and TNC/Audubon Conservation Priority

Areas outside of roadless (507,000 acres) would be given permanent protection from old-growth harvest; this would be designated in the Alaska Roadless Rule.

Alternative 4 would remove the roadless designation on areas identified as roaded roadless and on areas identified as logical extensions of existing roads. Alternative 4 would be less protective than Alternative 3 but would still include a high number of roadless acres within development LUDs. However, 757,000 roadless acres are designated as Timber Priority, which provides little or no protection of roadless characteristics and essentially eliminates the roadless protections provided in these development LUDs. Although suitable acres would increase for old growth and young growth, there would be no difference in the overall amount of harvest under this alternative relative to Alternative 1.

Under Alternative 5, approximately 7.0 million acres would be maintained and managed as Roadless Priority or LUD II Priority. Roadless designations would be removed on all development LUDs and mineral overlay areas and, as a result, it would rank the second lowest in terms of roadless designations. However, it would still be moderate in terms of overall protection due to the degree of protections provided by the underlying Forest Plan LUDs and Forest Plan standards and guidelines, which would not change. Because overall harvest levels would not change relative to Alternative 1 and because the broader Old-growth Habitat Conservation Strategy for the Tongass was developed prior to the roadless rule and would be maintained under the Forest Plan, the general effects of Alternative 5 on wildlife and the Conservation Strategy are expected to be relatively low but slightly greater than projected under the other alternatives, with the exception of Alternative 6.

Whereas the roadless rule language under Alternatives 2, 3, 4, and 5 would be modified, all regulatory roadless designations would be removed from the Tongass under Alternative 6 and, therefore, it would rank the lowest in terms of roadless designations and habitat protections. However, it would still be moderate in terms of overall protection due to the degree of protections provided by the underlying Forest Plan LUDs and Forest Plan standards and guidelines, which would not change. Because overall harvest levels would not change relative to Alternative 1 and because the broader Old-growth Habitat Conservation Strategy for the Tongass was developed prior to the roadless rule and would be maintained under the Forest Plan, the general effects of Alternative 6 on wildlife and the Conservation Strategy are expected to be relatively low but greater than projected for the other alternatives.

Species-specific Effects

The following sections describe impacts to threatened and endangered species, MIS, Alaska Region sensitive species, migratory birds, and endemic species that could occur by implementing the Forest Plan under the Alaska Roadless Area alternatives.

Threatened, Endangered, and Candidate Species

On the Tongass National Forest all ESA listed species are associated with the off-shore marine environment adjacent to the National Forest. There are no ESA listed threatened or endangered species that occupy the terrestrial or aquatic ecosystems systems managed by the Tongass National Forest with the exception of a few isolated haul-out locations for the Stellar sea lions associated with the western DPS.

The review of ESA listed species and habitats for the action alternatives associated with this analysis were found to have ‘no effect’ to any threatened or endangered species or designated critical habitat and therefore there is no need for consultation with either the USFWS or NMFS.

Under Section 7(a)(2) of the ESA, Federal agencies must ensure that actions they authorize, fund, or carry out are “not likely to jeopardize the continued existence” of any Federally listed threatened or endangered species or result in the destruction or adverse modification of the designated critical habitat of these species (16 U.S.C. § 1536(a)(2)). In general, if a Federal agency determines that an agency action may affect a listed species or designated critical habitat, it must initiate consultation. If the action agency determines that its action will have no effect on a listed species or designated critical habitat, the ESA section 7(a)(2) consultation obligations are not triggered. The Federal agency taking action evaluates the possible effects of its action and determines whether to initiate consultation (50 CFR §§ 402.14(a), 402.17(c)).

The ESA regulations define “effects of the action” to include “all consequences to listed species or critical habitat that are caused by the proposed action, including the consequences of other activities that are caused by the proposed action. A consequence is caused by the proposed action if it would not occur but for the proposed action and it is reasonably certain to occur” (50 CFR § 402.02). In this context, “‘but for” causation means that the consequence in question would not occur if the proposed action did not go forward. In other words, if the agency does not implement an action alternative associated with an analysis and the activity would still occur, there is no ‘but for’ causation. In that event, the activity would not be considered an effect of the action under consultation (84 FR 44976, 44977 (Aug. 27, 2019); 50 CFR§ 402.17(b)).

In regards to the action alternatives associated with this environmental impact statement, the alternatives described in this Environmental Impact Statement are not the source of causation for potential adverse effects to threatened or endangered species, rather ‘but for’ causation stems from the 2016 Forest Plan decision and not as a result of any changes to the roadless rule as described in this EIS.

All of the alternatives considered in this Roadless Rule EIS maintain the current 2016 Forest Plan LUDs, standards and guidelines, and predicted harvest amounts.

Threatened and Endangered Marine Mammals
Adherence to the ESA, MMPA, and NMFS guidelines for approaching sea lions and other marine mammals, as currently required under the Forest Plan, would continue under any alternative. The amount of human activity in the marine environment associated with Forest management activities is only a fraction of the total amount of human activity occurring in the marine environment. Land use designations and forest-wide standards and guidelines that have been developed for application on all Forest Service permitted or approved activities minimize or eliminate adverse impacts on marine species. Any Alaska Roadless Rule decision would not result in on-the-ground effects. Any future Forest Service actions or authorizations will be subject to additional Section 7 consultation under the ESA, as well as consultation required at the project level.

The proposed federal action and the adoption of any of the action alternatives resulting in changes to the roadless rule for Alaska are not the source of causation for any potential effects to threatened or endangered species or designated critical habitat and will have no-effect to listed species or designated critical habitat. When specific timber or other projects are proposed, site-specific NEPA analysis would be conducted at that time.

Short-tailed Albatross
Short-tailed albatross may occasionally occur in nearshore areas along the outer coast. Changes to the roadless rule for Alaska are not the source of causation for any potential effects and will have no-effect to the short-tailed albatross.

Alaska Region Sensitive Species

Queen Charlotte Goshawk
Timber harvest in both old-growth and mature young-growth forest may locally limit goshawk population capacity and affect prey populations through the modification of forest stands and reduction in contiguous mature forest. Nest trees optimally should be surrounded by contiguous stands of mature or old-growth forest large enough to include several alternate nests and provide post-fledging habitat. Timber harvest may also decrease foraging habitat quality through reductions in prey abundance and availability. Dense young-growth stands are difficult for goshawks to hunt, reducing availability of prey, even where prey populations may otherwise be adequate. The availability of adequate prey resources has been linked to goshawk territory occupancy and breeding success (Doyle and Smith 1994; Salafsky et al. 2005; Keane et al. 2006; Salafsky et al. 2007).

Forest Plan Standards and Guidelines for this species include project-level survey requirements for nesting goshawks, retention of confirmed or probable nest stands, designing and maintaining a buffer area of not less than 100 acres of POG forest if it exists centered on or adjacent to the nest tree or nest site, timing restrictions during active nesting, and retention of legacy old-growth forest structure in old-growth harvest units larger than 20 acres, where logging has been most intensive (USDA Forest Service

2016a). The system of OGRs and other non-development LUDs also maintains habitat for this species, although a recent study suggests that some uncertainty remains with respect to the ability of Forest Plan conservation measures to contribute sufficient habitat to sustain well-distributed, viable populations of northern goshawks throughout Southeast Alaska (Smith 2013). Continued project-level required protocol-level surveys, inventories and monitoring of established nest protection buffers will help to inform future decisions.

Impacts to goshawks are assessed in terms of the reduction in total and high-volume POG, which provides potential high-quality nesting and foraging habitat. High-volume POG represents optimal nesting habitat due to the presence of large trees and snags. Reductions in forest cover, and the subsequent progression of forest succession in young-growth stands, also have the potential to affect the abundance and availability of prey. At a landscape level, reductions in the amount of POG and mature young-growth forest may result in portions of the landscape becoming marginal or unsuitable for goshawks. Under all alternatives, the projected harvest level would be about 42,500 acres of old growth and 284,000 acres of young growth over 100 years. Approximately 86 percent of the original high-volume POG existing in 1954, the time at which industrial scale logging began on the Tongass, remains (see Table 3.3-8 in the *Biological Diversity* section). After 100 years of implementation under Alternative 1 or any of the action alternatives, approximately 85 percent of the original high-volume POG is expected to remain (see Table 3.3-8). None of the action alternatives would increase harvest rates of POG above the level of Alternative 1 (refer to the *Biological Diversity* section for a discussion of effects on POG by biogeographic province).

Young-growth forest provides marginal goshawk habitat, but over the long term, if unharvested or thinned with an objective of accelerating old-growth conditions, would return to old-growth conditions. Young-growth stands ready for commercial harvest may be reaching an age to provide some benefits to goshawk (foraging, occasional nesting, post-fledging areas) if adequate structure is developed (typically 50 to 100 years following harvest, depending on site productivity).

Under all alternatives, impacts to goshawks would still be greatest in the North Central Prince of Wales, Kupreanof/Mitkof Island, East Chichagof Island, and Revilla Island/Cleveland Peninsula biogeographic provinces where the most suitable young-growth forest is located; these provinces have been harvested relatively heavily in the past and considerable additional old-growth harvest would occur in the future. The beach and estuary fringe and RMAs provide connectivity for goshawks between reserve areas, and old-growth forest near beach, estuary, and riparian habitats generally support greater prey diversity and net prey productivity for goshawk foraging. Thus, young-growth stands in these areas have the potential to develop into productive habitats for goshawks. Pre-commercial and commercial thinning of young-growth stands, which would occur under all of the alternatives, would promote the development of stand conditions that improve foraging habitat for goshawks. However, even-aged harvest or group-selection of young-growth in these areas, as well as in the Old-growth Habitat LUD, would set back the stand development process (returning harvest units to the stand initiation stage). The creation of gaps several acres in size or more could result in localized reductions in goshawk foraging habitat quality and would delay the development of old-growth habitat capable of providing higher quality foraging, nesting, and post-fledging habitat. Effects to connectivity for goshawks are lessened through implementation of Forest Plan standards and guidelines (Beach and Estuary Fringe, RMAs, Legacy tree, goshawk habitat, and protection measures).

Despite these localized and project-level implementation effects, the transition to young growth guided by the 2016 Forest Plan, unchanged by the Alaska Roadless Rule alternatives, is likely to benefit goshawks by reducing the amount of POG harvest that would occur over the planning horizon, thereby maintaining more old-growth forest that provides potential foraging, nesting, and post-fledging habitat.

Individual projects would be required to conduct goshawk surveys and implement the goshawk standards and guidelines which would minimize impacts to this species at the project level. For the reasons articulated in this section, including the maintenance of the Old-growth Habitat Conservation Strategy, all the alternatives considered would not result in a loss of viability of this species or trend toward federal listing.

Kittlitz's Murrelet
The Kittlitz's murrelet is associated with glacial habitat and occupies areas outside of where timber harvest and associated activities and other development have occurred or are likely to occur. Consequently, implementation of any of the alternatives, guided by the 2016 Forest Plan restrictions would have no impact on the Kittlitz's murrelet. The 2016 Forest Plan standard and guideline to "provide for the protection and maintenance of known Kittlitz's murrelet nesting habitats" would be unchanged. Project-level analysis would occur should any future development be proposed near tidewater glaciers.

Black Oystercatcher
The black oystercatcher is associated with rocky shorelines and tidal mudflats along the coast. They could be affected by oil or fuel spills associated with vessels in the vicinity of the LTFs and the transport of logs from harvested areas under all of the alternatives. They could also be affected by disturbance associated with management activities within the beach fringe.

However, black oystercatchers occur at low densities across the Tongass and the habitats it uses (intertidal areas) do not typically coincide with management activities, although there is the potential for ongoing effects associated with recreation and tourism activities on the Tongass, disturbance associated with young-growth harvest in the beach fringe, and energy development or other activities under all alternatives. The Forest Plan requires a minimum 330-foot buffer from human activities around concentration or nesting areas that would apply to future projects regardless of roadless status. For these reasons, all the alternatives considered would not result in a loss of viability of this species or trend toward federal listing.

Aleutian Tern
Threats to this species include human disturbance at nest sites, marine oil spills, and change in forage fish populations (USFWS 2012d). Common to all alternatives, timber harvest associated activities (i.e., log transport, use of LTFs, and helicopter activity) could have the potential to affect this species through disturbance to nesting colonies or through water quality impacts to prey species. Although most known colonies are in remote sites in areas surrounded by non-development LUDs, some do exist in areas where Forest Service permitting may have the potential to cause disturbance. There is no specific Forest Plan direction for this species but the standards and guidelines for Seabird Colonies apply (USDA Forest Service 2016a).

None of the alternatives would increase the potential of any young-growth or old-growth harvest or other management activities in the vicinity of Black Sand Spit, in the Yakutat Ranger District, where the largest known breeding colony occurs. Only Alternatives 5 and 6 would remove this area from roadless designation; however, harvest in the vicinity would not occur because it is in a non-development LUD, as well as a conservation priority area as identified by The Nature Conservancy (TNC) and Audubon Alaska (2007). Therefore, all the alternatives considered would not result in a loss of viability of this species or trend toward federal listing.

Steller Sea Lion (Eastern DPS)
Steller sea lions may occur in the nearshore and pelagic waters throughout the Tongass. Common to all alternatives, Steller sea lions have the potential to be exposed to disturbance and noise associated with LTF activity, potential collisions with vessels, and fuel or oil spills associated with vessel traffic particularly if these activities occur in the vicinity of major haul-outs or rookeries. All identified rookery sites occur in the outside waters of the Tongass far from expected activities. One site, Forrester Island, is a designated National Wildlife Refuge and is under the jurisdiction of the USFWS. Most of the known haulouts (Biali Rock, Cape Cross, Biorka Island, Cape Ommaney, Coronation Island, Timbered Island, and Cape Addington) occur in the outside waters of the Tongass and would not likely be impacted by any future activities permissible under any of the alternatives. Of the known haulout sites, only Gran Point, Benjamin Island, Sunset Island, and Lull Point occur in the inside waters of the Tongass. Gran Point is an area in Chilkoot Inlet near Haines; Benjamin Island is a small island in Lynn Canal north of Juneau; Sunset Island is a small island located in Stephens Passage between Hobart and Windham Bay; and Lull Point located on the south end of Catherine Island on the east side of Baranof Island. It is unlikely that any of the areas identified as critical habitat would be impacted by activities that would be newly permissible under the

alternatives; if impacts do occur that create noise and disturbance (e.g., boating), the potential resulting disturbance would likely be minor and temporary and would be addressed at the project level.

The amount of human activity in the marine environment associated with Forest management activities is only a fraction of the total amount of human activity occurring in the marine environment. Some of the other activities include commercial fishing, sport fishing, hunting, subsistence, tourism, and mariculture. Most of these activities are not regulated by the Forest Service. Adherence to the MMPA, ESA, and NMFS guidelines for approaching sea lions, as currently required under the Forest Plan, would continue under all alternatives. Young-growth timber harvest within the beach fringe or other developments in these areas have the potential to result in very localized, minor, temporary reductions in water quality to which Steller sea lions could be exposed. Therefore, all the alternatives considered would not result in a loss of viability of this species or trend toward federal listing.

Sitka Black-Tailed Deer

Extensive analysis on deer was done for the 1997 Forest Plan and subsequent 2008 and 2016 Forest Plan Amendment EIS. Analyses conducted during the 2016 Forest Plan Amendment EIS also included information on summer and winter forage and effects of roadbuilding, noting that the expected ecological response of deer to old-growth and mature young-growth timber harvest, road building, and vegetation succession would be similar to those predicted previously, but the extent of future impacts would be expected to be reduced from earlier analyses because lower levels of old-growth harvest were proposed in all action alternatives in the 2016 Forest Plan Amendment EIS (USDA Forest Service 2016b).

As part of the 2016 Forest Plan Amendment EIS, the interagency deer habitat capability model was used to assess existing habitat capability within the planning area, and describes model limitations, and results (see USDA Forest Service 2016b, *Wildlife* section). Table 3.3-14 summarizes the modeled deer habitat capability by biogeographic province. Forest-wide, approximately 89 percent of the original (1954) habitat capability remains, ranging from 72 to 100 percent depending on the biogeographic province. The greatest reductions in deer habitat capability have occurred, and will continue to occur, in provinces where timber harvest has been concentrated (the North Central Prince of Wales, East Baranof, and Etolin Island biogeographic provinces).

Due to the continued harvest of POG forest and mature young-growth, deer habitat capability would continue to be reduced, but only slightly. Immediately following young-growth and old-growth timber harvest, there is an increase in the amount of forage available to deer during the summer and mild winter months in response to increased understory growth responding to sunlight associated with opening the forest canopy, although it may be of lesser quality compared to the same species of plants grown in the shade (Person and Brinkman 2013; Happe et al. 1990). Therefore, reductions in deer habitat capability in summer and mild winters are not expected to be realized immediately after timber harvest due to the short-term increase in forage but are expected to be greatest in heavy snow winters during years immediately following harvest and after about 25 years, as forest succession progresses and harvested stands reach the stem exclusion stage. Over the long term, reductions in habitat capability are expected to reduce carrying capacity, or the numbers of deer an area is capable of supporting given the available resources. This could lead to a decline in the deer population, particularly following severe winters, if the demand for resources (e.g., food or habitat) exceeds that which is available. Potential declines in the deer population resulting from reduced habitat capability may decrease the availability of deer to wolves (Person 2001; Farmer et al. 2007; Brinkman 2009). Likewise, reductions in deer habitat capability over the long term may reduce the access to and availability of deer to wolves and subsistence hunters.

At the forest scale, the current Forest Plan maintains 89 percent of the existing deer habitat capability over the long term and this would not vary among Alaska Roadless Rule alternatives. Stand treatments (pre-commercial and commercial thinning) in young-growth forest are not reflected in the deer habitat capability, but would result in increased understory growth which improves forage resources for deer over the first 15-25 years following harvest.

Other developments, such as energy projects and transmission lines, and transportation projects, can affect deer during construction through disturbance and through habitat removal or alteration. Operational impacts due to disturbance would be expected to be minimal. Forest Plan standards and guidelines, which are unchanged by any Alaska Roadless Rule alternative, include consideration of the most current

science, guidance, and methodologies related to avoiding and minimizing wildlife impacts and minimize impacts to deer and/or areas of important deer habitat during construction and operation.

Mountain Goat

Mountain goats inhabit alpine and subalpine areas and adjacent POG forests on the mainland portions of the Tongass and have been introduced to several islands. Mountain goats are susceptible to over-hunting if road access is increased or improved, though most roads are located a long distance (both vertically and horizontally) from mountain goat habitat.

The amount of road access quantified in terms of the amount of road construction and reconstruction, common to all alternatives, is representative of the potential for over-hunting. The projection over the next 100 years was modeled to include 994 to 1,043 miles of new road construction, 527 to 541 miles of road construction over decommissioned roadbeds, and 1,104 to 1,123 miles of road reconstruction for Alternative 1 and the action alternatives. Alternatives 1 and 2 represent the lowest estimated road miles, while Alternative 6 is at the highest end of the range. Existing road miles on NFS lands are estimated at 4,929 miles, including open roads, closed roads, and decommissioned roads. After 100 years of implementation, NFS lands are estimated to have 5,922 to 5,972 miles of existing roads, with Alternatives 1 and 2 at the low end and Alternative 6 at the high end and Alternatives 3, 4, and 5 in between. This would be an increase of 20 to 21 percent over existing conditions. While there would be acres potentially available for harvest with each of the action alternatives, there would be no change in the projected harvest amount. Most of the roads, particularly those accessing young-growth units, would be below 1,500 feet in elevation and outside of mountain goat habitat. Additionally, many new or reconstructed roads would be closed or decommissioned after use, further reducing effects on mountain goats. Risk of over-harvest due to human access along roads is mitigated to some extent by Transportation Forest-wide standards and guidelines that require travel access road objectives to be developed for all roads and mountain goat standards and guidelines, which would not be affected by any Alaska Roadless Rule alternative.

Energy, transportation, or other projects that may become permissible in new areas could affect mountain goats through direct disturbance or through removal or modification of habitats. These effects would be evaluated at the project level. The Forest-wide standards and guidelines would minimize impacts to mountain goats and their habitat during project construction and operation.

Black Bear

Preferred habitats for black bears, which include coastal, estuarine, and riparian areas, are protected by the Old-growth Habitat Conservation Strategy. None of the alternatives would remove these measures. Common to all alternatives, harvest of mature young-growth and old-growth timber (both even aged as well as thinning) would increase forage availability (berries) for black bears over the short term in the resulting early-successional plant communities. However, this food source typically lasts only about 25 years post-logging and decreases over time in association with canopy closure. Over the long term, old-growth harvest would decrease habitat suitability for black bears, due to the reduced understory forage in young-growth stands and loss of denning habitat in upland areas (e.g., large woody structures such as hollow logs and hollow living trees; Davis et al. 2012). The transition to young-growth harvest under the current Forest Plan, which is not changed by any of the alternatives, is expected to increase forage availability over the long term by reverting young-growth stand in the stem exclusion stage back to the stand initiation stage but, development of old-growth stand characteristics used by bears for denning would be delayed in those stands. Effects to the contributing elements of the Old-growth Habitat Conservation Strategy would be localized and common to all alternatives, with the maximum expected young-growth harvest affecting 0.4 percent of forest land in the beach and estuary fringe, 0.3 percent of the forest land within RMAs, and approximately 0.2 percent of the forest land (young-growth, POG, and unproductive forest) within the Old-growth Habitat LUD. (See USDA Forest Service 2016b, Appendix D for additional discussion of the Old-growth Habitat Conservation Strategy). Therefore, these areas would continue to function as habitat for black bears.

Timber harvest may also indirectly increase the susceptibility of black bears to over-harvest if road access is increased or improved. An increase in open roads, particularly in open habitats such as clearcuts and muskegs, where bears forage and are easier to see, can increase the potential for human-bear interactions. The amount of road access, quantified in terms of the amount of road construction and reconstruction anticipated under the current Forest Plan, is representative of the potential for over-hunting

(see discussion above under *Mountain Goat* for a comparison of the alternatives). Average total road density on NFS lands (across all WAAs) in 100 years would increase to approximately 0.23 mile per square mile for Alternative 1 and all action alternatives. This is in comparison to an existing road density of 0.19 mile per square mile.

Therefore, any potential increase in hunter access and risk of over harvest would be localized, and no measurable increase would be expected at the forest scale under any of the alternatives.

Energy, transportation, or other projects that may become permissible in new areas could affect black bears through direct disturbance or through removal or modification of habitats. These effects would be evaluated at the project level. The Forest-wide standards and guidelines would minimize impacts to black bears and their habitats during project construction and operation.

River Otter

River otters prefer habitats, especially POG forest, immediately adjacent to coastal and fresh water aquatic environments, with most use occurring within 500 feet of these areas. These old-growth habitats are protected by Forest Plan standards and guidelines for the beach and estuary fringe, riparian areas, and lakes which would be implemented under all alternatives.

Energy, transportation, or other projects that may become permissible in new areas could affect river otters through direct disturbance or through removal or modification of habitats, particularly if activities affect waterbodies. These effects would be evaluated at the project level. Forest-wide standards and guidelines would minimize impacts to river otters and their habitats during project construction and operation.

American Marten

Through the removal of forest cover and old-growth ecosystem features such as decadent live trees and snags, timber harvest (POG harvest and young-growth harvest) under that could occur under all alternatives would reduce the vertical and horizontal structural complexity important to marten in relation to prey access, denning and resting sites, escape from predation, and thermoregulation (Buskirk and Zielinski 1997; Hargis et al. 1999; Flynn and Schumacher 2001). Forest fragmentation resulting from timber harvest may also alter patterns of occupancy by marten (Bissonette et al. 1997; Chapin et al. 1998). Although more recent research indicates that marten use all forested stands relative to their ability, including young-growth stands mixed conifer and deciduous stands less than 40 years of age (Goldstein et al. 2013), harvests that result in the greatest reduction in deep snow marten habitat (high-volume POG at or below 800 feet elevation) are expected to have the greatest adverse effects to marten.

Reductions in deep snow marten habitat may result in localized reductions in the capability of the remaining habitat to support marten. Under Alternative 1, about 13,900 acres of deep snow marten habitat is projected to be harvested over the next 100 years; under the action alternatives, about 11,000 to 13,400 acres are projected for harvest during this timeframe (Table 3.3-19).

Table 3.3-19
Estimated Harvest (acres) of High-Volume (SD5N, SD5S, and SD67) and Large-Tree (SD67) Productive Old-Growth by Elevation Category and Alternative after 100 years (NFS lands only)

Elevation Category	Alternative					
	1	2	3	4	5	6
High-Volume POG						
< 800 feet	13,890	13,405	11,809	10,989	10,969	10,969
> 800 feet	10,227	10,340	11,902	12,671	12,681	12,681
Total	**24,117**	**23,745**	**23,711**	**23,660**	**23,650**	**23,650**
Large-Tree POG						
< 800 feet	5,516	5,213	4,466	4,032	3,992	3,992
> 800 feet	3,183	2,925	3,513	3,794	3,826	3,826
Total	**8,699**	**8,138**	**7,979**	**7,825**	**7,818**	**7,818**

Increased human access associated with new roads may result in increased marten vulnerability to harvest, particularly along open roads (Flynn et al. 2004). Harvest under the Forest Plan, under all alternatives, would result in minor increased average total road densities; however, the proportion of WAAs within various road density categories would not likely change under any of the alternatives (see the discussion under Black Bear). Increased road densities have the potential to indirectly increase hunter access and associated trapping pressure; however, these effects would be minor and would not significantly differ among alternatives as no increased harvest and only slight increases in roading (Alternatives 3, 4, 5, and 6) are anticipated.

Under the current Forest Plan, marten populations are supported by the Old-growth Habitat Conservation Strategy which works to maintain old-growth forest cover and coarse woody debris to provide structure important to marten for resting, denning, escape from predators, trapping refugia, and facilitate marten dispersal. The beach and estuary fringe and RMAs provide travel corridors for marten, and old-growth reserves (OGR) and other non-development LUDs provide refugia from trapping. Pre-commercial and commercial thinning of young-growth stands in these areas, which would occur under all of the alternatives, would promote the development of stand conditions that provide habitat structure for marten.

However, even-aged harvest or group-selection of young-growth in the beach and estuary fringe, RMAs, and non-development LUDs would setback the stand development process (returning harvest units to the stand initiation stage). The creation of gaps several acres in size or more could result in localized reductions in marten movement, local reductions in prey availability, and would delay the development of old-growth habitat conditions in harvested stands. However, overall connectivity for marten would be provided through application of the Forest Plan requirement of maintaining the 1,000-foot buffer immediately inland of young-growth harvest units in the beach and estuary fringe and a 200-foot buffer along the shoreline.

Energy, transportation, or other projects that may become permissible in new areas could affect marten through direct disturbance or through removal or modification of habitats. These effects would be evaluated at the project level. Forest-wide standards and guidelines would minimize impacts to marten and their habitats during project construction and operation.

Brown Bear

Brown bears are associated with low-elevation POG forests, particularly along Class I salmon streams. These habitats are protected to some extent by Forest-wide standards and guidelines for beach and estuary fringe and RMAs. However, young-growth harvest under the Forest Plan would occur in these areas under all alternatives. Young-growth harvest within beach and estuary fringe and RMAs are discussed above under Black Bear.

Road densities are another measure of the potential impact on brown bears. Primary concerns include increased hunting or poaching, and disturbance during critical life stages (e.g., late-summer feeding periods for bear). Habitat fragmentation, as well as habitat loss secondary to activities that are facilitated by vehicular access (e.g., timber harvest, mining, residential development, and renewable energy development) are other potential impacts. Open roads, which receive the highest and most consistent use, are likely to have the greatest effect on brown bears, although closed roads still facilitate access (e.g., off-highway vehicle, pedestrian) to roadless areas. There is no road density guideline for brown bears; however, it can be assumed that increased road density elevates the potential for human-bear interactions. Implementation of the Forest Plan under all alternatives would result in minor changes in total road density (see the discussion under Black Bear). Increased road densities have the potential to indirectly increase human-bear interactions; however, these effects would be minor. Alternatives 1 and 2 would be similar in their effects, Alternative 3 would be slightly greater, and Alternatives 4, 5, and 6 would be slightly greater than Alternative 3. Overall, there is little difference between the alternatives because predicted harvests levels are not changed (see Table 3.3-21).

Energy, transportation, or other projects that may become permissible in new areas could affect brown bears through direct disturbance or through removal or modification of habitat, particularly if developments affect Class I salmon streams. These effects would be evaluated at the project level. The Forest-wide standards and guidelines would minimize impacts to brown bears and their habitats during project construction and operation.

Alexander Archipelago Wolf

The 1997, 2008, and 2016 Forest Plan analyses contain extensive information on wolf ecology, building on the wolf assessment (Person et al. 1996). As outlined in the above Forest Plans and associated documents, scheduled harvest of POG forest has the potential to result in a small reduction of the wolf prey base (deer through decreased deer habitat capability) and increased human access along project roads, which could reduce the wolf population through increased legal and illegal hunting and trapping. It is assumed that a decline in the deer population would likely result in a decline in the wolf population (USDA Forest Service 2008b). Resonating effects could include reductions in opportunities to hunt or trap wolves (see USDA Forest Service 2016b, *Subsistence* section).

These effects are of particular concern on Prince of Wales Island where the population has apparently undergone substantial declines over the last several decades; however, this population represents a small portion (approximately 4 percent) of the overall Alexander Archipelago wolf population and this decline is not anticipated to affect the status of the population at large (USFWS 2015).

Evaluation employing the Interagency Deer Carrying Capacity Model as well as the FRESH Deer Model suggests that harvest of POG forest will decrease carrying capacity for deer over the long term because of reductions in the amount of available winter habitat due to the ultimate development of forest in stem-exclusion. However, this long-term decline in carrying capacity is lessened now due to the current Tongass Forest Plan's transition to young growth, which would not change under any alternative. Current deer habitat capability based on the interagency habitat capability model is below the Forest Plan guideline of 18 deer per square mile in many WAAs.

This results from several factors and varies among landscapes. Contributing factors include lower inherent capability of some landscapes and habitats, reduced habitat capability from past timber harvest and associated succession, and the static nature of how the model expresses habitat capability during succession (e.g., one value for young growth from 25 to 150 years of age). Model results suggested that continued harvest of POG forest in some areas would result in higher risk that there will be insufficient deer to sustain predation by wolves and human deer harvest over the long term (see existing modeled deer densities in Table 3.3-14 and 3.3-16). That concern exists despite the availability of alternative prey and current abundance of deer in some parts of the forest.

Projections based on the 2016 Forest Plan indicate a reduction in the existing percentage of WAAs with deer habitat capability of at least 18 deer per square mile by 11 percent after approximately 25 years (at stem exclusion) (see Table 3.10-14 in USDA Forest Service 2016). After 100 years of Forest Plan implementation the reduction in the percentage of WAAs with at least 18 deer per square mile would be 14 percent. WAAs with the greatest potential impacts are located in South Prince of Wales, North Central Prince of Wales, Kupreanof/Mitkof Islands, Revillagigedo Island, and Chichagof Island biogeographic provinces (see Table 3.10-14 in USDA Forest Service 2016). Reductions in habitat capability are due to both timber harvest as well as natural succession of stands harvested in the past. None of the alternatives would be expected to change the model results as there would be no increase in the overall harvest relative to the 2016 Forest Plan.

The transition to young-growth harvest under the current Forest Plan is not fully reflected in the interagency deer model results because the model does not assign different values to stands that have been pre-commercially or commercially thinned (i.e., it still treats them as stands in the stem exclusion phase with limited value for deer), or young-growth stands beyond the stem exclusion phase which become more suitable for deer. Harvest of young-growth stands would increase summer and low-snow winter forage availability for deer over the short term, providing temporary increases in habitat capability during most years, but reduced winter habitat capability in high-snow years. Over the long term as young-growth stands re-enter the stem exclusion phase, habitat capability for deer (and thus potential prey availability for wolves) would be expected to decrease (due to reduced forage availability) until the next stand treatment. Ultimately, the continued harvest of old-growth and young-growth forest that would be permissible under all the alternatives has the potential to result in localized reductions in deer habitat capability which may reduce prey availability for wolves in portions of the Tongass where deer are their primary prey (e.g., Prince of Wales Island and surrounding islands [GMU 2]). ADF&G recently updated its wolf management by game management area. All updated management reports and plans were reviewed but the discussion below focuses on GMU 2 (Porter 2018). The harvest data through 2014 was

used for the 2016 Forest Plan. ADF&G plans for the next period (2015-2020) include the development of a more formal management plan for Unit 2 wolves (Porter 2018). Other recently updated management reports and plans for various GMUs note that changes to seasons and bag limits for wolves are currently not needed at this time.

All action alternatives would allow the construction or reconstruction of roads in some areas previously prohibited by the 2001 Roadless Rule, but the amount of roads would be similar. Roads associated with timber harvest may also increase the risk of both legal and illegal hunting and trapping related wolf mortality by increasing human access. Estimated total road densities and open road densities below 1,200 feet (representative of low elevation habitats used by wolves and deer) would increase by 0.07 and 0.01 mile per square mile (NFS lands only) for all roads and for NFS roads only under the current Forest Plan (Table 3.3-20). Therefore, at most, localized increases in hunter access would be expected under the action alternatives with no substantial increase across the Tongass. Alternative 2 would be the same as Alternative 1, Alternative 3 would result in slightly more roads than Alternative 2, and Alternatives 4, 5, and 6 would result in slightly more roads than Alternative 3. These effects would be lessened through road closures after use, through storage or decommissioning. The effectiveness of closure and storage, or decommissioning and ultimately the extent of mitigation will depend on both enforcement and the approach to closure. These decisions are made at the island, district, and project level through Access Travel Management Plans based on an evaluation of all resources.

Table 3.3-20
Estimated Road Miles and Average Road Density below 1,200 feet in Elevation on NFS Lands and All Lands Combined for All Roads and for Open Roads by Alternative after 100 Years

	Existing		Alt 1		Alt 2		Alt 3		Alt 4		Alt 5		Alt 6	
Category	NFS Lands Only	All Lands	NFS Lands Only	All Lands	NFS Lands Only	All Lands	NFS Lands Only	All Lands	NFS Lands Only	All Lands	NFS Lands Only	All Lands	NFS Lands Only	All Lands
Road Miles														
All Roads	4,698	8,539	5,633	11,373	5,633	11,373	5,650	11,390	5,665	11,405	5,675	11,415	5,679	11,419
Open Roads	2,029	5,479	2,173	5,797	2,173	5,797	2,175	5,799	2,177	5,801	2,178	5,802	2,179	5,802
Road Density (mi/mi^2)														
All Roads	0.38	061	0.45	0.82	0.45	0.82	0.46	0.82	0.46	0.82	0.46	0.82	0.46	0.82
Open Roads	0.16	0.39	0.18	0.42	0.18	0.42	0.18	0.42	0.18	0.42	0.18	0.42	0.18	0.42

Source: Tongass National Forest GIS layer, 2018, and modeling of alternatives.

Energy, transportation, or other projects that may become permissible in new areas could affect wolves directly during construction through disturbance at den and rendezvous sites and indirectly through effects to deer habitat and increased vulnerability to harvest. These effects would be evaluated at the project level.

The Forest-wide standards and guidelines would minimize impacts to wolves, their habitats, and their prey base during project construction and operation, and through cooperation and coordination with ADF&G and the Wolf Technical Committee to meet the management intent to secure and support sustainable wolf population levels, particularly in GMU 2.

Bald Eagle

Common to all alternatives, timber harvest and associated activities, which create noise and disturbance (e.g., blasting and helicopter logging), have the potential to result in minor, temporary disturbance to individual bald eagles. As required by the Forest Plan, all activities would be conducted in accordance with the Bald and Golden Eagle Protection Act, including maintaining appropriate distances from active bald eagle nests. Riparian and beach and estuary standards and guidelines, as well as OGRs and other non-development LUDs, protect bald eagle habitat on the Tongass. Management activities in these areas could disturb eagles and reduce the protection afforded to suitable bald eagle habitat. Under all alternatives, commercial management of young growth (up to 10-acre openings) in the beach and estuary fringe and RMAs for the first 15 years after plan approval would continue. Harvest of young-growth in these areas would delay development of future trees/snags suitable for eagle nesting, perching, and

roosting; however, it includes a minimum 200-foot forested buffer along the shore (beach) that would continue to protect some eagle perching or roosting trees during that time.

Many young growth trees harvested would be of insufficient size to be suitable for nesting or preferable for roosting. Harvest of young growth has potential to disturb eagles, especially if helicopter harvest methods are used. Timing restrictions would apply near active eagle nests in the vicinity of harvest activities to minimize disturbance to eagles or the abandonment of nests.

Energy, transportation, or other projects that may become permissible in new areas could affect bald eagles directly during construction through disturbance and through habitat removal or alteration. During operation, electrocution with powerlines and/or collisions with project structures are a potential risk. These effects would be evaluated at the project level. The Forest-wide standards and guidelines would minimize impacts to bald eagles, their habitats, and their prey base during project construction and operation. They would include adherence to the MBTA, Bald and Golden Eagle Protection Act, and guidelines such as APLIC standards for transmission lines (APLIC 2006).

Red Squirrel, Red-breasted Sapsucker, Hairy Woodpecker, and Brown Creeper

These species are associated with old-growth forest and extensive quality habitat is protected through the conservation system, particularly OGRs and non-development LUDs. In the matrix, these species rely on legacy components (e.g., large diameter trees, snags) of the old-growth forest ecosystem for nesting and foraging. Harvests that could occur under all alternatives would result in the removal of POG forest nesting and foraging habitat (Tables 3.3-7, 3.3-8, and 3.3-9). Red-breasted sapsuckers are most closely associated with low-volume old growth, whereas hairy woodpeckers and brown creepers are associated with high-volume and large-tree stands, respectively. Red squirrels are more versatile and will use young-growth stands as young as 40 years of age. Indirect effects to these species would be associated with fragmentation and the reduction in POG patch sizes. Fragmentation reduces the amount and effectiveness of interior old-growth forest habitat by creating habitat edges along which may increase rates of nest predation by avian predators (Kissling and Garton 2008). Harvest of young-growth stands would have minimal fragmentation-related effects to these species because old-growth interior forest conditions preferred by these species would not be affected. However, connectivity for red squirrels could be locally reduced because this species may use mature young-growth stands that are suitable for commercial harvest.

Legacy Forest Structure standards and guidelines which are intended to maintain old-growth structure in areas that are already highly developed, as well as areas that will experience increased harvest levels over the life of the Forest Plan would continue to be implemented under all alternatives. These components (large trees and snags) may provide nesting and foraging habitat for the red squirrels, red-breasted sapsuckers, hairy woodpeckers, and brown creepers.

Energy, transportation, or other projects that may become permissible in new areas could affect red squirrels, red-breasted sapsuckers, hairy woodpeckers, and brown creepers during construction through direct disturbance or through removal or modification of habitats. During operation, the potential for collision with project structures is a risk. These effects would be evaluated at the project level. The Forest-wide standards and guidelines would minimize impacts to these species and their habitats during project construction and operation.

Vancouver Canada Goose

Vancouver Canada geese use wetlands (forested and non-forested) in the estuary, riparian, and uplands areas of the forest. Habitat needs for this subspecies are specifically provided for under the waterfowl standards and guidelines, which apply to specific sites, and a 100-foot buffer around lakes and streams. The beach, estuary, and riparian Forest-wide standards and guidelines provide additional protection to habitats used by Vancouver Canada geese.

Harvest of young-growth within the beach and estuary fringe and RMAs under the Forest Plan could affect this species. However, because of Forest Plan measures, effects on the Vancouver Canada goose should be minimal and would be similar under all alternatives.

Energy, transportation, or other projects that may become permissible in new areas could affect the Vancouver Canada goose during construction through direct disturbance or through removal or modification of habitats. During operation, collision with project structures is a risk. These effects would be evaluated at the project level. The Forest-wide standards and guidelines would minimize impacts to Vancouver Canada geese and their habitats during project construction and operation.

Other Species

Migratory Birds

Under all alternatives, harvest implemented under the Forest Plan would result in a reduction of perching, foraging, and potential nesting habitat and the increase in fragmentation associated with timber harvest and road building. After timber harvest, there would be a short-term increase in the habitat for species associated with early successional habitats and forest edges, which may result in short-term population growth for these species. However, extended local reductions in available habitat would be expected as forest succession progresses. Habitat removal would reduce the effectiveness of interior forest habitat, and increase the potential for nest predation and nest parasitism for some species, which can ultimately reduce reproductive success (Robinson et al. 1995). Migratory birds would be most susceptible to impacts from harvest activities occurring in suitable nesting habitat during the nesting/fledging period, which generally begins in mid-April and ends about mid-July, when young birds have fledged.

The migratory bird species most likely to be adversely affected by the harvest of POG forest under all of the alternatives are those that primarily nest in POG forests, including the Western screech-owl, rufous hummingbird, red-breasted sapsucker, Pacific-slope flycatcher, Steller's jay, northwestern crow, chestnut-backed chickadee, golden-crowned kinglet, varied thrush, Townsend's warbler, blackpoll warbler, northern goshawk, and marbled murrelet. However, species associated with early successional or scrub habitats such as the MacGillivray's warbler, golden-crowned sparrow, and golden-crowned kinglet would benefit through increases in suitable habitat over the short- to mid-term from timber harvest. All migratory bird species would benefit from the transition to young-growth harvest continued under all alternatives due to the reduced long-term scheduling of POG harvest. Differences among alternatives would be very slight because of the fact that harvest levels would remain the same.

Under all alternatives, the Old-growth Habitat Conservation Strategy would continue to provide for extensive areas in reserves of migratory bird habitat and distributed across the Forest. Legacy Forest Structure standards and guidelines that protect habitat features important for migratory birds on a stand level would be applied, as appropriate, under all alternatives.

Energy, transportation, or other projects that may become permissible in new areas could affect migratory during construction through direct disturbance or through removal or modification of nesting habitats. During operation, collision with project structures is a risk. These effects would be evaluated at the project level. The Forest-wide standards and guidelines would minimize impacts to migratory birds and their habitats during project construction and operation.

Bats

All bat species known to occur in Southeast Alaska are associated with mature forested habitats which provide roosting, breeding, and foraging sites, and bat activity appears rare in young-growth forest. Old-growth timber harvest would remove POG, thereby reducing the number of potential day-roosts available to tree-roosting bats and foraging habitat. Indirectly, timber harvest may also reduce the suitability of remaining roosting habitat through increased fragmentation (and decreased patch sizes) as day-roosts are more likely to be selected by some species (e.g., Keen's myotis and silver-haired bat) if they are located in stands with a higher number of trees in early to late decay stages (Boland et al. 2009).

Under all alternatives, harvest of POG that could occur under the Forest Plan would be expected to have some level of impact, but differences among alternatives would be very limited due to the uniform harvest level. It should be noted tree-roosting species may choose a large-diameter tree for roosting regardless of whether or not it is located in an area with past timber harvest (Boland et al. 2009). Habitat and landscape connectivity would be provided for these species by the Forest Plan conservation strategy.

Marbled Murrelets

Marbled murrelets nest in structurally complex old-growth forest stands (Piatt et al. 2007). As a result, timber harvesting and road construction within POG forest stands (especially high-volume POG) can remove nest trees or disturb nesting birds. Indirectly, timber harvest and road building increase fragmentation, reducing the effectiveness of interior forest habitat and creating habitat edges, which may result in increased rates of nest predation by avian predators. Under all alternatives, marbled murrelet nesting habitat would be protected by the Forest Plan conservation strategy.

The ongoing transition to young-growth harvest would benefit this species through the retention of a greater amount of POG forest on the landscape over the planning horizon. Moreover, many of young-growth trees harvested would be of insufficient size to be suitable for nesting. Additionally, harvest of young-growth stands that could occur under all alternatives would have minimal fragmentation-related effects to this species because old-growth interior forest conditions preferred by this species for nesting would not be affected.

Legacy Forest Structure standards and guidelines are intended to maintain old-growth structure in areas that are already highly developed, as well as areas that will experience increased harvest levels over the life of the Forest Plan. These components (large trees and snags) may provide nesting habitat for marbled murrelets. Differences in effects among the alternatives would be very slight because of the lack of differences in harvest volumes.

Energy, transportation, or other projects that may become permissible in new areas could affect marbled murrelets during construction through direct disturbance or through removal or modification of habitat. During operation, the potential for collision with project structures is a risk. The Forest-wide standards and guidelines would minimize impacts to marbled murrelets and their habitats during project construction and operation. Forest Plan standards and guidelines pertaining to marbled murrelets include maintaining a 600-foot radius no-cut buffer zone around identified murrelet nests; however, habitat protection is also provided through beach and estuary fringe and riparian standards and guidelines (USDA Forest Service 2016a), as well as the overall system of OGRs and other non-development LUDs.

Amphibians

Amphibians require both aquatic and terrestrial habitats in order to complete their life-cycle. Ponds, streams, and wetlands used by amphibians for breeding are protected by Forest Plan Riparian and Wetland standards and guidelines.

However, increased sedimentation and the entry of contaminated run-off from roads resulting from timber harvest can reduce the quality of these habitats. Under all alternatives, standard best management practices (BMPs) for water quality would be implemented to minimize these effects (see the Fisheries section for additional discussion).

Timber harvest has the potential to result in the loss and/or degradation of terrestrial habitats through changes in microclimates, soil compaction, and leaf litter disturbance. Tree canopy removal increases solar radiation to the forest floor, resulting in changes in moisture and soil temperatures which can make terrestrial habitats unsuitable for amphibians. Thinning or uneven-aged harvest techniques may reduce these effects.

The effects of specific harvest treatments on amphibians is complex. Some amphibians in the aquatic stage may be affected positively by even-aged harvest techniques (clearcutting), whereas effects of these treatments on juvenile and adult terrestrial stages are mostly negative (Semlitsch et al. 2009). In addition, renewable energy, mining, and transportation projects could affect amphibians through direct disturbance or through removal or modification of habitats, particularly if activities affect water bodies. The Forest-wide standards and guidelines would minimize impacts to amphibians and their habitats during project construction and operation.

Endemism

By definition, endemic species occur in isolated populations and many have limited mobility or specific habitat requirements. Thus, they are vulnerable to the effects of habitat loss and fragmentation, introduced non-natives, pathogens and disease, natural events (i.e., climate change), and overharvesting

(Dawson et al. 2007). Therefore, the ability to disperse and recolonize is an important factor in how endemic species are able to respond to environmental changes.

Under all alternatives, harvest and road construction/reconstruction implemented under the Forest Plan would affect endemic species through habitat loss (POG) and fragmentation (reduced patch size), and by altering the distribution of habitats across the landscape. This may inhibit the ability of individuals to move between patches of suitable habitat, and therefore may further limit the distribution of a population or reduce genetic interchange between subpopulations. These effects would occur to a less extent in association with young-growth harvest as these stands provide lower quality habitat to most endemic species. Although timber harvest levels are the same among all alternatives, Alternatives 4, 5, and 6 would have the greatest potential for effects on endemics because of the degree of fragmentation is likely to be higher under these alternatives (landscape connectivity and fragmentation are discussed in detail in the *Biological Diversity* section). Most endemic species would benefit from the transition to young-growth harvest continued under all alternatives due to the reduced amount of scheduled POG harvest over the long term.

Prince of Wales Flying Squirrel

A thorough analysis of this species occurred during the 1997, 2008 and 2016 Forest Plan efforts and results documented that the conservation strategy was functioning adequately to maintain the viability of this species in the planning area (USDA Forest Service 1997b, Appendix N; 2008b, Appendix D; 2016b). Prince of Wales flying squirrels are closely associated with old-growth structural characteristics and are limited by their dispersal capabilities. This subspecies has a limited gliding range (approximately 250 feet), a distance substantially less than the average clearcut width (Flaherty et al. 2008). Fragmentation resulting from old-growth timber harvest has the potential to reduce the value of residual patches of old growth in the matrix if they become isolated from adjacent patches either by distance or habitat type (young growth). Under all alternatives, old-growth timber harvest implemented under the Forest Plan could reduce the quality and quantity of flying squirrel nesting, foraging, and denning habitat.

However, the Old-growth Habitat Conservation Strategy would continue to maintain suitable old-growth habitat and provide landscape connectivity for flying squirrels.

Young-growth management (particularly commercial thinning) could benefit flying squirrels over the short term by increasing canopy height and creating more open space in the midstory conditions that facilitate efficient gliding (Scheibe et al. 2006). Over the long term, commercial thinning would promote stand development toward conditions capable of supporting breeding flying squirrels and improve the functional connectivity between old-growth reserves (Smith et al. 2011).

Prince of Wales Spruce Grouse

Prince of Wales spruce grouse are associated with muskegs, high-volume POG, and mixed conifer (scrub) habitats but will also use young-growth forest (15-30 years following timber harvest) with a well-developed middle story. Because they are associated with microhabitats within POG forests, old-growth timber harvest would alter habitat availability for this species, though effects would change over time. Harvest of old-growth timber under all alternatives would have a short-term benefit to grouse due to increased forage availability, followed by an extended period in which habitat conditions in harvested units would not be suitable. Young-growth harvest would provide similar short-term benefits to this species in the years following stand treatments. However, even-aged harvest of both old-growth and young-growth forest would initially (i.e., within the first 5 years after harvest) result in habitat patches unsuitable for spruce grouse, which may result in local impediments to movement. Due to their generally sedentary nature and preference for walking rather than flying, fragmentation due to even-aged timber harvest can result in the isolation of local spruce grouse populations (i.e., if open areas are too large or forested patches are spread too far apart to enable spruce grouse to move between them). However, thinning and group selection treatments can promote the development of structural and horizontal diversity beneficial to grouse (Russell 1999).

Increased road densities associated with timber harvest could also adversely affect spruce grouse by increasing hunter access (USFWS 2010). None of the alternatives would result in significant increases in average WAA road densities and therefore would not be expected to result in significantly increased harvest risk at the forest level. Localized increases in road densities would be managed through road

closures and storage or decommissioning which would likely minimize the potential for increased harvest risk for spruce grouse over the long term.

Overall effects of the alternatives would be very similar due to the constant level of harvest among them. The Old-growth Habitat Conservation Strategy would continue to provide suitable habitat and landscape connectivity for spruce grouse.

Cumulative Effects

Activities that occur on other land ownerships within and adjacent to the Tongass have the potential to affect the overall context within which effects to wildlife are considered. Appendix B provides a full list of all the activities considered in the cumulative effects analysis. Such reasonably foreseeable activities include, but are not limited to, timber harvest, community development, mining, recreation and tourism, and road construction. Typically, these activities have the potential to adversely impact wildlife populations through habitat conversion, fragmentation, and disturbance associated with road building, though some activities can have short-term or long-term beneficial impacts, depending on the species. Prediction of the future extent and intensity of such activities has a high degree of uncertainty associated with it on a Forest-wide basis over a broad time scale. The 2016 Forest Plan FEIS also summarizes a review of the overall wildlife viability analysis (see USDA Forest Service 2016b, cumulative effects discussion in the *Wildlife* section).

Many private lands in Southeast Alaska are already highly developed in terms of roading and timber harvest and are likely to experience a continuing decline in old-growth forest in the future. Therefore, the cumulative long-term trend within the Forest boundary under all alternatives is likely to be a decline in optimum habitat for most old-growth associated species, with non-NFS land contributing to this trend. Additionally, land exchanges and conveyances (e.g., Mental Health Trust) have the potential to remove some lands from protection under the Old-growth Habitat Conservation Strategy. The Forest Service would continue to evaluate opportunities to compensate for these losses by evaluating additional OGR modifications when land adjustments are implemented.

The transition to young-growth harvest on the Tongass would benefit wildlife species by reducing the overall amount of POG forest harvested over the planning horizon. Activities such as pre-commercial and commercial thinning would have both short-term (increased forage availability) and long-term (promotion of the development of old-growth forest stand characteristics) benefits to wildlife species that use POG forests on the Tongass.

When combined with other management activities occurring on non-NFS lands, implementation of the Forest Plan under any Alaska Roadless Rule alternative would produce additional impacts (noted above) associated with continued old-growth harvest to species for which this forest type is optimal habitat, such as goshawks, marten, mountain goats, red squirrel, red-breasted sapsucker, hairy woodpecker, brown creeper, marbled murrelets, and bat species. However, these declines in habitat (and associated effects such as fragmentation) would be lessened to some extent through the transition to young-growth harvest on NFS lands.

Approximately 875,700 acres of POG have been harvested across the Tongass, including both NFS lands and non-NFS lands, resulting in a reduction to 86, 78, and 67 percent of the original total, high-volume, and large-tree POG in Southeast Alaska, respectively (see Tables 3.3-10, 3.3-11, and 3.3-12). Approximately 82 percent of the original POG would remain on the Tongass after full implementation of the Alternative 1 or any of the action alternatives, along with future non-NFS harvest in 100+ years (Table 3.3-10). Future representation of high-volume POG and large-tree POG would be expected to be approximately 75 and 62 percent of the original amount, respectively, after 100+ years under the any of the alternatives. There would be no changes among the alternatives because harvest levels would be the same as Alternative 1.

Harvest associated with all alternatives would contribute to the cumulative reduction in POG and associated increase in fragmentation and loss of connectivity, which has the potential to reduce biological diversity. Timber harvest on NFS lands, as well as on non-NFS lands would result in similar effects; however, would not contribute above what was analyzed in the current Forest Plan.

Collectively, the implementation of the Forest Plan under all of the alternatives in combination with ongoing and foreseeable projects would increase the number of smaller patches on the landscape, reducing the amount of interior forest and increasing the occurrence of forest edge habitat. Edge effects such as shifts in species composition may reduce natural biological diversity over time by favoring some species over others; however, effects would be lessened by the transition to predominantly young-growth harvest, which would reduce the long-term cumulative effects to old-growth biological diversity by reducing the total amount of POG harvest and associated fragmentation. Note that the actual amount of harvest that has occurred to date on the Tongass is far less than that projected under all previous Forest Plan EISs and would likely continue to be less under all of the alternatives (see *Timber* section of this EIS for additional discussion).

Cumulative effects to modeled deer habitat capability would maintain 78 percent of the original level in 25 years and at 100 years. WAAs with the greatest impacts under the alternatives are located in GMU 2 (Prince of Wales and surrounding island) where concentrated past timber harvest has occurred. The USFWS Alexander Archipelago wolf species status assessment concluded that assuming continuation of current land use trends, the GMU 2 wolf population is anticipated to decline by another roughly 8 to 14 percent of current levels over the next 30 years (USFWS 2015). Although this could result in gaps in wolf distribution within GMU 2, given that it comprises just 6 percent of the population range wide, impacts to the overall distribution in Southeast Alaska or to species viability are not expected (USFWS 2015). The Forest Service will continue to coordinate with ADF&G and the Wolf Technical Committee to address future issues, especially within GMU 2.

Overall, biological diversity on the Tongass and in Southeast Alaska remains in good condition and the landscape continues to be dominated by old-growth forest ecosystems. As development continues through timber harvest and associated activities such as road building, and community expansion, particularly in areas where extensive development has already occurred (e.g., Prince of Wales Island), maintaining connectivity and roadless refugia will become increasingly important, particularly for wide-ranging species whose distribution depends on some level of connectivity across the landscape. In addition, the management of human resources will continue to play a role in maintaining biological diversity across the Tongass. Within the Tongass boundary, the Old-growth Habitat Conservation Strategy was designed to address the more extensive harvest on non-NFS lands through the OGR system and Forest-wide standards and guidelines, both of which were intended to maintain ecological components needed to maintain the ecological integrity important to a variety of organisms and maintain connectivity across the landscape, with or without much contribution from non-NFS lands. Note that the system of OGRs and overall Old-growth Habitat Conservation Strategy approach was developed prior to roadless and would be maintained regardless of the alternative selected.

There are portions of the Tongass where cumulative effects become more important due to the level of past harvest that has occurred. Specifically, the North Central Prince of Wales and Kupreanof/Mitkof Islands biogeographic provinces have experienced some of the highest reductions in original (1954) POG forest on the Tongass and are also where much of the young-growth suitable for commercial timber production is located. Additional timber harvest, particularly when located adjacent to previously harvested areas, has a greater potential to result in localized reductions in landscape connectivity and gaps in species distributions in these more heavily harvested areas compared to portions of the Tongass that have less cumulative past timber harvest. These cumulative effects would be most likely to occur for species with very limited ranges (endemic species limited to individual islands or island groups, e.g., Prince of Wales flying squirrel, Prince of Wales spruce grouse) or with limited dispersal capabilities or capabilities that are dependent on certain mature forest structural characteristics (e.g., goshawks, amphibians, flying squirrels, spruce grouse).

Species with limited dispersal capabilities (i.e., flying squirrels and spruce grouse, which are also endemic species) are likely to be more sensitive to habitat loss and fragmentation than species with greater dispersal capabilities (i.e., goshawks, wolves, and brown bears; D'eon et al. 2002). Natural fragmentation of habitats can also affect the level of additional fragmentation that can be supported. The Old-growth Habitat Conservation Strategy would continue to provide for extensive areas in reserves distributed across the Forest. The Legacy Forest Structure and other standards and guidelines that retain POG forest in harvested areas (e.g., beach and estuary fringe, RMAs, and Scenic Integrity Objectives) would also ensure the maintenance of a functional and interconnected old-growth ecosystem on the Tongass.

These features are important for species associated with shoreline and riparian habitats such as river otters, black bears, brown bears, bald eagles, and Vancouver Canada geese. These measures, particularly when implemented in areas that have experienced concentrated past harvest increase the likelihood that the landscapes will continue to provide the full range of matrix functions that support viable and well-distributed populations of wildlife species.

Under all alternatives, activities implemented under the Forest Plan would result in vessel traffic and marine activity associated with LTF use and log transport, which would occur irregularly over the life of the Forest Plan (in association with individual old-growth and young-growth timber harvest projects as they are proposed). Therefore, all of the alternatives would make a minor contribution to the existing potential for oil or fuel spills associated with existing vessel activity and bark accumulations near the LTFs to which marine and shoreline-associated species such as black oystercatchers, Aleutian terns, short-tailed albatrosses, humpback whales, and Steller's sea lions would be exposed. However, levels of marine activity are expected to remain within levels anticipated for the current Forest Plan (Alternative 1) under all of the action alternatives. Furthermore, all activities at the project level would be conducted in accordance with Alaska Water Quality Standards under Section 401 of the Clean Water Act for LTFs.

These standards place restrictions on the types, quantities, and extent of discharges (including bark) to the marine environment and would limit the effects of the project on water quality. Therefore, very minor contributions to cumulative effects in the marine environment are anticipated under all of the alternatives and these would be the same among the alternatives.

Climate change may also contribute to cumulative effects. Warmer temperatures and increased precipitation are anticipated to result in changes to vegetation and thus, the suitability of wildlife habitat, among other impacts (Haufler et al. 2010, Shanley et al. 2015; see the *Climate and Carbon* section). Although many species may benefit (e.g., greater overwinter survival of deer, and thus a greater prey base for wolves, resulting from warmer winter temperatures during normal years), habitat changes resulting from a longer growing season, wind, fires, insect infestations, and disease would have variable effects on others. The greatest concerns for wildlife populations in relation to climate change, however, are the weather extremes that can be expected to occur periodically (Haufler et al. 2010).

Periodic severe winter snowfalls, which may seem counterintuitive given the general warming trend, are anticipated (SNAP 2013). These stochastic events would be of greatest concern for populations that are limited in number or distribution. The Forest Plan Old-growth Habitat Conservation Strategy was designed to maintain a resilient old-growth forest ecosystem in the face of this uncertainty. The potential for contributions to climate change from continued old-growth timber harvest on the Tongass, which could indirectly affect wildlife species such as the Kittlitz's murrelet, is described in detail in the *Climate and Carbon* section.

Fish

Affected Environment

The important fish and aquatic habitat details of the Tongass were provided in the recently developed 2016 Forest Plan Amendment EIS (USDA Forest Service 2016b). This section relies extensively on that information to characterize the current affected environment and refers the reader to that document for further details. The abundant aquatic systems of the Tongass provide spawning and rearing habitats for most fish produced in Southeast Alaska. Maintenance of this habitat and associated high-quality water is a focal point of public, state, and federal natural resource agencies, as well as user groups, Native organizations, and individuals.

Several watersheds and VCUs in the Tongass have been evaluated for relative importance for several metrics relating to fish and wildlife. Included among these are conservation priority areas identified by The Nature Conservancy (TNC) and Audubon Alaska (Audubon Alaska and The Nature Conservancy 2007), and the "Tongass 77" (T77)[21] watersheds identified by Trout Unlimited. Audubon Alaska and TNC identified conservation priority watersheds that include high-value intact watersheds in primarily intact conditions and generally encompass the highest current ecological values within each province; these areas were recommended to be managed for intact ecological values and habitat productivity.

About 46,000 stream miles and 213,000 acres of lakes and ponds are present on Tongass lands. Of these, approximately 14,900 stream miles and 3,300 lakes and ponds are mapped as anadromous or high-value resident fish habitat. Another 9,500 stream miles and 1,000 lakes and ponds are mapped as resident fish habitat. Many estuarine and marine, fish and shellfish resources are affected by actions on the Tongass that affect marine shorelines and stream runoff (USDA Forest Service 2016b).

Subsistence, commercial, and sport fisheries are all important to the way of life for Southeast Alaskan residents and some forms occur in both marine and freshwater systems (USDA Forest Service 2016b). Major species include all five salmon species [pink salmon (*Oncorhynchus gorbuscha*), chum salmon *(O. keta*), coho salmon *(O. kisutch*), Chinook salmon *(O. tshawytscha*), and sockeye salmon *(O. nerka*)] for all activities, while various primarily trout species [e.g., rainbow trout/steelhead (O. *mykiss)* and cutthroat trout *(O. clarki*), Dolly Varden char *(Salvelinus malma*)] are important for sport, commercial, and subsistence fishing, while a variety of other marine species are also of importance. Hatcheries, and the enhancement of wild fish, among other aquaculture projects, contribute to resource availability and abundance.

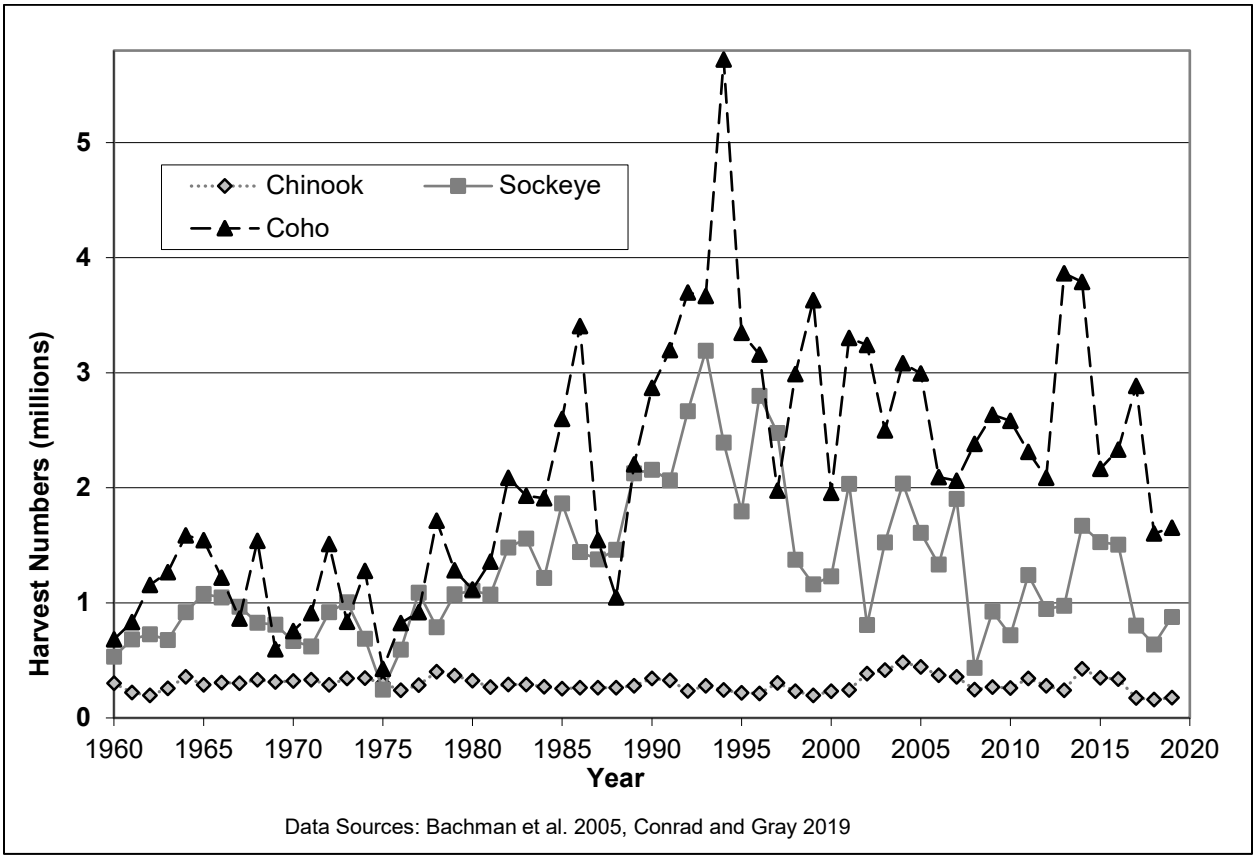
Details of quantity and changes in harvest of salmon species in Southeast Alaska are summarized here, including current updates on harvest and values. Commercial fish harvest in the waters of Southeast Alaska (includes Yakutat area harvest) can fluctuate widely from year to year but has remained typically in the tens of millions of fish for all five species (Figures 3.3-3 and 3.3-4). The annual average has ranged from a low of about 6 million in 1975 to a high of 112 million in 2013. Pink salmon have had a sharp decline since the 2013 peak with a low for odd-year returns of about 21 million in 2019. Pink salmon make up the bulk of the harvest, averaging 75 percent of all salmon from 1960 to 2019 (Conrad and Gray 2019; USDA Forest Service 2016b). Coho salmon also had below average harvests in 2018 and 2019.

Fish production from the Tongass is a primary source of fish for commercial, sport, and subsistence harvest. Based on recent period data (2007-2016), an estimated 75 percent of all salmon commercially harvested began their life in streams and lakes within the Forest boundaries (Johnson et al. 2019). Pink salmon have the highest portion of the commercial harvest originating in the Tongass at 91 percent. The estimated annual average commercial salmon harvest (2007-2016) produced from streams originating in the Tongass was over 41 million fish, with a wholesale value (ex-vessel value) over $69 million (adjusted

[21] The Tongass 77 (T77) refers to VCUs, which approximate major watersheds located on National Forest System lands that Trout Unlimited, Alaska Program, identified as priority salmon watersheds. Four watersheds were removed from the T77 in 2014 as a result of the Sealaska Land Entitlement Finalization in the Carl Levin and Howard P. "Buck" McKeon National Defense Authorization Act for Fiscal Year 2015 (Public Law 113-291).

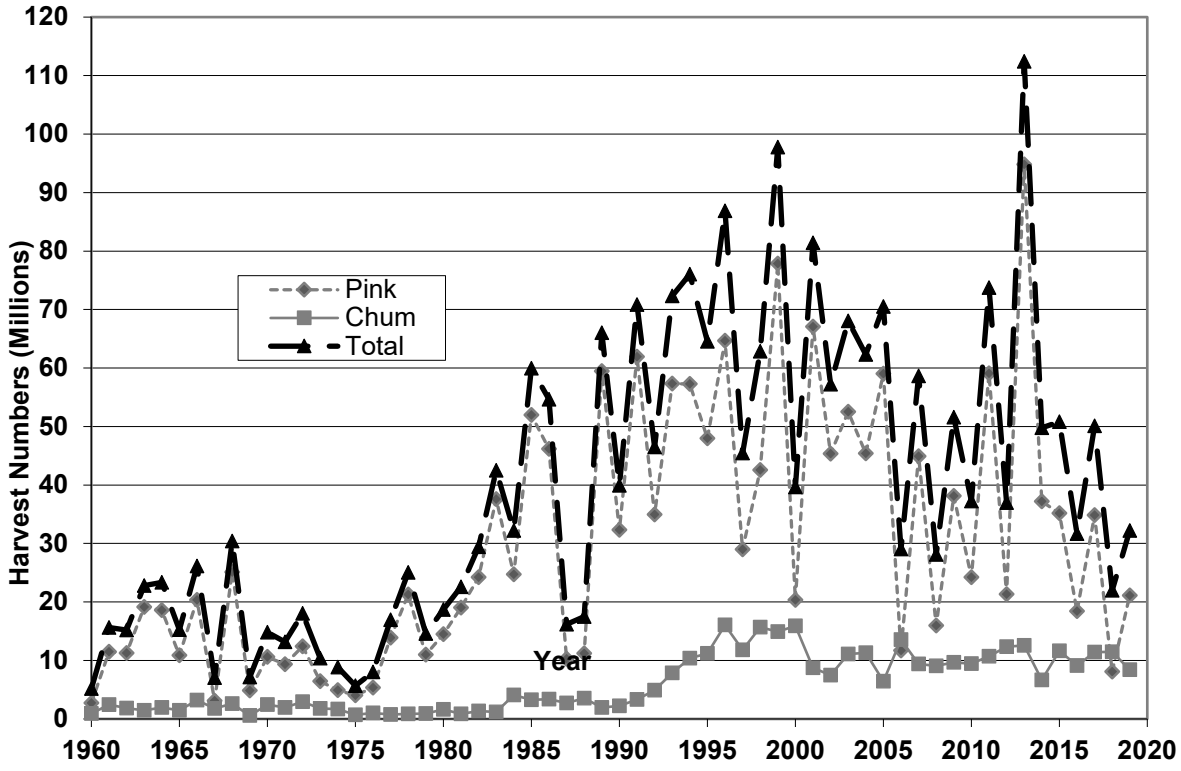
to 2017 dollars (Johnson et al. 2019). Approximately 85 percent of Southeast Alaska's sport fishing occurs in the vicinity of the Tongass. Sport fishing for salmon has been substantial over the recent two decades (averaging about 940,000 catch and 450,000 harvested salmon per year; see https://www.adfg.alaska.gov/sf/sportfishingsurvey/index.cfm?ADFG=region.results). Hatchery production has also contributed substantially to overall fish production regionally. Hatchery production statewide has greatly increased since 1977 with releases of more than 1.5 billion fish occurring annually since 1995, peaking in 2014 with about 1.8 billion juvenile fish released statewide (Vercessi 2015). State subsistence and personal use salmon fisheries averaged about 46,000 fish annually from 2005 to 2018 for Southeast Alaska and Yakutat, down from peak period average of 62,000 fish during (1994–2004 period) (Conrad and Gray 2019).

Figure 3.3-3
Commercial Harvest of Chinook, Sockeye, and Coho Salmon in Southeast Alaska 1960-2019



Data Sources: Bachman et al. 2005, Conrad and Gray 2019

Figure 3.3-4
Commercial Harvest of Pink, Chum and Total Salmon in Southeast Alaska 1960-2019



Data Sources: Bachman et al. 2005, Conrad and Gray 2019

Fish Habitat

Important Components of Fish Habitat

With more than 46,600 miles of streams and 212,000 acres of ponds and lakes, the Forest provides abundant fish habitat. Generally, salmon and trout require cool stream temperature to thrive in streams with stream temperature affecting fish rearing, migration and spawning success (Bjornn and Reiser 1991). The relative composition of stream substrate and sediment affects many factors in stream production, including spawning areas and spawning success for salmon and trout, and benthic organism composition and abundance, an important food resource for fish.

The amount of coarse sediment affects available spawning habitat and influences pool filling and bank stability (Spence et al. 1996). High levels of fines affect pool filling and survival of eggs and fry in spawning nests of salmon and (Chapman and McLeod 1987; Chapman 1988; Iwamoto et al. 1978; Gregory and Bisson 1997; McNeil 1964). Increased fines in streams also reduce interstitial spaces in large substrate that are important habitat for many common cool water mountain stream aquatic insects.

Large woody debris (LWD) is an important component of good trout and salmon habitat, especially in heavily wooded regions (Swanson et al. 1976; Bisson et al. 1987; Naiman et al. 1992; Beechie and Sibley 1997; Spence et al. 1996; Murphy et al. 1986), that provides channel complexity and cover, and is especially important in the formation of pools (Bisson et al. 1987; Sullivan et al. 1987; Benda et al. 2003). The primary timber-related actions that may affect LWD supply to streams include buffer width along streams, stream class and channel characteristics that buffers are placed on, size of trees remaining in

the buffer area, and effects on windthrow from adjacent harvest. Additional information on LWD in Tongass streams and timber harvest practices of the past is presented in the 2016 Forest Plan Amendment EIS (USDA Forest Service 2016b).

Fish passage and access to suitable habitat in streams and lakes is critical to fish stocks. Natural falls and barriers in systems have been found in some areas to prevent the use of suitable fish habitat, especially for anadromous stocks in some natural systems. Man-made barriers in the form of dams, diversion, and road-crossing structures have been common partial or complete barriers to fish movement in much of the developed areas where fish are present. Road crossings (e.g., culverts) over much of the range of salmonids in the Pacific Northwest have often reduced or eliminated access to substantial portions of habitat to migratory fish use.

Effects of Past Forest Management Practices

Effects of past timber harvest practices on fish populations and habitat in the Tongass were addressed in the 2016 Forest Plan Amendment EIS (USDA Forest Service 2016b). Older forest practices (mostly prior to 1980) in the Tongass have had adverse effects to anadromous fish habitat conditions, including spawning and rearing habitat, and migration conditions (Murphy and Milner 1997). Timber harvest during this timeframe accounts for about 60 percent of all timber harvest on the Forest. Generally, studies found that older harvested watersheds (mostly prior to 1980), which generally included clearcutting of riparian trees, had mostly lower fish production (Stillwater Sciences 2012).

Modern forest practices under the Forest Plan are intended to prevent the habitat degradation in riparian areas and headwater streams that have contributed to adverse effects on fish and habitat. Monitoring of stream habitat, fish, and riparian conditions has not found marked problems with water quality, fish resources, or habitat with the implementation of current forest practices (USDA Forest Service 2004, 2007, 2014, 2015c). The results of the latest monitoring report, while indicating that some issues need further monitoring and analysis to fully assess effects, have not resulted in any recommendations to change the current standards and guidelines of the Forest Plan (USDA Forest Service 2015c).

Fish Habitat Enhancement and Restoration

Recent enhancements have included varied activities such as fishways, falls improvements, and lake and stream stocking, while restorations have been primarily culvert removal or repair and LWD management. Other watershed improvement activities include riparian and upland vegetation improvement, road storage and decommissioning, and improved road drainage structures to reduce sediment entry to streams and improve fish passage.

Special Status Species

Fish Management Indicator Species

The 1982 Planning Rule directed the use of MIS in forest planning to help display the effects of forest management. For the 1997 Forest Plan, pink salmon, coho salmon, Dolly Varden char, and cutthroat trout were selected as MIS. Pink salmon were selected to represent anadromous fish that are limited in their freshwater life period by spawning gravel quality and quantity; coho salmon to represent anadromous fish that are generally limited in their freshwater life period by stream and lake rearing area; Dolly Varden char because of their ubiquitous distribution in freshwater habitats; and cutthroat trout because of their dependency on small freshwater stream systems, which are most susceptible to effects from management activities. These MIS, and their habitats, are described in the 1997 Forest Plan Revision FEIS (USDA Forest Service 1997a) where carried through to the 2008 Forest Plan Amendment. Because the 2016 Forest Plan Amendment EIS analyzed an amendment to the 2008 Forest Plan done under the 1982 Planning Rule, these species were carried forward and analyzed even though the 2012 Planning Rule does not use MIS for evaluating effects.

Sensitive Fish Species

Sensitive species are those plant and animal species identified by the Regional Forester for which population viability is a concern on NFS lands within the region. The goal of the Forest Service Sensitive Species Program (Forest Service Manual 2670) is to ensure that species numbers and population distribution are adequate so that no federal listing will be required, and no extirpation will occur on NFS lands.

The Alaska Region Sensitive Species List was updated in 2009 (USDA Forest Service 2009a). There currently are no fish species designated as sensitive species in the Alaska Region.

Threatened and Endangered Fish Species

Federally listed threatened and endangered species are those plant and animal species formally listed by the U.S. Fish and Wildlife Service (USFWS) or National Marine Fisheries Service (NMFS), under authority of the Endangered Species Act of 1973 (ESA), as amended. An endangered species is defined as one that is in danger of extinction throughout all or a significant portion of its range. A threatened species is defined as one that is likely to become an endangered species within the foreseeable future throughout all or a significant portion of its range.

No federally listed fish species or stocks originate from Alaska streams. However, some federally listed fish stocks may occur in marine waters within the boundary of the Tongass National Forest (NMFS 2020). These fish include the following:

Endangered species:

- Snake River sockeye salmon
- Upper Columbia River spring-run Chinook salmon

Threatened species:

- Upper Columbia River steelhead
- Snake River spring/summer Chinook salmon
- Snake River fall Chinook salmon
- Puget Sound Chinook salmon
- Lower Columbia River Chinook salmon
- Upper Willamette River Chinook salmon
- Hood Canal summer chum salmon
- Lower Columbia River coho salmon
- Snake River Basin steelhead
- Lower Columbia River steelhead
- Upper Willamette River steelhead
- Middle Columbia River steelhead
- Green Sturgeon (*Acipenser medirostris*) – Southern distinct population segment (DPS)
- Columbia River Chum Salmon
- Lake Ozette Sockeye Salmon
- Upper Columbia River DPS Steelhead Trout
- Puget Sound DPS Steelhead Trout

These listed stocks of salmon and steelhead do not spawn in Alaska but are known to seasonally inhabit marine waters on the outside coast to the west and occasionally in inside waters of the Tongass (McNeil

and Himsworth 1980; Trudel et al. 2004; Trudel et al. 2009; Burgner 1991; Haggerty 2009; Groot and Margolis 1991; Tucker et al. 2011). They may feed on fish that are dependent on coastal marine waters of the Tongass at some stages of their lives. The southern DPS of the green sturgeon is an anadromous species that spawns in the Sacramento River in California (NMFS 2015b). Green sturgeon also do not rear or spawn in fresh waters of Southeast Alaska but have been rarely found to be present in marine waters of Southeast Alaska and may feed on benthic organisms found in these waters, likely in waters less than 100 meters deep (Lindley et al. 2008; Huff 2012; Colway and Stevenson 2007).

Green sturgeon could be present in the inside waters of Southeast Alaska, particularly during the winter.

Environmental Consequences

Indirect Effects

The current standards and guidelines in the 2016 Forest Plan were developed substantially through work that was done initially by the Anadromous Fisheries Habitat Assessment (AFHA) (USDA Forest Service 1995). Follow-up work in the Tongass after 1995 and other studies have contributed to modifications of these standards and guidelines in the 1997, 2008, and 2016 Forest Plans. Monitoring in the Tongass has helped confirm that the actions taken under the standards and guidelines have protected fisheries resources in the Tongass. The Alaska Roadless Rule alternatives will be evaluated on how these alternative associated actions would affect fish resources relative to implementation of the 2016 Forest Plan under the 2001 Roadless Rule (Alternative 1).

Fish Habitat

Roads pose the greatest risk to fish resources on the Tongass (Dunlap 1996), partly because they pose the largest risk of management-caused sediment input to streams (Reid and Dunne 1984; Furniss et al. 1991; Gomi et al. 2005; Hassan et al. 2005). Road construction, road drainage, level of road use, number of road stream crossings, watershed road density, and related actions in forested areas may all influence the amount of sediment to streams (Gomi et al. 2005; Furniss et al. 1991; Swanson et al. 1987; Chamberlin et al. 1991; Reid and Dunne 1984). Road effects to aquatic systems and fish are likely to vary little among the alternatives.

Roads

Roads have been found to contribute more sediment to streams than any other land management activity (Gucinski et al. 2001). Roads can contribute towards increases in peak flow to streams (Grant et al. 2008) that can result in stream channel erosion and bed scour (Tonina et al. 2008), affecting stream bed and bank stability, and adverse effects on fisheries resources. Roads can also potentially create areas of hillslope instability resulting in landslide generation, contribute fine sediment from surface erosion, and alter surface and subsurface water flow patterns. Long-term sediment introduction from roads is influenced by the type of structure at the road–stream crossing, proximity of the drainage structures to streams, road slope, age, maintenance condition, time since last graded, seasonal timing of maintenance activities, amount of traffic, rock quality, weather, hillslope length, soil depth, and cutbank depth (Croke and Hairsine 2006; Wemple and Jones 2003; Kahklen and Hartsog 1999; Reid and Dunne 1984). Although standards and guidelines are in place to help moderate these effects, some adverse effects, or increase in risk of adverse effects, would occur with these road parameters.

Density of roads is also a major factor in considering watershed condition as indicated by the Forest Service Watershed Conditions Framework (WCF) (USDA Forest Service 2011b). Road density is one of 12 factors considered when rating the status of watershed on national forest. The WCF concluded as part of their assessment that watersheds with fewer roads generally have healthier overall resources (USDA Forest Service 2011c). Specifically, the Forest Service (2011c) noted the following: 1) a watershed with road density of less than 1 mile per square mile would be considered “good” or “properly functioning,” 2) watersheds with road density of 1 to 2.4 miles per square mile were “fair’ or “functioning at risk,” and 3) watersheds with road density greater than 2.4 miles per square mile were rated as “poor” or “impaired function.”

New road construction and road density would be similar under all alternatives because roads on the Tongass are largely developed in support of timber harvesting, and the PTSQ under the 2016 Forest Plan does not vary between the alternatives. The updated estimates of existing road conditions included almost 5,000 miles of existing roads on NFS lands (Table 3.3-21). The projection over the next hundred years was modeled to include an additional 1,000 miles of new roads, totaling about 5,900 miles of roads after 100 years. This would be an increase of about 20 percent over existing conditions. In addition to new roads, roads would be constructed over decommissioned roadbeds or reconstructed. Reconstruction involves the rehabilitation of the original roadbed, and can include cleaning ditches, replacing drainage structures, re-installing bridges, and grading and shaping. More ground disturbance would occur for reconstruction over decommissioned roads than for closed roads and may include some major roadbed restoration similar to new road construction. By the same rationale, the estimated 500 miles of roads constructed over decommissioned roadbeds and 1,100 miles of road reconstruction over 100 years for the No Action alternative would be similar among all alternatives (Table 3.3-21).

The number of new road miles estimated beyond the current forest plan (Alternative 1) would range from 0 to 49 miles total. Alternatives 1 and 2 would have about the same amount of road miles as indicated in the current Forest Plan evaluation, with Alternative 3 a slight increase over 1 and 2, and Alternatives 4, 5 and 6 similar with slightly more road miles than Alternative 3 (see *Transportation* section). Alternative 1 would result in a 20 percent increase in new roads over existing conditions; none of the other alternatives would increase this value more than 1 percent (i.e., 21 percent).

Road density also would change little among the alternatives. Given the young growth transition, the acres and level of old-growth harvest vary little across the alternatives, including the majority of sales which would be most economic, leading to the very small differences in roads built. Based on this information, the frequency of occurrence of road densities exceeding the “properly functioning” value of 1 mile of road per square mile was used as a general index of relative effects of roads on water quantity and quality and relative effect to fisheries resources. Under existing conditions, average road density is about 0.19 mile per mile square mile. Under all alternatives, the average road density on NFS lands is increased to about 0.23 mile per square mile (see Table 3.3-21). While there are slight differences among alternatives, this would translate into about 90 percent of all subwatersheds with road densities in the “properly functioning” range (less than 1 mile of road per square mile) for NFS lands for all alternatives.

The number of subwatersheds that have no roads on NFS lands is currently about 68 percent; this is projected to be about 62 percent under the current Forest Plan Alternative 1. The other alternatives would decrease to between 56 and 61 percent. While there would be slight increases in number of watersheds with roads, most of that increase would result in additional watersheds with road density less than 1 mile per square mile with these watershed remaining in the “properly functioning” range. Alternative 2 would have the least increase and Alternative 6 the most increase in number of watersheds with roads. The overall number of watersheds with road density less than 1 mile per square mile would be least with Alterative 6 as slightly more development would occur in watersheds without roads, with fewer new roads built in watersheds that have existing roads. Overall, there are only slight differences among the alternatives over the projected 100-year period in number of estimated changes in road density among watersheds.

Overall, the potential effects to fish from road construction, reconstruction, and maintenance under projects that could be approved in the future would be similar among all alternatives and would be evaluated at the project-scale.

Table 3.3-21
Estimated Road Miles and Percent of 6th Field Subwatersheds in Road Density Categories on NFS Lands under Existing Conditions and after 100 Years of Full Implementation[1]

		Alternative					
Road Type	Existing	1	2	3	4	5	6
Existing Roads [2] (miles)	4,929	4,929	4,929	4,929	4,929	4,929	4,929
New Road Construction (miles)	–	994	994	1,012	1,029	1,039	1,043

Table 3.3-21 (continued)
Estimated Road Miles and Percent of 6th Field Subwatersheds in Road Density Categories on NFS Lands under Existing Conditions and after 100 Years of Full Implementation[1]

Road Type	Existing	Alternative 1	2	3	4	5	6
Road Construction over Decommissioned Roadbeds (miles)	–	527	527	532	535	539	541
Road Reconstruction[3] (miles)	–	1,104	1,104	1,111	1,119	1,123	1,123
Total Roads (miles)	4,929	5,922	5,922	5,941	5,958	5,968	5,972
Percent New Road Increase	-	20%	20%	21%	21%	21%	21%
Road Density Categories (Mi/Sq. Mi.)[4]							
0.0	67.8%	61.5%	60.8%	59.6%	58.4%	57.7%	56.4%
>0.0 – 1.0	23.8%	28.3%	28.9%	29.8%	31.1%	31.8%	33.0%
>1.0 – 2.4	7.8%	8.2%	8.3%	8.7%	8.6%	8.6%	8.8%
>2.4 – 3.0	0.4%	1.4%	1.4%	1.4%	1.5%	1.5%	1.4%
>3.0	0.2%	0.6%	0.6%	0.5%	0.5%	0.5%	0.5%
Percent of watersheds with Average Road Density less than 1.0 mile/sq. mi.	91.6%	89.8%	89.7%	89.5%	89.5%	89.5%	89.4%
Average Road Density (miles/sq. mi.) for all NFS Lands	0.19	0.23	0.23	0.23	0.23	0.23	0.23

[1] Assumes full implementation of Forest Plan at PTSQ levels. Includes adjusted road miles estimated to be needed to harvest all scheduled timber in each alternative.
[2] Note that the 4,929 miles of existing roads consists of 43% open roads, 31% closed roads (i.e., in storage), and 26% decommissioned roads.
[3] Estimated existing road miles that would need to be reconstructed.
[4] Percentages are based on 959 6th field subwatersheds that contain at least 100 acres of NFS lands.
Source: Tongass National Forest GIS layer, 2018, and modeling of alternatives.

Fish Passage

Roads may also increase risk to fish movement due to improper construction affecting fish passage (Gibson et al. 2005) and blocked culverts. Stream-rearing fish, particularly cutthroat trout and Dolly Varden, which occupy the smaller headwater streams during some parts of their lives, are at the greatest risk. Fish passage guidelines (Forest Service Handbook 2090.21 Aquatic Habitat Management Handbook [USDA Forest Service 2001]) for culvert design greatly reduces the risk of new culvert installation impeding fish passage, but some risks remain.

As discussed above, road construction would be similar under all alternatives; thus, the number road crossings that could impede fish passage would also be similar. While the alternatives with the most potentially new road miles (Alternatives 4 through 6) would appear to have the largest potential for increase in stream crossings, the lack of increase in actual predicted harvest would greatly limit additional construction of new roads, and respective increase in stream crossings, relative to implementation of the current Forest Plan under the 2001 Roadless Rule. Therefore, the total change in stream crossings, including fish streams with their associated impacts to fish and their habitat, would be highest for Alternatives 4 to 6, but would be unlikely to vary substantially among the alternatives.

Timber Harvest

Timber harvest activities can increase risk to fish resources. Protection of riparian areas, including floodplains, areas of riparian vegetation, and certain wetlands associated with riparian systems, is of concern. Riparian vegetation serves many important functions for stream fish habitat, including supplying LWD, food input, and stream shade to name a few. The 2016 Forest Plan includes areas designated as RMAs that encompass the stream, mandatory no-harvest zones required by the 1990 TTRA, adjacent site-potential tree-height distances, landscape features such as floodplains, alluvial fans, and v-notches, and associated wetlands (Forest Plan, Appendix D; Paustian 2004). The RMAs are ecologically tailored to ensure the integrity of the stream channel, maintain the supply of large wood, and protect other functions critical to soil, water, fish, and wildlife in Southeast Alaska (USDA Forest Service 2015c). Greatest

protection is provided to riparian areas associated with alluvial soils and fish streams; fishless headwater streams are also protected as important conduits of clean water, large wood, stream substrate, and food for aquatic organisms. In addition, reasonable assurance of windfirmness (RAW) must be provided for buffers, which may or may not include additional buffer width depending on site conditions. While some blowdown has occurred in monitored buffers this has generally been low, averaging 6.8 percent of the buffer area in monitored RMAs with blowdown occurrence decreasing with time (USDA Forest Service 2019f). These Forest Plan standards and guidelines associated with riparian areas, wetlands, and beach and estuary fringe are expected to protect fish resources from significant impacts associated with timber harvest, but there is still some level of risk. These ecologically based RMA buffers are also likely an important component to mitigate potential effects of climate change on hydrologic regimes and fish (EcoAdapt 2014).

All alternatives would have the same PTSQ as the current Forest Plan. Timber harvest activities projected under the current plan could potentially affect over 320,000 acres after full implementation of the Forest Plan over 100 years. The acres of harvest would not be substantially different from the current plan or among the alternatives. Therefore, effects on fish and fish habitat would be similar among the alternatives.

The Tongass 77 Watersheds and TNC/Audubon Conservation Priority Areas

The 2016 Forest Plan prohibits old-growth timber harvest in T77 Watersheds and TNC/Audubon Conservation Priority Areas, and this carries through for all the alternatives in this EIS. Within ARAs, harvests would generally be prohibited in Watershed Priority, LUD II Priority, and Roadless Priority ARAs, with exceptions. The exceptions for timber harvest and road building are presented in Chapter 2 (Table 2-2). However, there would be no prohibition on young-growth harvests within the Timber Priority ARA (Alternative 4). Under Alternative 4, young-growth harvest could occur within Timber Priority ARAs if other suitability requirements were met (such as occurring within a development LUD). Community Priority ARAs (Alternative 3) do not include T77 Watersheds and TNC/Audubon Conservation Priority Areas.

While the size and location of future harvests are unknown, Table 3.3-22 presents the acres of suitable young growth and the projected harvest over 100 years within T77 Watersheds and TNC/Audubon Conservation Priority Areas. Suitable acres within these areas, as well as projected harvest, would occur outside of roadless areas.

Table 3.3-22
Acres of Suitable Young Growth and Estimated Harvest within Tongass 77 Watersheds and TNC/Audubon Conservation Priority Areas

	Alternative					
Harvest Type	**1**	**2**	**3**	**4**[1]	**5**	**6**
Suitable YG	55,500	58,800	59,000	59,200	60,100	61,300
Increase in Suitable YG Relative to Alt. 1	0	3,300	2,700	3,700	4,600	5,700
Estimated YG Harvest over 100 years	47,300	48,400	48,100	48,200	48,700	49,200
Increase in YG Harvest over 100 years	0	1,100	800	900	1,400	1,900

[1] Includes Timber Priority areas within Alternative 4 ARAs.

Suitable young growth in T77 watersheds and TNC/Audubon Conservation Priority Areas would not increase much between the alternatives, with increases relative to Alternative 1 ranging from about 2,700 acres (5 percent) under Alternative 3 to about 5,700 acres (10 percent) under Alternative 6 (Table 3.3-22). Increases in estimated harvest over 100 years range between 800 and 1,100 acres (about 2 percent) under Alternatives 2 through 4 and between 1,400 and 1,900 acres (3 to 4 percent) under Alternatives 5 and 6.

All action alternatives would allow young-growth harvest in T77 watersheds and TNC/Audubon Conservation Priority Areas outside of designated roadless areas. Relative changes from current plans for all alternatives are slight and spread over a 100-year period resulting in no substantial change or differences among alternatives to fish resources. Further, the Record of Decision on the 2016 Forest Plan calls for a 5-year internal scientific review in collaboration with stakeholders to assess impacts resulting from young-growth harvest in these high-value areas.

Alternative Summary

While more suitable harvest acres would be open among the action alternatives than are currently available, none of the alternatives propose to increase harvest over the existing Forest Plan. While some of the metrics that have potential to cause adverse effect to fish and their habitat (e.g. road miles, road crossing of streams, total harvest acres) may slightly increase, their quantity is not expected to change substantially among any of the alternatives. Additionally, while there are minor differences among the alternatives, the overall risk to fish resources and watersheds is unlikely to be large or differ from current Forest Plan projected conditions. None of the alternatives would change Forest Plan LUDs or Forest Plan standards and guidelines developed to protect fish and their habitat.

Overall effects to fish habitat are expected to be minimal under all alternatives, because of the strong protections to fish habitats provided by Forest Plan LUDs, Forest-wide standards and guidelines including the riparian management strategy, and the lack of old-growth harvest or associated road construction allowed in the T77 watersheds and TNC/Audubon Conservation Priority Areas. Localized effects on fish habitat may occur, but these are expected to be minimal overall with low long-term risk. Any potential site-specific effects will be addressed under separate site-specific NEPA analysis, as this assessment will not authorize any site-specific actions.

Alternative 1: This alternative would have the lowest potential harvestable acres, the lowest number of new and rebuilt roads constructed, and likely the lowest number of new and reconstructed stream crossings of any alternative. However, these numbers are not substantially different than the other alternatives. All stream crossings increase risks to fish passage, and new crossings have a greater risk of sediment effects. Given that the expected number of new and reconstructed stream crossings under this alternative would be similar to other alternatives, there would be an overall similar risk of sediment addition and passage issues to other alternatives.

Alternative 2: The opening of roaded roadless areas would allow access to more acres of second-growth forest areas than under current conditions in areas that already have roaded systems. However, there would not be a substantial difference in harvest volume, road building or road reconstruction compared to Alternative 1. While young-growth harvest could potentially increase in key TNC/Audubon Conservation Priority Areas and T77 watersheds in formerly roaded roadless areas, the amount of overall potential harvest area added would not be substantial. Overall, the risk of adverse effects to fish or their habitat relative through future actions would be similar to that under the current Forest Plan (Alternative 1). Compared to the Alternatives 4 through 6, Alternative 2 would be more protective to fish resources within T77 watersheds and TNC/Audubon Conservation Priority Areas, and some additional sockeye watersheds, because it is the most restrictive on timber harvest and road building by designating nearly all of these lands within ARAs as Watershed Priority (about 3.25 million acres) with the remaining areas designated LUD II Priority (about 856,000 acres) or Roadless Priority (8,700 acres).

Alternative 3: This alternative would open more areas to harvest and slightly increase road miles compared to Alternatives 1 and 2. The number of new road miles and road crossings would increase slightly (see *Transportation* section) relative to Alternatives 1 and 2 but overall harvest would not. While different areas may have harvest occurring and some additional roads may be constructed compared to the current Forest Plan, the change would be minor, and effects would be similar for fish, fish habitat, and watershed conditions as under Alternative 1. Like Alternative 2, Alternative 3 would be protective to fish resources within T77 watersheds and TNC/Audubon Conservation Priority Areas, and some additional sockeye watersheds, because it is the most restrictive on timber harvest and road building by designating nearly all of these lands within ARAs as Watershed Priority (3.21 million acres) with the remaining acres designated as Roadless Priority (24,000 acres).

In addition to designating T77 watersheds and TNC/Audubon Conservation Priority Areas within ARAs as Watershed Priority, Alternative 3 would also add protection to these areas outside of ARAs through the roadless regulation. Specifically, old-growth timber harvest would be prohibited, subject to exceptions (Table 2-2) within T77 watersheds and TNC/Audubon Conservation Priority Areas outside of ARAs. Thus, the old-growth harvest prohibition would be extended beyond the designated` roadless area boundaries in order to maintain the balance and integrity of the watershed protection system. A prohibition on old-growth harvesting already exists through the Forest Plan, but Alternative 3 would include this prohibition in regulation. Young-growth timber harvest outside of ARAs within these areas would be allowable, as it is currently. This would apply to about 507,000 acres outside of roadless areas.

Alternative 4: This alternative has the potential to add more roads in roadless areas beyond roaded roadless logical extensions into old-growth areas and has a slight increase in overall new road miles constructed than Alternative 3 but similar to Alternatives 5 and 6. While a potential slight increase in roads and potential harvest areas with associated effects to streams could occur, with the current project harvest remaining unchanged, harvest and road building in these areas would only occur, with minor exceptions, with an associated reduction in roads and harvest in other areas. Thus, there would be similar effects to fish and their habitat, though possibly in different areas, as under Alternative 1.

Alternative 4 would be slightly less protective to fish resources within T77 watersheds and TNC/Audubon Conservation Priority Areas than Alternatives 2 and 3, designating most roadless areas within these lands Roadless Priority (about 3.2 million acres) or LUD II Priority (about 140,000 acres) ARAs. Forest Plan requirements would still apply, including the prohibition on old-growth harvests within these areas. However, there would still only be a slight potential increase in roads and essentially no change in harvest amount, so effects to fish and their habitat would be similar to current plan conditions over the Tongass.

Alternative 5: This alternative removed all regulatory roadless designation, and related restrictions, in development LUDs. This alternative has the potential to add more roads in currently roadless areas beyond the roaded roadless and logical extensions into old-growth areas accessible and has a slight increase in overall new road miles compared to Alternative 3 but similar to Alternatives 4 and 6. While a potential slight increase in roads and potential harvest areas with associated effects to streams could occur, with the current project harvest remaining unchanged, harvest and road building in these areas would only occur, with minor exceptions, with an associated reduction in roads and harvest in other areas. Thus, there would be similar effects to fish and their habitat, though possibly in different areas, as under Alternative 1.

Alternative 5 would be less protective to fish resources within T77 Watersheds and TNC/Audubon Conservation Priority Areas than Alternatives 2 and 3 because it is moderately restrictive on timber harvest and road building in these areas, designating these lands as LUD II Priority (about 136,000 acres) and Roadless Priority (about 2.1 million acres) ARAs.

Alternative 6: This alternative removes all designations of roadless areas on the Tongass. This alternative has the potential to add more roads in currently roadless areas beyond the roaded roadless and logical extensions into old-growth areas accessible and has a slight increase in overall new road miles compared to Alternative 3 but similar to Alternatives 4 and 5. While a potential slight increase in roads and potential harvest areas with associated effects to streams could occur, with the current project harvest remaining unchanged, harvest and road building in these areas would only occur, with minor exceptions, with an associated reduction in roads and harvest in other areas. Thus, there would be similar effects to fish and their habitat, though possibly in different areas, as under Alternative 1.

Alternative 6 would be less protective to fish resources within T77 watersheds and TNC/Audubon Conservation Priority Areas than Alternatives 2, 3, and 4 because it is not restrictive on timber harvest and road building in these areas, removing all regulatory roadless designations. Forest Plan requirements would still apply, including the prohibition on old-growth harvests within these areas. However, there would still only be a slight potential increase in roads and essentially no change in harvest amount, so effects to fish and their habitat would be nearly identical to current plan conditions over the Tongass.

Special Status Species Assessments

Threatened and Endangered Species

As stated in the *Affected Environment* section, there are six Chinook salmon, two sockeye salmon, one coho salmon, two chum, six steelhead, and one green sturgeon evolutionarily significant units/DPSs that are federally ESA listed that may be present in waters potentially affected by project alternatives.

No ESA-listed stocks of salmon or steelhead originate (spawn) in Alaska streams. Listed species and stocks originate in freshwater habitats in Washington, Idaho, and Oregon. Some of these listed species migrate into marine waters off the coast of Alaska. While distribution of these stocks is primarily in outer coastal waters, some are occasionally present in the inner waters of Southeast Alaska and they may feed on prey resources originating within marine and estuarine waters of the Tongass.

The southern DPS of the green sturgeon is rarely present in Southeast Alaska waters. Most are believed to stay south, but some could be present in the inside waters of Southeast Alaska, particularly during the fall and winter. They migrate south again in spring (Lindley et al. 2008). The adults live in nearshore waters typically less than 100 meters deep (Lindley et al. 2008). Based on their regional and seasonal distribution, they would be uncommon in nearshore areas where potential project actions may have some effect.

The concern for ESA fish species would be those activities that affect the nearshore marine and marine environments. Beach and estuarine fringe timber harvests under the 2016 Forest Plan have a chance of affecting nearshore habitat that may supply prey resources to listed salmon, steelhead, or green sturgeon. Currently, there are about 17,000 miles of shoreline in the Tongass lands, and about 500 miles have past harvest. A small subset of these areas would be harvested over a 100+-year period under all alternatives. The Roadless Rule alternatives would not substantially or measurably change the quantity of these areas potentially affected. Nearshore marine bottom disturbance to intertidal and subtidal habitats could be caused by nearshore log yarding, vehicle travel on beaches, log rafting, and log loading and yarding vessel anchorage and associated activities. Sediment runoff to streams from land-based activities could have some effects to nearshore marine habitat where these species may be present. Site-specific nearshore marine habitat-disturbing actions, or any other ground-disturbing action, are not authorized under the considered alternatives of the Roadless Rule alternatives. Thus, the considered actions of the Roadless Rule alternatives would not have adverse effects to any of the listed species addressed in this section from potential nearshore marine disturbance or upslope activity.

These actions' effects to listed fish were considered in the 2016 Forest Plan Amendment EIS which included informal consultation and NMFS concurrence with effects determinations. Biological Assessments prepared for the 2016 Forest Plan, and their determinations, represent the baseline condition (no action). There would be no change from the baseline condition under any of the Alaska Roadless Rule alternatives because, while there would be more acres potentially available for harvest with each of the Alaska Roadless Rule action alternatives the Alaska Roadless Rule would not cause changes in projected harvest amounts or otherwise result in effects to ESA listed species. Thus, there would be no effect (no change from baseline) under any Alaska Roadless Rule alternative. Further, future projects that could be implemented would still be required to adhere to Forest Plan requirements and would be subject to ESA consultation if there would be effects to listed species and/or critical habitat.

Any proposed actions indirectly resulting from the considered alternatives will be evaluated on a case-specific basis as to their effects to listed species. This may include formal or informal consultation with NMFS at the time of project-specific evaluations.

The proposed federal action and the adoption of any of the action alternatives resulting in changes to the roadless rule for Alaska are not the source of causation for any potential effects to threatened or endangered fish species or designated critical habitat and will have no effect to listed species or designated critical habitat.

Sensitive Species

There are no aquatic sensitive species on the Tongass.

Cumulative Effects

General

The effects of the alternatives on fish resources may be influenced by other actions occurring in the project area. Appendix B provides a list of past, present, and reasonably foreseeable actions considered for cumulative effects and indicates which of these interact with aquatic resources affected by the Forest Plan alternatives.

The main factors affecting fish are related to land development actions that occur regionally. This primarily includes other timber harvest-related actions on non-NFS lands, especially associated roads. The total lands within the Tongass boundary, which includes all NFS lands and other non-NFS lands, is about 17.8 million acres. Of this, only about 6 percent (1.1 million acres) are non-NFS lands. However, development actions on these non-NFS lands, which include most cities and towns in Southeast Alaska, are moderately intense.

Cumulative effects to fish resources include those actions that affect water and watershed resources, such as the development of roads. Generally, overall average road density, which is an indicator of potential adverse sediment effects to streams, is expected to increase markedly on non-NFS lands, but across the region would only increase slightly over 100 years (see USDA Forest Service 2016b, *Water* section) under the current Forest Plan and would not change from this estimate among the alternatives (Table 3.3-23).

Table 3.3-23
Estimated Average Total Road Density on Tongass NFS Lands and Non-NFS Lands within the Tongass National Forest Boundary by Alternative over 100+ years[1]

	Road Density as Miles/Square Mile		
Alternative	Road Density on NFS Lands	Road Density on Non-NFS Lands[2]	Total Road Density All Lands
Existing	0.19	2.30	0.32
Alternative 1	0.23	3.60	0.44
Alternative 2	0.23	3.60	0.44
Alternative 3	0.23	3.60	0.44
Alternative 4	0.23	3.60	0.44
Alternative 5	0.23	3.60	0.44
Alternative 6	0.23	3.60	0.44

[1] Assumes full implementation of Forest Plan at PTSQ levels plus future non-NFS harvest. Includes adjusted roads miles estimated to be needed to harvest all scheduled timber in the alternative.
[2] Assumes an estimated increase in non-NFS road miles within the Forest boundary from 4,054 miles at present to 6,346 miles after 100 years.
Source: Tongass National Forest GIS layer, 2018, and modeling of alternatives.

Effects on fish resources are less directly tied to the amount of timber harvest than to roads, but harvest may affect fish through effects to water quality, riparian condition, and where the harvest occurs, as discussed under *Effects*. Existing conditions include retention of 86 percent of the original productive old-growth forest inside the Forest boundary and 95 percent of the land area remaining undisturbed from direct timber harvest (USDA Forest Service 2016b, *Water* section Table 3.4-10). Overall, the cumulative effects to fish relating directly to quantity of timber harvest would be about 82 percent of the original productive old growth on all lands within the Forest boundary under the current Forest Plan in the future and would be unchanged by any Alaska Roadless Rule alternative.

While some local regions may have fish resources affected where watershed harvest levels and road density are high under the current Forest Plan, additional affects from any Roadless Rule alternative would not occur. Protections on non-NFS lands for stream buffers would be less but roadless alternative actions would not likely change cumulative effects to fish resources in these. There would be no

difference in cumulative effects among the Alaska Roadless Rule alternatives and these cumulative effects would be unchanged from those disclosed in the 2016 Forest Plan Amendment EIS. Again, effects of harvest activities on fish resources would ultimately be considered at the project-specific levels, ensuring minimal adverse cumulative effects.

Climate Change

Climate change is one factor that has some unquantifiable potential to affect fishery resources on the Tongass. In general, climate changes could affect stream temperature, snow accumulation and precipitation, stream flow and peak stream flow, and ocean water levels. The effects to fish resources in the Tongass from these changes would be both positive and negative and would vary by species, life stage, and location. Higher temperatures are expected in the winter months, with greater precipitation increases expected in winter and fall (EcoAdapt 2014). With warmer temperatures, much of the precipitation that currently is snow would fall as rain. The result would be higher peak flows in the winter and fall in most streams, and, even with increased precipitation, lower summer flows primarily in snowmelt- and rain-fed dominated basins, which would include most major fish-producing systems in Southeast Alaska (Shanley and Albert 2014; Shanley et al. 2015).

Higher stream temperatures would result in faster egg development and emergence of fry. This may affect when fish out-migrate to the ocean, which may have negative consequences (Heard 1991; Salo 1991). Elevated temperatures, however, may result in faster fish growth in these typical cool water streams of Southeast Alaska, which could be positive. If temperatures increase too much, fish may suffer indirect effect such as insufficient food supply to maintain growth even for temperatures well below physiological stress. Elevated temperatures may also increase the rate of predation on juvenile fish by other fish species (e.g., cutthroat trout and Dolly Varden char). Elevated temperatures in late summer or fall could also affect adult salmon survival and reproductive success (Bryant 2009). Changes in temperature could also affect life stage development possibly affecting whether fish out migrate or remain as resident fish (Kendall et al. 2015; Pearce et al. 2009).

Changes in flow could also have positive and negative effects. Higher flows in the winter may increase overwintering habitat for fish such as juvenile coho salmon, while high flows at this time could also scour streams beds affecting fish redds and habitat (Shanley and Albert 2014; Bryant 2009). Increasing precipitation in the winter likely increases the risk of landslides and debris flows that may enter streams (Bryant 2009). Areas that historically received precipitation as snow may get more as rain as estimated for climate change. Many species of Pacific salmon have adapted to high flows by selecting coarser spawning substrate (depending on species size) and locations away from the channel center (May et al. 2009). Sloat et al. (2016) modeled the likely effects of future flow changes from climate change on spawning conditions in Southeast Alaska. They noted that median annual average flood flows would increase by 28 percent by 2080. The estimated effects on habitat varied by watershed and stream morphology–specific conditions.

Climate change could also result in sea-level change. This sea-level rise could inundate estuarine rearing areas for fish. Stream mouth areas of some low-gradient small streams, which are used by some rearing fish including coho salmon, could also be inundated with salt water if sea-level rises were substantial. Pink and chum salmon in some areas spawn in intertidal regions, which could be affected with sea-level rise. Current predictions are for a sea-level rise of 1.3 to 2.1 feet by 2081-2100 (Shanley et al. 2014). However, the Southeast Alaska land mass is rising in many areas; due to isostatic rebound from past glaciers, sea level in Southeast Alaska is decreasing by as much as about 3 centimeters/year (1.2 inches/year) (Larsen et al. 2005). Some areas, particularly in northern Southeast Alaska, may rise 1 to 4 feet over the next century (Kelly et al. 2007). This rate of land rebound increase would likely offset sea-level rises over most of the Tongass shorelines. Thus, overall effects on estuarine areas, coastal stream mouths, and fish stocks would vary considerably, and changes are difficult to predict and may even be difficult to detect.

In summary, there is general agreement that the climate is warming, precipitation will increase, and flows will increase in the fall and winter but decrease in summer in snow- and rain-dominated watersheds. However, there is uncertainty surrounding specific predictions and even more uncertainty regarding the effect of these changes on resources including fish. The cumulative effects of climate change are not clear but some of the changes could be detrimental to fish resources.

Other Important Issues

Climate and Carbon

Affected Environment

Climate

The Tongass National Forest occupies an archipelago and a narrow strip of the mainland between the Pacific Ocean and the crest of the coastal mountains. The configuration of the coastline, the warm Japanese ocean current, and the high coastal mountains combine to produce a cool, wet environment. Precipitation at sea level in Southeast Alaska ranges from 30 inches per year at Skagway to 220 inches per year at Little Port Walter, with precipitation rates increasing with elevation. Average annual precipitation can be as high as 400 inches on the mountains of southern Baranof Island and about 260 inches over the Juneau Icefield. Southeast Alaska has complete cloud cover approximately 85 percent of the year. Snowfall varies according to elevation and distance inland from the coast. October is generally the wettest month. May through July are on average the drier months. The Pacific maritime influence holds the daily and seasonal temperatures within a narrow range. Temperatures average 28 degrees Fahrenheit (°F) in the winter and 52°F in the summer. During the warmer months, temperatures are highest inland and lowest along the coasts, while in the colder months, the reverse is true. Storms and moderate to heavy precipitation occur year-round, but occurs most commonly in early fall. The abundant moisture supports an extensive temperate rain forest and feeds numerous streams, rivers, and lakes, which in turn provide valuable fish habitat.

Climate Change

Southeast Alaska experiences considerable year-to-year and decade-to-decade variability in its weather, associated with large-scale shifts in ocean temperatures, salinity levels, and ice conditions (as described in the 2016 Forest Plan Amendment EIS [USDA Forest Service 2016a]). However, Southeast Alaska's climate has shown a strong warming trend since the middle of the 19th century (i.e., the end of the Little Ice Age), as has much of the Northern Hemisphere (Parson et al. 2001; Sullivan et al. 2015; Markon et al. 2018). A portion of this change in Southeast Alaska's average temperature is likely the result of the natural changes in the earth's climate, which are caused in part by "wobbles" in the earth's rotation around the sun resulting in changes to earth's position within its elliptical path (i.e., the precession of equinoxes) as well as the Pacific Decadal Oscillation (as described in the 2016 Forest Plan Amendment EIS [USDA Forest Service 2016a]). However, recently (in geological terms) humans have contributed to the acceleration of natural climate change on a global level through multiple activities such as the burning of fossil fuels, which have released greenhouse gases (GHGs) into the environment, as well as reducing natural carbon sinks (Intergovernmental Panel on Climate Change [IPCC] 2014; USDA Forest Service 2015d; Markon et al. 2018). The potential impacts of accelerated global climate change on the ecosystems of Southeast Alaska may include acidification of ocean waters; increasing the temperatures of ocean and streams; altering water input sources; changing precipitation rates and patterns; increasing the rate of glacier retreat; increasing storm intensities; altering ecosystem composition and structure; altering species distributions; and altering fire regimes (Wolken et al. 2011; EcoAdapt 2014; Shanley et al. 2015; Markon et al. 2018).

The impacts of climate change have been, and will likely continue to be, more pronounced in the most northern and southern regions of the globe. Alaska, which is located farther north than any other U.S. territory or state, has experienced an increase in annual temperatures at twice the rate of the rest of U.S. (Haufler et al. 2010; Chapin et al. 2014; Markon et al. 2018). Alaska's annual average temperatures have increased by 3.4°F over the last 50 years, with an increase of 6.3°F in average winter temperatures (Haufler et al. 2010; Chapin et al 2014; U.S. Environmental Protection Agency [EPA] 2014a). The average number of snow-free days has also increased in Alaska by about 10 days (Chapin et al. 2014). The observed changes to the climate in Southeast Alaska have resulted in modifications to ecosystem processes and ecosystem services on the Tongass. For example, the warmer summers have led to

longer growing seasons for trees and other vegetation, while warmer winters have resulted in more insect outbreaks, plant diseases, and population declines for some plant species.[22] The warming trend has also reduced snowpack in low-elevation areas, which may be contributing to ongoing yellow-cedar decline.[23] Drier summers may have also contributed to the number and duration of low stream-flow episodes, which can have adverse effects on salmon while warming of some watersheds may increase productivity for some fish populations (EcoAdapt 2014). The increase in the amount of precipitation falling as rain instead of snow since the 1970s has reduced the frequency of low- and moderate-elevation avalanches, which has allowed mountain hemlock to colonize some alpine areas (EcoAdapt 2014; Shanley and Albert 2014). Furthermore, although Alaska has not yet experienced the same extensive rate of establishment by invasive plant species that has historically occurred in the rest of the U.S., the current and predicted milder winter temperatures and the longer growing season in Southeast Alaska have created opportunities for the spread and establishment of invasive plant species within this region (Bauder and Heys 2004; McKee 2006; Wolken et al. 2011).

The ongoing changes to Alaska's climate, as well as to the temperate forests in this region, can have global consequences. For example, recent data show that the melting of glaciers and ice sheets in Alaska has contributed more to the global increase in sea levels over the past 50 years than any other glaciated region that has been measured, with the exception of the Greenland and Antarctic ice sheets (Wolken et al. 2011; Chapin et al. 2014). The coastal-temperate forests in Southeast Alaska comprise approximately 10 percent of Alaska's total forests and 19 percent of the world's coastal-temperate forests (Wolken et al. 2011). Although these coastal forest types are confined to a relatively small footprint globally (covering less than 0.5 percent of the earth's total forested area), they play a critical role in the delivery of dissolved organic carbon to coastal oceans (Wolken et al. 2011). In addition, these forests currently take up and store large quantities of carbon relative to most forest types in higher latitudes (DellaSala 2014; DellaSala 2016; Law 2014). As a result, Southeast Alaska plays a role in the global climate and carbon cycle; however, the recorded and projected increases in temperature and precipitation in the region can have both positive and negative effects on these forests ability to sequester carbon (Parks 2013; Markon et al. 2018; see further discussion in the "Carbon Sequestration" subsection below).

Climate Models

There are several models that examine the potential future climate conditions and/or trends in Alaska's climate. Most models suggest warmer, wetter conditions for Alaska. They generally project that rainfall may increase and snowfall may decrease at lower elevations in Southeast Alaska over the next 50 to 100 years (Bonsal and Prowse 2006; SNAP 2013; Markon et al. 2018). The Scenarios Network for Alaska & Arctic Planning (SNAP) developed a model for climate projections in Southeast Alaska (SNAP 2013 as cited in EcoAdapt 2014). SNAP's projections suggest that mean winter temperatures in Southeast Alaska may increase by an additional 1.8 to 6.3°F (or 1 to 3.5 degrees Celsius) by the year 2050 (SNAP 2013 as cited in EcoAdapt 2014). Their model also suggests that precipitation levels may increase in all seasons, with winter precipitation potentially increasing by 5 to 15 percent by 2050. The most recent synthesis for the National Climate Assessment (by the NCA4 Alaska Chapter team), presented annual average temperature increases for Southeast Alaska for the end of the 21st century ranging from 4 to 6°F under a lower GHG emission scenario to 6 to 10°F under a higher scenario (Markon et al. 2018).

The effects that these changes in temperature and precipitation levels would have on local conditions would vary, with the increased precipitation potentially resulting in increased snow occurring at higher elevations where temperatures remain below freezing. Lower elevations could experience a shift from snow to rain and a decrease in snowpack as the lower elevations warm and the number of days with below freezing temperatures decrease (SNAP 2013 as cited in EcoAdapt 2014; Markon et al. 2018).

[22] In 2014, Alaska Region Forest Health Protection surveyed 4.5 million acres of the Tongass National Forest and mapped 51,000 acres of insect and disease damage. The most widespread damage type was recorded for yellow-cedar (which had a decline of about 19,600 acres), followed by 12,000 acres of spruce defoliation. Seventeen other infestation/damages were mapped, most notably cottonwood defoliation, hemlock sawfly, and general conifer defoliation (Heutte, pers. comm. 2015).

[23] Almost 585,000 acres of yellow-cedar decline have been mapped in Alaska through aerial detection surveys since the surveys began in the late 1980s, with extensive mortality occurring in a wide band from the Ketchikan area to western Chichagof and Baranof Islands (USDA Forest Service 2015d).

Carbon Sequestration

Forests both take up carbon dioxide and release it into the atmosphere. Forests are dynamic systems that naturally undergo ebbs and flows in carbon storage and emissions as trees establish and grow, die with age or disturbances, and re-establish and regrow. Management activities, such as timber harvests, tend to approximate and promote natural processes that would also release carbon to the atmosphere. Many management activities initially remove carbon from the forest ecosystem, but they can also result in long-term maintenance or increases in forest carbon uptake and storage by improving forest health and resilience to various types of stressors. Carbon can also be transferred and stored outside of the forest system in the form of wood products, further influencing the amount of carbon entering the atmosphere. Wood fiber can substitute for products that generate more GHG emissions to produce, such as concrete and steel, and it may be used as a renewable energy source ("substitution effect"). Substitution of wood for fossil fuel–intensive materials and energy can lower net carbon emissions.

Carbon, primarily in the form of carbon dioxide, is one of the major GHGs released into the atmosphere through both natural and anthropogenic (i.e., human-driven) influences (McPherson and Simpson 1999; IPCC 2014). Recent changes to the global carbon cycle, driven in large part by human activities, have been cited as the leading cause of global climate change and the general global warming trend that has been detected (IPCC 2014, 2018). Forests worldwide contribute greatly to the global carbon cycle by taking up and storing about 1.4 billion metric tonnes of carbon every year (McKinley et al. 2011), and forests already store over one trillion metric tonnes of carbon[24] in plants and soil (Domke 2018). Forest management can play an important role in moderating the amount of carbon dioxide that enters and leaves the atmosphere (Ryan et al. 2010; McKinley et al. 2011; Skog et al. 2014).

The Tongass contains almost 10 million acres of forest land. About 5.5 million of these acres are considered to be productive forest land. The Tongass stores more forest carbon than any other national forest in the United States (Barrett 2014), due to its very large size and high density of carbon. As such, an important ecosystem service sustained by this forest is carbon uptake and storage (i.e., the removal of carbon dioxide from the atmosphere and storage of it in live or dead biomass as well as organic soil matter). This makes the Tongass, along with forests worldwide, an important component in the global carbon cycle (DellaSala 2014; Law 2014).

Carbon Storage in Soils

Generally, the capacity of a forest system to take up and store carbon depends on the location (climate, disturbance), stand age, and species composition of the forest (Birdsey et al. 1993; McKinley et al. 2011). In some forests found in warmer climates, the accumulation of carbon can decrease overtime as the carbon stored in soils and dead vegetative materials are released through the process of organic decay, which includes biomass breakdown/decay and carbon release. A portion of the dead or decaying plant matter is eventually incorporated into the soil's organic and mineral layers within the Tongass where it accumulates and has varying degrees of recalcitrance (i.e., resistance to breaking down), decaying quickly or over centuries. The cool conditions on the Tongass produce a slower rate of decomposition compared with forests in warmer climates. Mature forests within the Tongass generally store considerable amounts of carbon in the soils. Although the soils of the Tongass currently store considerable amounts of carbon, D'Amore and Lynn (2002) note that numerous studies have shown that carbon stored in soils may be released to the atmosphere in the form of carbon dioxide or methane as the climate warms, and climate warming is expected to be relatively high in Southeast Alaska (see above). Harvest activities can modify this effect by increasing the amount of solar energy that is allowed to reach the ground while the forest regenerates following a harvest. In contrast, forest clearing can have a slight local cooling effect due to surface albedo (replacing the darker forest with more reflective open land, especially in winter when the ground is covered by snow). Davidson and Janssens (2006) noted that many factors can affect the sensitivity of soil decomposition rates to increased temperatures (e.g., the relative mix of organic to mineral substrates, soil moisture levels, as well as other biotic and abiotic conditions) and that not all soil types would be equally sensitive to increased temperature; however, D'Amore has indicated that the

[24] Carbon mass is used here, not carbon dioxide mass, because carbon is a standard unit and can easily be converted to any other unit. To convert carbon mass to carbon dioxide mass, multiply by 3.67 to account for the mass of the oxygen.

organic layers in the soil profile on the Tongass may experience increased decomposition rates if average temperatures were to increase (D'Amore et al. 2015; D'Amore 2016). Based on a synthesis of information from a wide range of recent studies, Conant et al. (2011) state that the impacts of climate warming on decomposition dynamics have not been resolved due to apparently contradictory results from field and lab experiments, most of which has focused on labile carbon with short turnover times. But the majority of total soil carbon stocks are composed of organic carbon with turnover times of decades to centuries. They conclude that important advances in understanding the temperature response of the processes that control substrate availability, depolymerization, microbial efficiency, and enzyme production will be needed to predict the fate of soil carbon stocks in a warmer world.

Carbon Storage Aboveground

Previous studies have been conducted to determine how much carbon is stored on the Tongass. Barrett (2014) examined the storage and flux of carbon in live trees, snags, and logs in the Tongass.[25] On the Tongass, growth and recruitment of live trees removed an estimated 760 pounds of carbon per acre per year on average from the atmosphere, but net change in live (aboveground) carbon mass was not significantly different from zero, with mortality and harvest estimated at 670 pounds of carbon per acre per year on average (Barrett 2014). Estimates were based on plot data measured in 1999-2003 compared with plots measured in 2004-2010. Including wilderness areas, aboveground live and snag carbon on the Tongass is estimated to be 601 (± 21) million U.S. tons[26] on an estimated 9.7 million acres of forest.[27] Some 233 million U.S. tons of this carbon are on lands that are legally excluded from timber harvesting, such as formally designated wilderness areas (Barrett 2014). Total carbon densities on unmanaged forests were estimated as 72 U.S. tons per acre, which comprised 7 percent logs, 13 percent snags, and 80 percent live trees. Carbon densities on managed forests were estimated as 45 U.S. tons per acre, which comprised 38 percent logs, 8 percent snags, and 54 percent live trees (Barrett 2014). On a per-acre basis, the Western hemlock and Sitka spruce forest types were found to have the highest amount of carbon (Barrett 2014). Using the per-acre values by forest types, and extrapolating to include wilderness areas, provides a rough estimate of about 650 million U.S. tons in aboveground tree carbon on the Tongass, equivalent to 2.4 billion U.S. tons of carbon dioxide (Barrett 2014).

To put this in perspective, an estimated 83,500,000 billion metric tons of carbon are stored worldwide, primarily in the oceans and marine sediment, based on United Nations estimates. In 2005, Heath et al. (2011) estimated that the carbon stored in the Tongass in all carbon pools (above- and below-ground live tree biomass, understory vegetation, standing dead trees, down dead wood, forest floor, and soil organic carbon to the depth of one meter) makes up about 11 percent of the carbon stored in the national forests of the United States. More recently, Smith et al. (2019) estimated that the Tongass portion of all stored carbon (all pools) in 2017 made up about 9 percent of the carbon stored in United States national forests. Leighty et al. (2006) estimate that between 6.4 and 17.2 million metric tons (0.2 to 0.6 percent) of stored carbon in aboveground carbon pools, net of subsequent regrowth, has been lost on the Tongass since timber harvest began in 1900 through 1995. For comparison, approximately 2,039 million metric tons of carbon dioxide (converts to approximately 556 million metric tons of carbon) were released to produce electric power in the United States in 2012 (U.S. Energy Information Administration [EIA] 2013). The total U.S. carbon dioxide emissions in 2017 (which includes the electric sector discussed above, as well as other sections such as industry, transportation, agriculture, and commercial/residential) were approximately 5,280 million metric tons of carbon dioxide (converts to approximately 1,439 million metric tons of carbon) (EPA 2019).

Mature forests on the Tongass National Forest likely store considerably more carbon compared to younger forests (within the individual trees themselves as well as within the organic soil layer found in mature forests). At the stand level, the rate of carbon uptake may decline and level off as forests reach older ages due to increases in mortality and subsequent respiration, although total carbon storage may

[25] A number of carbon pools and fluxes were not included in Barrett's report, including (1) carbon in non-forested lands, which includes alpine environments, wetlands, grasslands, and shrublands; (2) below-ground carbon, including roots, soils, and organic materials; (3) carbon in non-tree vegetation and litter within forest; (4) carbon in a few pools currently not measured by FIA, which includes stumps below 4.5 feet and dead saplings; and (5) carbon in forest lands in inaccessible wilderness.

[26] Conversions: 1 U.S. ton = 0.907 metric ton, 1 metric ton = 1.102 U.S. tons

[27] Note that this does not represent a complete accounting of stored carbon, as it does not take into consideration carbon stored in the soil, nor does it take into consideration the stored carbon present in the final products of the harvested timber.

continue to increase over time (Ryan et al. 1997; Pregitzer and Euskirchen 2004). However, this decline in the rate of carbon uptake may be slower and less pronounced than in other regions, given that decomposition rates in the Tongass are relatively lower. Furthermore, some studies have indicated that individual live trees can continue to accumulate carbon at increasing rates as they mature, thereby resulting in large amounts of carbon stored annually within mature trees (Stephenson et al. 2014).

Land Conversion

Important to the maintenance of this ecosystem service performed by the Tongass is the maintenance of its land base in forest. The largest source of GHG emissions in the forestry sector globally and within the United States is deforestation, defined as the removal of all trees on forested land to convert it to other land uses. Converting forest land to a non-forest use not only removes carbon from the forest, it inhibits future carbon uptake and storage indefinitely, because there is no regrowth. Since the mid-1950s, changes in land use have been minor in the Tongass. Development pressure for land use conversion in Southeast Alaska has been slight. This is true for the non-NFS lands as well.

Timber Harvesting

Timber harvesting and active forest management can affect a forest's ability to take up and store carbon. After a forest is harvested, it will eventually regrow and recover the carbon removed from the ecosystem in the harvest. In some cases, removing carbon from forests for human use can result in lower net contributions of GHGs to the atmosphere than if the forest was not managed, when accounting for the carbon stored in wood products, substitution effects, and forest regrowth (Skog et al. 2014; Bergman et al. 2014; McKinley et al. 2011), Skog et al. (2014) noted that harvesting forests with high biomass and replanting with new forests would reduce carbon stocks more in the near term than if the high biomass forest were retained. They also note that increasing harvest intervals for forests harvested prior to peak growth rates begin to decline (culmination of mean annual increment [CMAI]) would maintain higher carbon stocks over time. Several authors (DellaSala 2016; Janish and Harmon 2002) suggest that the amount of carbon lost initially due to harvesting might take 50 to 200 years to fully recover in the ecosystem. However, these estimates do not include consideration of harvested wood products and substitution effects, which would effectively reduce the initial impacts more quickly. The net effect of a timber harvest and active forest management action (i.e., amount of carbon released versus the amount stored) would depend on how the harvested timber was used (e.g., if it was used for durable timber products, paper, pulp, or biomass fuels), what substitute materials are available for construction purposes (i.e., non-wood materials), the amount of carbon emitted during harvesting activities, the amount of carbon emitted via decomposition of on-site wood and organic soil matter losses, and the influence of the harvested wood on timber markets elsewhere (McKinley et al. 2011; Jonsson et al. 2012).

Timber harvesting in Southeast Alaska peaked in the 1970s and 1980s, and harvest on the Tongass declined after that, especially after closure of two large pulp mills in the 1990s. Beginning in the 1980s logging increased on Alaska Native corporation and state lands. Approximately 474,000 acres of productive old growth have been harvested on the Tongass, almost entirely from the 1950s and more recent. This represents about 9 percent of the original amount of productive old growth and about 5 percent of all forest land on the Tongass. About 76 percent of these acres were harvested prior to 1990. Current harvest rates (since about 2006) were around 1,200 acres or less each year. The USDA Forest Service (Birdsey et al. 2019) estimated that the 2011 carbon storage on the Tongass was reduced by less than 0.3 percent by all disturbances (including harvest, insects, wind, and fire) during the period from 1990 to 2011. During this period, the harvest rate was approximately 5,100 acres of old growth per year. This result includes all non-soil ecosystem pools.

Forest carbon stocks on the Forest, including above- and below-ground, appear to be steady or increasing, even after the impacts of disturbances, increasing about 1.4 percent between 1990 and 2013 (USDA Forest Service 2015d). In the Alaska Region's baseline forest carbon assessment, the USDA Forest Service (2015d) concluded that, based on forest inventory data, total forest ecosystem carbon (in all seven ecosystem carbon pools) stored on the Tongass steadily increased from 2005 to 2013, adding about 4.6 million metric tons of carbon during this 8-year period. For context, another complementary report found that about 1.9 million metric tons of carbon were removed by timber harvests on the Tongass

over a recent and longer period (21 years) from 1990-2011 (Birdsey et al. 2019). Thus, when comparing these recent periods, carbon stocks were being added at a much greater annual rate (by more than 6 times) than what was removed from harvesting.

Other Disturbance Factors

Aside from timber harvesting, the only other disturbance factors of major importance on the Tongass have been windthrow and, to a lesser extent, insects; large windthrow events have occurred sporadically, but small windthrow disturbances are a common occurrence in Southeast Alaska forests. Land exchanges could be considered a disturbance factor as well. However, the lands involved are generally maintained as forests, possibly undergoing forest management.

Environmental Consequences

Indirect Effects

Climate Change / Carbon Sequestration

Implementation of any of the alternatives would be similar to how the Forest is managed today and would not convert additional forest land to non-forest uses. The largest source of GHG emissions in forest ecosystems globally and within the United States is deforestation, defined as the permanent removal of all trees on forested land to convert it to other land uses such as agriculture and residential development. Maintaining forest land is necessary to ensure carbon storage over time and to realize potential carbon benefits from management activities through regrowth. Forests would not be converted to other land uses but rather would be retained and managed to maintain a vigorous and healthy condition with a decreasing reliance on old-growth harvest and increased harvest of regenerated forest (young growth) over the next 15 years. Consequently, the alternatives would not result in major sources of GHG emissions relative to local, national and global emissions and can be important in maintaining forest carbon uptake and storage and other ecosystem services in the region.

The effects of implementing the Forest Plan under the nationwide Roadless Rule (i.e., the No Action Alternative) and the action alternatives on GHG emissions and climate change would likely be small although there is considerable uncertainty regarding these effects. For instance, there is uncertainty regarding long-term carbon release particularly because of the importance of how the wood is used (durable or nondurable products), the regrowth of young forests, and market dynamics related to substitution. Considering the alternatives in a global atmospheric carbon dioxide context, treatment levels would have a small contribution to GHG emissions and therefore would have a negligible effect on climate change. Because local GHG emissions mix readily into the global pool of GHGs, it is difficult and highly uncertain to ascertain the indirect effects of emissions resulting from these alternatives on global climate. There would be only negligible differences among the alternatives because the harvest levels and the mix of old growth and young growth to be harvested are expected to be very similar, and thus unaffected by implementation of the Alaska Roadless Rule. As a result, the alternatives would not differ in regard to their contributions to GHG emissions, changes in forest carbon stocks, carbon sequestration, or global climate change. Given the level of uncertainty in parameters related to the net contribution of GHGs, an attempt to quantify the evaluation would not provide a clearer understanding of potential effects.

This scope and degree of harvest effects would be similar and minor for all the alternatives, affecting an estimated 3.5 percent of the 9.7 million acres of forested land, 6 percent of all productive forest land, and less than 1 percent of productive old growth forests on the Tongass over 100 years (based on the assumption that harvest occurs at the Projected Timber Sale Quantity rate over the next 100 years). The average harvest rate over the next 100 years would be about 425 acres per year for old growth and 2,842 acres per year for young growth (with more old growth and less young growth in the early years and the opposite in later years), which is substantially lower than the harvest rate analyzed in the USDA Forest Service (Birdsey et al. 2018) disturbance report (discussed previously). In addition, timber harvests mostly affect aboveground carbon stocks (live woody vegetation), while carbon stored in the soils represents a relatively stable and long-lived carbon pool (McKinley et al. 2011; Domke et al. 2017), However, there is

growing evidence that carbon stored in soil is sensitive to global change effects, particularly land use histories, resource management, and climate (Domke et al. 2017).

Based on the fact that all of the alternatives would result in the same harvest volumes, effects are expected to be similar. Given the fact that the average harvest rate expected over the next 100 years is low by historical standards it is logical to assume that the rate of carbon loss due to disturbances would also be lower, because timber harvesting has been the dominant disturbance type (Birdsey et al. 2019). Further, given the maintenance of live tree carbon estimated on the Tongass by Barrett (2014) and the growth of total ecosystem carbon on the Tongass estimated by the USDA Forest Service (2015d) (both discussed previously) under the more intensive historical harvests, it is logical to assume that ecosystem carbon will continue to accumulate at the forest level, outpacing carbon removed due to the expected amount of harvesting under all alternatives.

Some assessments suggest that the effects of climate change in some U.S. forests may cause shifts in forest composition and productivity or prevent forests from fully recovering after severe disturbance (Anderson-Teixeira et al. 2013), thus impeding their ability to take up and store carbon and retain other ecosystem functions and services. An evaluation of the relative stability of biomes and the climate niche of dominant tree species on neighboring Chugach National Forest suggests that the Chugach Kenai Peninsula of Alaska are exceptionally resilient to expected changes in climate over the next 30 to 50 years (Hayward et al. 2017). However, there are considerable differences between the Tongass and the Chugach/Kenai assessment area and a comparable assessment has not yet been completed for the Tongass.

On the Tongass, yellow-cedar is one species that is already demonstrating effects of climate change on its distribution (Hennon et al. 2016). Based on plot data, Parks and Barrett (2013) noted that live-tree biomass in higher elevation ecoregions of the Alaska temperate rain forest increased by 7 to 8 percent between 1995 and 2008, western redcedar showed a 4.2 percent increase in live-tree biomass, and shore pine showed a 4.6 percent decrease. They concluded that continued warming in Alaska's temperate rain forest could lead to further biomass increases at higher elevations via faster growth, more trees, and uphill migration of tree species. However, there is considerable uncertainty in the long-term response of Tongass forests in terms of forest composition, especially because the forest trees of Southeast Alaska are so long-lived. Despite long-term changes in climate, there is no direct evidence to suggest that that regenerating rainforest on the Tongass will have a reduced capacity for carbon storage under future climate conditions.

Cumulative Effects

Climate Change / Carbon Sequestration

This section will address two issues: 1) the cumulative effects of the alternatives and other past, present, and reasonably foreseeable actions on climate change and carbon sequestration; and 2) the cumulative effects of climate change on the Forest Service's future management of the Tongass.

The extent and scope of cumulative effects on climate change and carbon sequestration depends on the amount and condition of total forest land harvested (worldwide, as well as locally within Southeast Alaska) and the use to which harvested wood is put, as well as the use of the land post-harvest and how the non-NFS lands are managed (including private and state-managed lands within the U.S., as well as forests in other countries). In addition, it depends on the amount of carbon released during harvest, processing, and transporting wood products and the decomposition rates of organic materials. Furthermore, it depends on factors such as the amount of new hydroelectric or other renewable energy power projects that are built (e.g., those that might replace diesel-generated power), future community expansion and development, and emissions from ongoing and future activities in the region. It is likely that most of the state and private commercial forest land in Southeast Alaska, except for state parks and some other state lands, would be managed for the production of forest products under any of the alternatives considered in this analysis. A noteworthy exception to this is the recent decision by Sealaska to set aside 165,000 acres of forested land in Southeast Alaska for 110 years to store, or bank, carbon (Sealaska 2018).

Potential initial negative effects on the Tongass may be ameliorated and may be completely reversed with time, reducing or eliminating potential negative cumulative effects on carbon and climate. Carbon emitted during the initial implementation of the management actions (e.g., harvest) would have a temporary influence on atmospheric carbon concentrations, because carbon would be removed from the atmosphere over time following management as the forest regrows. These net outcomes would be the cumulative result of forest regrowth, enhanced productivity of young stands, growth of older stands, growth releases from light thinning, carbon storage off-site in products (Tongass produces mainly saw logs for long-lived products), and substitution benefits of wood products and wood-based energy (IPCC 2007; McKinley et al. 2011; Keyser and Zarnoch 2012; Bergman et al. 2014; Skog et al. 2014). Also, over the longer term, the lower anticipated harvest levels associated with the Forest Plan are likely to result in the continued increase in forest carbon stocks and reduced carbon emissions to the atmosphere when considering the whole Forest, independent of which alternative is selected. The management mechanisms applied in all alternatives are consistent with internationally recognized climate change adaptation and mitigation practices identified by the IPCC. The IPCC recognizes a broader definition of the forest system (which includes the fate of carbon once it leaves the forest and use by society) and where various types of timber harvesting are among a suite of tactics to achieve short- and long-term carbon benefits (IPCC 2000, 2007).

Climate change could impact the resources currently managed by the Forest Service as well as how the Forest Service manages the Tongass in the future. While there is general agreement among scientists that the climate of Southeast Alaska is warming, there is considerable uncertainty concerning the exact scope of the effects of climate change on the forests of Southeast Alaska and how best to deal with possible changes to the many resources managed on the Tongass. A summary of the effects of climate change on Tongass resources is presented in the Climate and Air section of the 2016 Forest Plan Amendment EIS (USDA Forest Service 2016b). Because the effects of the alternatives on climate change are the same, this discussion is not repeated here.

The Forest Service will continue to work with local stakeholders and scientists to develop measures to alert the Forest Service to trends that may affect the health of the Forest and the species that depend on it, as well as measures that could be implemented to minimize or adapt to the effects of climate change on managed resources.

Karst Lands

Affected Environment

The geology and climate of Southeast Alaska are particularly favorable for karst development. Karst is a comprehensive term that applies to the unique topography, surface and subsurface drainage systems, and landforms that develop by the action of water on soluble rock in Southeast Alaska. The dissolution of the rock results in the development of internal drainage, producing sinking streams (streams that sink into the stream bed or karst features), closed depressions, sinkholes, collapsed channels, and caves.

Karst lands add a vertical, underground dimension to land use planning. Karst subsurface drainage networks generally operate independently of, and with more complexity than, the surface drainage systems above. On karst lands, the many solution-widened fissures at the surface become entry points into the subsurface drainage system, where water and sediment from surface sources move vertically downward into the underground lateral systems. Sediment and water from disturbed lands or roads may enter this system at a single point and emerge unexpectedly at one or more distant springs, sometimes crossing surface watershed boundaries.

Karst resources must be evaluated according to their vulnerability to land uses. Vulnerability mapping recognizes that some parts of the karst landscape are more sensitive than others to surface activities and groundwater contamination. These differences in vulnerability may be a function of the extent of karst development, the openness of the karst systems, and the sensitivity of other resources that benefit from karst groundwater systems. The vulnerability categories and their criteria are defined in the 2016 Forest Plan, Appendix H (USDA Forest Service 2016a). For projects that could affect karst, a four-step Karst Vulnerability Assessment is conducted that includes identifying potential karst lands, inventorying and characterizing karst resources in the project area, delineating karst hydrologic systems and recharge areas, and assessing the vulnerability of the karst terrain to management activities.

Applicable federal, state, and municipal laws, regulations, and policies that govern the management of karst include the Federal Cave Resources Protection Act (FCRPA) of 1988 (16 United States Code 4301-4309; 102 Stat. 4546), 36 CFR Part 290, 36 CFR part 261, Forest Service Manuals 2356 and 2880, and the Forest Plan (Karst and Cave Resources, Forest-wide Standards and Guidelines pp. 4-23 to 4-25, Plan Components for young-growth harvests on karsts pp. 5-5 to 5-6, and Appendix H).

Approximately 431,000 acres of karst underlies NFS lands inside the Tongass. Of these acres of NFS karst lands, approximately 278,000 acres were originally POG. Based on geographic information system (GIS) queries conducted for the 2016 Forest Plan Amendment EIS, about 82,000 of these POG acres (29 percent) have been harvested. Much of the karst land within development LUDs has been designated as high vulnerability karst land and is protected by standards and guidelines or included within geologic Special Interest Areas.

On the low to moderate vulnerability karst lands, where mineral or glacially derived soils fully or partially cover the epikarst, forest regeneration is exceptional. In these areas, even the complete loss of soil and litter from the surface of the limestone will not prohibit the re-establishment of a forest because the displaced surface materials are retained within the epikarst channels (Harding and Ford 1993).

Recent monitoring has shown that the karst and cave standards and guidelines outlined in Forest Plan ensure a high level of protection for significant caves and karst resources overall (USDA Forest Service 2015a). However, the Forest Service identified a need to amend the 2016 Forest Plan on lands identified as moderate vulnerability to provide greater flexibility in managing harvest to protect the karst resources based on site-specific conditions. The standards and guidelines for young-growth harvest on karst was amended in August 2020 to reduce the limitation on harvest.

Recent monitoring has shown that the karst and cave standards and guidelines outlined in Forest Plan were implemented to the fullest extent practicable, and through effectiveness monitoring have shown that they ensure a high level of protection for significant caves and karst resources overall (USDA Forest

Service 2015a). The standards and guidelines for young-growth harvest on karst was amended in August 2020 to reduce the limitation on harvest.

For additional information on the importance and sensitivity of karst, and the effects of past and current forest management practices on karst, see the 2016 Forest Plan Amendment EIS (USDA Forest Service 2016b, pp. 3-28 to 3-36).

Environmental Consequences

Indirect Effects

Potential effects from harvest that could occur under any of the alternatives could initially increase flow through karst systems after initial harvest in low and moderate vulnerability karst areas and subsequently (approximately 15 years post-harvest) decrease flow through these karst systems due to dense forest regeneration (Aley et al. 1993). Increase to turbidity and changes in water chemistry through the karst system could also occur due to these changes in flow (Aley et al. 1993). However, with implementation of the Forest Plan standards and guidelines, and site-specific mitigation measures (designed and implemented at the project level), the Forest Service expects to mitigate the effects of these activities.

None of the alternatives predict a PTSQ greater than the amount disclosed in the 2016 Forest Plan Amendment EIS (46 MMBF per year) nor would they result in a considerable difference in suitable acres on mapped low or medium vulnerability karst lands (estimated to range from 64,000 acres for Alternatives 1, 2, 3, and 4 to 65,000 acres for Alternative 5 and 6). Impacts to karst and cave resources would be based on site-specific proposals, which are currently unknown, and would be addressed in subsequent project environmental analyses. From a broad programmatic standpoint, the impacts to karst and cave resources from the proposed alternatives would be the same as disclosed in the 2016 Forest Plan Amendment EIS due to implementation of the Forest Plan standards and guidelines. Karst inventories and vulnerability assessments would continue to be required before timber harvest could occur on suitable lands under all alternatives.

No additional harvest is anticipated in any areas mapped as high vulnerability karst under any alternative because they are included in the existing Special Interest Areas and are not suitable for harvest. However, where commercial thinning is determined to be an appropriate treatment on high vulnerability karst lands, effects to karst will be addressed through project-specific prescriptions and analysis to ensure karst management objectives can be met.

Cumulative Effects

There are approximately 549,522 acres (859 square miles) of karst lands within the boundaries of the Tongass. Some 431,000 acres (674 square miles) are on NFS lands. Past timber harvest has affected the epikarst landscape on the Tongass. In some portions of the Tongass, 70 to 80 percent of the commercial forest land within specific karst blocks has been harvested. It is estimated that about 29 percent (82,239 acres) of the karst lands on NFS lands have been harvested (based on the GIS database). In addition, several hundred miles of authorized and unauthorized roads have been constructed on karst lands. All alternatives would allow additional future harvests and associated road building and reconstruction on karst lands to varying degrees. For example, the Central Tongass Project could authorize an estimated 3,100 to 3,500 acres of harvests on karsts along with roads. However, Forest Plan karst and cave management direction would be implemented so there should be no cumulative detrimental effect to karst and cave resources.

Baichtal and Swanston (1996) observed sediment deposits and waterline marks in underground systems that suggested that past timber harvesting had increased sediment and debris transport and flooding of underground passages, many of which had not previously flooded for centuries. These timber harvests were conducted prior to the Karst and Cave Resources Standards and Guidelines implemented in the 1997 Forest Plan. As a result, they had more significant effects on karst lands than current and future harvest activities. At that time, many cave entrances were filled or blocked by logging slash, sediment, and debris. Additional runoff generated from road surfaces commonly had been diverted into karst features. They also noted strong evidence of greatly increased surface runoff on karst landscapes and

adjacent surfaces after timber harvest, which increased sediment, nutrient, and debris transport capability of associated drainage networks.

Most easily accessible, low-elevation karst areas on Prince of Wales Island have been harvested. After the initial timber harvests, harvest activities concentrated on steeper, higher elevation karst landscapes characterized by shallower, excessively well-drained soils. Baichtal and Swanston (1996) suggested that trees were smaller and regeneration problems were greater on these steep, upper elevation sites. This condition possibly resulted from shallow soils with low nutrient availability, excessive drainage of surface and soil waters into subsurface karst systems, removal of much of the shallow soil because of inadequate log suspension, and continued desiccation of the soil once the protective forest canopy was removed. After timber removal, high rainfall rapidly transported fragile soils into the well-developed epikarst.

More recent monitoring of karst lands near harvested areas (USDA Forest Service 2015a) have confirmed that current timber harvest practices have adjusted substantially to accommodate Karst and Cave Standards and Guidelines. For example, karst resource input was provided for timber sales projects throughout the Tongass.

Extensive landscape changes and ground disturbance have occurred and are likely to continue to occur on non-federal lands in Southeast Alaska. These include timber harvest and road construction, mining, recreation and tourism, growth of human settlements, transportation projects, and energy and transmission projects. Forest Service regulations requiring protection of karst resources do not apply to non-federal lands.

Transfers of karst lands from NFS lands to other land managers or private owners could also occur under any of the alternatives through land adjustments (such as the Alaska Mental Health Trust Land Exchange). This type of future action could increase the amount of karst lands in Southeast Alaska that are not in a protected LUD.

The Forest Service identified a need to amend the 2016 Forest Plan. The amendment focused on Standard S-YG-KC-02 related to commercial timber harvest on lands identified as moderate vulnerability karst to provide greater flexibility in managing harvests to protect the karst resource based on site-specific conditions. The standards and guidelines for young-growth harvest on karst was amended in August 2020 to reduce the limitation on harvest.

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Sensitive and Invasive Plants

Affected Environment

Threatened, Endangered, Sensitive, and Rare Plants

Threatened and Endangered Plants

There are no federally listed or proposed threatened or endangered plants under the Endangered Species Act known to occur on the Tongass. The only federally listed or proposed plant in Alaska is the endangered Aleutian hollyfern (*Polystichum aleuticum)*, which is only known to occur on Adak Island and is not expected to occur on the Tongass. A petition to list yellow-cedar (*Callitropsis nootkatensis*) was filed with the U.S. Fish and Wildlife Service (USFWS) on June 24, 2014. The petition was subsequently determined not warranted on October 7, 2019 (84 Fed. Reg. 53336).

Alaska Region Sensitive Plants

Sensitive plants are those plants identified by the Regional Forester for which population viability is a concern on NFS lands within the region. The objective of the Forest Service Sensitive Species Program (Forest Service Manual 2600 [USDA Forest Service 1991]) is to ensure that species numbers and population distributions are adequate so that no federal listing will be required and no extirpation will occur on NFS lands. The Alaska Region Sensitive Species list, updated in 2009 (Goldstein et al. 2009), includes 18 plants designated as sensitive, 14 of which are known to occur on the Tongass and an additional 2 that are not known but are suspected to occur. The 16 sensitive plants known or suspected to occur in the Tongass are listed in Table 3.6-1 along with habitat and occurrence information. Our understanding of sensitive and rare plant distribution across the Tongass is limited because of the enormous size of the Tongass coupled with the fact that most botanical surveys are focused within planning areas for specific projects.

Rare Plants

The 2016 Tongass Land and Resource Management Plan (Forest Plan) defines rare plants as:

> "…those with potential conservation concerns on the Tongass National Forest. They may be common elsewhere; however, the edge of their range is known or suspected to be on the Tongass National Forest, or disjunct populations of the plant species occur on the Tongass National Forest."

The Alaska Natural Heritage Program (AKNHP) maintains a list of plants that are rare in Alaska. The AKNHP Rare Vascular Plant List was most recently updated in 2013. This list contains 126 vascular plants documented to occur on the Tongass.

Under the 2016 Forest Plan, rare plants have similar protection in the Forest-wide standards and guidelines as sensitive plants. The AKNHP Rare Vascular Plant List is used as guidance for determining which rare plants may be evaluated in the project-level analysis. Generally, plants with a state ranking of S1 (critically imperiled in state) or S2 (imperiled in state) are given consideration during project analysis. Plants with a state ranking of S3-5 are sometimes given consideration if they are known to be rare in a specific location on the Forest.

Table 3.6-1
Alaska Region Sensitive Plants Known or Suspected to Occur on the Tongass National Forest

Common Name (Scientific Name)	Habitat and Occurrences on the Tongass National Forest[2]
Eschscholtz's little nightmare (*Aphragmus eschscholtzianus*)	Grows in moist mossy areas, seeps, heaths, and scree slopes in subalpine and alpine areas. Suspected to occur in mountainous areas on the northern mainland of the Tongass, but has not been documented on the Tongass.
Spatulate moonwort (*Botrychium spathulatum*)	Habitat includes coastal forests, stabilized coastal dunes, upper beach meadows, well-drained open areas, alpine habitats, and riparian forests. In southeastern Alaska, populations are known from Kruzof Island (on lands managed by the State of Alaska) and one on Chichagof Island on the Tongass.
Moosewort (*Botrychium tunux*)	Grows on upper beach meadows, coastal dunes, stream, terraces, river bars, and subalpine and alpine slopes. Ten known occurrences on the Tongass; 8 on the Yakutat Ranger District, 1 on the Wrangell Ranger District, and 1 in the Admiralty National Monument.
Giant moonwort (*Botrychium yaaxudakeit*)	Grows on upper beach meadows, beach dunes, coastal outwash plains, abandoned fields, and roadsides. Six known occurrences on the Tongass, one on the Hoonah Ranger District, and five on beach meadows on the Yakutat Ranger District.
Macoun's thistle (*Cirsium edule* var. *macounii*)	Grows in moist to dry open meadows, open forests in the upper montane to lower alpine zone, on scree slopes and talus slopes, and along glacial streams and lakeshores. Two known occurrences on the Tongass, both on the Ketchikan Misty Fjords Ranger District.
Mountain lady's slipper (*Cypripedium montanum*)	Habitat includes upper beach meadows, areas along the beach-forest ecotone, open forests, muskegs, and wet meadows. Known from one population on the Tongass, on the Wrangell Ranger District.
Large yellow lady's slipper (*Cypripedium parviflorum* var. *pubescens*)	On the Tongass, grows in peatlands on calcareous substrates. Two known occurrences on the Tongass, both on northern Prince of Wales Island.
Calder's lovage (*Ligusticum calderi*)	Habitat includes alpine and subalpine meadows, boggy slopes, open mixed conifer forests, and rocky areas. There are 24 known occurrences on the Tongass: 23 on the Craig Ranger District and one on the Thorne Bay Ranger District.
Pale poppy (*Papaver alboroseum*)	Grows in open, well-drained areas, in rocky tundra of ridges and mountain summits, ash and cinder slopes, and sand and gravel of glacial outwash and river floodplains. Occasional disturbance can create or maintain habitat, including by humans (e.g., stabilized road sides, railroad trackbeds) can create habitat. Not known from, but suspected to occur on, the Tongass.
Lesser round-leaved orchid (*Platanthera orbiculata*)	Occurs in a variety of habitats including temperate, boreal, deciduous, and wetland forests. In Alaska, grows in low-elevation forested wetlands, medium to high volume old-growth hemlock forests with high bryophyte cover and red cedar, forest edges or near gaps in shady forests, near muskegs, open water, or boggy areas. This species is known from 285 occurrences on the Tongass, comprising 61 distinct populations.
Alaska rein orchid (*Platanthera unalascensis*)[3]	Habitat includes dry open sites, riparian areas, mesic meadows, drier areas in coniferous and mixed evergreen forests, and bogs and heath habitat from low to subalpine elevations. On the Tongass, generally grows in low-productivity forests at lower elevations in poorly drained soils. Known from 27 occurrences on the Tongass: 2 on the Ketchikan Misty Fjords Ranger District, 6 on the Sitka Ranger District, and 19 on the Thorne Bay Ranger District.
Kruckeberg's swordfern (*Polystichum kruckebergii*)	Habitat includes ultramafic rock outcrops. Known from nine occurrences: five on the Ketchikan Misty Fjords Ranger District and four on the Sitka Ranger District.
Lichen, no common name (*Ricasolia amplissima* (Scop.) De Not. Subsp. Sheiyi Derr & Dillman)[4]	Grows on trunks and main branches of Sitka spruce, Pacific crab apple (Malus fusca), and western hemlock in old-growth beach fringe forest. There are 30 known occurrences on the Tongass: 6 on the Petersburg Ranger District, 9 on the Sitka Ranger District, 13 on the Thorne Bay Ranger District, and 2 on the Wrangell Ranger District.
Unalaska mist-maid (*Romanzoffia unalaschcensis*)	Grows on ledges and crevices in rock outcrops and in gravelly areas along stream banks, often along coasts. Two known occurrences on the Tongass, both on the Thorne Bay Ranger District.

Table 3.6-1 (continued)
Alaska Region Sensitive Plants Known or Suspected to Occur on the Tongass National Forest[1]

Common Name (Scientific Name)	Range and Habitat2
Henderson's checkermallow (*Sidalcea hendersonii*)	Habitat includes wet meadows, estuaries, and tidal flats. On the Tongass, the one known population grows at the upper edge of an upper beach meadow near the edge of a hemlock and spruce forest. This population was located on the Juneau Ranger District; however, during surveys conducted in 2013 and 2017, the occurrence was not located.
Dune tansy *Tanacetum camphoratum* Less. (syn. = T*anacetum bipinnatum* (L.) Sch. Bip. Pro parte)[5]	Habitat includes upper beaches, sand dunes, and well-drained and calcareous soils. Known from seven occurrences on the Tongass, all on the Sitka Ranger District.

[1] Sensitive Plant list updated February 2009.
[2] Habitat and occurrence information based on: AKNHP 2018; Dillman 2004, 2008, 2011; Douglas et al. 1999; eFloras 2018; Goldstein et al. 2009; Nawrocki et al. 2013; USDA Forest Service 2012b, 2015e, 2019g.
[3] New taxonomy: Nawrocki et al. 2017.
[4] New taxonomy: Dillman et al. 2017; Cornejo et al. 2017
[5] New taxonomy: Carlson and Fulkerson 2018.

Invasive Plants

Executive Order 13112 (1999) defines an "invasive species" as a species that is 1) non-native (or alien) to the habitat under consideration, and 2) whose purposeful or accidental introduction causes or is likely to cause economic or environmental harm or harm to human health. This Executive Order directs all federal agencies to address invasive species concerns and refrain from actions likely to increase invasive species problems.

Invasive plants can negatively affect habitat by competing with native plants for resources such as water and light, establishing and changing the community composition, eliminating or reducing native plants, or changing the vegetation structure. The changes in community composition or vegetation structure can reduce native plant populations as well as negatively affect habitat for wildlife and fish. Compared to other states, Alaska has a low level of invasive plant infestations; however, invasive plant infestations within the state are increasing (Carlson and Shephard 2007; Nawrocki et al. 2011; Schrader and Hennon 2005).

Policy and guidance for managing invasive plants are provided by the Forest Service Manuals and Handbooks and Forest Service policy, including the Invasive Species Management Policy (Forest Service Manual [FSM] 2900), the *National Strategic Framework for Invasive Species Management* (USDA Forest Service 2013a), the Alaska Region Invasive Species Strategy (USDA Forest Service 2006), and the Tongass National Forest Invasive Plant Management Plan (Lerum and Krosse 2005). Additionally, the Tongass established an integrated weed management plan that includes manual and mechanical, as well as herbicidal, treatments of target invasive species on the Wrangell and Petersburg Ranger Districts (USDA Forest Service 2013b). FSM 2900 and Forest-wide standards and guidelines include direction to review proposed projects to determine the risk of introduction or spread of invasive plants and implement appropriate mitigation measures. They also include direction to control existing invasions and rehabilitate habitats impacted by invasive species.

Occurrences of invasive plants throughout Alaska are tracked by the Alaska Exotic Plants Information Clearinghouse (AKEPIC), a cooperative project between the Forest Service, State and Private Forestry, the National Park Service, U.S. Geological Survey, University of Alaska, and other federal, state, and local agencies. The AKEPIC database maintains a georeferenced inventory of Alaska's invasive plants (AKEPIC 2018). Additionally, all invasive plant surveys, invasive plant finds, and treatments are entered into the Forest Service's Natural Resource Information System (NRIS) georeferenced invasive species database (USDA Forest Service 2018i). As of January 2019, 125 species of invasive plants have been documented on the Tongass. The Forest Service database (NRIS-INVP) and associated map provides an estimate of the extent of infestations, as well as the locations of invasive species observed. Table 3.7-3 of the 2016 Forest Plan Amendment EIS (USDA Forest Service 2016b) lists the invasive plants known on the Tongass, the number of observations of each species, and their invasiveness ranking. At the time of

publication of the 2016 Forest Plan Amendment EIS, there were 23,386 documented observations of 124 different invasive plant species on the Tongass. Currently, there are 24,257 known occurrences of 125 invasive plant species known on the Tongass.

Environmental Consequences

This section compares effects of the six alternatives on sensitive, rare, and invasive plants. There would be no effects to threatened or endangered plants under any of the alternatives because none are known on the Tongass and changes to the Roadless rule are not the source of causation for any potential effects to threatened or endangered species.

The alternatives described in Chapter 2 differ in the locations and extent of land designated as roadless and the management categories designated for lands within roadless areas. None of the alternatives authorize any site-specific projects or other ground-disturbing activities; rather the alternatives describe exceptions under which certain activities might be allowed within roadless areas. Specific projects that include ground disturbance or timber harvest must undergo site-specific environmental analysis when they are proposed as required by the NEPA. Additionally, the activities must still comply with applicable standards and guidelines identified in Forest land management plans.

Activities allowed under the action alternatives would primarily affect productive old-growth and young-growth forest habitats. Although there would be effects on unproductive forest, non-forest or other vegetation types, as roads are constructed through many types of habitat, these effects would be more limited since these vegetation types would not be the focus of any future timber harvest and associated road construction.

Indirect Effects

Sensitive and Rare Plants

Effects Common to All Alternatives

Effects of future timber harvest and road construction on sensitive or rare plants could include physical damage by cutting, trampling, or crushing them with vehicles, other machinery, foot traffic, or felled trees. Severe impacts may cause mortality or inhibit the vigor and reproductive capability of the plants.

Indirect effects to sensitive or rare plants from timber harvest or road construction and reconstruction involves alteration of habitat, such as changes in sunlight or hydrology, herbivore or pollinator behavior, soil structure and fertility, vegetation structure, fragmentation of habitat, and competition from other native plants as well as invasive plants. Some indirect effects, such as changes in sunlight or hydrology, can be beneficial or harmful depending on the effect and the species' life history. Other activities likely to cause indirect effects to sensitive and rare plants include increased off-road vehicle use, increased access, and increased use and associated trampling by recreationists.

A BE is conducted as part of the site-specific environmental analysis for individual project proposals. This type of sensitive plant review is required to include sufficient detail to determine how any proposed action may affect each sensitive species. In addition, existing Forest-wide standards and guidelines would be applied to avoid or minimize impacts to those sensitive plants and their habitat.

As a part of a NEPA analysis, an effects analysis may also be conducted for rare plants; however, a formal BE is not required. All alternatives would continue to follow the current Forest-wide standards and guidelines for rare plants.

Effects Specific to Each Alternative

In general, alternatives that are less permissive of road construction would have less risk of adverse effects to sensitive and rare plants and alternatives more permissive of road construction would have more risk of adverse effects. New road construction would be similar under all alternatives because roads on the Tongass are largely developed in support of timber harvesting and the PTSQ under the 2016 Forest Plan does not vary between the alternatives. Thus, the predicted 1,000 new road miles on NFS lands over 100 years for the No Action alternative (Table 3.3-21) would be similar for all alternatives, with

minor variations. Under Alternatives 1 and 2, nearly 1,000 miles of new roads are estimated to be built on the Tongass over the next 100 years. Slightly more roads would likely be constructed under Alternative 3; however, the difference would likely be negligible. Alternatives 4, 5, and 6 are likely to result in the most road miles because they add the most remote suitable timber acres. However, the overall differences among alternatives in total new road miles are expected to be low because total harvest levels would remain the same among all alternatives.

Species-Specific Impacts to Sensitive and Rare Plants

Approximately 126 plants listed on the AKNHP Rare Vascular Plant List have been documented on the Tongass; because of the large number of rare plants, species-specific impacts to rare plants are not discussed in this document, but if, during project planning, they are known or suspected within the project area, they would be evaluated. Potential effects to the 16 sensitive plant species known or suspected to occur on the Tongass under each of the alternatives are discussed below.

As discussed above, 16 sensitive plant species are known or suspected to occur on the Tongass. Two of these 16 sensitive plant species, Escholtz's little nightmare (*Aphragmus escholtzianus*) and pale poppy (*Papaver alboroseum*), are suspected, but not known to occur on the Tongass. Therefore, there is a very low risk that any of the alternatives would adversely impact these two sensitive species.

Potential impacts to the 14 sensitive plant species that have been documented on the Tongass can be estimated by looking at the proportion of known occurrences of each sensitive plant species in areas suitable for young-growth and old-growth timber harvest, and the percentage of harvest expected in each of these suitable areas under each alternative. Only four sensitive plant species have known occurrences expected to be within suitable young-growth or old-growth harvest areas over 100 years (Table 3.6-2).

As shown in Table 3.6-2, no known occurrences of Macoun's thistle (*Cirsium edule* var. *macounii*) or large yellow lady's-slipper (*Cypripedium parviflorum* var. *pubescens*) are expected within old-growth harvest areas under any of the alternatives. The proportion of known occurrences of Alaska rein-orchid (*Platanthera unalascensis*) expected within old-growth harvest areas over 100 years includes 0.3 to 0.6 occurrences under all alternatives. For lesser round-leaved orchid (*Platanthera orbiculata*), the proportion of known occurrences expected within old-growth harvest units is 7.4 to 11.3 over 100 years under all alternatives. However, differences may be explained by the variable level of effort expended searching for sensitive plants.

Within young-growth harvest areas, the proportion of known occurrences of Macoun's thistle expected within harvest areas is 0.8 to 0.9 for all alternatives over 100 years. The proportion of known occurrences of large yellow lady's-slipper and Alaska rein-orchid expected within young-growth harvest areas is 1.6 to 1.7 under alternatives over 100 years. The proportion of known occurrences of lesser round-leaved orchid expected within young-growth harvest units is 27.0 to 28.9 under all alternatives over 100 years. Therefore, the differences among alternatives appear to be insignificant, and may be related to the variable effort expended in sensitive plant surveys in one area versus another.

Under all alternatives, if previously undocumented populations of any sensitive plant species are located during project surveys, Forest-wide standards and guidelines under all alternatives would consider protection to minimize impacts to these species on the Tongass. For additional discussion of potential impacts to sensitive plant species from future timber harvest, road construction, and other development projects on the Tongass, see the 2016 Forest Plan Amendment EIS (USDA Forest Service 2016b). Additional details on the assessment of impacts to lesser round-leaved orchid are provided in the Plants BE (Krosse 2016).

Table 3.6-2
Known Occurrences of Sensitive Plant Species within Estimated Old-Growth and Young-Growth Harvest Areas over 100 Years by Alternative

		Species			
Alternative	Harvest Type	Macoun's thistle (*Cirsium edule* var. *macounii*)	Large yellow lady's slipper (*Cypripedium parviflorum* var. *pubescens*)	Lesser round-leaved orchid (*Platanthera orbiculata*)	Alaska rein-orchid (*Platanthera unalascensis*)
1	Known Occurrences in Est. YG Harvest Areas	0.9	1.7	28.9	1.7
	Known Occurrences in Est. OG Harvest Areas	0	0	13.4	0.7
2	Known Occurrences in Est. YG Harvest Areas	0.8	1.6	28.0	1.6
	Known Occurrences in Est. OG Harvest Areas	0	0	13.1	0.6
3	Known Occurrences in Est. YG Harvest Areas	0.8	1.6	27.7	1.6
	Known Occurrences in Est. OG Harvest Areas	0	0	10.7	0.5
4	Known Occurrences in Est. YG Harvest Areas	0.8	1.6	27.7	1.6
	Known Occurrences in Est. OG Harvest Areas	0	0	9.3	0.4
5	Known Occurrences in Est. YG Harvest Areas	0.8	1.6	27.6	1.6
	Known Occurrences in Est. OG Harvest Areas	0	0	9.1	0.4
6	Known Occurrences in Est. YG Harvest Areas	0.8	1.6	27.3	1.6
	Known Occurrences in Est. OG Harvest Areas	0	0	9.1	0.4

OG = old growth; YG = young growth

Invasive Plants

Effects Common to All Alternatives

Ground disturbance associated with timber harvest, road construction, and other development or management activity on the Forest provides an opportunity for invasive plant introduction or expansion. Introduction and spread of invasive plants can occur because these activities disturb soil and/or remove existing vegetation, providing openings for invasive plants to establish or spread. Additionally, movement of equipment and personnel can also provide opportunities for transport of invasive plant seeds or propagules into new areas. Indirect effects can include the establishment or spread of invasive plants through the use of roads after harvest for recreation or during road maintenance. Similarly, construction and maintenance of energy and transmission line projects and associated road construction, maintenance, and use increases the risk of invasive species spread and colonization. The impacts of invasive plant spread and colonization can often spread beyond the area of disturbance.

Effects Specific to Each Alternative

The potential for the introduction and spread of invasive plant species due to ground disturbance associated with timber harvest, road construction, and other development or management activity exists under all alternatives. Increased disturbance increases the risk of establishment or spread of invasive plants. As discussed above, the volume of timber anticipated to be harvested and the miles of new roads anticipated to be constructed are not expected to be significantly different under the six alternatives. As a result, the alternatives are not expected to differ significantly in regard to their contributions to the introduction and spread of invasive species on the Tongass. Timber harvest and road construction in

inventoried roadless areas, however, could potentially lead to the introduction and spread of invasive species where these species do not currently exist. Thus, Alternatives 1 and 2 would have little effect on the spread of invasive species, and Alternative 3 would only have a slightly larger effect. Alternatives 4, 5, and 6 would have the largest potential to result in the spread of invasive into currently roadless areas because they include the most suitable forest land in remote areas and would likely result in more road construction.

The number of documented occurrences of invasive plant species within suitable young-growth and old-growth stands is similar under all the alternatives. Additionally, none of the alternatives authorize any site-specific projects or other ground-disturbing activities. Specific projects that include ground disturbance or timber harvest must undergo site-specific environmental analysis when they are proposed as required by NEPA, and the activities must still comply with applicable standards and guidelines identified in forest land management plans, including management of invasive species.

Cumulative Effects

Sensitive and Rare Plants

There are no federally listed or proposed threatened or endangered plants that are known to occur or are likely to occur on the Tongass; therefore, there would be no contribution to cumulative effects to threatened or endangered plants under any of the alternatives.

When considering effects to sensitive and rare plants, it is important to look at the cumulative effects of past, present, and reasonably foreseeable future activities on all land ownerships within the geographic area. The significance of any direct or indirect effect in contributing to the cumulative effects on sensitive and rare plants from management activities depend on the amount and type of disturbance in the cumulative effects analysis area and how that disturbance may affect known locations of sensitive and rare plants.

Past plus expected timber harvest, road construction, and implementation of other development projects on all land ownerships within the Forest boundary on all lands in Southeast Alaska can be used to compare the risk that each alternative would add to cumulative effects on both sensitive and rare plants. Therefore, all lands in Southeast Alaska constitute the cumulative effects analysis area for sensitive and rare plants. Appendix B provides a full list of all the projects considered in the cumulative effects analysis.

As stated above, overall timber harvest levels are not expected to vary significantly among the proposed alternatives. Therefore, the contribution of cumulative effects to sensitive or rare plants due to timber harvest and road construction would be similar for all alternatives. Other activities that have occurred in the past and are reasonably foreseeable to occur in the future that have the potential to add to cumulative effects to rare and sensitive plants include mineral extraction, energy and transmission line projects, hydroelectric projects, transportation developments, and urban and recreational site development (Appendix B). Each of the activities could include clearing vegetation and disturbing habitat for construction and maintenance; therefore, they have the potential to affect sensitive and rare plants and their habitat. These impacts would be considered in project analysis and an assessment of cumulative effects to sensitive and rare plants would also be done for individual projects as part of the NEPA process for the relevant analysis area. Timber harvesting on state, municipal, and private land is governed by the Alaska Forest Resources and Practices Act (AS 41.17). Alaska Forest Resources and Practices Regulations (ADNR 2013) do not address threatened, endangered, or rare plants; however, they do recommend minimizing road construction and limiting disturbance in marshes and muskegs, which would provide some protection for some of the sensitive and rare plants.

Changes in Alaska's climate (discussed in the *Climate and Carbon* section of this chapter) could affect the hydrology and other habitat conditions where sensitive and rare plants occur. While the models do not fully agree on the climate change predictions for Southeast Alaska, they generally predict warmer weather with increased rainfall, and a decrease of snowfall. Recent research by Shanley et al. (2015) predicted an increase in mean annual temperature of approximately 3 to 10 degrees Fahrenheit, a 3 to 18 percent increase in mean annual precipitation, and a 22 to 58 percent decrease in snowfall by the 2080s (Shanley et al. 2015). These changes would likely result in lower soil moisture due to increased

evaporation during warmer summer months. Also, a precipitation shift from snow to rain could lead to more water running off the landscape rather than being stored as snow and feeding streams and wetlands in the late spring and summer, thus increasing evaporation and reducing water storage. These factors could lead to drier streams, meadows, and wetlands.

Changes in temperature and hydrologic conditions would likely favor some plants and stress others. There has been little research into the effects of changes in environmental conditions for each of the sensitive and rare species; consequently, there is uncertainty as to the effect of changes in the climate on sensitive and rare plant species known or suspected to occur on the Tongass.

Invasive Plants

Invasive plants on any land ownership in Southeast Alaska can affect establishment or spread of invasive plants on NFS lands and vice versa. As mentioned in the direct and indirect effects, activities can have wider effects on invasive plant spread than the specific area of land disturbance due to the interconnectedness of land. The cumulative effects of invasive plants from management activities would depend on factors such as the following:

- Amount and location of ground disturbance;
- Existence and extent of invasive plants at the time of project implementation;
- Overall habitat alteration due to invasive plants expected as a result of past, present, and foreseeable projects; and
- Anticipated response of invasive plants to the proposed actions and any management considerations or mitigation and monitoring that will be applied to each project.

Past, present, and future timber harvest, road construction, and other development activities on both private and public lands can be used to compare the risk of cumulative effects of the six alternatives on invasive plant introduction or spread. As stated above, overall timber harvest levels are not expected to vary significantly among the alternatives. Therefore, the contribution of cumulative effects to invasive plants due to timber harvest and road construction would be similar for all alternatives (road miles vary less by about 50 miles between alternatives over 100 years; see Table 3.3-21).

As discussed under cumulative effects for sensitive and rare plants, there are fewer restrictions on timber activities on non-NFS lands than on NFS lands. Timber activities on non-NFS lands that can contribute to the introduction or spread of invasive plants are not specifically regulated by the State of Alaska. Other activities that have occurred and are reasonably foreseeable to occur in the future that have the potential to add to cumulative effects of invasive plants include mineral activities, renewable energy and transmission line projects, hydroelectric projects, transportation developments, and urban and recreational site development (Appendix B). Each of these activities can include clearing vegetation, construction, transportation for construction and ongoing activities, and maintenance. Therefore, they have the potential to introduce or spread invasive plants in an area and would need to be considered in the project analysis.

Changes in Southeast Alaska's climate (discussed in the *Climate and Carbon* section of this chapter) could also create the conditions that encourage the spread of invasive plants by altering opportunities for invasive plants to colonize new areas, where could be compounded by climate change. Changing climate may also result in range extensions for some species that are native at more southerly latitudes, and they may become established or become more widespread on the Tongass, as a result. Changes in growing conditions would likely favor some plant species and stress others. There is uncertainty about the effect of changes in climate on invasive plants on the Tongass.

With any of the action alternatives, applying mitigation measures in the form of Forest-wide standards and guidelines as well as ongoing invasive plant control and management programs will contribute to lessening the cumulative effects of invasive plants across Southeast Alaska. For additional discussion of Forest-wide standards and guidelines and mitigation measures used by the Forest Service for prevention and control of invasive plants during implementation of management actions, see the 2016 Forest Plan Amendment EIS (USDA Forest Service 2016b).

Transportation, Energy, Communications, and Infrastructure

Affected Environment

Transportation

Residents of the region are dependent on air and water transportation for travel between most communities, rather than roads or rail. A roaded transportation system has developed on NFS lands, largely in support of timber harvesting, but for the most part does not connect communities except on Prince of Wales Island.

Regional Transportation System

The Alaska Department of Transportation & Public Facilities (ADOT&PF) issued the comprehensive Southeast Alaska Transportation Plan (SATP) in 2004 (ADOT&PF 2004). The 2004 SATP called for transitioning away from the long-distance ferry runs to a system that connects the communities of Southeast Alaska with roads and relies on shuttle ferries to fill the gaps in the road network. The 2004 SATP identified 34 essential highway and utility corridors and requested they be reserved and incorporated into the Forest Plan. A Draft SATP was published in June 2014 (ADOT&PF 2014) that includes the same 34 essential corridors.

In recent years, ADOT&PF completed about 30 miles of highway construction in furtherance of the SATP goals. An additional 140 miles of highways are funded for design and construction in the SATP corridors, and a portion of those projects were scheduled to move to the construction phase in the 2019 and 2020 construction seasons. There are also 16 miles of highway funded for environmental permitting and design in the SATP corridors, without current appropriations for construction activities. The multiple highway projects will deliver improved transportation of goods and services through Southeast Alaska and will ease the development of connecting utilities in the region.

Because the ADOT&PF's Southcoast Region lies largely within the Tongass National Forest's boundaries, many of the proposed road projects cross NFS lands and require Forest Service authorization. The proposed linkages for the East Lynn Canal Highway (Juneau Access Improvement Project), the Kake to Petersburg road, and the Sitka to Warm Spring Bay road are examples of projects that would cross NFS land.

In August 2005, Congress enacted Section 4407 of the Safe, Accountable, Flexible, Efficient Transportation Equity Act - A Legacy for Users (SAFETEA-LU; Public Law 109-59), which states: "Notwithstanding any other provision of law, the reciprocal rights-of-way and easements identified on the map numbered 92337 and dated June 15, 2005, are hereby enacted into law." In 2015, the President signed into law Public Law 114-94, Fixing America's Surface Transportation Act. This law amended Section 4407 of SAFETEA-LU by striking "hereby enacted into law" and inserting "granted" affecting about 25 transportation and utility corridors to connect communities and providing marine access to Forest Service lands over State-managed lands.

National Forest System Roads

NFS roads are constructed to provide access to NFS lands and are included in the Forest Development Transportation Plan (see Transportation Standards and Guidelines in Chapter 4 of the 2016 Forest Plan Amendment EIS [USDA Forest Service 2016a]). Most NFS roads are unpaved, single-lane roads.

On the Tongass, the demand for roads has historically been for access to timber resources. The maintenance and reconstruction requirements of the existing system depend mainly on the volume of timber hauled and, to a lesser extent, on recreational use. The need for future road development is largely determined by the need to access timber resources. There are approximately 4,900 miles of roads on Tongass NFS lands, including both opened and closed system roads (3,600 miles) and non-system or decommissioned roads (1,300 miles) (see Table 3.3-21). Of the 3,700 miles of classified Tongass NFS

roads, over 80 percent are not open to use or not maintained for highway vehicles. There are another 4,300 miles of roads that are on non-NFS lands.

All timber harvest requires some road construction and maintenance and repair. If the planned harvest area is roaded, often the case for timber harvest which comprises solely regenerated timber stands, then most of the activity expected is road maintenance and repair. Otherwise, road construction is the primary activity.

Log Transfer Facilities

The transport of harvested timber from Southeast Alaska requires both land and water routes to reach processing facilities. Log transfer facilities (LTFs) are used to transfer logs to barges or rafts for towing. Over 100 LTFs exist on the Tongass. A Memorandum of Understanding (MOU) provided a framework for the State to grant the Forest Service tideland easements to use the 126 LTFs on state lands listed on Map 92337. There are currently over 60 LTFs with active permits.

Transportation Systems in the Forest Plan

The 2016 Forest Plan applies the Transportation Systems Corridors Direction to existing and future transportation system corridors such as the those considered under the SATP and applicable laws (i.e., Section 4407 of Public Law 109-59; Alaska National Interest Lands Conservation Act of 1980 [ANILCA] Title XI, Public Law 96-487).

Within IRAs, the Roadless Rule generally prohibits construction or reconstruction of roads with some exceptions. The Forest Service may authorize a road in an IRA if they determine it meets certain criteria (see Chapter 2).

Energy

Twenty-two operating hydroelectric projects are located either on NFS lands or on adjacent state or private land. These projects have a total installed capacity of 216.9 megawatts (MW) and range in size from less than 1 MW to 78 MW in size. Most hydropower sites are licensed by the Federal Energy Regulatory Commission under the Federal Power Act.

The existing transmission system in Southeast Alaska is limited. The electric systems in a few communities are currently interconnected. These may be summarized by region, as follows:

- Southeast Alaska Power Agency (SEAPA) Region—The SEAPA system connects Ketchikan, Petersburg, and Wrangell.
- Juneau Area—The Alaska Electric Light & Power system connects Juneau, Douglas Island, Auke Bay, and Greens Creek Mine.
- Prince of Wales Island—The Alaska Power & Telephone (AP&T) system connects Coffman Cove, Craig, Hollis, Hydaburg, Kasaan, Klawock, and Thorne Bay.
- Upper Lynn Canal Region—A separate AP&T system connects Haines and Skagway in the Upper Lynn Canal Region and is connected via an intertie to the existing Inside Passage Electrical Cooperative) system that serves Klukwan and Chilkat Valley.
- Kake to Petersburg Intertie (approved but not constructed) — In 2016, the Forest Service issued a Record of Decision approving the construction of a transmission line connecting Kake and Petersburg.

Inventoried Roadless Areas

Currently, there are five proposed or unconstructed renewable energy projects in IRAs (see Table 3.7-1). In addition, proposed transmission lines serving as power interties among Southeast Alaska communities, including the line between Kake and Petersburg, would also cross IRAs.

Table 3.7-1
Proposed or Unconstructed Renewable Energy Projects in IRAs

Name	Ranger District	Power Destination	IRA
Sweetheart Lake	Juneau	Juneau	302
Crooked Creek/Jim's Lake	Hoonah	Elfin Cove	311
Little Port Walter	Sitka	Little Port Walter Marine Station	334
Bell Island Geothermal[1]	KMF	Swan-Tyee Intertie	529
Mahoney Lake[2]	KMF	Swan-Tyee Intertie	524

[1] See *Minerals* section for geothermal discussion.
[2] Federal Energy Regulatory Commission licensed in 1998, unconstructed.

Hydroelectric projects are not prohibited in IRAs[28] on the Tongass. The Federal Power Act (FPA) grants the Federal Energy Regulatory Commission (FERC) the authority to issue and administer licenses for hydropower projects. For projects located on NFS lands, Section 4(e) of the FPA requires FERC to determine whether the project is consistent with National Forest purposes and the land management plan. Section 4(e) also gives the Forest Service authority to impose mandatory conditions in the FERC license to ensure the adequate protection and use of NFS land and resources.

The Roadless Rule does not prohibit the construction or maintenance of transmission lines that do not require road construction or reconstruction. Temporary or permanent roads are not permitted in IRAs, with exceptions, though temporary linear construction zones can be authorized. The restriction on road building, including construction access roads, may pose a challenge for routes that cross IRAs, potentially increasing construction and maintenance costs. As of January 2018, 10 hydropower or intertie projects have been approved in IRAs in the Alaska Region, including the 2016 approval of the Kake to Petersburg intertie.

Communication Sites

Appendix E of the 2016 Forest Plan (USDA Forest Service 2016a) lists approved communication sites on the Tongass (Table E-1). Sites approved for telecommunication facilities are characterized by antennas, electronic transmitters, equipment shelters, and a wide variety of electronic communication support equipment such as those listed in Forest Service Handbook 2709.11, Chapter 90.

Proposals for new communications uses on the Tongass will be encouraged to co-locate on an approved communications site, unless the proponent demonstrates that communication sites approved in the Forest Plan are not technically feasible due to geographic location or are incompatible with the requested use.

Communication and infrastructure are not prohibited in IRAs.

Environmental Consequences

The 2016 Forest Plan provides Forest-wide direction for Renewable Energy and for Transportation Systems Corridors and other activities, which allows greater flexibility in development including renewable energy development to help Southeast Alaska communities reduce fossil fuel energy dependence. Energy project development and regional transportation development are possible under all alternatives with limitations that vary by alternative. Although these projects can be permitted under Alternative 1, there is likely to be improvement for project development under each of the action alternatives because of the broadening of the rule language regarding access for the construction, expansion, or maintenance of facilities.

[28] In reinstating the Roadless Rule on the Tongass, the Alaska District Court's judgement in Organized Village of Kake, et al., v. USDA, et al. clarified that "nothing in this judgement shall be construed to prohibit any person or entity from seeking, or the USDA from approving, otherwise lawful road construction, road reconstruction, or the cutting or removal of timber for hydroelectric development pursuant to the standards and procedures set forth in the Federal Power Act."

The following discussions address the indirect and cumulative effects of the alternatives on the transportation and other infrastructure of Southeast Alaska. Direct effects would result from on-the-ground activities that could occur in or outside of roadless areas under the Forest Plan and would be evaluated when they are proposed.

Transportation Effects

National Forest System Roads

The amount of new road construction would be similar under all alternatives because roads on the Tongass are largely developed in support of timber harvesting and the PTSQ under the 2016 Forest Plan does not vary between the alternatives. Thus, the predicted 1,000 new road miles on NFS lands over 100 years for the No Action alternative would be similar for all alternatives, with minor variations (about 49 miles difference; Table 3.3-21). Because the locations of future harvests and associated roadbuilding are unknown, a qualitative discussion of the predicted difference is used here.

There are about 5,100 miles of system and non-system roads on NFS lands (Table 3.3-21). Over the next 100 years, an estimated additional 1,000 miles of new roads would be constructed under all alternatives, totaling about 6,100 miles of roads over 100 years. This would be an increase of about 21 percent over existing conditions. In addition to new construction, some roads would be constructed or reconstructed over decommissioned roadbeds. Reconstruction involves the rehabilitation of the original roadbed, and can include cleaning ditches, replacing drainage structures, re-installing bridges, and grading and shaping. The estimated 500 miles of roads constructed over decommissioned roadbeds and 1,100 miles of road reconstruction over 100 years would occur under all alternatives.

Alternatives 1 and 2 would have roughly the same amount of road miles because additional timber harvest opportunities would be provided through the removal of roadless area designation within roadless areas that generally have roads (known as roaded roadless). In roaded areas, most of the activity expected is road maintenance and repair.

Alternative 3 is expected to result in slightly more new road miles than Alternatives 1 and 2 because additional timber harvest opportunities may be provided through extending areas removed from roadless designation to forest lands adjacent to existing road systems in addition to the roaded roadless areas. Thus, some new roads may be constructed to access these adjacent areas, and road maintenance and repair would occur within previously roaded areas.

Alternatives 4, 5 and 6 would be similar and have the potential for slightly more road miles than Alternative 3 because they would allow harvests and roadbuilding in areas farther from existing road systems. However, the economics of building roads to access forest land farther from the forest transportation system would be a limiting factor for new road construction.

Most roads developed for timber harvest would be closed to motorized traffic once their initial use is over. These roads are built for silvicultural purposes under exemptions granted under Section 404(f)(1) of the Clean Water Act. Roads constructed and maintained specifically for recreation or other uses do not qualify under this exemption (USACE 2004).

The effects of operations at LTFs are likely to be same under all alternatives because the PTSQ does not vary between the alternatives. Guidelines for LTF siting, construction and operation, and monitoring are provided in Appendix G of the 2016 Forest Plan.

Regardless, the decision on this Alaska Roadless Rulemaking would not result in any direct on-the-ground effects. Future Forest Service activities that would result in road building, maintenance, or removal would be subject to additional project-level NEPA analysis.

Effects on Regional Transportation Opportunities

Alternative 1
Transportation Systems Corridor plan components under the Forest Plan would apply to major road systems such as state and federal highways, railroads, and those identified by the State of Alaska in the current version of the SATP and applicable laws (for example, Section 4407 of Public Law 109-59, as amended, Title XI of ANILCA, Public Law 96-487).

The 2001 Roadless Rule provides an exception to allow construction, reconstruction, or realignment of a Federal Aid Highway to occur in IRAs and pursuant to reserved or outstanding rights, or as provided by statute or treaty. However, the exception provided for Federal Aid Highway projects applies only when no other reasonable or prudent alternative exists, which limits its applicability. Additionally, regional transportation projects may be funded by the State and would also fall outside of this exception.

Action Alternatives
Each of the action alternatives would add or remove areas or roadless designations to varying degrees (Table 2-12) that would affect where and for what purpose roads could be developed. Generally, roads would be prohibited in ARAs unless they met the one of the exceptions listed in Table 2-2. The exceptions vary by ARAs. Watershed Priority ARAs (Alternatives 2 and 3) are the most restrictive to road building. Timber Priority ARAs (Alternative 4) place no prohibition on permanent or temporary roads, and Community Priority ARAs allow more exceptions than Alternative 1. LUD II and Roadless Priority ARAs fall in the middle.

The effect to the potential for development of regional transportation systems within each ARA is discussed below.

All ARAs
Exceptions are provided for Federal Aid Highway projects roads and roads authorization pursuant to reserved or outstanding rights, or as provided for by statute or treaty, among others. See Table 2-2. Additional exceptions are applied according to the ARA designations.

Watershed Priority (Alternatives 2 and 3)
With the exception of the authorities provided for all ARAs, roads may not be constructed or reconstructed in an Alaska Roadless Area designated as Watershed Priority. Watershed Priority ARAs would be more restrictive on regional transportation routes than Roadless, Timber, or Community Use Priority designated ARAs because there is no exception for State highways, utility systems, or for accessing facilities such as airports, marine access points, and communication sites.

LUD II Priority (Alternatives 2, 4, and 5)
Within LUD II Priority ARAs roads may be constructed or reconstructed if consistent with the legislated management restrictions established in Section 201 of the Tongass Timber Reform Act.

Roadless Priority (Alternatives 2, 3, 4, and 5)
In addition to the exceptions provided for all ARAs, roads would be permissible for State of Alaska's SATP projects for the connection of communities and development of the regional transportation system, and for facilities and utility systems (Table 2-2 for complete list).

Timber Priority (Alternative 4 only)
Timber Priority ARAs would not prohibit road building and would make the process to develop regional transportation systems less restrictive.

Community Priority (Alternative 3 only)
In addition to the exceptions provided for all ARAs, roads would be permissible for public facilities and utility systems (Table 2-2 for complete list). Like Watershed Priority ARAs, there is no exception for State highways.

Alternative 2
Alternative 2 includes Watershed, LUD II, and Roadless Priority ARAs. With 3.28 million acres (1.1 million acres of development LUDs) of Watershed Priority ARAs, Alternative 2 would be more restrictive on regional transportation opportunities than Alternative 1 within Watershed Priority ARAs because there is no exception for State SATP routes (though Federal Highway and roads authorized by other laws would still be permissible). However, the exceptions for regional road systems would be increased in LUD II (854,000 acres) and Roadless Priority ARAs (5.21 million acres) compared to the 2011 Roadless Rule.

The 2004 SATP (ADOT&PF 2004) identified 34 essential highway and utility corridors distributed throughout Southeast Alaska and the Forest. Roadless areas exist along many of these routes and, under Alternative 2, several of the crossed roadless areas would be designated as Watershed Priority ARAs, which do not include the exception for State roads included in the LUD II and Roadless Priority ARA. However, most of these routes were granted by Congress in 2005 (Public Law 109-59). Routes identified in the 2004 SATP that were not granted by Public Law 109-59 that could be prohibited in Watershed Priority ARAs include:

- A route on the east side of Eastern Passage (SATP Map 13); Portions of the Kuiu Island Corridor (SATP Map 19);
- A route on the Cleveland Peninsula north of Ketchikan (SATP Map 23);
- A portion of the route on Chichagof Island between Pelican and Tenakee Inlet (SATP Map 17); and
- A beachfront segment along Clarence Strait southeast of Coffman Cove (SATP Map 14).

Alternative 3
Alternative 3 includes 8.2 million acres of Watershed Priority, Community Priority, and Roadless Priority ARAs. Like Alternative 2, Alternative 3 would include 3.26 million acres (1.1 million acres of development LUDs) of Watershed Priority ARAs and would be more restrictive than Alternative 1 on regional transportation opportunities in these areas. However, the exceptions for regional road systems would be increased in Roadless Priority ARAs (4.6 million acres) compared to the 2011 Roadless Rule. By decreasing roadless areas by 1.25 million acres, Alternative 3 would be more permissive to road building than Alternatives 1 and 2 (although 847,000 acres of this would be in LUD II areas).

Like Alternative 2, opportunities for development of regional transportation systems that were not granted by Congress (Public Law 109-59) could be prohibited within Watershed Priority ARAs. Additionally, while Community Priority ARAs provide more exceptions for road building, including Federal Aid Highway projects, there is no exception for State highways.

Alternative 4
Alternative 4 includes about 9 million acres of LUD II, Roadless, and Timber Priority ARAs. Alternative 4 would be more permissive to road building than Alternatives 1 and 2 because it decreases roadless area acres by about 343,000 million acres and designates about 749,000 acres as Timber Priority ARAs. Together, the area removed from roadless designation and the area of Timber Priority ARAs would be about 1.1 million acres, similar to Alternative 3. Road-building restrictions imposed by the Roadless Rule within development LUDs would be removed from these 1.1 million acres. Of the remaining 8.2 million acres of ARAs in Alternative 4, 7.4 million acres would be designated as Roadless Priority, and the remaining 854,000 acres would be designated as LUD II Priority.

Alternative 5
Alternative 5 includes 7.0 million acres of ARAs and would be more permissive to road building than Alternatives 1 through 4 because it decreases roadless area acres by about 2.3 million acres. All remaining ARAs would be Roadless Priority, which provide more exceptions for regional road systems compared to the 2001 Roadless Rule, or LUD II Priority. A total of 6.2 million acres would be Roadless Priority ARAs and 0.85 million acres would be LUD II Priority. The remaining Roadless and LUD II Priority ARAs would have more exceptions for road systems compared to the 2001 Roadless Rule.

Alternative 6
Alternative 6 would be the most permissive to road systems because it would remove all 9.3 million acres of roadless areas.

Energy and Infrastructure Effects

Five proposed hydropower projects are located in IRAs. Other hydropower projects and other types of energy projects could be developed in the future. Potential impacts to roadless areas would be addressed during the permitting and licensing of these projects, with most requiring NEPA analysis and oversight by the Federal Energy Regulatory Commission. Potential impacts would be mitigated, but some impacts, like the presence of a road or facilities in a roadless area, would be unavoidable.

No significant adverse consequences related to energy projects and related infrastructure are anticipated for any of the alternatives. Removing roadless designations in areas under Alternatives 2 through 6 would simplify the process for projects but would not necessarily result in an increase in the number of projects developed. If new roadless areas are added or expanded, the permitting process could be more burdensome, but projects would not be prohibited. An exception for utility systems in Roadless Priority ARAs under Alternatives 2, 3, 4, and 5 and Community Priority under Alternative 3 would allow for timber harvest and road construction. Under Alternative 4, lands within the Timber Priority ARA would not prohibit timber harvest or road construction at all. If roadless areas are removed, or exceptions for utility systems added, the greatest effect may be in making the permitting process for developers less burdensome and with less regulatory uncertainty, resulting in a quicker permitting process and potentially lower costs, rather than an increase in the number of projects developed. Additionally, exceptions for road building for the construction, expansion, or maintenance of utility systems would improve long-term access to utility infrastructure for operations and maintenance. Thus, operation and maintenance costs could be reduced and service reliability improved.

Under all alternatives, energy projects would need to be consistent with the Forest Plan (particularly Chapter 5). Existing and proposed renewable energy projects are widely distributed across the Forest, with five proposed renewable energy projects in roadless areas (Table 3.7-2). This would reduce the cumulative effects of these activities on any specific roadless area. Overall, none of the alternatives would likely have additional adverse effects to roadless areas relative to current conditions.

Management and administration would remain the same in all the action alternatives. For projects located on NFS lands, Section 4(e) of the FPA requires FERC to determine that the license will not be inconsistent with National Forest purposes. The Forest Service will continue to use Section 4(e) to impose mandatory conditions in the FERC license to ensure the adequate protection and use of NFS land and resources. Non-FERC projects would continue to be administered through issuance of a special use authorization, with specified conditions and in accordance with other federal and state permits and/or permissions, to allow construction and operation of projects.

Table 3.7-2
Alaska Roadless Area Priorities at Proposed or Unconstructed Renewable Energy Projects in IRAs[1]

Name	Roadless Area	Action Alternatives				
		2	3	4	5	6
Sweetheart Lake	302	W	W	R	R	Rv
Crooked Creek/Jim's Lake	311	R	R	R	R	Rv
Little Port Walter	334	R	R	R	R	Rv
Bell Island Geothermal[2]	529	W	W	R	R	Rv
Mahoney Lake	524	R	R	R	R	Rv

[1] R = Roadless Priority; W = Watershed Priority; Rv = Removed
[2] See *Minerals* section for geothermal discussion.

Communications and infrastructure projects that do not require tree cutting or road construction / reconstruction are not prohibited in IRAs, nor would they be in ARAs. Added exceptions for energy

infrastructure and essential facilities in Roadless Priority and Community Use Priority ARAs, and to a lesser extent LUD II Priority ARAs would facilitate development of projects such as transmission lines, airports, marine access points, and communication sites.

Cumulative Effects

The road construction projected for non-NFS lands primarily includes roads needed for timber harvest, but also includes roads that may be built to serve or connect communities. Road corridors covered by Public Law 109-59 would, if developed, connect additional areas in Southeast Alaska to the continental highway system, and improve transportation between communities.

There is considerable uncertainty concerning the future development of Southeast Alaska's road system. As stated above, the ADOT&PF has prepared a Draft SATP and is delivering transportation projects under that plan. However, new roads linking communities and linking Southeast Alaska to the continental highway system are expensive to build and maintain.

If new wood-processing facilities and markets are not developed, especially for young-growth products, the levels of harvest predicted in the 2016 Forest Plan Amendment EIS (USDA Forest Service 2016b) are unlikely to occur, and new road construction would be less than anticipated. There is also uncertainty concerning the funds to maintain the existing NFS road network, to place existing roads into storage status, and to decommission roads that are no longer needed. Risks associated with inadequate funding include adverse effects to fish, water quality, and wildlife and increased safety hazards as older roads and stream crossings deteriorate.

Timber Resources

Affected Environment

Introduction

The forests of Southeast Alaska are primarily the western hemlock-Sitka spruce forest type. This forest type is part of the temperate rain forest that occupies a coastal strip 2,000 miles long from northern California to Southcentral Alaska. While western hemlock and Sitka spruce comprise the majority of the stocking in this forest type, associated species include, depending on location, yellow-cedar, western redcedar, mountain hemlock, and silver fir (Harris and Johnson 1983). Other forest lands support relatively small stands dominated by yellow-cedar, lodgepole pine (shore pine), red alder, or black cottonwood. Western hemlock is used for pilings, poles, railway ties, windowsills, doors, and construction lumber, and has been an important fiber source for pulp. Sitka spruce is used for lumber and commodity products, as well as specialty products, such as piano sounding boards, guitar faces, oars, planking, masts, and spars for custom-made or traditional boats, and ladders. For centuries Alaska Natives have used cedar species for canoes and paddles, housing (along with Sitka spruce), and totem poles. Today, redcedar is primarily used as a roofing material and yellow-cedar has many uses, including boats, utility poles, heavy flooring, framing, and marine decking and piling.

The forests of Southeast Alaska are the major source of raw materials for the region's wood products industry. Generally, timber harvested on NFS lands is available for processing by the local wood products industry but most timber harvested on non-NFS lands is exported. Due to economic conditions in recent years, the exporting of timber from NFS lands has been allowed under certain circumstances. The wood products industry and associated regional employment is discussed in more detail in the *Key Issue 2* section of this document.

Current Condition of the Forest Land Base

Approximately 56 percent of the forest land on the Tongass (approximately 5.5 million acres) is classified as productive forest land; these lands are considered biologically capable of producing industrial wood products. Approximately 0.5 million acres of the productive forest lands on the Tongass have been converted to young-growth forest due to harvest or other disturbances such as fire or wind. This is approximately 5 percent of the total forest land base and 10 percent of the productive forest lands and represents approximately 15 billion board feet of harvested timber.

In addition to productive forest lands, the Tongass includes approximately 4.4 million acres of unproductive forest. These are lands that are not capable of producing industrial forest products, but are important for watershed protection, wildlife habitat, recreation, and other uses. Unproductive forest is land incapable of yielding crops of industrial wood, usually because of adverse site conditions. These conditions may include sterile or poorly drained soil, subalpine conditions, and steep rocky areas where landslides or avalanches curtail timber development.

Currently, the forest land suitable for timber production covers approximately 564,000 mapped acres (230,000 old growth and 334,000 young growth). Following field verification, the suitable acreage is expected to amount to approximately 474,000 acres. This is based on the level of falldown assumed in the 2016 Forest Plan. Falldown is the reduction in suitable acreage that occurs when a project is implemented and taken from the paper plan stage to an actual field-based plan. It is mostly due to finding new streams, over steepened slopes, difficult to log areas, muskegs, etc., within areas that were mapped as suitable.

Current Condition of the Timber Resource

Age Class Distribution. The Tongass is a mix of old-growth stands and naturally regenerated young-growth forest, which consists of both wind-created and harvest-created young growth. Harvest-created young growth amounts to approximately 5 percent of the total forest land area. Suitable forest lands are classified into five stand conditions: 1) old-growth sawtimber, 2) young-growth sawtimber, 3) pole timber,

4) seedling and sapling, and 5) non-stocked. For timber inventory purposes, stands of trees 150 years old or older are designated as old growth. Over 85 percent of productive forest lands meet the criteria for old-growth sawtimber (USDA Forest Service 2016b). Forests less than 150 years (harvest and natural) cover approximately 0.5 million acres; forests that are 150 years of age or older cover over 5 million acres.

Approximately 46 percent of the area harvested over the past century is no longer suitable, due to Congressional designations such as Wilderness, State and Native land selections, or Forest Plan LUD allocations. For example, areas designated as Wilderness or LUD II by Congress are no longer suitable.

Approximately 80 percent of harvested young growth stands on the Tongass are less than 55 years of age and about 10 percent of young-growth stands are 56 to 65 years of age. Because stands on the Tongass need to be about 65 years old or older to have a chance of being economic to harvest, less than 10 percent of the Tongass harvested young-growth stands are currently in this category.

Volume Strata

The Forest currently uses three volume strata to categorize commercial timber: high, medium, and low volume. Average volumes for each category vary with geographic area on the Tongass. In terms of net sawlog volume, the high-volume stratum averages about 25 to 33 thousand board feet (MBF) per acre, medium volume averages about 18 to 28 MBF per acre, and low volume averages about 5 to 15 MBF per acre, depending on geographic area (USDA Forest Service 2016b, Table 3.13-4).

While the three-strata approach is useful for estimating timber volume for forest planning purposes, it is not a good tool for identifying other important forest elements, including forest structure, biological diversity, and wildlife habitat. For example, two stands may have the same volume, but one may be a dense stand of medium-sized trees with a single canopy layer, while the other stand may be a combination of widely-spaced large overstory trees and two or three lower canopy layers containing small- and medium-sized trees. To help account for these differences, the Size Density Model (SDM), which is based on a combination of tree sizes and tree densities (Caouette et al. 2001), has proven to be a better tool for representing these other forest elements. Using tree sizes and densities provides a more comprehensive forest measuring system for describing habitat than timber volume (Spies and Franklin 1991). The SDM (Caouette and DeGayner 2005) is described and used in the *Biological Diversity* and other sections.

Non-National Forest System Lands

The State of Alaska, Native village corporations, Sealaska (the Native regional corporation), and individuals own over 1,186,000 acres of land in Southeast Alaska, inside the Forest boundary. Approximately 364,000 acres of this land currently consists of productive old-growth forest and 422,000 acres consists of young growth. This means that approximately 54 percent of the original productive old growth on non-NFS lands has been harvested (based on geographic information system analysis and information provided by the landowners; USDA Forest Service 2016b). Most timber harvested from Department of Natural Resources state lands in recent years has been processed locally, while timber harvested from University Trust and Mental Health Trust lands has been exported.

Current Practices

Young-Growth Management

Managing young-growth forests in Southeast Alaska will become an increasingly important component of forest management on the Tongass in the next decade. Young-growth stands can be treated through thinning and other intermediate treatments to concentrate growth in fewer, larger trees, improve lumber quality, and/or to enhance habitat conditions for wildlife. Zaborske et al. (2000) concluded that the types of treatments applied to young stands will have a profound effect on the types of materials available in the future, including log diameter, knot size, and wood strength.

Public Law 113-291 specifies that the Tongass may harvest trees prior to 95 percent of culmination of mean annual increment (CMAI) to facilitate the transition away from commercial timber harvest of old-growth stands, given certain acreage and time limitations.

Over 200,000 acres have been precommercially thinned on the Tongass since 1979. In recent years, precommercial thinning has averaged approximately 5,600 acres per year. The Forest has less experience with other young-growth management techniques, such as pruning and commercial thinning.

There has been increased interest in commercial thinning in recent years, not only to improve timber values, but as a tool to improve wildlife habitat. Studies in other forest types in the Pacific Northwest indicate that stand structures that are similar to old-growth forest conditions can be developed through thinning (Thysell and Carey 2000). However, there are many unanswered questions as to how to implement thinning treatments that provide a sustainable source of high-value wood products while maintaining biological diversity (Zaborske et al. 2000). In a study comparing the lumber harvested from thinned and unthinned, 90-year-old stands on the Tongass, Christensen et al. (2002) found that there was no difference in volume recovery or lumber grade in thinned and unthinned Sitka spruce. For western hemlock, the unthinned stands produced more wood volume, but the thinned stands produced more high-grade lumber. The Prince of Wales Commercial Thinning Study was awarded as an Integrated Resource Service Contract at the end of Fiscal Year 2008. This study looks at five different commercial thinning prescriptions that offer a range of potential treatments that could be used on the Tongass. The five different prescriptions were implemented at three replicates: near Harris River, in the Maybeso Experimental Forest, and near Naukati. The objectives of the study are to assess how mechanized equipment operates, how the different prescriptions hold up to Southeast Alaska's weather, and what the understory response is after treatment. A 5-year re-measurement of the sites was completed in 2014.

There is also increased interest in managing young-growth stands to increase and maintain understory vegetation, especially as forage for deer and other wildlife. Hanley et al. (2005) noted that much research is needed on new approaches involving thinning of older stands, including red alder in the secondary successional sequence. Zaborske et al. (2002) found that thinning greatly increased forage production, though the amount of useful forage produced varied by the type of thinning implemented.

In addition to their continuing research on managing young forests, scientists at the Pacific Northwest Research Station joined with the Tongass in 2001 to establish an operational-scale adaptive management study of young-growth management options. This program, called the Tongass-wide Young-Growth Studies (TWYGS), is designed to evaluate the potential benefits of treating young-growth stands to increase wildlife habitat and wood production. Currently, TWYGS includes experiments that test the effectiveness of alder interplanting, precommercial thinning, slash treatments, girdling and pruning.

Regeneration Methods and Reforestation

Regeneration methods are the harvest methods used to create a new age class within a stand. The methods used on the Forest are not expected to differ when applied to old-growth or young-growth stands. A description of the primary methods is provided in the *Timber* section of the 2016 Forest Plan Amendment EIS (USDA Forest Service 2016b). They cover even-aged, two-aged, and uneven-aged systems.

The National Forest Management Act (NFMA) requires assurance that all areas receiving final removal harvest can be adequately restocked with trees within 5 years of that harvest. On the Tongass, natural restocking is usually adequate to meet this objective because both western hemlock and Sitka spruce are prolific seed producers (USDA Forest Service 1983). The new stand originates from advance regeneration and from seeds that come from residual trees or from trees adjacent to the harvest unit.

Species Composition

Of the four major commercial tree species on the Tongass, western hemlock is the most shade tolerant, followed by western redcedar, yellow-cedar, and Sitka spruce, in that order (USDA Forest Service 1990). Western hemlock is by far the most prevalent species, making up 83 percent of the old-growth forests (Farr and McClellan 1994). Western hemlock has the lowest economic value of these four species.

Having a diverse species mix contributes to wildlife habitat quality, economic value, and minimizes losses due to insects and diseases that are species-specific.

Regeneration harvest methods that create open conditions and expose bare mineral soil, such as clearcutting, would encourage germination and growth of Sitka spruce and the cedars. Group selection with openings of at least 2 acres could also encourage germination and growth of Sitka spruce and the cedars, but to a lesser degree than clearcutting due to side shading. The amount of sun reaching the surface would vary depending on the size, shape, and aspect of the opening. Regeneration methods that create less ground disturbance and smaller openings in the canopy such as single tree selection, smaller sized groups in group selection, overstory removals, and treatments with many reserve trees would encourage growth of western hemlock at the expense of the other species. However, limited retrospective studies indicate that Sitka spruce can be maintained in mixed hemlock-Sitka spruce stands over a wide range of cutting intensities if enough Sitka spruce trees are present in the stand after harvest (McClellan 2005). Two-aged harvest would be similar to even-aged harvest if leave trees are concentrated near the unit boundaries but may be more favorable for western hemlock regeneration if reserve trees are scattered through the unit, due to shading from the residual overstory.

Forest Health

Insects, diseases, related decay processes, and windthrow are an integral and natural part of forest ecosystems. Many of these appear to play key roles in gap-level disturbance (see discussion of old-growth forests in the *Biological Diversity* section of this chapter) and in providing wildlife habitat. The majority of the forests on the Tongass are old-growth forests. Losses to the timber resource caused by heart rot in live trees are considerable in old-growth forests. Approximately one-third of the volume of the old-growth hemlock-spruce forests in Southeast Alaska is decayed by heart rot fungi (USDA Forest Service and ADNR 2014).

In addition to heart rot, some of the more common destructive insects, diseases, and conditions within Southeast Alaska are the black-headed budworm (*Acleris gloverana*), hemlock sawfly (*Neodiprion tsugae),* hemlock dwarf mistletoe, (*Arceuthobium tsugense*) and other decays, Alaska yellow-cedar decline*,* and windthrow.

Decline and mortality of yellow-cedar continues to be one of the most widespread and important forest problems in Southeast Alaska. This decline is associated with wet, poorly drained sites, and recent research has demonstrated that no organism is the primary cause of the decline (Hennon and Shaw 1997). As the climate continues to warm, cedar decline is likely to continue to spread, especially in the south and east. Conversely, yellow-cedar appears to be spreading northward as climate warms, into areas that retain snow longer into the spring.

Windthrow is the dominant disturbance agent in Southeast Alaska. Two forms occur: small-scale events (gap disturbance) and large-scale events (catastrophic disturbance). Most of the Forest is subject to small-scale windthrow events. Individual trees or small groups of trees blow over during storm events, opening gaps in the canopy that allow young trees to grow to fill the openings. This results in complex, mixed-aged stands. Disease and decay agents also play a role in this process. Small-scale events occur on a regular basis and result in openings from 6 to 13 percent on the canopy (Nowacki and Kramer 1998). Areas not protected by topographic barriers from the severe effects of infrequent, major storms are subject to large-scale windthrow events that cause catastrophic damage. Entire stands have been blown down in the past, resulting in the regeneration of more even-aged stands with more uniform canopies (Nowacki and Kramer 1998). Both forms of windthrow are a part of the natural forest generation, growth, and development. Juday et al. (1998) rated many potential impacts on the coastal forests of Southeast Alaska due to climate change. They concluded that there was a high risk of increased large-scale blowdown across Southeast Alaska as well as increased windthrow around harvest units.

Environmental Consequences

The analysis of the potential effects of the alternatives addresses the following questions:

- How much land would be allocated to timber production?

- What would be the future condition of the Forest in 100 years?

The analysis of timber supply and demand for timber products, as well as how existing sales under contract and timber volume in preparation may be affected by the alternatives is discussed in the *Key Issue 2* section of this EIS. The effects on the timber industry infrastructure and employment levels are also discussed in that section.

Suitable Timber Lands

Most importantly, the Tongass has initiated a formal transition from predominantly old-growth harvest to predominantly young-growth harvest. The 2016 Forest Plan prescribes an average of 46 MMBF per year while transitioning to predominantly young growth harvest after about 16 years. See a more complete discussion of the market demand, the young-growth transition strategy, and the export policy in the *Key Issue 2* section of this EIS.

There are approximately 5.5 million acres of productive forest land on the Tongass. Approximately 1,000,000 acres were mapped as suitable for timber production under the 2008 Forest Plan (which included roadless areas). Under the 2016 Forest Plan (which excluded roadless), approximately 564,000 acres (230,000 acres of old growth and 334,000 acres of young growth) were mapped as suitable for timber production. In this EIS, the amount of suitable land would vary by alternative for both young growth and old growth (Table 3.8-1) (see Maps 7-12 on the thumb drive and website, which show suitable by alternative).

Table 3.8-1
Mapped Suitable Acreage of Old-Growth and Young-Growth under Each Alternative (thousands of acres)[1]

	Alternative					
Classification	**1**	**2**	**3**	**4**	**5**	**6**
Suitable Forest Land						
Mapped Suitable Old Growth	230	247	305	388	395	395
Mapped Suitable Young Growth	334	344	348	349	351	354
Total Estimated Suitable Old Growth	**564**	**592**	**653**	**736**	**746**	**749**

[1] Sums and differences may not appear exact due to rounding.

Mapped suitable old-growth acreage would range from 230,000 acres under Alternative 1 to 395,000 acres under Alternatives 5 and 6, which is a 72 percent increase relative to Alternative 1. Mapped suitable young-growth acreage is relatively consistent among alternatives, however, ranging from 334,000 to 354,000 acres, only a 5 percent increase. The vast majority of suitable young growth is already suitable in Alternative 1. An exception is the roaded roadless areas, which are designated as roadless but include 10,000 acres of suitable young growth along with their access roads. These roaded roadless areas are incorporated into Alternative 2 and the other action alternatives.

Projected Timber Harvest

The PTSQ of each of the alternatives is an indicator of possible future timber supply level that each alternative would produce. PTSQ is the estimated quantity of timber meeting applicable utilization standards that is expected to be sold during the plan period.

The PTSQ for the Tongass under the 2016 Forest Plan, based on an annual average, is 46 MMBF in the initial years (about 15 or more years). The projection is 34.5 MMBF from old growth and 11.5 from young growth for the first decade. Full transition is expected about Year 16 with 41 MMBF of young growth and 5 MMBF of old growth. After that, young growth harvest is permitted to grow, but old growth harvest must remain at 5 MMBF per year.

All alternatives would have the same PTSQ. There would be no change in young-growth or old-growth harvest. Aside from the changes in suitable timber land acres, none of the alternatives include any changes to the 2016 Forest Plan, so the only changes are the removal of the roadless designation overlay.

The main effect of the alternatives on timber would be the ability to develop economic sales. Although no additional harvest would take place, the expansion of suitable areas means that greater area is available for the development of sales, allowing more choices for the development of economic ones. Therefore, the resultant effect would be the same harvest spread out over a larger area. Alternative 2 would add suitable acres from the roaded roadless areas, which, because of their existing infrastructure and connection to the existing road systems should include some of the most economic areas. Alternative 3 would result in even more added suitable acres in areas where roads already exist, in areas where roads could be logically extended within the same watershed, and in Community Priority ARAs and, therefore, are also generally considered relatively economic to harvest. Alternatives 4, 5, and 6 would result in a greater increase in harvest in remote areas; however, a number of factors would limit this increase. First, remote areas almost entirely consist of old growth, so once transition starts resulting in a greater proportion of young growth in the harvest in 10 to 15 years, there is little reason to move away from existing roads. Second, current economic conditions suggest that economic sale requirements may limit the level of entry into remote areas, at least for the next 5 or 10 years. This suggests that while Alternatives 2 and 3 may result in improvements in sale economics because they open up areas that appear likely to be more economic due to accessibility, the additional expansion produced by Alternatives 4, 5, and 6 may not produce further improvements in economic sales.

Cumulative Effects

In 1954, there were approximately 6.3 million acres of productive forest land on all ownerships inside the Tongass Forest boundary (including Annette Island). The amount of forest land in Southeast Alaska that is available for timber management has declined over the past century, largely due to Wilderness and LUD II designation by Congress, land selections by the State and ANSCA, land restricted by roadless designations, and land allocated to non-development LUDs in the current Forest Plan. This, along with mill closures and changes in timber markets, has contributed to a decline in timber harvest. Harvest on all lands in Southeast Alaska peaked from the late 1960s through the early 1990s and has been in decline since then. Total harvest on federal, state, and private lands declined from just under 1,000 MMBF in 1989 to less than 80 MMBF in 2017. Approximately 722,000 acres of productive forest land have been harvested since 1954 in this portion of Southeast Alaska; approximately 64 percent of this is NFS land and 36 percent is on Alaska Native corporation, state, and other lands (USDA Forest Service 2016b).

Currently, there are between 0.56 and 0.75 million acres of NFS lands considered suitable for timber management on the Tongass, depending on the alternative. In addition, approximately 0.5 million acres of state, Alaska Native corporation, and other private lands are available for harvest. Potential annual harvest on state and private land is estimated to be approximately 90 MMBF (Daniels et al. 2016). Based on past experience, most of the harvest on private land would be exported and would not contribute to meeting local demand. Using this estimate, cumulative harvest in Southeast Alaska would be about 136 MMBF for the next decade, increasing slowly in succeeding decades, and would be the same for all alternatives. Table 3.8-2 displays the cumulative harvest under the alternatives.

Table 3.8-2
Maximum Estimated Average Annual Timber Harvest in Southeast Alaska during the Next Decade (MMBF)

Alternative	National Forest[1]	State and Private[2]	Total
1	46	90	136
2	46	90	136
3	46	90	136
4	46	90	136
5	46	90	136
6	46	90	136

[1] PTSQ in the current Forest Plan
[2] 70 MMBF/year from Native corporation lands and 20 MMBF/year from state land (Daniels 2015). Most harvest on private land is exported.
MMBF = million board feet; PTSQ = projected timber sale quantity

Minerals

Affected Environment

Mineral deposit types and mineral resource occurrences were described thoroughly in the 2016 and 2008 Forest Plan Amendment Environmental Impact Statements (EIS; USDA Forest Service 2016b, 2008b) and the 1997 Forest Plan EIS (USDA Forest Service 1997a).

With respect to National Forest management, mineral resources are divided into three groups: locatable minerals, leasable minerals, and salable minerals. The Forest Service manages mineral resource programs that are specific to each group of minerals.

The Forest Plan, as amended, allocates about 249,570 acres of the Forest to the Minerals LUD. The intent of the Minerals LUD is to encourage exploration and development of locatable minerals in areas of high mineral potential, while taking other resource values into account.

Locatable Minerals

Locatable minerals are those minerals that may be located and removed from Federal lands under the authority of the General Mining Law of 1872, as amended. Examples of some locatable minerals on the Tongass are gold, silver, copper, molybdenum, iron, nickel, lead, and zinc. The General Mining Law of 1872, as amended, grants every United States citizen the right to prospect and explore public domain lands open to mineral entry. The right of reasonable access is guaranteed and is not at the discretion of the Forest Service.

The Forest Service works with mining claimants and operators to provide reasonable access to their claims, minimize adverse environmental impacts on surface resources, and ensure reasonable reclamation of disturbed lands affected by mining operations. Protection of surface resources is accomplished by reviewing the mining plan of operations submitted by the claimant, disclosing impacts of the proposed mining operations in a project-specific environmental analysis, approving only those activities that are reasonably incident to the proposed operation, monitoring operations to ensure environmental standards are met, and ensuring prompt and reasonable reclamation of disturbed areas.

By law, designated Wilderness, National Monuments, Research Natural Areas, Enacted Municipal Watersheds, and Wild Rivers (when designated by Congress) are withdrawn from mining claim location, subject to valid existing rights.

On the Tongass, Modified Landscape, Scenic Viewshed, Recreational Rivers, Timber Production, and Minerals LUDs are open to mineral entry. The Primitive Recreation, Semi-Remote Recreation, Old-growth Habitat, Experimental Forest, Special Interest Areas, Scenic Rivers, and LUD II LUDs remain open to mining activities; however, special stipulations and more stringent mitigation measures may be required for mining activities in these LUDs. Similarly, roadless areas within any of these LUDs are open to mineral entry.

Leasable Minerals

Certain types of minerals, primarily energy resources (e.g., oil, gas, coal, and geothermal resources), are not subject to mining claim location but are available for exploration and development under provisions of the Mineral Leasing Act of 1920 and other mineral leasing laws. Access to these types of minerals is provided through leases, permits, or licenses that include fee and/or royalty payment conditions. The authority to manage these minerals is presently administered by the U.S. Department of Interior, Bureau of Land Management (BLM) in cooperation with the Forest Service. National Monuments, Wilderness Areas, and Wild Rivers are withdrawn from mineral leasing.

No leasable minerals are presently being produced on the Tongass, nor have they been since at least the 1997 Forest Plan, and the anticipated demand is expected to remain low. There are three existing geothermal leases on Bell Island but they have not been developed. Previous assessments have indicated a potential for oil and gas occurrence in the Yakutat region (BLM 2006; URS Corporation 2006);

however, the resource development potential is considered low. Outside of the Yakutat area, oil and gas occurrence potential elsewhere in the Tongass is considered low to none. Coal is found at several locations in Southeast Alaska; however, the development of these resources is considered uneconomic, other than possibly for local use, and exploration or development activity is unlikely.

Geothermal resources occur in 19 known locations in Southeast Alaska. Thermal springs in several locations have been developed for small-scale commercial uses such as tourism, aquaculture, community bathhouses, and district heating of buildings (URS Corporation 2006). There has been some recent interest in geothermal resources in the Bell Island area, but no projects are currently under consideration by the Forest Service. In 2012, the Forest Service issued a consent determination on the Bell Island lease application areas being made available for leasing and the adjacent mainland (USDA Forest Service 2012c). Of note, the consent determination included restrictions on new road construction or reconstruction (Roadless Area Stipulation) on any leases within NFS Inventoried Roadless Areas (IRAs).

While the occurrence potential for geothermal resources is considered high in several locations and some exploration could occur, geothermal development activity is not anticipated in the near future.

Salable Minerals

Salable, or "common variety," minerals are sold rather than located or leased. These minerals include petrified wood and common varieties of sand, rock, building stone, gravel, pumice, clay, and other similar materials. Crushed rock is the most common saleable mineral extracted on the Tongass and is often used to construct roads. The supply of quality rock sources is largely dependent upon the locations of active logging operations.

Mineral Resource Inventory and Development Potential

The 2008 Forest Plan Amendment provides a summary of Mineral Resource Inventory and Development potential on the Tongass including identified mineral resources and undiscovered resources. There has been no update to mineral inventories since that time.

Mineral Resource Demand

The extent to which identified and undiscovered mineral resources on the Tongass will be developed in the future depends largely upon the level of demand for those resources. Demand for mineral resources can be inferred based on the amount of money spent by the mining industry to prospect and explore for mineral resources in Southeast Alaska. Between 1982 and 1987, the mineral industry spent an average of $2.92 million per year on mineral exploration in Southeast Alaska, with a high of $5.85 million in 1987 (USDA Forest Service 1997a). Exploration expenditures increased drastically for the 1988 to 1991 period, when the industry spent more than $20 million each year. Expenditures generally declined for the next 10 years, reaching $1.6 million in 2001, before increasing again to a level of $9.9 million in 2006 (Alaska Department of Natural Resources [ADNR], Alaska's Mineral Industry annual reports and summaries for 1997 to 2005). Annual exploration expenditures remained high between 2007 and 2013, averaging $20 million with a high of $34.3 million in 2011. Recently, statewide exploration spending increased significantly to $120.8 million in 2017, doubling 2016 exploration spending (Athey and Werdon 2018), but exploration spending for Southeast Alaska alone was not provided.

Environmental Consequences

Indirect Effects

None of the alternatives propose any changes to the Forest Plan relating to minerals management. Operators will continue to submit plans of operation to the Forest Service for approval, and regulations under which those operating plans are processed will not change by alternative. Identified and undiscovered mineral resource tracts, characteristics and location of mineral deposits, and Southeast Alaska geology will not vary as a result of implementing any of the alternatives.

Locatable Minerals

Under any alternative, future exploration and development (except for valid, currently existing rights) would be precluded in areas withdrawn from mineral entry, such as Wilderness.

Future exploration, mining, and mineral processing activities would continue to occur in ARAs where valuable deposits exist. When necessary, construction or reconstruction of roads for locatable mineral exploration or development is part of the reasonable right of access provided under the General Mining Law. Therefore, none of the alternatives would affect rights of reasonable access to prospect and explore lands open to mineral entry and to develop valid claims.

All proposals for locatable mineral exploration or development are subject to the planning and design requirements governing locatable minerals in 36 CFR 228, subpart A, and the appropriate level of environmental analysis. The plan of operations would be approved subject to modifications identified in the environmental analysis and would be binding on the operator.

Under Alternative 5, roadless areas would be removed from areas with the highest potential for locatable mineral development (areas within the Forest Plan Minerals LUD). The minerals overlay LUD aims to encourage the prospecting, exploration, development, mining, and processing of locatable minerals in these areas. These areas would also be removed from roadless under Alternative 6, the full exemption alternative.

Leasable Minerals

The effects of any mineral leasing activity would be analyzed at the appropriate future time if the Forest Service receives specific requests for access to leasable minerals.

Alternative 1
The Tongass has three active geothermal leases but the anticipated demand for leasable minerals is generally expected to remain low. The Forest Service is aware of some level of interest in leasable minerals in specific areas of the Tongass; however, there are no active leasable projects nor have there been since at least the 1997 Forest Plan. Consistent with the current Forest Plan, any mineral leasing activity would need to be consistent with the standards and guidelines for the respective LUDs affected by the leasable mineral activity. The Forest Service currently prohibits roadbuilding for any new leasable projects, including geothermal projects, within IRAs. Although the road building is prohibited, these projects may include the incidental cutting, sale, and/or removal of trees.

Alternatives 2, 3, 4, and 5
Roadless areas would be added and removed under Alternatives 2, 3, 4, and 5 (see Chapter 2, Table 2-12). The Forest Service currently prohibits roadbuilding for any new leasable projects, including geothermal, within IRAs. This prohibition would continue in newly designated ARAs except within the Timber Priority ARA. Following project-specific analyses, roads could be approved for leasable projects within Timber Priority (Alternative 4) ARA. If the geothermal project was developed as a public utility system, roads would be permissible under the exceptions provided for in Roadless Priority (Alternatives 2, 3, 4, and 5) and Community Use Priority (Alternative 3) designated ARAs.

Regarding the Bell Island geothermal site, the island would retain its roadless designation under each of these alternatives. It would be designated a Roadless Priority ARA under Alternatives 4, and 5, which would allow roads under the provided exceptions if the geothermal project was developed as a community utility system. It would be designated a Watershed Priority ARA under Alternatives 2 and 3, which would not allow for road building associated with leasable projects.

The effects of any geothermal or other leasable project would be analyzed at the appropriate future time if the Forest Service receives specific requests for such projects.

Alternative 6

Under Alternative 6, there would be no areas under a roadless designation. Consistent with the current Forest Plan, any mineral leasing activity would need to be consistent with the standards and guidelines for the respective LUDs affected by the leasable mineral activity.

Salable Minerals

The predominant use of salable minerals is to construct roads in support of the Tongass transportation system. Since road construction is not expected to vary much between alternatives, there would be little difference in salable mineral development between the alternatives.

Cumulative Effects

Under all alternatives, the right to prospect and explore public domain lands open to locatable mineral entry are preserved. Existing mineral projects are expected to continue and new projects are expected to be explored and developed. The effects of any mineral activity operating under the standards and guidelines of the Forest Plan would be evaluated at the time appropriate future time if the Forest Service receives specific requests for such projects.

In September 2018, the Forest Service published two separate Advance Notices of Proposed Rulemaking in the FR as first steps to update the agency's regulations that address surface activities associated with exploration and development of locatable minerals, and to update regulations that address leasing and subsequent development of oil and gas resources. Revision of the regulations governing both locatable minerals and oil and gas resources should help achieve more efficient permitting processes, which in turn reduces regulatory burdens.

Recreation and Tourism

Affected Environment

Southeast Alaska possesses a remarkable and unique combination of features including inland waterways with over 11,000 miles of shoreline, mountains, fjords, glaciers, and large fish and wildlife populations that provide opportunities for a wide range of outdoor recreation experiences. Many Alaska residents purposefully live in proximity to such settings as a part of their lifestyle. Most visitors who travel to see Alaska expect to find it in a wild and unspoiled state, but also expect comfort and convenience, reliable transportation, and other features requiring some level of infrastructure and development. The challenge for recreation managers is to identify and understand the relationship between the settings and the variety of groups seeking to recreate on or near the Tongass. Commercial providers of recreation activities base much of their marketing strategy on particular environmental settings and identified recreation places within those settings.

The Tongass includes approximately 16.7 million acres of land available for recreation. This land contributes to the feeling of vastness and solitude that dominates the region; however, much of the land is not heavily used for outdoor recreation. Difficult and steep terrain, wetlands, icefields, glaciers, and heavy vegetation confine most recreation activities to accessible shorelines, river and stream bottoms, and around the many lakes within the Forest. Extensive use is made of some of the icefields and alpine areas (above tree line), but access to these areas is usually by aircraft. Both residents and visitors use developed campground and picnic areas, beaches, trails, cabins, shelters, and visitor centers that are located near communities. An inventory of developed recreation sites on the Tongass is presented in Table 3.10-1.

Table 3.10-1
Tongass Recreation Facilities, 2015

Type of Facility	Number
Anchor Buoys	42
Boating Sites	7
Campgrounds	15
- Number of Sites	220
Camping Areas	7
Day Use Areas	10
Picnic Sites	33
Group Picnic Sites	2
Hotel, Lodge, Resort	2
Interpretive Site	3
Interpretive Visitor Centers	3
Lookout/Cabin	147
Shelters	39
Observation Site	2
Swimming Site	2
Trailheads	120
Trails (number of miles):	
– Nonwilderness	876
– Wilderness	92
– Total Trail Miles	969
Wildlife Viewing Sites	10

The National Park Service (NPS) and the State of Alaska also provide recreation opportunities in Southeast Alaska. The NPS manages 3.3 million acres in three park units, with the majority of this land

located within the Glacier Bay National Park and Preserve. Alaska State Parks manages about 80,000 acres and 34 park units, including 16 marine parks, in Southeast Alaska. In addition, the Alaska Department of Fish and Game (ADF&G) manages two state wildlife refuges, two critical habitat areas, and one wildlife sanctuary, and the Alaska Division of Forestry manages the 247,000-acre Haines State Forest.

Community road systems are limited and used for access to recreation sites and attractions near local communities. Existing road systems are primarily located near the communities of Juneau, Sitka, Ketchikan, Petersburg, and Wrangell. There is also an extensive road system connecting the communities on Prince of Wales Island, as well as road systems near the communities of Hoonah and Kake. There is no interconnecting highway system between islands or between communities on the mainland.

Roads exist in other locations where timber harvest has taken place. Residents, as well as independent visitors from elsewhere, often use road systems that are accessible from the Alaska Marine Highway System ferries or from local communities for recreational purposes. Roads in locations where there are no communities or interconnecting ferry access receive relatively low levels of recreation use. However, recreation-related vehicle use has been growing on certain remote islands, including Kruzof, Zarembo, and Etolin Islands, and isolated systems on Kuiu and Kupreanof Islands. While the total amount of recreation use on these islands is low, it can be heavy at times, such as during hunting season.

Supply of Recreation Opportunities

Recreation Opportunity Spectrum

The 2016 Forest Plan (USDA Forest Service 2016a) uses the ROS to help identify, quantify, and describe the range of recreation settings provided by the Forest. The ROS system portrays the combination of activities, settings, and experience expectations along a continuum that ranges from highly modified to primitive environments. The following seven classifications are identified along this continuum from most to least developed:

- Primitive (P)
- Semi-Primitive Non-Motorized (SPNM)
- Semi-Primitive Motorized (SPM)
- Roaded Natural (RN)
- Roaded Modified (RM)
- Rural (R) and Urban (U)

The setting indicators and applicable standards and guidelines for the seven ROS classes are described in Appendix I to the 2016 Forest Plan (USDA Forest Service 2016a). These classes and associated indicators may be used in recreation planning and project analysis to describe the current condition across the landscape (ROS inventory) and assess the potential effects of the alternatives on recreation settings. Viewed in terms of acres, the Primitive (P) ROS setting is the largest on the Tongass, with approximately 62 percent of the forest (10.4 million acres) allocated to this setting (Table 3.10-2). SPNM accounts for a further 18 percent (3.1 million acres), followed by RM (10 percent) and SPM (9 percent) (Table 3.10-2).

Table 3.10-2
Forest-wide Recreation Opportunity Spectrum Acres

ROS Class	Acres	Percent of ROS Total
Primitive (P)	10,357,832	62
Semi-Primitive Non-Motorized (SPNM)	3,052,410	18
Semi-Primitive Motorized (SPM)	1,458,528	9
Roaded Natural (RN)	157,386	1
Roaded Modified (RM)	1,662,825	10
Rural and Urban (R and U)	5,618	<0

Note:
The total acres by Recreation Opportunity Spectrum (ROS) class shown in this table are slightly lower than the Forest-wide total because the ROS inventory does not include the entire Forest. Source: USDA Forest Service 2016b, Table 3.15-3

Recreation Places

The pattern of use associated with known protected boat anchorages, boat landings, aircraft landing sites, and the limited road systems makes it possible to identify specific "recreation places" on the Tongass. A total of 1,436 recreation places, encompassing approximately 3.6 million acres, were identified as part of the planning process for 1997 Forest Plan Revision (USDA Forest Service 1997a). Recreation places are classified in two basic ways. First, recognizing that access plays a key role in recreation in Southeast Alaska, "home ranges" were defined for each community. Inventoried recreation places were classified into two categories: those located within a radius of approximately 20 miles from communities ("home range") and those farther than 20 miles from a community. Almost half (48 percent) of the identified recreation place acres are within a community home range. Second, recreation places were identified as either important or ordinary/common based on five categories: facilities, marine, hunting, fishing, and tourism. Recreation places may be important for one, several, or none of the identified categories. Important recreation places by category are summarized in Table 3.10-3 and discussed further in the *Recreation and Tourism* section of the 1997 Forest Plan Revision FEIS (USDA Forest Service 1997b, pp. 3-109, 3-111).

Table 3.10-3
Important Recreation Places by Category and as a Share of Total Recreation Places[1]

	Number of Places	Percent of Total[2]	Acres (1,000s)	Percent of Total[2]
Facilities[3]	402	28	1,053	29
Marine[4]	617	43	1,089	30
Hunting[5]	373	26	1,452	40
Fishing[6]	187	13	472	13
Tourism	876	61	1,924	53
Total[7]	**1,436**	**NA**	**3,630**	**NA**

na = not applicable
[1] Recreation places are rated as either important or common/ordinary.
[2] The Percent of Total columns sum to more than 100 because a recreation place can be rated important in more than one category.
[3] All recreation places with facilities were rated as being important. In addition, other recreation places with some type of facility, such as a viewing platform, and facilities authorized by a special use permit for recreation purposes, were identified as important.
[4] The marine category identified here is different to the marine type identified in Table 3.15-6 (USDA Forest Service 2016b). The marine category in this table only includes those recreation places that are truly unique or typify the Southeast Alaska marine experience.
[5] Important hunting areas were distinguished from ordinary hunting areas based on a number of factors, including heavy recurring use, hunter success, ease of access, opportunities for several species, and prized species, such as mountain goats and moose.
[6] Important fishing recreation places were identified using ADF&G ratings for recreational fishing. Source: USDA Forest Service 2016b, Table 3.15-7.
[7] Totals are for all recreation places (important and ordinary/common) and are not the sum of the preceding rows.

Recreation Use

Many residents of Southeast Alaska place a high value on the quality and availability of outdoor recreation opportunities in the region, with the proportion of Alaskan residents who participate in outdoor activities generally much higher than elsewhere in the United States (Bowker 2001). Many local residents engage in dispersed recreation activities on National Forest System (NFS) land and adjacent saltwater. Most recreation activities take place in and depend upon settings that are primarily undeveloped and widely dispersed. Much of the recreation on the Forest occurs as day trips originating from a nearby community. Although there are some locations on the Tongass where fees are collected and locations where people can be easily counted, accurate data on dispersed recreation use is difficult to obtain. As a result, while there is a general consensus that outdoor recreation opportunities provided by the Tongass are highly important to residents, there is limited data that accurately quantifies resident recreation use.

Resident recreation demand is influenced by a number of factors, including regional population levels, per capita participation rates, and recreation travel behavior. Over time, the supply of certain recreation opportunities in Southeast Alaska has increased. Road systems have expanded into previously inaccessible areas and visitor services and in some cases resulted in supply-induced increases in participation. Supply-induced participation changes have also been accompanied by additional demand for specific recreation places or facilities for a related activity. Increased opportunities for roaded access and activities are typically accompanied by a need for parking, dispersed campsites, picnic sites, trails to scenic attractions, and additional short access routes to cabin sites and previously inaccessible beaches.

Based on the results of the National Visitor Use Monitoring (NVUM) program for 2010 to 2014 and coefficients developed by White and Stynes (2010), the Forest Service (2017f) calculated a visitation estimate of 2,874,000 annual visits to the Tongass. The results of earlier surveys indicated that half of Alaska residents surveyed who live in Southeast Alaska reported using a boat or plane to access the national forest (White and Stynes 2010). Almost half (49.7 percent) of non-resident visits to the Tongass involved the use of a guide or outfitter at some point, with local cruises, wildlife viewing, and flightseeing reported most frequently. Alaska residents in contrast were found to very rarely use outfitters or guides (White and Stynes 2010).

The Tongass is home to a vibrant and growing tourism industry. Cruise ship and other package visitors are a very large group that uses the Tongass. These visitors spend less time in the area than independent visitors and generally follow preplanned and regimented itineraries. Shore excursions have, however, become an important part of the cruise ship experience, with much of this activity centered around ports of call that accommodate large or mid-sized cruise ships. Trends in visitation in areas near communities that serve as large cruise ship ports (such as Juneau, Ketchikan, Sitka, and Hoonah) include a desire for shorter, “softer” adventure excursions that do not require “hard” skills to experience wild Alaska (Zegre et al. 2012). Half-day and day excursions into the Forest have increased in popularity, providing increased revenues for ship operators and opportunities for local entrepreneurs.

Independent visitors, who constitute a much smaller group, tend to arrive by air, ferry, and highway and engage in a variety of activities.[29] Independent visitors spend more time in the communities and on the Forest, and may secure the services of outfitters and guides, restaurants, motels, and transportation services such as floatplanes, boats, and gas stations. Independent travelers tend to plan their own itineraries, but often secure the services of mini-packages, such as day excursions or fishing charters. These types of visitors compete more directly with residents for recreation opportunities on the Forest.

Lodges have grown in popularity in recent years, with fishing lodges playing an important role in the tourism industry in some areas. This is, for example, the case with Elfin Cove, an unincorporated town located west of Hoonah, where nine recreational fishing lodges are located in the vicinity of the town (Dugan et al. 2009). Fishing lodges accounted for 79 percent of the non-cruise, multi-day packages identified in Summer 2016, with wilderness lodges and adventure tours accounting for a further 6 percent of the total each. Rail packages (1 percent), motor coach tours (1 percent), rental car/recreational vehicle

[29] Three Southeast Alaska communities – Haines, Hyder, and Skagway – can be accessed from outside the region via highway. As noted above, there is no interconnecting highway system between islands or between communities on the mainland.

package (2 percent), and hunting (less than 1 percent) accounted for the remaining share of multi-day packages (McDowell Group 2017).

The marketing of recreation opportunities by suppliers has important similarities to resident recreation concerns. For example, many businesses that provide boat or aircraft access for wildlife viewing and other activities have a low tolerance for the presence of other groups in the same area. The presence of more than two or three other parties in a bay or area may cause such operators to seek other locations. Similarly, resident recreationists who traditionally use an area may be discouraged by businesses operating in the same area. Outfitter/guide businesses are discussed in the next section.

Outfitter and Guide Use

The Forest Service authorizes outfitter and guiding services to provide for public health and safety and foster successful small businesses. Outfitters and guides are typically skilled and experienced individuals who conduct activities in a manner that protects environmental resources and ensures that national forest visitors receive high-quality services. Due to its remote and rugged nature, recreation use on much of the Tongass requires good outdoor skills and/or specialized equipment. Outfitters and guides provide access and equipment to assist people who might not otherwise be able to pursue certain recreation activities on the Forest. Outfitter/guides on the Tongass range from small family-run operations to larger corporations and non-profit organizations, with activities ranging from fishing and hunting to helicopter flights and photography. Both residents and nonresidents use the services of outfitter/guides, but nonresidents tend to use outfitter/guides more often because they do not have the local knowledge or necessary equipment. Outfitter/guides are authorized to operate on the Tongass through special use permits and are required to report use as a condition of their permit.

While people often participate in several different activities in one or more settings on any given trip, different activities result in different numbers of people in a group and different amounts of time spent on the Forest. At one end of the spectrum, guided bear hunting consists of many small groups of one or two people. (State regulations require non-resident hunters to use guides for hunting brown bear and mountain goats). Hunters are dispersed across a large area and are on the Forest for typically 5 to 10 days, during spring and fall. At the other end of the use spectrum are mid-sized nature-viewing tour boats with group sizes from 12 to 70 people. These groups are typically concentrated in a few areas of the Forest. Their use is short-term and typically concentrated in late spring, summer, and early fall.

Using information provided by outfitter/guides as part of their permit requirements, the Forest Service compiles data for 143 separate outfitter/guide use areas, which are used to identify and manage recreation use. These use areas are subdivisions of the Guide Use Areas that ADF&G uses to manage commercial big game guiding. Use areas are distinct geographic areas that range in size from about 500 acres to more than 1.3 million acres. Outfitter/guide use areas consist of a mix of IRAs, Wilderness, and LUD II areas, as well as other areas managed for a range of non-development and development use under the 2016 Forest Plan. Thirteen outfitter/guide use areas have no IRA acres and 11 more include less than 100 acres. IRAs make up more than half the total acres of 96 of the 143 use areas (66 percent), with the roadless area share ranging from 51 percent to 100 percent.

A total of 3.1 million outfitter/guide clients or service days were reported on the Tongass from 2013 to 2017, for an annual average of 632,100 service days. A service day is defined as a day or any part of a day for which an outfitter or guide provides service to a client on NFS lands. Reported use in 2017 was 641,149 service days, higher than the five-year average. Reported use is presented for 2013 to 2017 for the 143 outfitter/guide use areas in Table C-1 in Appendix C. The following sections provide an overview of existing outfitter/guide use by ranger district. More detailed information on outfitter/guide use and management is available in the Outfitter and Guide Management Plan documents that address outfitter/guide use on the Forest (USDA Forest Service 2009b, 2009c, 2012d, 2012e, 2017e).

Admiralty National Monument

Admiralty National Monument is composed of 11 outfitter/guide use areas, 8 of which do not include any IRAs. The roadless share of the other three areas ranges from 14 percent to 31 percent. A total of 14,221 outfitter/guide service days were reported on Admiralty National Monument from 2013 to 2017, for an annual

average of 2,844 service days (Table 3.10-4). Viewed in terms of service days, wildlife viewing at Pack Creek Zoological Area was the most popular activity, accounting for 23 percent of total outfitter/guide use on Admiralty National Monument. Pack Creek Zoological Area is located in the Pack Creek use area, which does not include any roadless areas and would not be affected under any of the alternatives. Freshwater fishing was the next most popular activity making up 21 percent of service days. The Greens Creek use area accounted for almost half (47 percent) of total freshwater fishing service days.

Craig Ranger District

Outfitter/guide data are compiled for the Craig Ranger District as a whole. Approximately 77 percent of the 0.93 million acres that comprise this area are roadless. A total of 9,343 outfitter/guide service days were reported from 2013 to 2017, for an annual average of 1,869 service days. Wildlife viewing was the most popular outfitter/guide activity in this area, accounting for 84 percent of total service days (Table 3.10-4).

Table 3.10-4
Outfitter/Guide Average Annual Use 2013 to 2017 by Ranger District and Activity

	Ranger District									
Reported Activity[1]	Admiralty	Craig	Hoonah	Juneau	Ketchikan Misty Fjords	Petersburg	Sitka	Thorne Bay	Wrangell	Yakutat
Total Service Days	2,844	1,869	6,079	575,802	17,399	8,266	13,431	1,239	2,346	2,831
Percent of Total by Ranger District										
Camping	1	1	5	0	0	18	5	26	42	1
Fishing	21	2	4	0	3	2	10	23	2	90
Flightseeing	0	0	0	0	36	0	0	0	0	0
Helicopter ski/tours	0	0	0	15	0	0	0	0	0	0
Hiking/Mountaineering	17	0	52	7	31	63	43	28	8	0
Hunting	14	9	1	0	0	6	5	4	1	3
Nature Viewing	1	0	0	0	0	0	2	0	0	0
Non-Motorized Boating	1	0	1	3	3	0	0	0	0	0
Other	0	1	0	2	0	0	5	0	0	0
Remote-Setting Nature Tours	15	2	10	0	12	6	14	3	12	0
Road-Based Activities	0	1	26	0	2	1	15	0	0	0
Sightseeing	7	1	1	0	0	3	1	16	4	2
Visitor Center	0	0	0	71	1	0	0	0	0	0
Wildlife Viewing	23	84	0	0	12	0	0	0	29	0

Note:
[1] Reported activities and service days are from the Forest Service outfitter/guide database.

Hoonah Ranger District

The Hoonah Ranger District includes 10 outfitter/guide use areas and parts of two others, Tenakee Inlet and West Yakobi Island, which are also partially in the Sitka Ranger District. Four of the 12 areas do not include any roadless areas. The roadless share of the other eight areas ranges from 61 percent to 100 percent. A total of 30,394 outfitter/guide service days were reported from 2013 to 2017, for an annual average of 6,079 service days. Hiking/mountaineering accounted for 52 percent of average annual use. Road-based activities were the second most popular activity (26 percent), followed by remote-setting nature tours (10 percent) (Table 3.10-4). Viewed by use area, hiking/mountaineering service days were concentrated in two use areas, Port Althorp and Idaho Inlet, which together accounted for 81 percent of total service days. Port Althorp also accounted for more than one-third (39 percent) of the remote-setting nature tour visitor days. Road-based activities were concentrated in the Port Frederick and Freshwater Bay areas, which together accounted for 99 percent of total road-based service days.

Juneau Ranger District

The Juneau Ranger District includes 28 outfitter/guide use areas. Three of the 28 areas do not include any roadless areas. The roadless share of the remaining 25 areas ranged from 67 percent to 100 percent. A total of 2,879,009 outfitter/guide service days were reported from 2013 to 2017, for an annual average of 575,802 service days (Table 3.10-4). Visits to the Juneau Ranger District accounted for 91 percent of Forest-wide outfitter/guide service days over this period. Put another way, outfitter/guides using the Juneau Ranger District reported 10 times as many service days as the other nine districts (including Admiralty National Monument) combined. Visits to one use area, Juneau Icefield 4 – Mendenhall Glacier, accounted for 90 percent of reported service days, with the majority of these service days (79 percent of total Mendenhall Glacier service days) consisting of trips to the Forest Service's Mendenhall Glacier Visitor Center. Helicopter ski/tours accounted for 15 percent of total service days on the Juneau Ranger District and were mainly reported for the seven Juneau Icefield and three Skagway Icefield use areas, with Juneau Icefield 4 – Mendenhall Glacier accounting for almost half (48 percent) of the reported total.

Ketchikan Misty Fjords Ranger District

The Ketchikan Misty Fjords Ranger District includes 28 outfitter/guide use areas. Four of the 28 areas do not include any roadless areas, and two more had less than 50 roadless acres each. The roadless share of the remaining 22 areas ranged from 6 percent to 98 percent. A total of 86,997 outfitter/guide service days were reported from 2013 to 2017, for an annual average of 17,339 service days. Flightseeing accounted for 36 percent of service days, followed by hiking/mountaineering (31 percent) (Table 3.10-4). More than 99 percent of flightseeing service days were reported in the Misty Core Lakes use area. This area does not include any roadless areas and would not be affected under any of the alternatives.

Hiking/mountaineering service days on the Ketchikan Misty Fjords Ranger District were reported for a number of areas, with the largest use occurring in the Betton Island use area, which accounted for about 72 percent of service days in this category. Other important types of use included remote-setting nature tours (12 percent of service days) and wildlife viewing-developed sites (12 percent of service days) (Table 3.10-4). Almost all (98 percent) of the remote setting nature tour service days were reported in the Betton Island use area. Wildlife viewing-developed site service days were all reported for the Margaret Creek Wildlife Viewing Area, which is part of the Margaret Bay outfitter/guide use area.

Petersburg Ranger District

The Petersburg Ranger District includes 20 outfitter/guide use areas, one of which does not include any roadless acres. The roadless share of the remaining 19 areas ranges from 2 percent to 99 percent. A total of 41,328 outfitter/guide service days were reported from 2013 to 2017, for an annual average of 8,266 service days.

Hiking/mountaineering was the most popular outfitter/guide activity (63 percent of service days), followed by camping (18 percent) (Table 3.10-4). Hiking/mountaineering service days were reported for a number of use areas, with relatively large numbers reported for the Thomas Bay/Point Vandeput (30 percent) and Petersburg Creek/Duncan Salt Chuck (25 percent) use areas. Camping service days were reported in almost all of the outfitter/guide use areas on the Petersburg Ranger District.

Sitka Ranger District

The Sitka Ranger District includes 13 outfitter/guide use areas and parts of two others, Tenakee Inlet and West Yakobi Island, which are also partially in the Hoonah Ranger District. Two of the 15 areas include less than 10 roadless acres, with the roadless share of the other 13 areas ranging from 70 percent to 99 percent. A total of 67,156 outfitter/guide service days were reported from 2013 to 2017, for an annual average of 13,431 service days.

Hiking/mountaineering accounted for 43 percent of reported service days, followed by road-based activities (15 percent), and remote-setting nature tours (14 percent) (Table 3.10-4). Two outfitter/guide use areas, the Sitka Area and Kelp Bay use areas, together accounted for more than three-quarters of reported visitor days. Hiking/mountaineering and remote-setting nature tour service days were

concentrated in these use areas, with the Sitka Area also accounting for most of the road-based activity service days.

Thorne Bay Ranger District

Outfitter/guide data are compiled for the Thorne Bay Ranger District as a whole. Approximately 40 percent of the 0.9 million acres that comprise this area are roadless. A total of 6,196 outfitter/guide service days were reported from 2013 to 2017, for an annual average of 1,239 service days.

Hiking/mountaineering, camping, and fishing were the most popular outfitter/guide activities in this area, accounting for 28 percent, 26 percent, and 23 percent of total service days, respectively (Table 3.10-4).

Wrangell Ranger District

The Wrangell Ranger District includes 13 outfitter/guide use areas. Two of the 13 areas had no roadless acres, with the roadless share of the other 11 areas ranging from 40 percent to 99 percent. A total of 11,730 outfitter/guide service days were reported from 2013 to 2017, for an annual average of 2,346 service days. Camping was the most popular outfitter/guide activity, accounting for 42 percent of total service days, followed by wildlife viewing-developed sites (29 percent) and remote-setting nature tours (12 percent) (Table 3.10-4).

Camping service days were reported for most of the use areas. Wildlife viewing-developed site service days were all reported for the Anan Creek wildlife viewing area, which is part of the Anan Creek outfitter/guide use area. Remote-setting nature tour service days were reported for a number of use areas, with the Stikine-LeConte Wilderness use area accounting for 71 percent of the total.

Yakutat Ranger District

The Yakutat Ranger District includes 16 outfitter/guide use areas, with roadless shares ranging from 1 percent to 99 percent. A total of 14,157 outfitter/guide service days were reported from 2013 to 2017, for an annual average of 2,831 service days. Fishing was the most popular outfitter/guide activity accounting for 90 percent of service days (Table 3.10-4). Fishing visitor days were reported for a number of use areas, with the Situk River use area accounting for 71 percent of the total.

Environmental Consequences

Supply of Recreation Opportunities

Recreation Opportunity Spectrum

This EIS is programmatic, meaning that it examines potential effects arising from direction and allowable activities for broad land areas, rather than specific activities in specific locations. The action alternatives would increase the acres available for timber harvest, but harvest levels are expected to remain the same across all alternatives. In addition, while there may be some variation by alternative, the amount of new or reconstructed road miles is expected to be broadly similar across all alternatives because roads on the Tongass are largely developed in support of timber harvesting and harvest levels are expected to remain similar. Estimated road miles by alternative are summarized in Table 3.3-21 (in the *Key Issue 3* section, above).

Alternatives 2 to 6 would result in changes to the number of suitable old-growth and young-growth acres available for harvest[30] in development LUDs (Timber Production, Modified Landscape, and Scenic Viewshed) presently managed as roadless. Total suitable acres are, therefore, used here as a relative measure of timber opportunity by ROS setting to differentiate between alternatives. They do not represent estimates of how much harvest would occur under each alternative, which, as noted above, is expected to be the same across all alternatives. In addition, harvest projections are used to provide another

[30] Changes in roadless management, areas in development LUDs managed as roadless, and suitable timber are discussed in more detail in the Outfitter and Guide Use section below.

perspective on potential programmatic changes in ROS settings. Actual harvest locations would depend on the timber sales that are carried out during Forest Plan implementation.

As discussed in the preceding affected environment section, the ROS system is designed to help identify and quantify different types of recreation setting on the Tongass and portrays the combination of activities, settings, and experience expectations along a continuum that ranges from highly modified to primitive environments (Table 3.10-2). Recreational visitors with an expectation of a remote experience would be most affected by timber harvest in Primitive, SPNM, and SPM settings.

Figure 3.10-1 shows total old-growth suitable acres by ROS setting and alternative. Total old-growth suitable acres would increase relative to Alternative 1 under all five action alternatives, with increases ranging from about 20,000 acres (9 percent) (Alternative 2) to 168,000 acres (74 percent) (Alternatives 5 and 6). The total number of suitable acres would increase in all ROS settings. The largest increase for Alternatives 4 to 6 would occur in the SPNM setting, with approximately 79,000 acres of old-growth suitable acres added in SPNM settings under Alternatives 5 and 6. Large absolute increases would also occur in RM, with approximately 62,600 acres added to RM settings under Alternatives 5 and 6 (Figure 3.10-1).

Young-growth acres suitable for timber production would remain relatively constant across all alternatives. Suitable young-growth acres would range from 334,000 acres for Alternative 1 to 354,000 acres for Alternative 6. More than 90 percent of young-growth suitable for harvest is in the RM setting under all six alternatives.

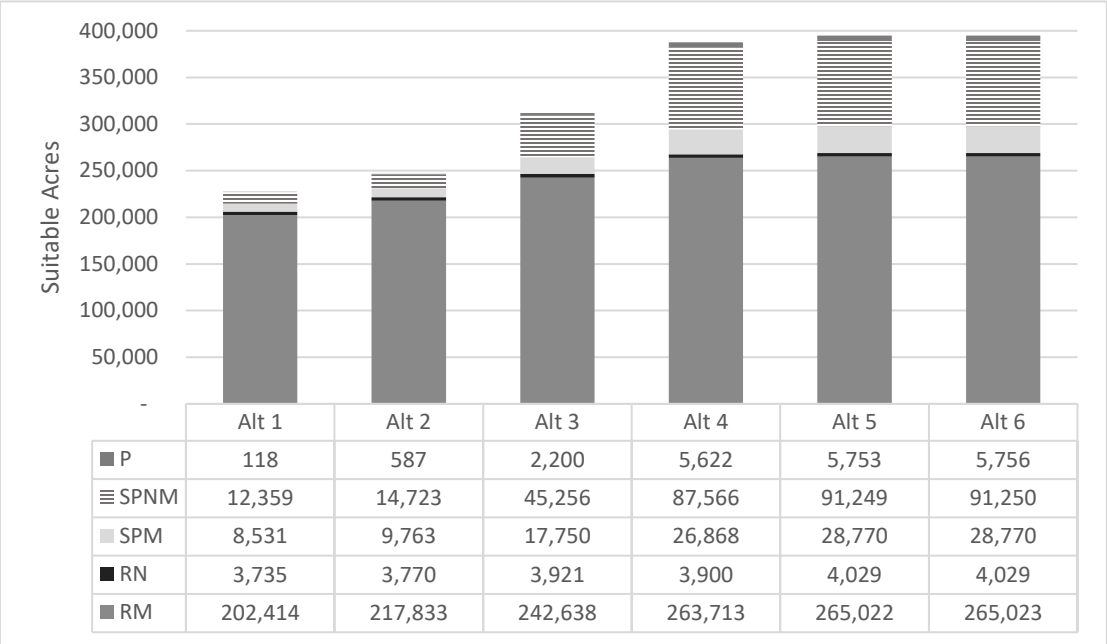
Although the alternatives would vary in terms of the amount and location of acres suitable for timber harvest, the total volumes expected to be harvested would be the same under each alternative. An estimated 42,500 acres of old growth would be harvested over 100 years.[31] As described above, the following analysis assumes that the estimated total number of acres harvested would be the same for each alternative. Based on this analysis, RM as a share of the estimated total would decrease relative to Alternative 1 under all alternatives, decreasing from 91 percent under Alternative 1 to 72 percent under Alternatives 4 to 6 (Figure 3.10-2). Much of this decrease in RM would be made up by an increase in SPNM acres. SPNM as a share of the estimated total would range from 4 to 5 percent under Alternatives 1 and 2 to 18 percent under Alternatives 4 to 6 (Figure 3.10-2).

Using the same assumptions for young growth, an estimated 284,000 acres of young growth would be harvested over 100 years under all alternatives.[32] Harvest would largely be concentrated in RM settings under all six alternatives, with RM accounting for 93 to 96 percent of total harvest acres by alternative.

[31] These estimates of total old growth (42,500 acres) and young growth (284,000 acres) that would be harvested over 100 years were developed as part of the 2016 Forest Plan Amendment EIS modeling for the Forest Plan (Alternative 1 in this EIS).

[32] See previous footnote.

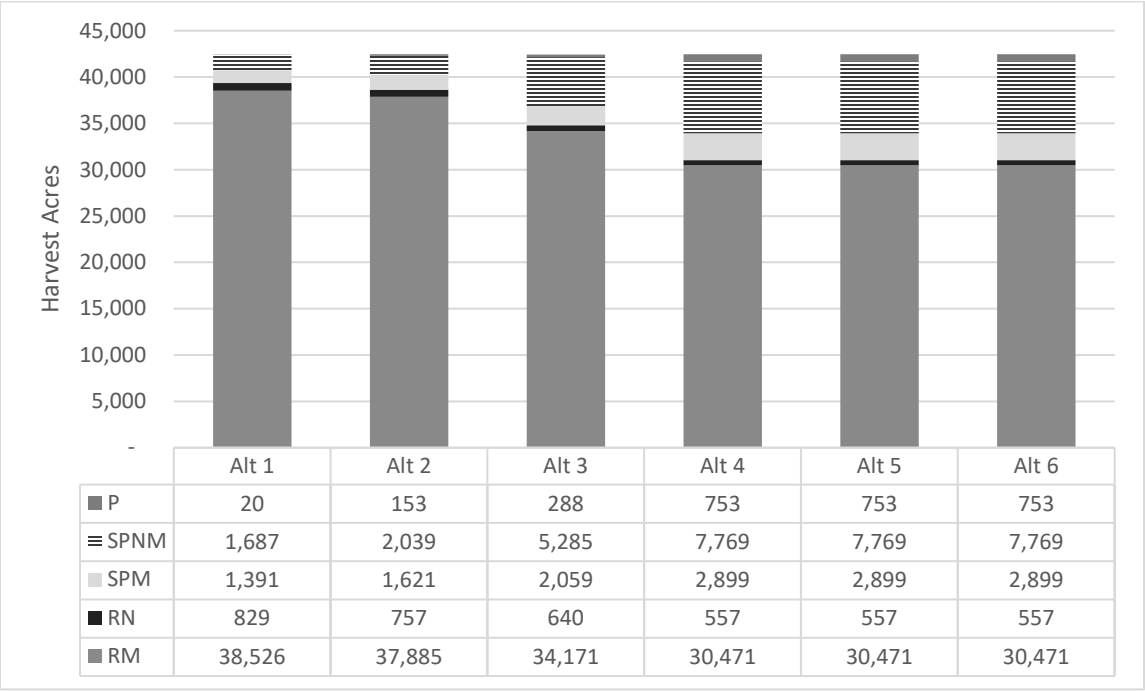
Figure 3.10-1
Old-Growth Suitable Acres by ROS Setting and Alternative



	Alt 1	Alt 2	Alt 3	Alt 4	Alt 5	Alt 6
P	118	587	2,200	5,622	5,753	5,756
SPNM	12,359	14,723	45,256	87,566	91,249	91,250
SPM	8,531	9,763	17,750	26,868	28,770	28,770
RN	3,735	3,770	3,921	3,900	4,029	4,029
RM	202,414	217,833	242,638	263,713	265,022	265,023

Note:
[1] Urban (U) and Rural (R) ROS settings are not shown because they each make up a very small share of suitable acres under all six alternatives, less than 10 acres and between 100 and 200 acres, respectively.

Figure 3.10-2
Old-Growth Acres Expected to be Harvested After 100 Years by ROS Setting and Alternative



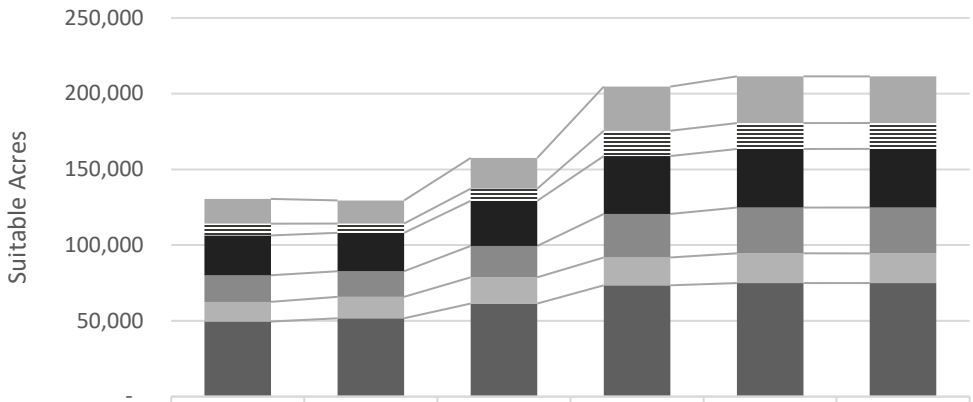
	Alt 1	Alt 2	Alt 3	Alt 4	Alt 5	Alt 6
P	20	153	288	753	753	753
SPNM	1,687	2,039	5,285	7,769	7,769	7,769
SPM	1,391	1,621	2,059	2,899	2,899	2,899
RN	829	757	640	557	557	557
RM	38,526	37,885	34,171	30,471	30,471	30,471

Recreation Places

As with the preceding ROS assessment, total suitable acres available for timber production are used here as a relative measure of timber opportunity by recreation place to differentiate between alternatives. They do not represent estimates of how much harvest would occur under each alternative, which is expected to be the same across all alternatives. Figure 3.10-3 shows total old-growth suitable acres by important recreation place category and alternative. Total old-growth suitable acres in recreation places would increase relative to Alternative 1 under all five action alternatives. The total number of suitable old-growth acres would increase for all recreation place categories. The largest absolute increases would occur in home range recreation places, with net increases of approximately 25,400 suitable old-growth acres under Alternatives 5 and 6. Home range recreation places are those inventoried recreation places within an approximate 20-mile radius of one or more communities. Large increases would also occur under Alternatives 5 and 6 in recreation places important for marine use, hunting, and tourism, with net increases of about 12,400 to 14,500 suitable old-growth acres (Figure 3.10-3).

Total young-growth acres suitable for harvest would remain relatively constant across all alternatives, with the largest increase anticipated for home range recreation places under Alternative 6, a net gain of almost 4,000 acres.

Figure 3.10-3
Old-Growth Suitable Acres by Recreation Place Category and Alternative



	Alt 1	Alt 2	Alt 3	Alt 4	Alt 5	Alt 6
Tourism	16,258	15,326	20,355	29,272	30,754	30,755
Fishing	7,761	6,060	8,149	16,664	17,087	17,088
Hunting	26,296	25,456	29,682	38,127	38,703	38,703
Marine	17,548	16,744	20,627	28,871	30,307	30,308
Facilities	13,019	14,272	17,480	18,270	19,570	19,570
Home Range	49,553	51,666	61,374	73,539	74,970	74,971

Note:
[1] Recreation place categories are not mutually exclusive. A recreation place can be rated as important in more than one category.

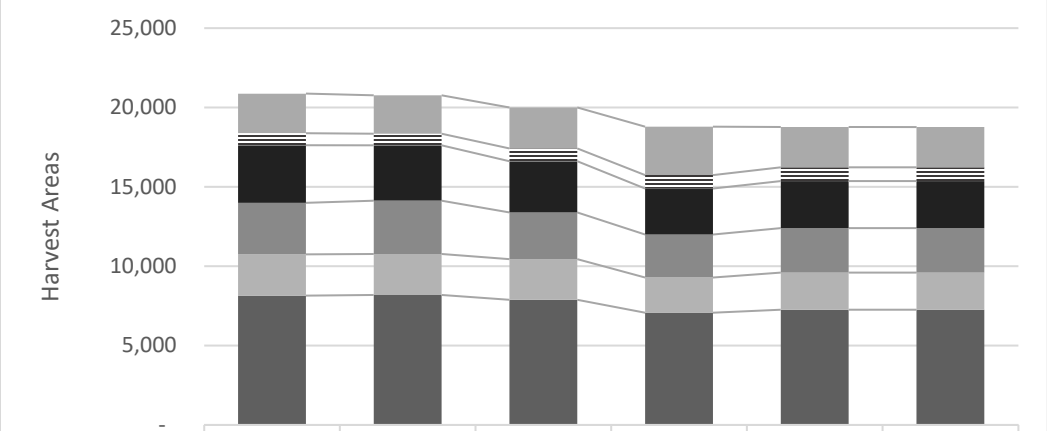
As discussed with respect to ROS settings, although the alternatives would vary in terms of the amount and location of acres suitable for timber production, the total volumes expected to be harvested would be the same under each alternative. The following analysis assumes that the estimated total number of acres harvested over 100 years would be the same for each alternative. Harvest would be distributed across available suitable acres, including those that coincide with important recreation places. Based on this analysis, the acres of old-growth acres harvested within four of the recreation place categories (home range, facilities, marine, and hunting) would mostly decrease relative to Alternative 1 (Figure 3.10-4). Old-

growth acres harvested in recreation places important for fishing and tourism would be expected to increase relative to Alternative 1.

Using the same assumptions for young-growth, total acres harvested in important recreation places over 100 years would be similar across all alternatives, with changes relative to Alternative 1 ranging from a decrease of 1.3 percent (Alternative 6) to an increase of 1.3 percent (Alternative 2).

Overall, the total share of recreation place acres that would be harvested over 100 years would be small under all alternatives. Viewed as a share of total recreation place acres in each category, estimated old-growth and young growth harvest would range from about 2 percent (facilities and tourism) to 4 percent (home range and fishing) of total acres, with harvest in the other two categories (marine and hunting) equivalent to about 3 percent of total acres. Total acres by category are shown in Table 3.10-3. Actual harvest locations would depend on the timber sales that are carried out during plan implementation.

Figure 3.10-4
Old-Growth Acres Expected to be Harvested After 100 Years by Recreation Place Category and Alternative



	Alt 1	Alt 2	Alt 3	Alt 4	Alt 5	Alt 6
Tourism	2,497	2,420	2,586	3,049	2,543	2,543
Fishing	764	727	800	846	870	870
Hunting	3,625	3,489	3,232	2,898	2,947	2,947
Marine	3,246	3,357	2,939	2,709	2,803	2,803
Facilities	2,592	2,582	2,568	2,217	2,336	2,336
Home Range	8,154	8,190	7,882	7,072	7,268	7,268

Note:
[1] Recreation place categories are not mutually exclusive. A recreation place can be rated as important in more than one category.

Recreation Use

As noted above, this EIS evaluates direction and allowable activities for broad land areas, rather than authorizing specific activities in specific locations. Actual timber harvest locations and associated road development activities would depend on the timber sales that are carried out during Forest Plan implementation. Further, timber harvest levels are expected to be similar under all alternatives. This makes it difficult to evaluate the effects of the alternatives on particular groups of recreation users or resources. The following discussion addresses potential impacts at the programmatic or Forest-scale and assesses relative potential impacts in terms of suitable acres available for harvest as a measure of potential timber opportunity. Forest-wide suitable acres are shown by alternative in Maps 7 to 12 (on thumb drive or website).

Changes in roadless area designations have the potential to affect the spatial distribution of future development activities, especially timber harvest. Figure 3.10-1 indicates that Alternatives 4 to 6 would result in relatively large increases in suitable old-growth acres available for harvest in SPNM ROS settings, as well as RM settings. Harvest projections over the next 100 years for each alternative indicate that the share of harvest in Primitive, SPM, and especially SPNM settings would increase relative to Alternative 1 under all the action alternatives with the largest increases occurring under Alternatives 4 to 6 (Figure 3.10-2). Similarly, the number of suitable acres available for harvest in important recreation places would increase relative to Alternative 1 under all action alternatives with the largest increases under Alternatives 4 to 6 (Figure 3.10-3).

Timber harvest and associated road construction in Primitive and Semi-Primitive (SPNM and SPM) ROS settings has the potential to affect recreation activities and users dependent on remote, natural settings with low to no evidence of human use. Harvest in these settings could affect the quality of the recreation experience and displace visitors to other parts of the Forest. These types of impacts are likely to occur in Primitive, SPNM, and SPM ROS settings in recreation places, especially in "home range" recreation places (i.e., those within approximately 20 miles of communities). Impacts are likely to be most acute in Primitive and Semi-Primitive areas where recreation use is already at or near capacity, including areas where competition already exists between resident recreationists, independent visitors, and outfitter/guide operations. Outfitter/guide use is discussed in more detail below.

Changes in roadless area designations could also indirectly affect nearby Primitive and Semi-Primitive ROS settings, as displaced recreationists seek other locations with similar qualities. In addition to long-term impacts in Primitive and Semi-Primitive settings, in the short term, resident and other recreationists could be displaced by logging operators in the nearby vicinity, with the presence of logging equipment potentially affecting access and the overall quality of the recreation experience. This type of short-term impact would potentially affect recreationists across all ROS settings.

The alternatives evaluated here could also result in different supply-induced changes in participation. In the past, supply-induced changes in participation on the Tongass have been mainly related to changes in road systems and road access. This type of change in participation appears to have occurred on Prince of Wales, Wrangell, and Mitkof Islands, for example. In these locations, road systems developed for timber harvesting created an opportunity for road-related access to previously inaccessible recreation settings and, therefore, an opportunity for recreation activities involving wheeled vehicles. In addition, new roads that provide easier access to a wider area may create new semi-primitive opportunities that increase the capacity of a recreation place or create a new recreation place. Continuation of such new opportunities would be dependent on the availability of funds for road maintenance and other system management needs.

There would be some new road access in the long term under all alternatives. In addition, the Community Priority ARA (Alternative 3) would allow road construction and reconstruction in conjunction with the construction, expansion, or maintenance of a developed recreation site. Nearly all new roads constructed under the alternatives would be closed following harvest. These roads would, therefore, not be available for use by highway vehicles or high-clearance vehicles. They may, however, be available for access by other methods and would, as a result, have the potential to affect existing recreation patterns. Any potential increase in recreational access may be limited by the extent to which road closures include restoring the road bed to a more natural condition, possibly blocking or discouraging non-vehicle access as well. The action alternatives would increase the acres available for timber harvest, but acres harvested and timber volume removed are expected to remain the same across all alternatives. As a result, the amount of new or reconstructed road miles would be similar across the alternatives, but would be lowest under Alternatives 1 and 2 and highest under Alternatives 4, 5, and 6. Alternative 3 would likely result in more roads than Alternatives 1 and 2, and fewer than Alternatives 4 to 6. In addition, based on the distribution of suitable acres, Alternatives 4 to 6 would be more likely to result in new road construction in Primitive or Semi-Primitive ROS settings.

Outfitter and Guide Use

Land management activities that affect the natural appearance of the landscape have the potential to affect outfitter/guide operations that provide commercial recreation opportunities on the Forest. Impacts to

existing outfitter/guide use are likely to be greatest where changes in roadless designations allow development in remote areas that are used for outfitter/guide activities dependent on high scenic integrity and undisturbed landscapes.

Changes in roadless area designations could also affect outfitter/guide use in other adjacent or nearby areas as outfitter/guides displaced from one location seek other places to take clients. Some use areas are currently at capacity, which could serve to exacerbate potential displacement effects. Long-term changes in roadless area management could affect the Forest's ability to meet future outfitter/guide demand, especially for operators seeking more remote areas. In the short term, commercial recreation operators could be displaced by logging operations in the nearby vicinity, with the presence of logging equipment and related noise affecting the quality of the recreation experience.

In some locations, new road construction could create new opportunities for operators who use Forest roads for access. However, nearly all new roads constructed under the alternatives would be closed following harvest.

The following analysis assesses potential impacts to the 143 outfitter/guide use areas that the Forest Service uses to manage outfitter/guide use using the following primary measures by alternative: 1) change in acres managed as roadless; 2) change in acres in development LUDs managed as roadless; 3) change in suitable old-growth and young-growth acres available for harvest; and 4) projected old-growth and young-growth harvest. As described below, a screening review based on existing outfitter/guide use and changes in suitable old-growth acres is used to help focus on a smaller group of outfitter/guide use areas for more detailed review.

Changes in Roadless Area Acres

The change in acres managed as roadless provides a broad overview of the changes in the current management situation by outfitter/guide use area. Changes in roadless acres are presented by outfitter/guide use area and alternative in Table C-2 in Appendix C.

Under Alternative 3, roadless designation would be removed from "roaded roadless" and "logical extension" areas, as discussed in Chapter 2. Alternative 3 would also remove protection from the 843,000 LUD II acres that are currently within an IRA. LUD II acres removed from roadless designation would still retain their congressionally-designated protections, which require that these areas be managed in a roadless state to retain their wildland character. Therefore, decreases shown for Alternative 3 tend to overstate the amount of acres that would no longer be protected.

Two sets of estimates are provided for Alternative 4. Three ARAs would be designated under this alternative: LUD II Priority, Roadless Priority, and Timber Priority. The Timber Priority ARA would exempt timber harvest and road construction. The first set of estimates (4a) shows the net change in acres classified as roadless; the second set (4b) also subtracts the acres that would be managed as Timber Priority ARA because road construction would be allowed in these areas.

Changes in Acres in Development LUDs Managed as Roadless

Not all acres removed from roadless management would be available for development. LUD II acres removed from roadless designation under Alternative 3, for example, would, as noted above, still retain their congressionally-designated protections, which require that these areas be managed in a roadless state to maintain their wildland character. Other areas removed from roadless designation occur in non-development LUDs, such as Old-growth Habitat and Remote and Semi-remote Recreation, which do not allow old-growth timber harvest. The change in acres in development LUDs managed as roadless serves as a measure of development potential.

Development LUDs for the purposes of this analysis are Timber Production, Modified Landscape, and Scenic Viewshed. These three LUDs all allow timber production, with Timber Production generally considered an intensive development LUD and Modified Landscape and Scenic Viewshed considered moderate development LUDs. Approximately 7 percent (1,152,700 acres) of the Forest is presently managed in development LUDs without roadless designation. This total does not include development

LUD acres that are presently in IRAs. Total development LUD acres without roadless designation would increase under all action alternatives, with net gains ranging from about 53,300 acres (Alternative 2) to more than 2.1 million acres (Alternatives 5 and 6), as areas are removed from roadless designation.

Changes in development LUDs are presented by outfitter/guide use area and alternative in Table C-3 in Appendix C.

Changes in Suitable Timber

Not all lands allocated to development LUDs are available for timber management. As described in Appendix A to the 2016 Forest Plan (USDA Forest Service 2016a), old-growth forest located within Phases 2 and 3 of the Tongass Timber Sale Program Adaptive Management Strategy or within the Tongass 77 (T77) Watersheds and The Nature Conservancy (TNC)/Audubon Conservation Priority Areas is identified as not suitable for timber production. As a result, not all increases in development LUD acres would provide additional opportunities for timber harvest. Changes in suitable old-growth and young-growth acres available for harvest are, therefore, used as a relative measure of timber opportunity to differentiate between alternatives (see Tables C-3 and C-4 in Appendix C, respectively). Suitable acres in this context serve as a relative measure of timber resources that would be potentially available under the current Forest Plan by outfitter/guide use area and alternative. Forest-wide, approximately 227,300 acres are presently considered suitable old-growth available for harvest. This total would increase under all the action alternatives, with gains ranging from about 19,500 acres (Alternative 2) to 160,600 to 167,800 acres (Alternatives 4 to 6). Approximately 333,700 acres are considered suitable for young-growth harvest, with estimated increases ranging from about 11,300 acres (Alternative 2) to 20,200 acres (Alternative 6).

Estimated Timber Harvest over 100 Years

Total acres harvested are assumed to remain constant across all alternatives. After 25 years of Forest Plan implementation, an estimated 24,000 old-growth acres would be harvested. Old growth would continue to be harvested over time, but at a much reduced rate, with an estimated total of 42,500 old-growth acres expected to be harvested after 100 years. The corresponding totals for young growth are 43,300 acres after 25 years and 284,100 acres after 100 years. Estimated harvest totals over 100 years show the amount of harvest likely to occur by alternative and outfitter/guide use area. Estimated harvest acres were distributed over the suitable old-growth base using the following assumptions: 1) all harvest acres were assigned to medium- and high-volume old growth only; 2) based on historic harvest distributions, 95 percent of old-growth harvest was assumed to occur on the five south ranger districts (Craig, Ketchikan Misty Fjords, Petersburg, Thorne Bay, and Wrangell); and 3) harvest was assumed to occur in VCUs with higher stumpage values as estimated for the 2008 Forest Plan using the Spectrum model. The resulting distributions represent best estimates based on the available information and the above assumptions. Actual harvest locations will depend on the timber sales that are carried out during plan implementation.

Effects on Selected Outfitter/Guide Use Areas

The following analysis uses changes in suitable old-growth acres in conjunction with information on existing outfitter/guide use to help focus on potentially affected areas. Changes in suitable old-growth acres are presented by outfitter/guide use area and alternative in Table C-4 in Appendix C. Reported service days for 2013 to 2017 are presented for each outfitter/guide use area in Table C-1 in Appendix C. Not all of the outfitter/guide use areas were used over the past 5 years; a number do not include any roadless acres; others include roadless acres, but none are suitable for old-growth harvest; and others would see little change in suitable old-growth acres by alternative. A screening review based on these factors identified 15 outfitter/guide use areas where potential conflicts between existing outfitter/guide use and future management could occur based on recent patterns of existing use. These are outfitter/guide use areas with recent outfitter/guide use where there would be increases in suitable old-growth acres under one or more of the action alternatives. Areas with no or limited existing use and no or small estimated changes in suitable old-growth acres relative to Alternative 1 were removed from further review. A majority of the areas removed had no or minimal change in suitable old-growth acres under all five action alternatives (see Table C-4 in Appendix C).

This screening was undertaken to help focus on potentially affected areas as part of this programmatic review and is not meant to imply that potential conflict between changes in roadless management and outfitter/guide use would be limited to the 15 identified areas only. Outfitter/guide use could also be affected in site-specific locations in other areas. Further, changes in roadless area designations in one or more of the 15 identified outfitter/guide use areas could indirectly affect use in adjacent or nearby areas as displaced outfitter/guides seek other places to take clients. It is also important to note that the screening review looked at recent outfitter/guide use only, and did not consider future patterns of outfitter/guide use or Forest Service outfitter/guide management actions.

The 15 areas identified for further discussion are identified in Table 3.10-5, which also identifies the total number of acres in each area and the share presently in IRAs and provides a summary of reported service days for 2013 to 2017. Eight of the 15 identified outfitter/guide use areas are located on the north part of the Forest, in the Juneau, Sitka, and Hoonah Ranger Districts. The remaining seven areas include the entire Craig and Thorne Bay Ranger Districts, and outfitter/guide use areas on the Petersburg (four areas) and Ketchikan Misty Fjords (one area) Ranger Districts. These areas are identified in Figure 3.10-5, which shows these areas along with the areas presently in development LUDs not managed as roadless. These 15 areas and the other 128 outfitter/guide use areas are shown on Map 13, which also shows existing roadless areas and suitable old-growth and young-growth acres presently available for harvest.

Table 3.10-5
Total Area, Percent Roadless, and Reported Service Days for Selected Outfitter/Guide Use Area

			Reported Service Days						
Outfitter/Guide Use Area	Total Acres	Percent in IRA	2013	2014	2015	2016	2017	Grand Total	Annual Average
01-03 East Chilkats	361,545	67%	446	454	179	146	246	1,471	294
04-03 Sitka Area	345,862	85%	5,213	4,733	6,005	5,614	6,597	28,162	5,632
04-04A Rodman Bay	75,427	60%	250	428	385	347	508	1,918	384
04-04B Kelp Bay	144,680	89%	4,048	4,427	5,316	5,343	5,494	24,628	4,926
04-11A Port Frederick	112,512	77%	10	15	78	1,358	3,021	4,482	896
04-11B Freshwater Bay	160,078	61%	178	228	1,838	2,235	2,468	6,947	1,389
04-12 Tenakee Inlet	312,435	79%	95	89	108	230	407	929	186
04-13 Peril Strait	232,130	72%	744	1,057	1,473	1,254	1,368	5,896	1,179
CRD 00 Craig Ranger District	925,877	77%	2,574	1,920	2,125	1,798	926	9,343	1,869
K19 North Revilla	70,401	83%	217	269	101	286	193	1,066	213
P01 Mitkof Island	109,302	32%	1,179	1,106	1,105	681	568	4,639	928
P08 North Lindenberg Peninsula	75,605	78%	200	227	482	224	255	1,388	278
P12B Kuiu Island Road System	134,852	31%	167	91	174	156	108	696	139
P21 Muddy River Area	63,357	68%	474	330	411	263	257	1,735	347
TBRD 00 Thorne Bay Ranger District	901,507	40%	1,872	1,495	953	1,006	870	6,196	1,239

Source: Most recent five years of data (2013-2017) from the Tongass National Forest Outfitter/Guide Database.

The following sections assess potential impacts by alternative to existing outfitter/guide use in each of the 15 identified areas. This assessment is a programmatic review based on the distribution of suitable old-growth and young-growth acres available for harvest by alternative, and locations where outfitter/guides have reported use as part of their permit requirements. Projected old-growth and young-growth harvest is also reviewed for each of the 15 areas. Reported outfitter/guide use information includes number of groups and service days, primary activity, and usually a named location (e.g., Teardrop Creek, Mirror Creek, Mosquito Cove Trail). This location information is useful at the programmatic level, but does not identify actual patterns of outfitter/guide use, which may extend over relatively large areas, depending on

the activity. It is also important to note that the 15 outfitter/guide use areas identified are large areas ranging from about 63,000 acres to more than 900,000 acres in size. All 15 areas are larger than the District of Columbia and the two largest areas (Craig Ranger District and Thorne Bay Ranger District) are each larger than the state of Rhode Island. Use in some of these areas involves multiple outfitter/guides, activities, and locations. Potential conflict could occur in multiple locations in each area. The following assessment is not a site-specific review, rather it uses available information to illustrate broad patterns of use and differentiate between alternatives. More detailed information on outfitter/guide use and management is available in the Outfitter and Guide Management Plan documents that address outfitter/guide use on the Forest (USDA Forest Service 2009b, 2009c, 2012d, 2012e, 2017e).

With these caveats in mind, the following review found that in almost all of these areas existing outfitter/guide use occurs on or near shorelines and along Forest road systems where development has occurred in the past. Viewed in terms of increases in acres suitable for harvest, impacts under Alternatives 2 and 3 would be minimal in all areas, with increases in roadless acres and reductions in suitable acres occurring in some areas under these alternatives. Alternatives 4 to 6 would add similar numbers of suitable acres in all areas. In most cases, additions under Alternatives 4 to 6 would expand areas of existing suitable acres around an existing road system, for example, rather than open-up new areas for potential harvest. For old-growth this is at least partially due to the definition of suitable, which allows harvest only in Phase 1 of the Tongass Timber Sale Program Adaptive Management Strategy and excludes the T77 Watersheds and TNC/Audubon Conservation Priority Areas, as noted above. These exclusions result in roadless restrictions being removed in development LUDs, with no corresponding increase in suitable acres.

In most of the following outfitter/guide use areas, harvest that could already occur in these areas (under Alternative 1) has the potential to conflict with existing outfitter/guide use. By expanding the acres available for harvest, Alternatives 4 to 6 could add to these potential impacts by increasing the number and geographic extent of the acres affected. The addition of acres could also improve the economics of a potential timber sale, increasing the potential for a sale to be proposed in that area.

The following review by outfitter/guide use area also considers projected old-growth and young-growth harvest by alternative. Based on the assumptions used to distribute estimated old-growth harvest acres, very limited to no old-growth harvest is projected to occur in 8 of the 15 outfitter/guide use areas discussed below, specifically those areas located on the north part of the Forest. In other cases, old-growth and young-growth harvest is projected to decrease relative to Alternative 1, based on the relative distribution of suitable acres across the Forest.

Areas in development LUDs without roadless designations are shown for the six alternatives in Figures 3.10-5 to 3.10-10, which also highlight the 15 outfitter/guide use areas discussed below. More detailed maps showing suitable old-growth and young-growth acres available for harvest for each alternative and outfitter/guide use area are provided as Maps 13 to 18 (on thumb drive or website).

Figure 3.10-5
Alternative 1 with 15 Selected Outfitter/Guide Use Areas

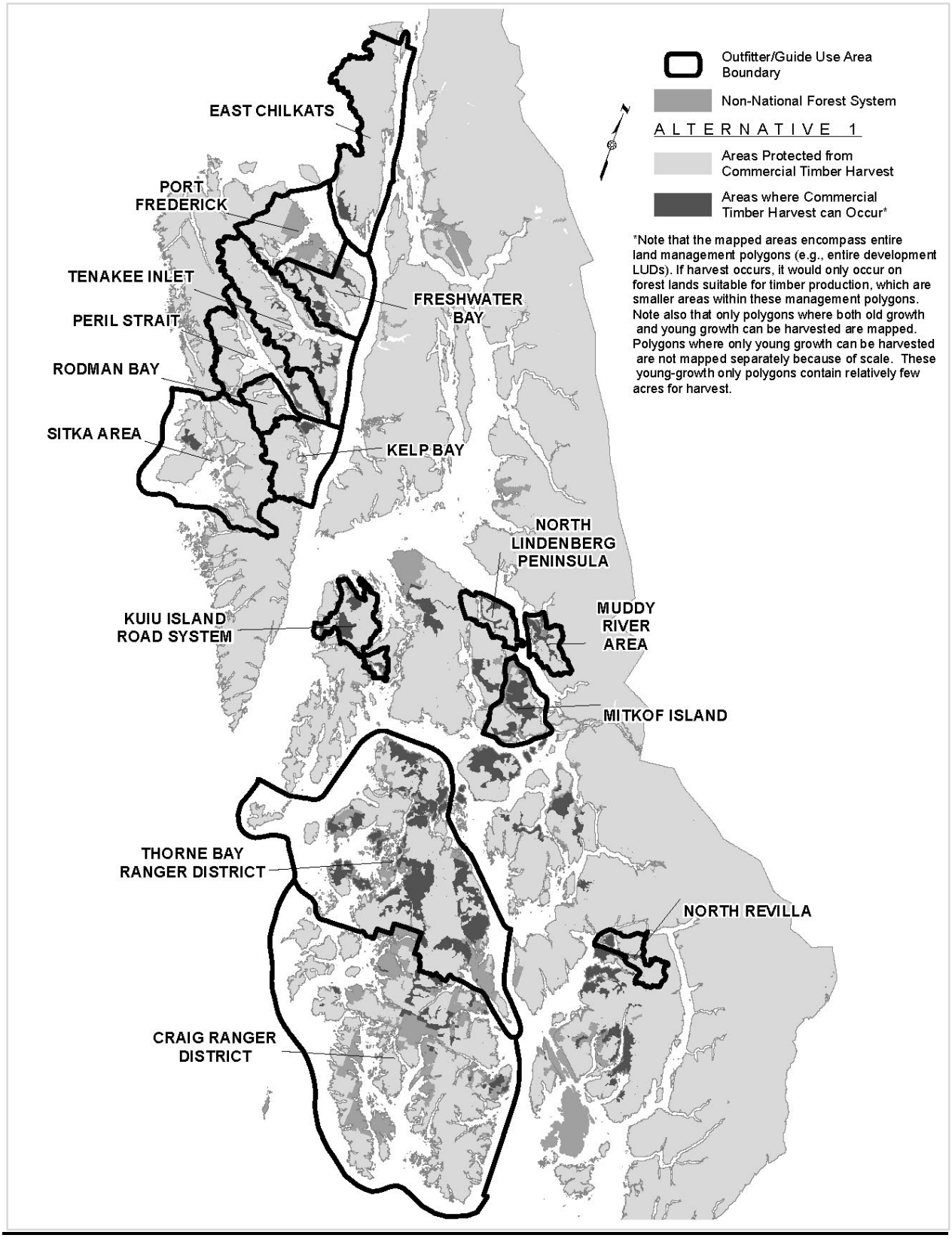


Figure 3.10-6
Alternative 2 with 15 Selected Outfitter/Guide Use Areas

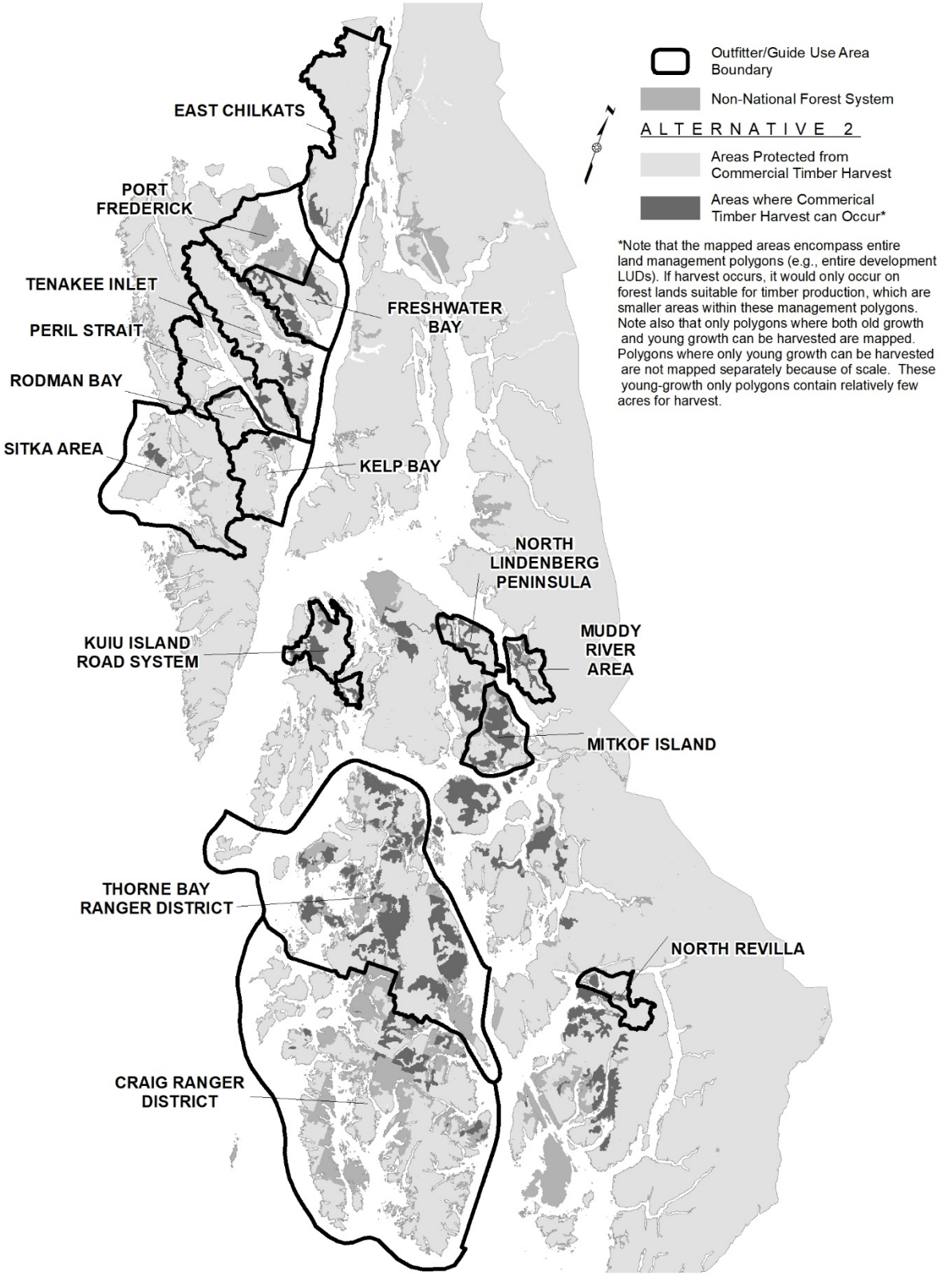


Figure 3.10-7
Alternative 3 with 15 Selected Outfitter/Guide Use Areas

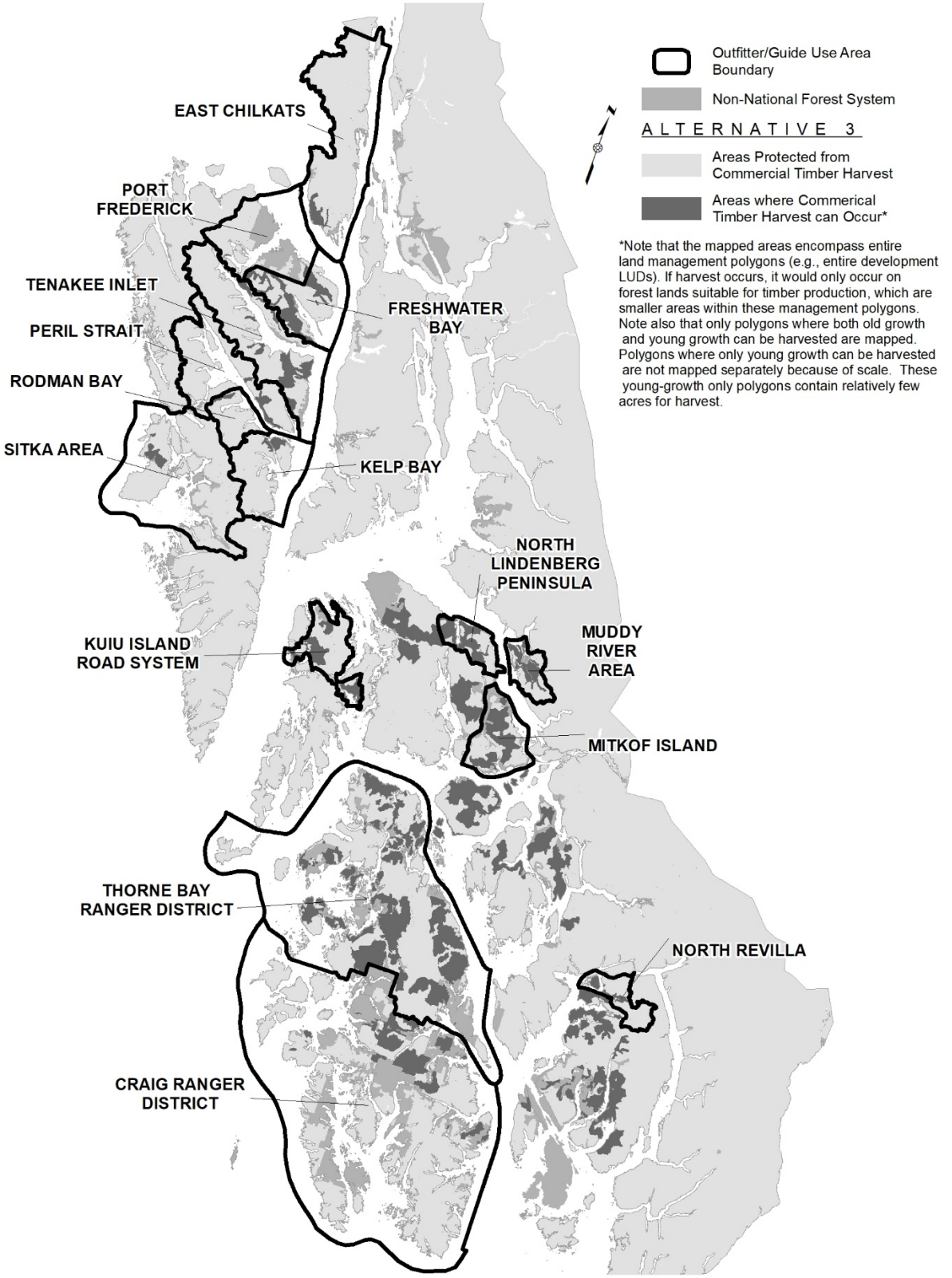


Figure 3.10-8
Alternative 4 with 15 Selected Outfitter/Guide Use Areas

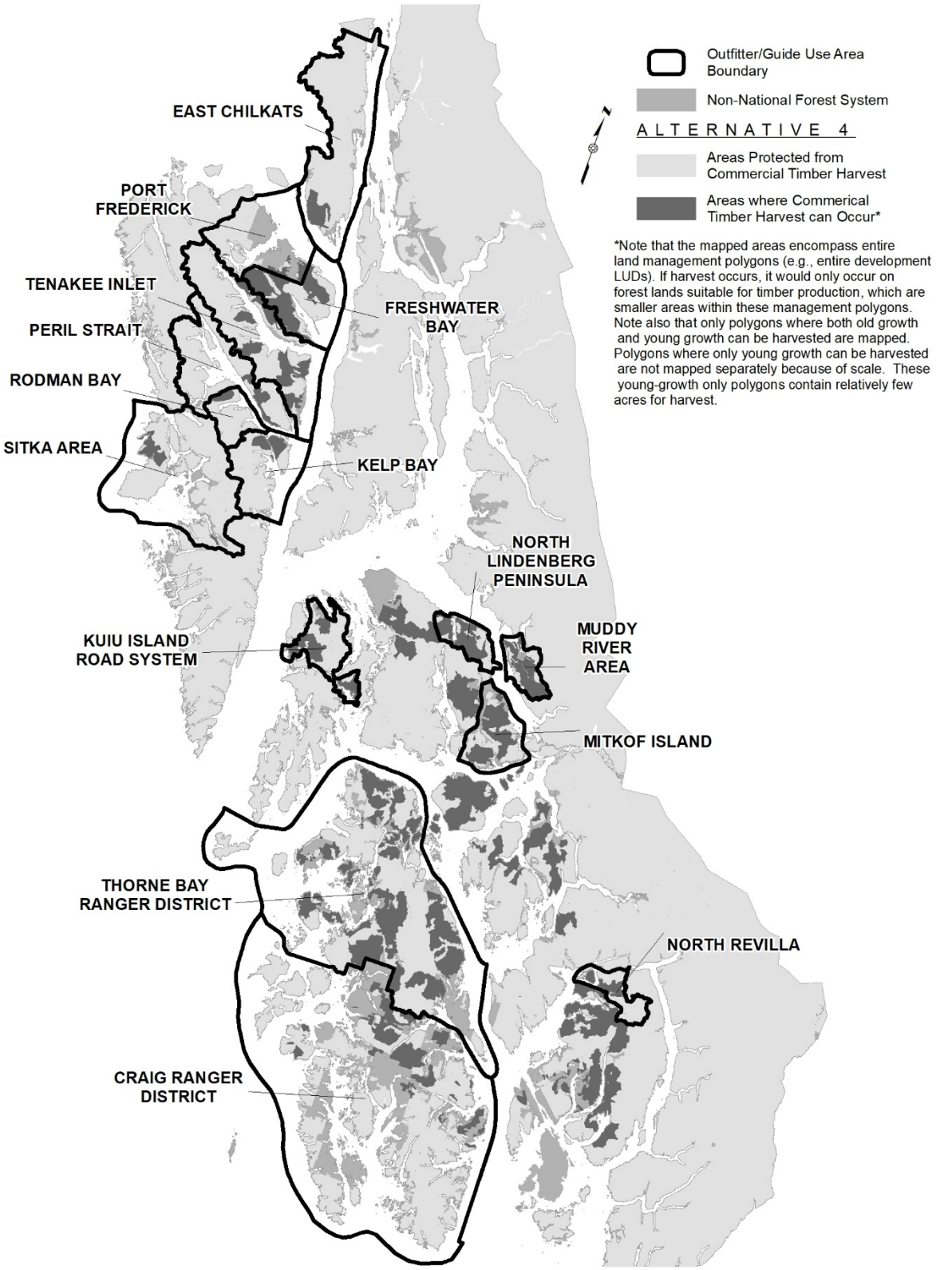


Figure 3.10-9
Alternative 5 with 15 Selected Outfitter/Guide Use Areas

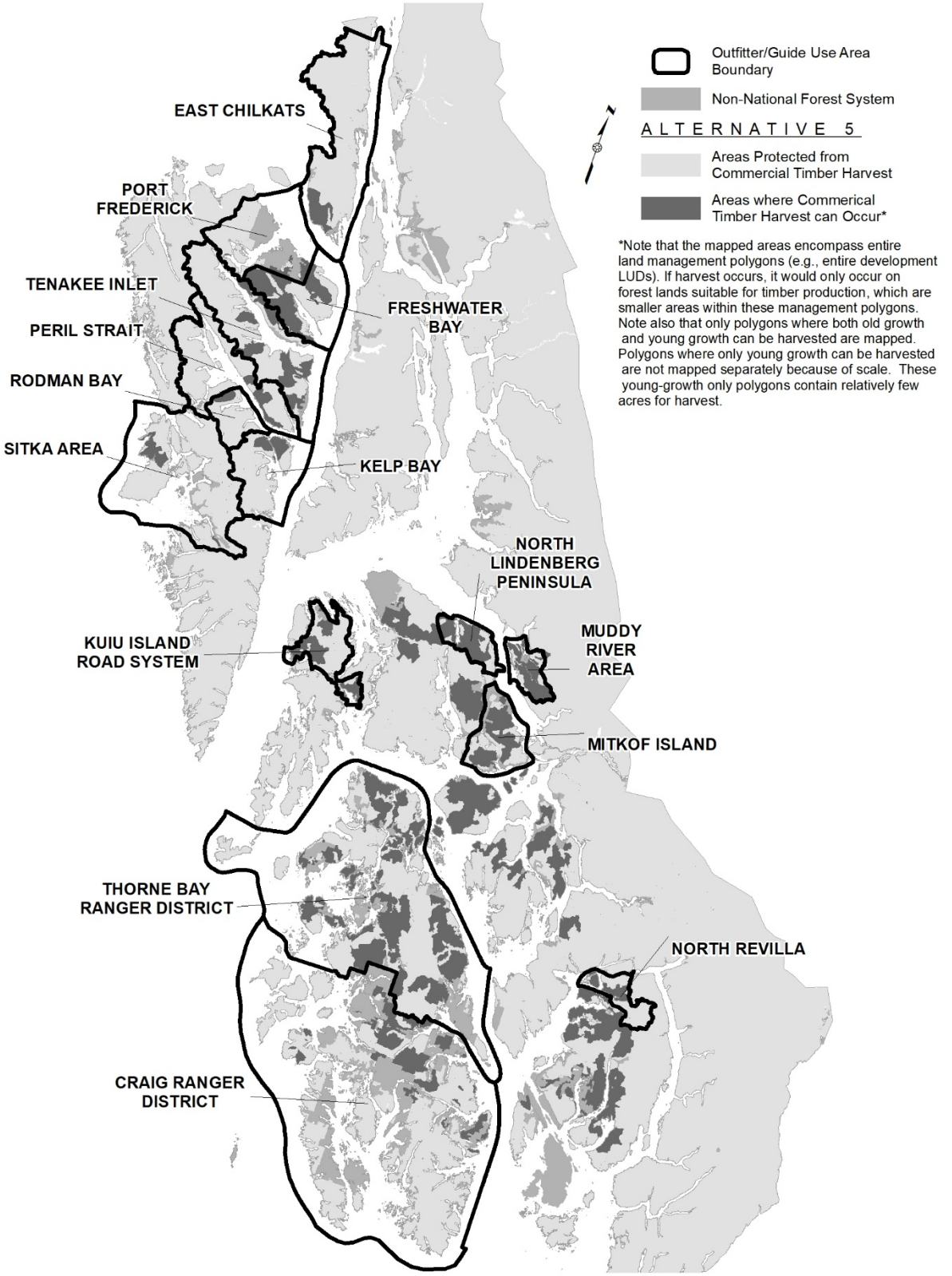
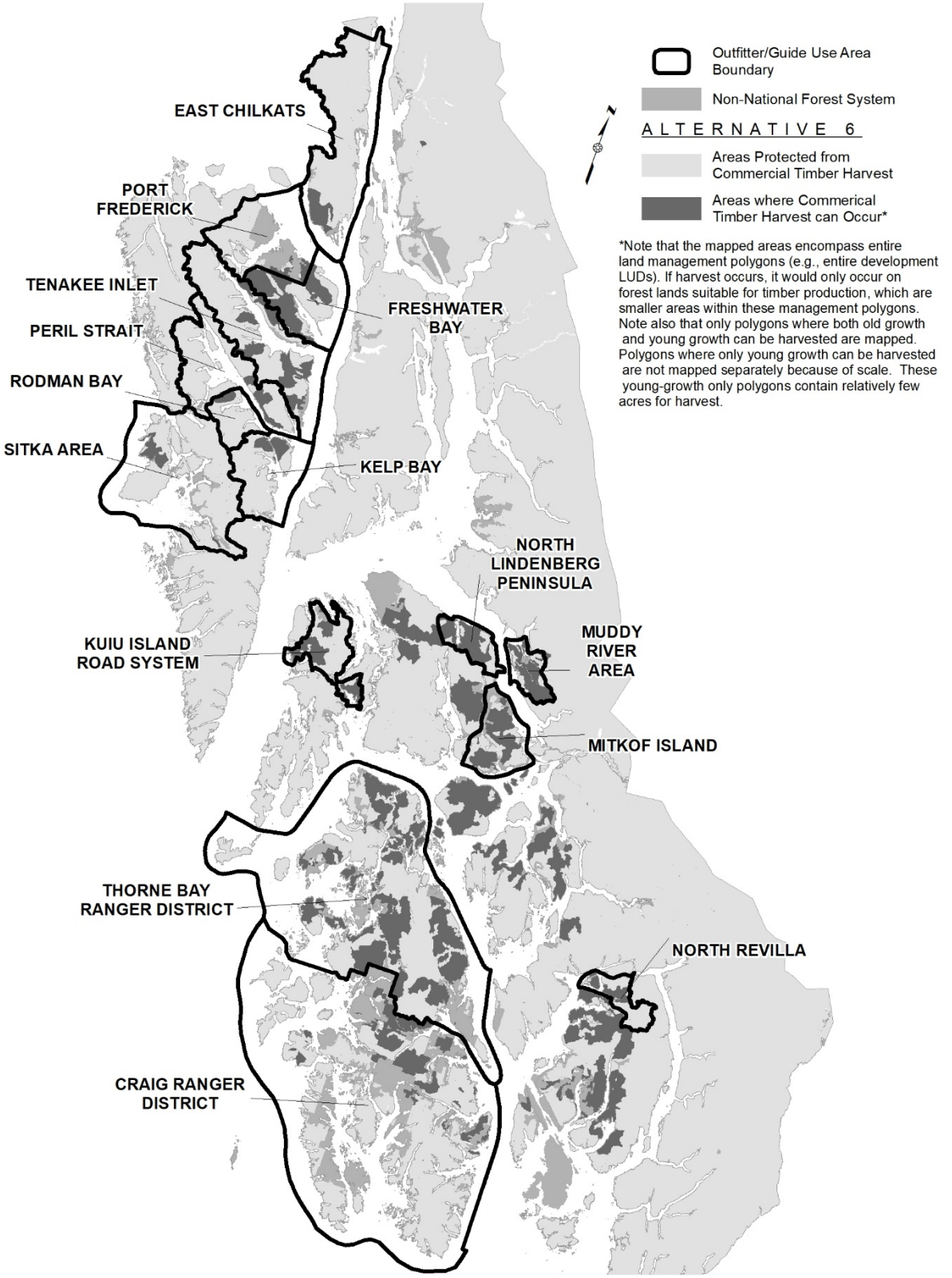


Figure 3.10-10
Alternative 6 with 15 Selected Outfitter/Guide Use Areas



01-03 East Chilkats

The East Chilkats outfitter/guide use area is located on the Juneau Ranger District and consists of 361,545 acres, almost two-thirds of which (67 percent) are located in IRAs (Table 3.10-5). Located on the south end of the Chilkat Peninsula, this use area is bordered to the west by Glacier Bay National Park and Lynn Canal to the east, with the Endicott River Wilderness located alongside the north part of the area. An existing NFS road system that is open for public use is located at the southern end of the area.

Seven outfitter/guides reported use in this area from 2013 to 2017, two of which used the area regularly (4 out of 5 years). An annual average of 294 service days were reported over this period (Table 3.10-5). The majority of the use involved one operator conducting guided freshwater fishing trips. Fishing accounted for the majority (86 percent) of reported service days, followed by hiking/mountaineering (11 percent). Use was reported at 12 locations, with Teardrop Creek accounting for 36 percent of reported service days, followed by Couverden Creek (31 percent) and Mirror Creek (19 percent).

The East Chilkats use area includes about 16,100 acres of lands in development LUDs outside of roadless, with about 6,350 acres of suitable old-growth available for harvest and 3,800 acres of suitable young-growth. Existing suitable old-growth acres are concentrated around the existing logging road system at Point Couverden on the south end of the peninsula. Suitable young-growth is also located along this road system and along the shorelines near Excursion Inlet on the west side, and near St. James Bay and Sullivan Island to the east.

Table 3.10-6
Change in Roadless Area, Development LUDs without Roadless Designation, and Suitable Timber by Alternative for the East Chilkats Outfitter/Guide Use Area

	Total Acres	Change from Alternative 1 (acres)				
Management Type	Alt 1	Alt 2	Alt 3	Alt 4	Alt 5	Alt 6
Roadless Area[1, 2]	244,171	-2,259	-2,259	-2,259	-50,978	-244,171
Development LUDs – Not Roadless[2]	16,105	2,049	2,049	2,049	50,441	50,441
Suitable Old Growth	6,345	291	291	3,421	4,350	4,350
Suitable Young Growth	3,777	687	687	688	1,061	1,105
Old-Growth Harvest	292	1	-44	-98	-80	-80
Young-Growth Harvest	3,216	461	422	421	704	704

Notes:
[1] Changes in roadless area acres for Alternative 3 include LUD II acres, which would be removed from roadless classification, but would still be managed in a roadless condition.
[2] Roadless acres managed as Timber Priority ARA under Alternative 4 are included in the roadless area total and excluded from the development LUD total, which has the effect of understating the changes in these categories.

The number of roadless acres in the East Chilkats use area would decrease under the action alternatives, with decreases ranging from about 2,250 acres (Alternatives 2, 3, and 4) to about 244,200 acres under Alternative 6, which would remove roadless designation from all lands. Alternative 5 would remove roadless designation for about 51,000 acres (Table 3.10-6). Increases in the number of acres in development LUDs without roadless designation would range from about 2,050 acres (Alternatives 2 to 4) to 50,450 acres (Alternatives 5 and 6). Increases in suitable old-growth would range from less than 300 acres (Alternatives 2 and 3) to about 4,350 acres (Alternatives 5 and 6). Suitable young-growth acres would increase by about 700 acres (Alternatives 2 to 4) to 1,100 acres (Alternatives 5 and 6) (Table 3.10-6).

Suitable old-growth and young-growth acres would be added in and around the existing road system under all alternatives. Alternatives 5 and 6 would add more suitable old growth along the Excursion Inlet shoreline north of the past harvest area. Young-growth acres would also be added along the shoreline, north of William Henry Bay (all action alternatives) and south of Lynn Sisters (Alternatives 5 and 6). Harvest near Lynn Sisters under Alternatives 5 and 6 could conflict with existing outfitter/guide use in that area. Fishing at Lynn Sisters accounted for about 10 percent of reported service days from 2013 to 2017.

The East Chilkats outfitter/guide use area is located on the Juneau Ranger District and, therefore, only very limited old-growth harvest is projected to occur over the next 100 years under all of the alternatives,

with estimated harvest totals ranging from about 200 to 300 acres. An estimated total of 3,200 acres of young growth are projected to be harvested over the next 100 years under Alternative 1, with harvest acres expected to increase under all five action alternatives, with net increases of 420 acres (Alternatives 3 and 4) to 700 acres (Alternatives 5 and 6) (Table 3.10-6).

04-03 Sitka Area

The Sitka Area outfitter/guide use area is located on the Sitka Ranger District and consists of 345,862 acres, 85 percent of which are located in IRAs (Table 3.10-5). This use area includes Sitka and northwest Baranof Island from north of Fish Bay to south of Three Entrance Bay, as well as Kruzof, Partofshikof, Halleck, Krestof, and Siginaka Islands. Much of the shoreline is protected and provides easy access to the bays, sounds, and straits located throughout the area.

Thirty-two outfitter/guides reported use in this area from 2013 to 2017, 11 of which used the area regularly (4 out of 5 years). An annual average of 5,632 service days were reported over this period, more than 40 percent of the total reported for all areas on the Sitka Ranger District. Hiking accounted for 39 percent of reported use, followed by road-based nature tours (32 percent) and remote-setting nature tours (12 percent). Use was reported in multiple locations, with relatively high use identified for the Mud Bay road system and Iris Meadows, which together accounted for 31 percent of reported service days, followed by the Mosquito Cove Trail, with 20 percent of service days.

The Mud Bay road system and Iris Meadows are mainly used for road-based nature tours. The Mosquito Cove Trail is mainly used for hiking, with some road-based nature tour use also reported.

The Sitka Area includes 24,400 acres of lands in development LUDs outside of roadless, with about 2,300 acres identified as suitable for old-growth harvest and 9,850 acres suitable for young-growth harvest (Table 3.10-7). Existing suitable old-growth acres are almost entirely located on Kruzof Island, primarily along the existing Mud Bay road system. Suitable young-growth acres are also located in this area, as well as along FR 7595 on the north part of Kruzof Island.

Suitable young-growth acres are also available along existing Forest road systems near Fish Bay, St. John Baptist Bay, and along Nakwasina Sound.

Table 3.10-7
Change in Roadless Area, Development LUDs without Roadless Designation, and Suitable Timber by Alternative for the Sitka Area Outfitter/Guide Use Area

	Total Acres	Change from Alternative 1 (acres)				
Management Type	Alt 1	Alt 2	Alt 3	Alt 4	Alt 5	Alt 6
Roadless Area[1, 2]	296,576	456	456	-1,479	-60,038	-296,576
Development LUDs – Not Roadless[2]	24,386	465	465	467	58,947	58,951
Suitable Old Growth	2,322	20	20	2,529	2,530	2,530
Suitable Young Growth	9,849	1	9	9	9	37
Old-Growth Harvest	0	0	0	6	5	5
Young-Growth Harvest	8,384	-274	-353	-356	-397	-448

Note:
[1] Changes in roadless area acres for Alternative 3 include LUD II acres, which would be removed from roadless classification, but would still be managed in a roadless condition.
[2] Roadless acres managed as Timber Priority ARA under Alternative 4 are included in the roadless area total and excluded from the development LUD total, which has the effect of understating the changes in these categories.

Changes in roadless area acres in the Sitka Area would be minimal under Alternatives 2 to 4, with Alternatives 2 and 3 adding about 450 acres to roadless designation. Alternative 4 would remove about 1,500 acres from roadless, with this total increasing to 26,900 acres (9 percent of the roadless area), if acres designated as Timber Priority ARA are included with those removed. Alternative 5 would remove roadless designations from about 60,000 acres. Alternative 6 would remove regulatory roadless prohibitions from all lands in existing IRAs, approximately 296,600 acres (Table 3.10-7).

Alternatives 2 to 4 would have very little effect on development potential, as measured by acres in development LUDs without roadless designation, with each alternative adding about 470 acres, about 2 percent of the existing total. Alternatives 5 and 6, on the other hand, would increase existing development LUD acres without roadless designation more than three-fold, with a net increase of 58,950 acres under each alternative. There would be essentially no change in suitable young-growth acres under any alternative, and a negligible decrease in suitable old-growth acres under Alternatives 2 and 3. Alternatives 4 to 6 would each add about 2,500 suitable old-growth acres, mainly along the north side of the Mud Bay road system on Kruzof Island.

The Mud Bay road system is heavily used by outfitter/guides, mainly offering road-based nature tours. The existing old-growth suitable acres in this area are along this road system. The addition of 2,500 suitable old-growth acres under Alternatives 4 to 6 would extend the area available for harvest. Harvest of existing suitable old-growth and young-growth acres under all alternatives would conflict with outfitter/guide use in the area. The old-growth acres that would be added under Alternatives 4 to 6 could potentially make harvest in this area more likely by expanding available volumes and improving economics; potentially exacerbating the level of adverse impact if harvest were to occur in these areas. However, little to no old-growth harvest is projected to occur over the next 100 years in this area under any of the alternatives. An estimated 8,400 acres of young growth are projected to be harvested over the next 100 years under Alternative 1, with harvest acres expected to decrease under all five action alternatives, with drops ranging from about 300 acres (Alternative 2) to 450 acres (Alternative 6) (Table 3.10-7).

04-04A Rodman Bay

The Rodman Bay outfitter/guide use area is located on the Sitka Ranger District and consists of 75,427 acres, 60 percent of which are located in IRAs (Table 3.10-5). This use area is located on the north end of Baranof Island extending from just west of Peschani Point to Point Moses, just east of the Lake Eva Trail. Shorelines are easily accessed in the area's bays: Rodman Bay, Appleton Cove, and Saook Bay.

Twenty outfitter/guides reported use in this area from 2013 to 2017, five of which used the area regularly (4 out of 5 years), with one outfitter/guide accounting for more than half (57 percent) of total reported use. An annual average of 384 service days were reported over this period (Table 3.10-5). Hiking accounted for almost half (46 percent) of reported use, followed by freshwater fishing (37 percent), and remote-setting nature tours (13 percent). Use was reported at eight locations around the area's three bays. Almost three-quarters (74 percent) of reported service days were for Saook Bay or Saook Bay Creek.

The Rodman Bay use area includes 24,400 acres of lands in development LUDs outside of roadless, with about 750 acres identified as suitable for old-growth harvest and 7,500 acres suitable for young-growth harvest (Table 3.10-8). Existing suitable young-growth acres are located along the existing road systems around Rodman Bay, Appleton Creek, and Saook Bay, along Rodman Creek, and extending northeast along the Duffield Peninsula toward Peschani Point. Existing suitable old-growth acres are located either side of the suitable young-growth along Forest Road 7587 on the Duffield Peninsula.

The number of roadless acres in the Rodman Bay use area would increase under Alternatives 2 and 3, with net gains of approximately 7,650 aces, about 10 percent of the total use area. The number of acres with roadless designation would decrease under Alternatives 4, 5, and 6. Alternative 5 would remove roadless designation for about 34,500 acres, and Alternative 6 would remove regulatory roadless prohibitions from all lands, approximately 45,400 acres (Table 3.10-8).

Table 3.10-8
Change in Roadless Area, Development LUDs without Roadless Designation, and Suitable Timber by Alternative for the Rodman Bay Outfitter/Guide Use Area

	Total Acres	Change from Alternative 1 (acres)				
Management Type	Alt 1	Alt 2	Alt 3	Alt 4	Alt 5	Alt 6
Roadless Area[1, 2]	45,371	7,639	7,639	-423	-34,452	-45,371
Development LUDs – Not Roadless[2]	24,368	-6,257	-6,257	302	34,306	34,306
Suitable Old Growth	749	61	61	2,661	2,662	2,662
Suitable Young Growth	7,508	-44	-44	0	0	0
Old-Growth Harvest	0	0	0	0	0	0
Young-Growth Harvest	6,392	-245	-311	-277	-309	-364

Note:
[1] Changes in roadless area acres for Alternative 3 include LUD II acres, which would be removed from roadless classification, but would still be managed in a roadless condition.
[2] Roadless acres managed as Timber Priority ARA under Alternative 4 are included in the roadless area total and excluded from the development LUD total, which has the effect of understating the changes in these categories.

Changes in the total number of acres in development LUDs without roadless designation would range from a decrease of about 6,300 acres under Alternatives 2 and 3 to an increase of about 34,300 acres for Alternatives 5 and 6. Increases in suitable old-growth acres available for harvest would range from a negligible increase under Alternatives 2 and 3 (about 20 acres) to about 2,700 acres (Alternatives 4 to 6) (Table 3.10-8). Suitable old-growth acres would be entirely added to the Duffield Peninsula, extending the existing narrow bands of suitable old-growth to the north and south. None of the action alternatives would add suitable young-growth acres (with negligible decreases expected for Alternatives 2 and 3).

Harvest of existing suitable young-growth acres under all alternatives would conflict with outfitter/guide use in the area. Projected young-growth harvest is, however, expected to decrease relative to Alternative 1 under all five action alternatives, with decreases ranging from about 250 acres (4 percent) to 360 acres (6 percent) (Table 3.10-8). The suitable old-growth acres added on Duffield Peninsula under Alternatives 4 to 6 are located farther away from areas that receive relatively high levels of existing outfitter/guide use. In addition, no old-growth harvest is projected to occur over the next 100 years in this area under any of the alternatives (Table 3.10-8).

04-04B Kelp Bay

The Kelp Bay outfitter/guide use area is located on the Sitka Ranger District and consists of 144,680 acres, 89 percent of which are located in IRAs (Table 3.10-5). Located on the northern end of Baranof Island, this use area extends from Hanus Bay to south of Takatz Bay and includes Catherine Island and surrounding islands, as well as the islands in Kelp Bay. Easily accessible shorelines include Hanus Bay, Cosmos Cove, Kasnyku Bay, Takatz Bay, and Kelp Bay.

Almost 40 outfitter/guides reported use in this area from 2013 to 2017, 20 of which used the area regularly (4 out of 5 years). An annual average of 4,926 service days were reported over this period (Table 3.10-5). Hiking accounted for more than half (54 percent) of reported use, followed by remote-setting nature tours (17 percent) and hatchery tours (13 percent). Use was reported at 31 locations, with the Lake Eva Trail accounting for almost half (46 percent) of reported service days. Other popular locations were Hidden Falls Hatchery (21 percent of total service days) and various locations around Kelp Bay (10 percent of total service days).

Conflicts between guided groups (hunting, remote-setting nature tour, and freshwater fishing) have been reported during spring and fall hunting seasons at Hanus Bay and Kelp Bay. Concerns have also been expressed about small cruise ship activity in Kelp Bay and the impact of larger groups on the remote experience being sought by other outfitter and guide operators in the area (USDA Forest Service 2017e).

The Kelp Bay use area includes about 10,500 acres of lands in development LUDs outside of roadless, with about 2,500 acres identified as suitable for old-growth harvest and 3,500 acres suitable for young-growth harvest (Table 3.10-9).

Existing suitable old-growth and young-growth acres are located on the north end of Catherine Island, around Hanus Bay, and either side of Portage Arm. Suitable young-growth acres are also along existing roads near Kelp Bay.

Table 3.10-9
Change in Roadless Area, Development LUDs without Roadless Designation, and Suitable Timber by Alternative for the Kelp Bay Outfitter/Guide Use Area

	Total Acres	Change from Alternative 1 (acres)				
Management Type	Alt 1	Alt 2	Alt 3	Alt 4	Alt 5	Alt 6
Roadless Area[1, 2]	131,182	230	230	-228	-22,462	-131,182
Development LUDs - Not Roadless[2]	10,447	182	182	195	22,341	22,341
Suitable Old Growth	2,524	66	66	3,880	3,880	3,880
Suitable Young Growth	3,535	0	0	0	0	0
Old-Growth Harvest	109	1	-16	95	86	86
Young-Growth Harvest	3,009	-97	-129	-130	-144	-167

Notes:
[1] Changes in roadless area acres for Alternative 3 include LUD II acres, which would be removed from roadless classification, but would still be managed in a roadless condition.
[2] Roadless acres managed as Timber Priority ARA under Alternative 4 are included in the roadless area total and excluded from the development LUD total, which has the effect of understating the changes in these categories.

The number of roadless acres in the Kelp Bay use area would increase slightly under Alternatives 2 and 3 and decrease under the other action alternatives. Alternative 5 would remove roadless designation for about 22,500 acres, and Alternative 6 would remove regulatory roadless prohibitions from all lands, approximately 131,200 acres (Table 3.10-9).

The total number of acres in development LUDs without roadless designation would range from slight increases under Alternatives 2 and 3 (less than 200 acres) to about 22,350 acres (Alternatives 5 and 6). Increases in suitable old-growth acres available for harvest would range from a negligible increase under Alternatives 2 and 3 (less than 100 acres) to 3,900 acres (Alternatives 4 to 6). Suitable old-growth acres would be added next to the areas of existing suitable old-growth, extending further south on Catherine Island and northwest on Baranof Island toward Lake Eva. None of the action alternatives would add suitable young-growth and projected young-growth harvest is expected to decrease slightly relative to Alternative 1 under all five action alternatives (Table 3.10-9). Harvest of existing suitable old-growth and young-growth acres under all alternatives would conflict with outfitter/guide use in the area. The old-growth acres that would be added under Alternatives 4 to 6 could potentially exacerbate these impacts if harvest were to occur in these areas. However, only very limited old-growth harvest is projected to occur over the next 100 years under all of the alternatives, with estimated harvest totals ranging from about 100 to 200 acres (Table 3.10-9).

04-11A Port Frederick

The Port Frederick outfitter/guide use area is located on the Hoonah Ranger District and consists of 112,512 acres, 77 percent of which are located in IRAs (Table 3.10-5). This use area encompasses the north and northeast portions of Chichagof Island from Chicken Creek east to Port Frederick. The area also includes the city of Hoonah, Alaska Native corporation lands, State properties, and several private inholdings. Access is via boat or floatplane.

Fourteen outfitter/guides reported use in this area from 2013 to 2017, two of which used the area regularly (4 out of 5 years). An annual average of 896 service days were reported over this period. Use has, however, increased substantially over recent years, with reported service days increasing from 10 (2013) to 1,358 and 3,021 in 2016 and 2017, respectively (Table 3.10-5).

Road-based nature tours accounted for almost two-thirds (62 percent) of reported use, followed by hiking (34 percent). Use was reported at 12 locations, with Burnt Point and the Neka Bay North Bight Large Group Area each accounting for more than one-third of reported service days, followed by Game Creek (20 percent).

The Port Frederick use area includes about 14,800 acres of lands in development LUDs outside of roadless, with about 1,500 acres of old-growth identified as suitable for harvest and 3,800 acres of young-growth suitable for harvest (Table 3.10-10). Existing suitable old-growth acres are mainly located east of Hoonah. Suitable young-growth acres are located south of Port Frederick and along the existing road system that follows the Neka River.

Table 3.10-10
Change in Roadless Area, Development LUDs without Roadless Designation, and Suitable Timber by Alternative for the Port Frederick Outfitter/Guide Use Area

	Total Acres	Change from Alternative 1 (acres)				
Management Type	Alt 1	Alt 2	Alt 3	Alt 4	Alt 5	Alt 6
Roadless Area[1, 2]	88,043	3,278	3,122	-368	-48,870	-88,043
Development LUDs – Not Roadless[2]	14,815	-3,051	-2,957	209	48,677	48,677
Suitable Old Growth	1,502	19	73	3,766	3,867	3,867
Suitable Young Growth	3,789	2	2	13	18	126
Old-Growth Harvest	104	-2	-17	147	136	136
Young-Growth Harvest	3,225	-104	-137	-130	-141	-83

Notes:
[1] Changes in roadless area acres for Alternative 3 include LUD II acres, which would be removed from roadless classification, but would still be managed in a roadless condition.
[2] Roadless acres managed as Timber Priority ARA under Alternative 4 are included in the roadless area total and excluded from the development LUD total, which has the effect of understating the changes in these categories.

The number of roadless acres in the Port Frederick use area would increase by more than 3,000 acres under Alternatives 2 and 3 and decrease under the other action alternatives. Alternative 5 would remove roadless designation for about 48,900 acres, and Alternative 6 would regulatory roadless prohibitions from all lands, approximately 88,000 acres (Table 3.10-10).

The total number of acres in development LUDs without roadless designation would decrease by about 3,000 acres under Alternatives 2 and 3 and increase by about 48,700 acres under Alternatives 5 and 6. Increases in suitable old-growth acres available for harvest would range from a negligible increase under Alternatives 2 and 3 (less than 100 acres) to about 3,800 acres (Alternative 4) and 3,900 acres (Alternatives 5 and 6). Suitable old-growth acres would be added south and east of Hoonah in areas that do not presently receive high outfitter/guide use. Further, only very limited old-growth harvest is projected to occur over the next 100 years under all of the alternatives, with estimated harvest totals ranging from about 100 to 250 acres (Table 3.10-10). Changes in suitable young-growth acres available for harvest are negligible (about 125 acres or less). Projected young-growth harvest is expected to decrease slightly relative to Alternative 1 under all five action alternatives (Table 3.10-10).

04-11B Freshwater Bay

The Freshwater Bay outfitter/guide use area is located on the Hoonah Ranger District and consists of about 160,078 acres, 61 percent of which are located in IRAs (Table 3.10-5). This use area encompasses the north and northeast portion of Chichagof Island from Whitestone Harbor east to Freshwater Bay. Access is via floatplane, boat, or the Hoonah forest road system.

Fifteen outfitter/guides reported use in this area from 2013 to 2017, three of which used the area regularly (4 out of 5 years). An annual average of about 1,389 service days were reported over this period. Use has, however, increased over recent years, with reported service days increasing from 178 (2013) to 2,235 and 2,468 in 2016 and 2017, respectively (Table 3.10-5).

Road-based nature tours accounted for more than three-quarters (78 percent) of reported use, followed by hiking (9 percent) and freshwater fishing (8 percent). Use was reported at 14 locations, with Upper Game Creek accounting for almost half (45 percent) of reported service days, followed by Kennel Creek (23 percent) and Freshwater Bay (13 percent).

The Freshwater Bay use area includes about 47,200 acres of lands in development LUDs not currently classified as roadless, with about 16,600 acres of suitable old-growth available for harvest and 12,400 acres of suitable young growth (Table 3.10-11). Existing suitable old-growth and young-growth acres are located along the existing road systems in the area with almost half (46 percent) of the non-roadless portion of the area considered suitable and available for harvest.

The number of roadless acres in the Freshwater Bay use area would decrease under all of the action alternatives with decreases ranging from about 1,300 acres (Alternative 2) to 97,500 acres under Alternative 6, which would remove regulatory roadless prohibitions from all lands. Alternative 5 would remove roadless designation for about 49,400 acres, with a similar reduction under Alternative 4 (49,400 acres), if acres designated as Timber Priority ARA are included with those removed.

Table 3.10-11
Change in Roadless Area, Development LUDs without Roadless Designation, and Suitable Timber by Alternative for the Freshwater Bay Outfitter/Guide Use Area

	Total Acres	Change from Alternative 1 (acres)				
Management Type	Alt 1	Alt 2	Alt 3	Alt 4	Alt 5	Alt 6
Roadless Area[1, 2]	97,513	-1,319	-11,085	-11,714	-49,438	-97,513
Development LUDs – Not Roadless[2]	47,176	1,667	10,737	10,737	49,119	49,120
Suitable Old Growth	16,587	530	3,646	12,120	12,236	12,236
Suitable Young Growth	12,373	171	196	316	363	1,205
Old-Growth Harvest	718	0	38	-39	-67	-67
Young-Growth Harvest	10,534	-204	-293	-200	-215	368

Notes:
[1] Changes in roadless area acres for Alternative 3 include LUD II acres, which would be removed from roadless classification, but would still be managed in a roadless condition.
[2] Roadless acres managed as Timber Priority ARA under Alternative 4 are included in the roadless area total and excluded from the development LUD total, which has the effect of understating the changes in these categories.

The total number of acres in development LUDs outside of roadless would increase under all alternatives with gains ranging from about 1,700 acres (Alternative 2) to 49,100 (Alternatives 5 and 6). Increases in suitable old-growth acres available for harvest would range from about 550 acres (Alternative 2) to more than 12,000 acres (Alternatives 4 to 6). Suitable young-growth acres available for harvest would increase under all alternatives, with the largest increase (about 1,200 acres) under Alternative 6 (Table 3.10-11). Suitable old-growth acres would be added throughout the area under Alternatives 4 to 6. Harvest of existing suitable old-growth and young-growth acres under all of the alternatives would conflict with outfitter/guide use in the area. The old-growth acres that would be added under Alternatives 4 to 6 could potentially exacerbate these impacts if harvest were to occur in these areas.

However, only limited old-growth harvest is projected to occur over the next 100 years under all of the alternatives, with estimated harvest totals ranging from about 650 acres (Alternatives 5 and 6) to 750 acres (Alternative 3) (Table 3.10-11). An estimated 10,500 acres of young growth are projected to be harvested over the next 100 years under Alternative 1, with minor changes in projected harvest acres expected under all five action alternatives, ranging from a drop of about 300 acres (Alternative 3) to an increase of around 400 acres (Alternative 6) (Table 3.10-11).

04-12 Tenakee Inlet

The Tenakee Inlet outfitter/guide use area is located on the Sitka and Hoonah Ranger Districts and consists of 312,435 acres, 79 percent of which are located in IRAs (Table 3.10-5). This use area encompasses the central and eastern portions of Chichagof Island that surround Tenakee Inlet, as well as the lands adjacent to Chatham Strait from the mouth of Tenakee Inlet south to Florence Bay.

Sixteen outfitter/guides reported use in this area from 2013 to 2017, with none using the area more than 3 out of 5 years. Reported use has increased in recent years, jumping from 95 service days in 2013 to 407 in 2017, for a 5-year annual average of 186 service days (Table 3.10-5). Hiking accounted for almost half (47 percent) of reported use, followed by brown bear hunting (33 percent) and remote-setting nature tours

(10 percent). Use was reported at more than 20 locations, with much of the use reported at the bays on the south side of Tenakee Inlet. Seal Bay received the most use (29 percent of total service days), followed by Corner Bay (20 percent) and Basket Bay (10 percent).

The Tenakee Inlet use area includes about 47,500 acres of lands in development LUDs outside of roadless, with about 13,300 acres identified as suitable for old-growth harvest and 10,100 acres suitable for young-growth harvest (Table 3.10-12). Existing suitable old-growth and young-growth acres are located along the existing road systems that are excluded from the Chichagof IRA (IRA 311).

The number of roadless designated acres in Tenakee Inlet would increase under Alternative 2, with a net gain of approximately 7,900 acres, about 2 percent of the total use area. The number of acres with roadless designation would decrease under the other action alternatives. Alternative 5 would remove roadless designation from about 104,400 acres, and Alternative 6 would remove regulatory roadless prohibitions from all lands, approximately 247,600 acres.

Table 3.10-12
Change in Roadless Area, Development LUDs without Roadless Designation, and Suitable Timber by Alternative for the Tenakee Inlet Outfitter/Guide Use Area

	Total Acres	Change from Alternative 1 (acres)				
Management Type	Alt 1	Alt 2	Alt 3	Alt 4	Alt 5	Alt 6
Roadless Area[1, 2]	247,557	7,869	-47,029	-16,774	-104,363	-247,557
Development LUDs – Not Roadless[2]	47,494	-7,562	2,825	11,844	104,096	104,100
Suitable Old Growth	13,299	-1,348	1,736	11,727	11,735	11,736
Suitable Young Growth	10,114	94	94	95	140	174
Old-Growth Harvest	581	1	90	-78	-99	-99
Young-Growth Harvest	8,610	-204	-294	-297	-302	-351

Notes:
[1] Changes in roadless area acres for Alternative 3 include LUD II acres, which would be removed from roadless classification, but would still be managed in a roadless condition.
[2] Roadless acres managed as Timber Priority ARA under Alternative 4 are included in the roadless area total and excluded from the development LUD total, which has the effect of understating the changes in these categories.

The total number of acres in development LUDs without roadless designation would decrease by about 7,600 acres under Alternative 2. Increases in development LUDs outside of roadless for the other alternatives would range from about 2,800 acres (Alternative 3) to about 104,100 acres (Alternatives 5 and 6). Changes in suitable old-growth acres available for harvest would range from a drop of 1,350 acres (Alternative 2) to increases of more than 11,700 acres (Alternatives 4 to 6). Suitable old-growth acres would mainly be added to areas in and around existing roads, extending the areas of existing suitable old-growth available for harvesting. The action alternatives would each add less than 150 acres of suitable young-growth.

Suitable old-growth acres would be added in the vicinity of Basket Bay and Corner Bay, both of which receive relatively high levels of reported outfitter/guide use. Suitable old-growth acres would also be added south of Crab Bay, another area with reported outfitter/guide use, under Alternatives 4 to 6. These additions would extend existing areas of suitable acres that are presently available for harvest. Harvest of these areas under all of the alternatives, including Alternative 1, would have the potential to conflict with existing outfitter/guide use, but particularly under Alternatives 4 to 6, which would increase suitable old-growth acres by 87 percent.

However, only very limited old-growth harvest is projected to occur in this area over the next 100 years under all of the alternatives, with estimated harvest totals ranging from about 400 acres (Alternatives 5 and 6) to 700 acres (Alternative 3) (Table 3.10-12). An estimated 8,600 acres of young-growth are projected to be harvested over the next 100 years under Alternative 1, with decreases in projected harvest acres expected under all five action alternatives, ranging from drops of about 200 acres (Alternative 2) to 350 acres (Alternative 6) (Table 3.10-12).

04-13 Peril Strait

The Peril Strait outfitter/guide use area is located on the Sitka Ranger District and consists of 232,130 acres, 72 percent of which are located in IRAs (Table 3.10-5). This use area encompasses the southern end of Chichagof Island surrounding Hoonah Sound and Peril Strait, from near Sergius Point to Point Hayes. Access to the shoreline along Hoonah Sound and Peril Strait is dictated by weather conditions and tidal flow.

Twenty-one outfitter/guides reported use in this area from 2013 to 2017, eight of which used the area regularly (4 out of 5 years). An annual average of 1,179 service days were reported over this period (Table 3.10-5). Hiking accounted for more than half (58 percent) of reported use, followed by freshwater fishing (15 percent), brown bear hunting (9 percent), and road-based nature tours (9 percent). Use was reported at more than 30 locations, with about one-third of service days reported at Sitkoh Bay, Sitkoh Creek, and Sitkoh Lake on the south end of Chichagof Island. Relatively high use was also reported for Eammon Island (18 percent of total service days), Deep Bay, Sergius Narrows (11 percent), and the False Island Road System (10 percent).

The Peril Strait use area includes 49,400 acres of lands in development LUDs outside of roadless, with about 3,000 acres identified as suitable for old-growth harvest and 9,000 acres suitable for young-growth harvest (Table 3.10-13). Existing suitable old-growth and young-growth acres are mainly located along the existing road systems at the south end of Chichagof Island, and further northwest around two existing roads on the north shore of Peril Strait.

Table 3.10-13
Change in Roadless Area, Development LUDs without Roadless Designation, and Suitable Timber by Alternative for the Peril Strait Outfitter/Guide Use Area

	Total Acres	Change from Alternative 1 (acres)				
Management Type	Alt 1	Alt 2	Alt 3	Alt 4	Alt 5	Alt 6
Roadless Area[1, 2]	168,913	19,926	-64,777	-1,120	-53,059	-168,913
Development LUDs – Not Roadless[2]	49,419	-17,470	-17,464	712	52,386	52,391
Suitable Old Growth	2,998	28	28	1,537	2,536	2,536
Suitable Young Growth	9,063	99	99	126	129	188
Old-Growth Harvest	313	-2	-50	-30	18	18
Young-Growth Harvest	7,716	-171	-251	-233	-268	-288

Notes:
[1] Changes in roadless area acres for Alternative 3 include LUD II acres, which would be removed from roadless classification, but would still be managed in a roadless condition.
[2] Roadless acres managed as Timber Priority ARA under Alternative 4 are included in the roadless area total and excluded from the development LUD total, which has the effect of understating the changes in these categories.

The number of designated roadless acres in the Peril Strait use area would increase under Alternative 2, with an estimated net gain of approximately 19,900 aces, about 12 percent of the total use area. The number of acres with roadless designation would decrease under the other action alternatives. Alternative 5 would remove roadless designation from about 53,100 acres, and Alternative 6 would remove regulatory roadless prohibitions from all lands, approximately 168,900 acres (Table 3.10-13).

The total number of acres in development LUDs without roadless designations would decrease by almost 17,500 acres under Alternatives 2 and 3. Increases in development LUDs outside of roadless for the other alternatives would range from about 700 acres (Alternative 4) to about 52,400 acres (Alternatives 5 and 6). Changes in suitable old-growth acres available for harvest would range from about 30 acres (Alternatives 2 and 3) to about 2,550 acres (Alternatives 5 and 6). Suitable old-growth acres would mainly be added in areas in and around existing roads, extending the areas of existing suitable old-growth available for harvesting. The action alternatives would each add less than 200 acres of suitable young-growth.

Suitable old-growth acres would be added south of Sitkoh Lake, on the north side of the False Island road system, and around the existing roads further northwest on the north shore of Peril Strait under Alternatives 4 to 6. These additions would extend existing areas of suitable acres that are presently

available for harvest. Harvest of these areas under Alternatives 4 to 6 would have the potential to conflict with existing outfitter/guide use.

However, only very limited old-growth harvest is projected to occur in this area over the next 100 years under all of the alternatives, with estimated harvest totals ranging from about 260 acres (Alternative 3) to 330 acres (Alternatives 5 and 6) (Table 3.10-13). An estimated 7,700 acres of young-growth are projected to be harvested over the next 100 years under Alternative 1, with decreases in projected harvest acres expected under all five action alternatives, ranging from drops of about 200 acres (Alternative 2) to 300 acres (Alternative 6) (Table 3.10-13).

CRD 00 Craig Ranger District

The CRD 00 outfitter/guide use area, which consists of the entire Craig Ranger District, encompasses about 926,000 acres, 77 percent of which are located in IRAs (Table 3.10-5). The Craig Ranger District is located on the southern half of Prince of Wales Island, the largest island in Southeast Alaska. Prince of Wales Island has the most extensive road system in Southeast Alaska, ranging from paved scenic byways to logging roads that require four-wheel drive. These roads provide access to numerous areas with opportunities to fish, hike, camp, hunt, boat, and view wildlife.

Twenty-one outfitter/guides reported use in this area from 2013 to 2017, five of which used the area regularly (4 out of 5 years). An annual average of 1,869 service days were reported over this period. Use in this area was noticeably lower in 2017 than in previous years, with just 926 reported service days, about half the annual average (Table 3.10-5). Wildlife viewing accounted for 85 percent of reported service days, followed by hunting (7 percent). Use was reported at 75 locations, with the Dog Salmon fish pass wildlife viewing site and Polk Inlet accounting for 39 percent and 17 percent of service days, respectively. Reported use at Dog Salmon fish pass was mainly from 2014 to 2016; use at Polk Inlet was mainly reported in 2013.

The Craig Ranger District includes about 66,300 acres of lands in development LUDs outside of roadless, with about 12,900 acres of suitable old growth available for harvest and 17,000 acres of suitable young growth (Table 3.10-14). Existing suitable acres are located along the road systems throughout the non-roadless parts of the area, including areas near Dog Salmon fish pass and Polk Inlet. The Craig Ranger District use area includes Congressionally designated LUD II areas, as well the South Prince of Wales Wilderness.

Table 3.10-14
Change in Roadless Area, Development LUDs without Roadless Designation, and Suitable Timber by Alternative for the Craig Ranger District Outfitter/Guide Use Area

	Total Acres	Change from Alternative 1 (acres)				
Management Type	Alt 1	Alt 2	Alt 3	Alt 4	Alt 5	Alt 6
Roadless Area[1, 2]	735,240	-4,049	-157,633	-39,977	-268,322	-735,240
Development LUDs - Not Roadless[2]	66,339	16,393	37,161	41,389	244,548	256,527
Suitable Old Growth	12,932	4,312	9,921	14,856	15,847	15,851
Suitable Young Growth	16,958	2,916	3,929	3,937	4,093	4,242
Old-Growth Harvest	3,124	495	741	706	804	804
Young-Growth Harvest	14,461	1,928	2,579	2,578	2,618	2,582

Note:
[1] Changes in roadless area acres for Alternative 3 include LUD II acres, which would be removed from roadless classification, but would still be managed in a roadless condition.
[2] Roadless acres managed as Timber Priority ARA under Alternative 4 are included in the roadless area total and excluded from the development LUD total, which has the effect of understating the changes in these categories.

The number of roadless acres in the Craig Ranger District would decrease under all of the action alternatives with drops ranging from about 4,050 acres (Alternative 2) to about 735,200 acres under Alternative 6, which would remove regulatory roadless prohibitions from all lands. Alternative 5 would remove roadless designation from about 268,300 acres (Table 3.10-14).

The total number of acres in development LUDs outside of roadless would increase under all alternatives with gains ranging from about 16,400 acres (Alternative 2) to 256,500 acres (Alternative 6). Increases in suitable old-growth acres available for harvest would range from about 4,300 acres (Alternative 2) to about 14,900 to 15,850 acres (Alternatives 4 to 6), which would more than double the amount available. Increases in suitable young-growth acres would range from about 2,900 acres (Alternative 2) to about 4,250 acres (Alternative 6) (Table 3.10-14). Suitable acres would mainly be added in the north central part of the area, near the communities of Craig, Klawock, and Hollis in the Twelvemile and Soda Bay IRAs (IRAs 534 and 505), with smaller concentrations on the south part of Sumez Island and east of Cholmondeley Sound. These additions would expand the areas presently available for harvest in the vicinity of Dog Salmon fish pass and Polk Inlet. Harvest of suitable acres in the vicinity of these areas under all alternatives would have the potential to conflict with existing outfitter/guide use.

Projected old-growth harvest is estimated to range from 3,100 acres (Alternative 1) to almost 4,000 acres (Alternatives 3 to 6). Young-growth harvest is projected to range from 14,500 acres (Alternative 1) to about 17,000 acres (Alternatives 3 to 6) (Table 3.10-14).

K19 North Revilla

The North Revilla outfitter/guide use area is located on the Ketchikan Misty Fjords Ranger District and consists of 70,400 acres, 83 percent of which are located in IRAs (Table 3.10-5). The North Revilla area encompasses the northern, non-wilderness portion of Revillagigedo Island, including Hassler Island and Black Island.

Eight outfitter/guides reported use in this area from 2013 to 2017, five of which used the area regularly (4 out of 5 years). An annual average of 213 service days were reported over this period (Table 3.10-5). Hiking accounted for most (82 percent) of reported use, followed by fishing (17 percent). Use was reported for three locations. Hiking use was reported at Klu Bay and the Orchard Lake Trail, with fishing reported at Orchard Lake.

The North Revilla use area includes about 9,400 acres of lands in development LUDs outside of roadless, with 2,200 acres identified as suitable for old-growth harvest and 2,300 acres suitable for young-growth harvest (Table 3.10-15). Existing suitable old-growth and young-growth acres occupy much of the non-roadless portions of this use area, including Hassler Island, along the south shoreline, and around Orchard Lake.

Table 3.10-15
Change in Roadless Area, Development LUDs without Roadless Designation, and Suitable Timber by Alternative for the North Revilla Outfitter/Guide Use Area

	Total Acres	Change from Alternative 1 (acres)				
Management Type	Alt 1	Alt 2	Alt 3	Alt 4	Alt 5	Alt 6
Roadless Area[1, 2]	59,814	-426	-426	-427	-13,347	-59,814
Development LUDs – Not Roadless[2]	9,377	303	303	303	13,208	13,209
Suitable Old Growth	2,181	103	103	2,384	2,654	2,655
Suitable Young Growth	2,278	5	5	133	144	154
Old-Growth Harvest	262	-2	-51	266	256	256
Young-Growth Harvest	1,939	-59	-79	24	23	13

Notes:
[1] Changes in roadless area acres for Alternative 3 include LUD II acres, which would be removed from roadless classification, but would still be managed in a roadless condition.
[2] Roadless acres managed as Timber Priority ARA under Alternative 4 are included in the roadless area total and excluded from the development LUD total, which has the effect of understating the changes in these categories.

Changes in roadless area acres in North Revilla would be minimal under Alternatives 2 to 4, with roadless designation removed from less than 450 acres. This total increases to 9,600 for Alternative 4, if acres designated as Timber Priority ARA are included with those removed. Alternative 5 would remove roadless designation from about 13,350 acres, with Alternative 6 removing roadless designation from all lands in existing IRAs, approximately 59,800 acres (Table 3.10-15).

Alternatives 2 to 4 would have little effect on development potential, as measured by acres in development LUDs outside of roadless, with each alternative adding about 300 acres, about 3 percent of the existing total. Alternatives 5 and 6, on the other hand, would more than double existing development LUD acres without roadless designation, with a net increase of about 13,200 acres under each alternative.

Changes in suitable old-growth acres available for harvest would range from about 100 acres (Alternatives 2 and 3) to an increase of about 2,400 to 2,650 acres under Alternatives 4 to 6, more than double the suitable old-growth acres under Alternative 1. Suitable old-growth acres would mainly be added on Black Island and north of the existing suitable acres on Revillagigedo Island. The action alternatives would each add less than 200 acres of suitable young growth. Harvest of existing suitable old-growth and young-growth acres under all of the alternatives would conflict with outfitter/guide use in this area. The old-growth acres that would be added under Alternatives 4 to 6 could potentially exacerbate these impacts if harvest to occur in these areas. However, only limited old-growth harvest is anticipated under all of the alternatives, with projected harvest over the next 100 years estimated to range from about 260 acres (Alternative 1) to 510 acres (Alternative 6). Projected young-growth harvest is not expected to vary much across the alternatives (Table 3.10-15).

P1 Mitkof Island

The Mitkof Island outfitter/guide use area is located on the Petersburg Ranger District and consists of 109,300 acres, 32 percent of which are located in IRAs (Table 3.10-5). This use area encompasses all of Mitkof Island and includes the city of Petersburg.

Fifteen outfitter/guides reported use in this area from 2013 to 2017, five of which used the area regularly (4 out of 5 years). An annual average of about 928 service days were reported over this period (Table 3.10-5). Hiking accounted for more than half (59 percent) of reported service days, followed by camping (9 percent) and remote-setting nature tours (15 percent). Use was reported at 11 locations, with the Ideal Cove Trail accounting for 71 percent of reported service days, followed by Point Alexander (13 percent).

The Mitkof Island use area includes about 57,000 acres of lands in development LUDs outside of roadless (slightly more than half the total area), with about 15,500 acres of suitable old-growth available for harvest and 9,800 acres of suitable young-growth (Table 3.10-16). Existing suitable old-growth and young-growth acres are located along the existing road systems through the center of the island, as well as along the roads that wrap around the south side of the Sumner Mountains.

Table 3.10-16
Change in Roadless Area, Development LUDs without Roadless Designation, and Suitable Timber by Alternative for the Mitkof Island Outfitter/Guide Use Area

	Total Acres	Change from Alternative 1 (acres)				
Management Type	Alt 1	Alt 2	Alt 3	Alt 4	Alt 5	Alt 6
Roadless Area[1, 2]	35,054	-286	-4,244	-4,376	-22,476	-35,054
Development LUDs – Not Roadless[2]	56,859	140	4,098	4,098	22,198	22,199
Suitable Old Growth	15,527	9	1,431	3,385	3,572	3,572
Suitable Young Growth	9,756	5	6	23	31	57
Old-Growth Harvest	3,588	-331	-704	-846	-866	-866
Young-Growth Harvest	8,306	-267	-352	-342	-376	-427

Notes:
[1] Changes in roadless area acres for Alternative 3 include LUD II acres, which would be removed from roadless classification, but would still be managed in a roadless condition.
[2] Roadless acres managed as Timber Priority ARA under Alternative 4 are included in the roadless area total and excluded from the development LUD total, which has the effect of understating the changes in these categories.

The number of roadless acres in the Mitkof Island use area would decrease under all of the action alternatives with drops ranging from less than 300 acres (Alternative 2) to about 35,000 acres under Alternative 6, which would remove regulatory roadless prohibitions from all lands. Alternative 5 would remove roadless designation from about 22,500 acres (Table 3.10-16).

The total number of acres in development LUDs outside of roadless would increase under all alternatives with gains ranging from less than 150 acres (Alternative 2) to 22,200 (Alternatives 5 and 6). Increases in suitable old-growth acres available for harvest would range from about 1,400 acres (Alternative 3) to about 3,400 acres (Alternative 4) and 3,600 acres (Alternatives 5 and 6). Suitable old-growth acres would be added to the timber base in three main locations under Alternatives 4 to 6, none of which would likely conflict with areas receiving relative high levels of existing outfitter/guide use. Further, projected old-growth harvest in this area is expected to drop relative to Alternative 1 under all of the action alternatives (Table 3.10-16).

Increases in suitable young-growth acres would be negligible (less than 60 acres) under all of the action alternatives, with projected young-growth harvest expected to drop under all five of the action alternatives.

P08 North Lindenberg Peninsula

The North Lindenberg Peninsula outfitter/guide use area is located on the Petersburg Ranger District and consists of 75,600 acres, 78 percent of which are located in IRAs (Table 3.10-5). Located on the north end of Kupreanof Island, this use area is bordered to the north and east by Frederick Sound and includes Portage Bay.

Twelve outfitter/guides reported use in this area from 2013 to 2017, three of which used the area regularly (4 out of 5 years). An annual average of 278 service days were reported over this period (Table 3.10-5). Camping accounted for more than three-quarters (76 percent) of reported service days, followed by remote-setting nature tours (9 percent). Use was reported at 11 locations, with locations around Portage Bay accounting for 46 percent of reported service days, followed by Five Mile Creek (29 percent).

The North Lindenberg Peninsula use area includes about 13,500 acres of lands in development LUDs outside of roadless, with about 4,700 acres of suitable old-growth available for harvest and 3,700 acres of suitable young growth (Table 3.10-17). Existing suitable old-growth and young-growth acres are located along the existing roads on the east side of Portage Bay.

The number of roadless acres in the North Lindenberg Peninsula use area would decrease under all of the action alternatives with drops ranging from 10,700 acres (Alternative 2) to about 59,000 acres under Alternative 6, which would remove regulatory roadless prohibitions from all lands. Alternative 5 would remove roadless designation from about 49,000 acres (Table 3.10-17).

Table 3.10-17
Change in Roadless Area, Development LUDs without Roadless Designation, and Suitable Timber by Alternative for the North Lindenberg Peninsula Outfitter/Guide Use Area

	Total Acres	Change from Alternative 1 (acres)				
Management Type	Alt 1	Alt 2	Alt 3	Alt 4	Alt 5	Alt 6
Roadless Area[1, 2]	59,007	-10,681	-28,098	-28,123	-48,981	-59,007
Development LUDs – Not Roadless[2]	13,525	10,157	24,318	24,335	48,445	48,446
Suitable Old Growth	4,661	3,263	7,320	8,770	8,862	8,862
Suitable Young Growth	3,685	742	756	756	804	815
Old-Growth Harvest	1,263	549	829	743	723	723
Young-Growth Harvest	3,137	509	481	479	500	475

Notes:
[1] Changes in roadless area acres for Alternative 3 include LUD II acres, which would be removed from roadless classification, but would still be managed in a roadless condition.
[2] Roadless acres managed as Timber Priority ARA under Alternative 4 are included in the roadless area total and excluded from the development LUD total, which has the effect of understating the changes in these categories.

The total number of acres in development LUDs without roadless designation would increase under all alternatives with gains ranging from about 10,150 acres (Alternative 2) to 48,450 (Alternatives 5 and 6). Increases in suitable old-growth acres available for harvest would range from about 3,300 acres

(Alternative 2) to about 8,800 to 8,900 acres (Alternatives 4 to 6) (Table 3.10-17). Old-growth acres would be added throughout the area under Alternatives 4 to 6. Increases in suitable young growth acres would range from about 750 to 800 acres under all of the action alternatives. Harvest of existing suitable old-growth and young-growth acres under all alternatives (including Alternative 1) would conflict with outfitter/guide use in the area. The old-growth acres that would be added under Alternatives 4 to 6 could potentially exacerbate these impacts if harvest were to occur in these areas. Projected old-growth harvest in this area is estimated to increase relative to Alternative 1 under all of the action alternatives, with increases ranging from about 550 acres (Alternative 2) to 830 acres (Alternative 3). Projected young-growth harvest would also increase under all of the action alternatives (Table 3.10-17).

P12B Kuiu Island Road System

The Kuiu Island Road System outfitter/guide use area is located on the Petersburg Ranger District and consists of 134,850 acres, 31 percent of which are located in IRAs (Table 3.10-5). The Kuiu Island Road System area is located on the north end of Kuiu Island. The area includes the mainline and spur roads on Kuiu Island. Roads extend to Saginaw Bay, Security Bay, Rowan Bay, Bay of Pillars, Port Camden, and Three Mile Arm.

Nine outfitter/guides reported use in this area from 2013 to 2017, five of which used the area regularly (4 out of 5 years). An annual average of about 139 service days were reported over this period (Table 3.10-5). Hunting, mainly for black bear, and camping each accounted for about one-third (33 percent and 32 percent, respectively) of reported service days, followed by freshwater fishing (26 percent). Use was reported at 13 locations, with Kadake Creek and Port Camden each accounting for slightly more than one-quarter (26 percent) of reported service days, with various locations along the road system making up 24 percent.

The Kuiu Island Road System use area includes about 77,000 acres of lands in development LUDs outside of roadless, with about 14,750 acres of suitable old-growth available for harvest and 19,600 acres of suitable young-growth (Table 3.10-18). Existing suitable old-growth acres are located in the center of the area and north of Rowan Bay. Existing young-growth acres are distributed along the existing road system throughout the area.

The number of roadless acres in the Kuiu Island Road System use area would increase under Alternative 2 (2,500 acres) and decrease under the other action alternatives, with drops ranging up to about 41,400 acres under Alternative 6, which would remove regulatory roadless prohibitions from all lands. Alternative 5 would remove roadless designation from about 30,900 acres (Table 3.10-18).

Table 3.10-18
Change in Roadless Area, Development LUDs without Roadless Designation, and Suitable Timber by Alternative for the Kuiu Island Road System Outfitter/Guide Use Area

	Total Acres	Change from Alternative 1 (acres)				
Management Type	Alt 1	Alt 2	Alt 3	Alt 4	Alt 5	Alt 6
Roadless Area[1, 2]	41,428	2,529	-4,458	-8,197	-30,932	-41,428
Development LUDs – Not Roadless[2]	76,994	-2,558	4,425	7,913	30,622	30,622
Suitable Old Growth	14,741	-1,351	1,049	4,247	4,248	4,248
Suitable Young Growth	19,585	0	2	25	34	49
Old-Growth Harvest	4,025	-738	-899	-736	-797	-797
Young-Growth Harvest	16,673	-545	-716	-704	-778	-910

Notes:
[1] Changes in roadless area acres for Alternative 3 include LUD II acres, which would be removed from roadless classification, but would still be managed in a roadless condition.
[2] Roadless acres managed as Timber Priority ARA under Alternative 4 are included in the roadless area total and excluded from the development LUD total, which has the effect of understating the changes in these categories.

The total number of acres in development LUDs outside of roadless would decrease under Alternative 2, by about 2,600 acres. Increases in development LUD acres outside of roadless under the other action

alternatives would range up to about 30,600 acres (Alternatives 5 and 6). Total suitable old-growth acres would decrease under Alternative 2, dropping by about 1,350 acres. Increases under the other action alternatives would range from about 1,050 acres (Alternative 3) to 4,250 acres (Alternatives 4 to 6). Increases in suitable young-growth would be about 50 acres or less under all alternatives.

Suitable old-growth acres would mainly be added in the north central and southwest parts of this area. Harvest of existing suitable old-growth and young-growth acres under all alternatives would conflict with existing outfitter/guide use in this use area. An estimated 4,000 old-growth acres are projected to be harvested in this area over 100 years under Alternative 1. Projected old-growth harvest acres in this area are estimated to decrease relative to Alternative 1 under all five of the action alternatives. Projected young-growth harvest is estimated to decrease relative to Alternative 1 under all five alternatives, with drops ranging from about 550 acres (Alternative 2) to 900 acres (Alternative 6) (Table 3.10-18).

P21 Muddy River Area

The Muddy River Area outfitter/guide use area is located on the Petersburg Ranger District and consists of 63,357 acres, 68 percent of which are located in IRAs (Table 3.10-5). The Muddy River Area is located on the mainland east of Frederick Sound. The area includes the Thomas Bay road system, Patterson River, Muddy River, Point Agassiz, and a portion of Thomas Bay.

Eight outfitter/guides reported use in this area from 2013 to 2017, three of which used the area regularly (4 out of 5 years). An annual average of 347 service days were reported over this period (Table 3.10-5). Hiking accounted for more than three quarters (78 percent) of reported use, followed by camping (9 percent). Use was reported for seven locations, with relatively high use identified for Patterson River (62 percent), followed by Ruth Island, Thomas Bay (23 percent). Service days reported for Patterson River were mainly hiking, with some mountain goat hunting use also reported.

The Muddy River Area includes about 16,650 acres of lands in development LUDs outside of roadless, with about 2,900 acres identified as suitable for old-growth harvest and 4,200 acres suitable for young-growth harvest (Table 3.10-19). Existing suitable old-growth and young-growth acres are located along the existing road system and extend south along the Muddy River and Crystal Creek drainages reflecting past harvest in the area. Suitable old-growth acres are also located on Point Agassiz Peninsula and Deer Island.

Table 3.10-19
Change in Roadless Area, Development LUDs without Roadless Designation, and Suitable Timber by Alternative for the Muddy River Outfitter/Guide Use Area

	Total Acres	Change from Alternative 1 (acres)				
Management Type	Alt 1	Alt 2	Alt 3	Alt 4	Alt 5	Alt 6
Roadless Area[1, 2]	43,101	-233	-7,917	-7,924	-28,919	-43,101
Development LUDs – Not Roadless[2]	16,651	236	7,796	7,796	28,713	28,713
Suitable Old Growth	2,891	115	3,180	6,764	6,772	6,772
Suitable Young Growth	4,218	0	0	0	0	13
Old-Growth Harvest	617	-28	356	805	780	780
Young-Growth Harvest	3,591	-117	-154	-156	-173	-194

Notes:
[1] Changes in roadless area acres for Alternative 3 include LUD II acres, which would be removed from roadless classification, but would still be managed in a roadless condition.
[2] Roadless acres managed as Timber Priority ARA under Alternative 4 are included in the roadless area total and excluded from the development LUD total, which has the effect of understating the changes in these categories.

Decreases in roadless area acres in the Muddy River Area would range from about 200 acres (Alternative 2) to about 43,100 acres under Alternative 6, which would remove regulatory roadless prohibitions from all lands. Increases in development LUDs outside of roadless would range up to 28,700 acres (Alternatives 5 and 6). There would be no change in suitable young-growth acres by alternative. Changes in suitable old-growth acres available for harvest would range from about 100 acres (Alternative 2) to an increase of almost 6,800 acres (Alternatives 4 to 6) (Table 3.10-19).

Suitable old-growth acres would mainly be added in the south portion of the area. Harvest of existing suitable old-growth and young-growth acres under all alternatives (including Alternative 1) would conflict with outfitter/guide use in this area. The old-growth acres that would be added under Alternatives 4 to 6 could potentially exacerbate these impacts if harvest were to occur in these areas. Projected old-growth harvest is estimated to range from about 600 acres (Alternative 2) to 1,400 acres (Alternatives 4 to 6). Young-growth harvest is projected to decrease relative to Alternative 1 under all five action alternatives (Table 3.10-19).

TBRD 00 Thorne Bay Ranger District

The TBRD 00 outfitter/guide use area, which consists of the entire Thorne Bay Ranger District, encompasses about 901,500 acres, 40 percent of which are located in IRAs (Table 3.10-5). The Thorne Bay Ranger District is located on the northern half of Prince of Wales Island. The largest island in Southeast Alaska, Prince of Wales Island has an extensive road system that provides access to numerous areas with opportunities to fish, hike, camp, hunt, boat, and view wildlife. The Thorne Bay Ranger District is known for its cave systems and karst topography.

Twenty-seven outfitter/guides reported use in this area from 2013 to 2017, 11 of which used the area regularly (4 out of 5 years). An annual average of 1,239 service days were reported over this period. Use in this area was lower in 2017 than in previous years, with about 870 reported service days, slightly more than two-thirds of the annual average (Table 3.10-5). Freshwater fishing accounted for 43 percent of reported service days, followed by sightseeing (20 percent), and camping (13 percent) and remote-setting nature tours (13 percent). Use was reported at 65 locations, with the El Capitan Cave interpretative site accounting for 39 percent, followed by locations along Staney Creek (9 percent) and Thorne River (8 percent).

The Thorne Bay Ranger District includes about 327,000 acres of lands in development LUDs outside of roadless, with about 62,300 acres of suitable old-growth available for harvest and 127,000 acres of suitable young-growth (Table 3.10-20). Existing suitable acres are located along the road systems throughout the non-roadless parts of the area. The Thorne Bay Ranger District use area includes Congressionally designated LUD II areas, as well the Coronation Island, Warren Island, and Karta River Wildernesses.

Table 3.10-20
Change in Roadless Area, Development LUDs without Roadless Designation, and Suitable Timber by Alternative for the Thorne Bay Ranger District Outfitter/Guide Use Area

	Total Acres	Change from Alternative 1 (acres)				
Management Type	Alt 1	Alt 2	Alt 3	Alt 4	Alt 5	Alt 6
Roadless Area[1, 2]	364,798	-13,619	-193,327	-80,038	-133,003	-364,798
Development LUDs – Not Roadless[2]	326,652	12,415	60,737	61,064	127,126	127,126
Suitable Old Growth	62,326	3,114	14,383	20,349	21,299	21,299
Suitable Young Growth	126,994	1,241	1,296	1,351	1,353	1,560
Old-Growth Harvest	13,469	-752	-1,877	-2,643	-2,723	-2,723
Young-Growth Harvest	108,114	-2,512	-3,595	-3,593	-4,126	-4,903

Notes:
[1] Changes in roadless area acres for Alternative 3 include LUD II acres, which would be removed from roadless classification, but would still be managed in a roadless condition.
[2] Roadless acres managed as Timber Priority ARA under Alternative 4 are included in the roadless area total and excluded from the development LUD total, which has the effect of understating the changes in these categories.

The number of roadless acres in the Thorne Bay Ranger District would decrease under all of the action alternatives, with decreases ranging from about 13,600 acres (Alternative 2) to about 365,000 acres under Alternative 6, which would remove regulatory roadless prohibitions from all lands. Alternative 5 would remove roadless designation for about 133,000 acres (Table 3.10-20).

The total number of acres in development LUDs outside of roadless would increase under all alternatives with gains ranging from about 12,400 acres (Alternative 2) to 127,100 acres (Alternatives 5 and 6). Increases in suitable old-growth acres available for harvest would range from about 3,100 acres

(Alternative 2) to about 20,350 acres (Alternative 4) and 21,300 acres (Alternatives 5 and 6). Increases in suitable young-growth acres would range from about 1,200 to 1,600 acres across all the action alternatives (Table 3.10-20). Suitable old-growth acres would be added throughout the area, with larger additions near Klawock in the Kogish IRA (IRA 509) and Karta IRA (IRA 510), with relatively large gains in the northwest part of the area in the El Capitan IRA (IRA 517). These additions are not expected to conflict with outfitter/guide use at the most visited locations in this use area because changes are not proposed in those areas. In addition, both projected old-growth and young-growth harvest acres are estimated to decrease relative to Alternative 1 under all five action alternatives (Table 3.10-20).

Cumulative Effects

This section considers the incremental effects of the alternatives when added to other past, present, and reasonably foreseeable actions. The effects of past and present actions on recreation are included in the *Affected Environment* portion of this section, which discusses current recreation facilities and activities on the Tongass. Past actions include past timber harvest and road building that has facilitated roaded recreation and changed ROS settings, as well as the development of recreation facilities, such as cabins, campgrounds, interpretive sites, and visitor centers. Present actions include the impacts of current management policies on existing recreation patterns, particularly those that are authorized by special use permits. For outfitter/guide use, recent and reasonably foreseeable actions include ongoing capacity determinations and use allocations on many Ranger Districts (USDA Forest Service 2009b, 2009c, 2012d, 2012e, 2017e). Some use areas are currently at capacity, which could serve to exacerbate potential displacement effects from long-term changes in roadless area management.

The number of cruise ship passengers visiting the region remains a significant source of current and future recreation demand on the Tongass. Current recreation patterns on the Tongass also reflect past timber harvest and road building activities on adjacent private and Alaska Native corporation lands, as well as wildland recreation opportunities on federal- and state-managed lands elsewhere in the region.

Reasonably foreseeable actions on NFS lands include the projected levels of future timber harvest and other developments that are used in the preceding analysis to assess the potential impacts of the alternatives on the supply of recreation opportunities, recreation use, and commercial outfitter/guide use. Other reasonably foreseeable actions include regional transportation development as defined by the State Transportation Plan and the Forest Service Alaska Region Long Range Transportation Plan, as well as road paving on Prince of Wales Island, the closing of roads, and construction of the Angoon Airport. In addition, the expansion of cities like Juneau, Ketchikan, and Sitka, recreational cabin development, land auctions by the State, and land adjustments could include additional road construction, timber harvest, and facility construction. It is not possible at this time to predict exactly which roads would be developed or their likely impact on future recreation patterns.

Reasonably foreseeable future actions also include an expected growth in recreation and tourism businesses, as well as the development of additional fishing and other lodges. This type of development would facilitate additional recreation and tourism in the region and on the Forest. Human settlement expansion around the region's larger cities, as well as residential expansion that could potentially result from state land auctions, would likely result in increased demand for a range of recreation activities, with some developments favoring developed recreation opportunities, and others more dependent on undeveloped lands. Mining activities are expected to expand at existing sites, including Greens Creek on Admiralty Island and Kensington Gold Mine north of Juneau, as well as possible future sites, including the Bokan Mountain and Niblack sites on the southern end of Prince of Wales Island. Mining projects are for the most part expected to have a negative effect on recreation activities, because most recreational activities are incompatible with these types of land use.

Scenery

Affected Environment

The Tongass offers a variety of scenery to its visitors, from mountain ranges and the glaciers of the mainland to low-lying marine landscapes composed of intricate waterways, bays, and island groups. The Forest is viewed from a variety of vantage points, including the communities of Southeast Alaska, the Alaska Marine Highway ferry route, cruise ship routes, existing road systems, popular small boat routes and anchorages, developed recreation sites and facilities, and hiking trails. Visitor-related flight seeing via small aircraft is increasing in popularity and provides aerial views of the forest landscape.

The Forest Service developed a Visual Management System (VMS) in 1974 to integrate aesthetic considerations into large-scale resource management decisions. Due to advances in technology, as well as the increased demand for high-quality scenery, the Scenery Management System (SMS) was released in 1996. The SMS integrates the increased understanding of ecosystem processes and cultural landscapes in identifying the effects of various management practices on scenic resources. The SMS was used in this analysis to inventory existing scenic resources, provide measurable scenic quality management objectives for each portion of the landscape, and estimate the landscape's sensitivity based on the visibility from priority travelways and use areas.

To apply the SMS to the Forest, a viewshed analysis of the entire Tongass was completed using the Tongass Geographic Information System (GIS) and is described in the Scenery section of the 2016 Forest Plan Amendment EIS (USDA Forest Service 2016b). This viewshed analysis was completed separately for each Ranger District and was based on the viewsheds of selected points along Visual Priority Routes and Use Areas. The analysis included identification of distance zones, which were subsequently overlaid with the LUDs to generate the Scenic Integrity Objectives (SIOs) (refer to the Forest-wide standards and guidelines in the Forest Plan for details on how SIOs were determined for each LUD).

Existing Scenic Integrity

The existing scenic resources of the Tongass encompass everything from vast tracts unmodified by human activity to areas of heavily modified landscapes. Existing Scenic Integrity (ESI) ratings are used by the Forest Service to analyze the degree of intactness of the landscape character. These ratings are used to categorize the degree of alteration visible in the landscape on a continuum from a natural setting to a heavily altered landscape. The ratings apply to the broad landscape affected, not just the acres altered. As described below, ESI ratings range over six levels of integrity, from Very High to Unacceptably Low.

- **Very High**—Landscapes where the valued landscape character is intact with only minute deviations, if any. The existing landscape character and sense of place is expressed at the highest possible level.
- **High**—Landscapes where the valued landscape character appears intact. Deviations may be present, but must repeat the form, line, color, texture, and pattern common to the landscape character so completely and at such scale that they are not evident.
- **Moderate**—Landscapes where the valued landscape character appears slightly altered. Noticeable deviations must remain visually subordinate to the landscape character being viewed.
- **Low**—Landscapes where the valued landscape character appears moderately altered. Deviations begin to dominate the valued landscape character being viewed, but they borrow valued attributes such as size, shape, edge effect and pattern of natural openings, vegetative type changes or architectural styles outside the landscape being viewed. They should not only appear as valued character outside the landscape being viewed, but compatible or complementary to the character within.
- **Very Low**—Landscapes where the valued landscape character appears heavily altered. Deviations may strongly dominate the valued landscape character. They may not borrow from valued attributes

such as size, shape, edge effect and pattern of natural openings, vegetative type changes, or architectural styles within or outside the landscape being viewed.

- **Unacceptably Low**—Landscapes where the valued landscape character being viewed appears extremely altered. Deviations are extremely dominant and borrow little if any form, line, color, texture, pattern or scale from the landscape character.

Table 3.16-1 in the 2016 Forest Plan Amendment EIS (USDA Forest Service 2016b) displays the percent of acres of each ESI for the Tongass. A breakdown between "seen" and "seldom seen" areas is presented. Seen areas are those areas that can be viewed in the foreground, middleground, or background from inventoried Visual Priority Routes and Use Areas with a concern level of 1 or 2, the travelways and use areas with the highest number of users. Seldom seen areas are all the rest of the Forest. The ESI for wilderness is also included in this table. Approximately 88 percent of the Tongass is rated as a Very High ESI, which is a visually unaltered condition. About 10 percent of the land is rated as Low, Very Low, or Unacceptably Low, which indicates noticeable development activity. The remainder of the Forest is rated as High or Moderate. Some of the wilderness acres have a High or lower rating. This is mostly due to the landscape effect of developments adjacent to wilderness and past development activities within wildernesses.

Under the Forest Plan, all land has a designated LUD, which guides the types and intensity of development actions. The LUDs designate the SIOs for each area, which define the degree to which the natural landscape can be altered, and provide guidelines for timber harvest, road building, and other activities to ensure they are conducted in a way that allows the scenic objectives to be achieved. A LUD may have different SIOs depending on the distance zone (foreground, middleground, background) in which the development activity is to take place.

SIOs are classified using the same terms outlined above for ESI: Very High, High, Moderate, Low, and Very Low. The Unacceptably Low rating is only used to inventory existing conditions and cannot be used as a management objective.

- The current adopted SIOs for all land within the Tongass are displayed in Table 3.11-1. This table separates the percent of acres of each SIO into five categories: foreground, middleground, background, seldom seen, and other (municipal watersheds and non-wilderness national monuments where the SIO is determined on a project-by-project basis). The Very High SIO is typically assigned to wilderness; however, it is not used for Tongass wilderness because of the potential alterations allowed under the Alaska National Interest Lands Conservation Act (ANILCA). The vast majority of wilderness acreage will be managed through the specific wilderness plans with a Very High SIO. Thus, over 60 percent of the Tongass is to be managed at the High or Very High Scenic Integrity level.
- Demand for scenic quality can be represented by the increase in visitor-related travel to the Tongass, as well as a heightened awareness and sensitivity of Alaskan residents to scenic resource values. This results in a strong indirect connection between scenic resource values and the economy of Southeast Alaska. For example, Southeast Alaska's Inside Passage is advertised and promoted by the Alaska Department of Commerce, cruise ship operators, and the Southeast Alaska Tourism Council. Their marketing strategy focuses on the scenery of the Tongass as a major attraction. The visitors to Southeast Alaska arrive with expectations and an image of the environment and scenery awaiting them. If recent trends continue, demand for viewing scenic landscapes will increase. A report published by the Alaska Department of Community and Economic Development shows that the largest number of visitors (1.96 million) for 2013-2014 was 5,000 more than the last record set in 2007-2008. This increase also represents a 6 percent increase over 2012-2013.

Lands adjacent to the Alaska Marine Highway, cruise ship routes, flight-seeing routes, high-use recreation areas, and other marine and land-based travel routes will be seen by more people, more frequently, and for greater duration.

Table 3.11-1
Adopted Scenic Integrity Objectives for the Tongass (percent)

	Scenic Integrity Objective					
Category	High	Moderate	Low	Very Low	Other[1]	Total
Foreground	7.6	3.6	1.4	0.0	0.5	13.1
Middleground	18.1	7.2	2.4	5.9	0.5	34.1
Background	0.8	0.4	0.0	0.1	0.0	1.4
Seldom seen	34.1	8.6	0.0	7.4	0.9	51.1
Unmapped	0.1	0.0	0.0	0.0	0.3	0.3
Total	**60.6**	**19.8**	**3.9**	**13.5**	**2.2**	**100.0**

[1] Includes land in the Municipal Watershed and Non-wilderness National Monument LUDs. SIOs in these LUDs are to be determined on a project-by-project basis. Generally, the High SIO will be met.

Source: USDA Forest Service, Tongass National Forest 2018 GIS. Numbers are not exact and may not sum correctly due to rounding.

Environmental Consequences

The Tongass has adopted specific management objectives for scenic resources (i.e., SIOs) for each LUD in the Forest. The adopted SIOs indicate the desired or acceptable level of human-induced alteration to the valued landscape character. No changes in the SIOs or related Scenery standards and guidelines are proposed under any alternative. Harvest of old growth would follow the SIOs of the 2016 Forest Plan for all alternatives. However, the Forest Plan relaxes the SIOs for young-growth harvest to increase the availability of young growth, especially in the first few decades. In other words, all alternatives have reduced SIOs in viewsheds where young growth is to be harvested. As a result, the current SIO designated for the LUD in which young-growth harvest takes place is not likely to be met in many cases. In addition, currently two projects are proposing forest plan amendments for SIOs to ensure economical old-growth timber sales. The effects of these amendments are analyzed in the environmental documents specific to these projects, are limited in scope and scale to the project, and do not change the overall efficacy of the SIOs in achieving scenic resource objectives outlined in the Forest Plan for the planning unit.

Adopted SIOs can be thought of as an indicator of long-term cumulative effects. SIOs are adopted to provide a threshold for the amount of modification to the landscape during land-altering activities; therefore, land may have an adopted SIO of Low, but currently meet the High SIO.

The potential effects to the scenic resource are primarily described in the following two ways:

1. A display of acres of each SIO adopted for suitable young growth, along with LUD, for each alternative.
2. A display of the effects of each alternative on a selected group of key viewsheds throughout the Tongass (described below).

Indirect and Cumulative Forest-wide Effects

Changes in Scenic Integrity Objective Acres

The Forest Plan relaxes the SIOs for young-growth harvest to Very Low, no matter what the SIO is currently, in all development LUDs. However, young-growth harvest is also allowed in the Old-Growth Habitat LUD and there is no change in the SIO for this LUD (it would remain High). All alternatives would follow these same SIO definitions for young-growth harvest. Table 3.11-2 displays the acres of suitable young growth in each SIO that would result from the six alternatives.

Overall old-growth and young-growth harvest would be similar under all alternatives. However, the distribution of harvest acres would vary based on the locations of suitable forest land. As shown in Table 3.11-2, the vast majority of young-growth harvest areas would have Very Low SIOs in all alternatives, which could result in adverse effects on scenery. The only variation from Very Low SIOs would occur for

young-growth harvest in Old-Growth Habitat LUDs. These harvest areas would have High SIOs. All alternatives would have similar percentages of High SIOs.

Table 3.11-2
Scenery Integrity Objectives for Suitable Young Growth by LUD and Alternative (percent)

	Alternative					
SIO/LUD	**1**	**2**	**3**	**4**	**5**	**6**
Very Low/Timber Production	60%	61%	61%	61%	61%	60%
Very Low/Modified Landscape	23%	23%	22%	22%	22%	22%
Very Low/Scenic Viewshed	5%	6%	6%	6%	6%	6%
High/Old-Growth Habitat	11%	11%	11%	11%	11%	12%
Total Young-Growth Suitable Acres	**334,000**	**345,000**	**349,000**	**349,000**	**351,000**	**354,000**

[1] Consists of unmapped areas.
Note: Numbers are based on GIS estimates and are not exact due to rounding.

Effects on Selected Viewsheds

To help focus the visual effects on more familiar areas, the alternatives were analyzed by selected large viewsheds in the Tongass. These 23 viewsheds were selected for their popularity and intensity of public use and travel and are the same as those analyzed in the EIS associated with the 1997 Forest Plan (USDA Forest Service 1997a) and in the EISs associated with the 2008 and 2016 Forest Plan Amendment EIS (USDA Forest Service 2008b, 2016b). They technically represent a series of viewsheds along a travelway and take in entire VCUs. Table 3.11-3 compares suitable and projected harvest acres for young-growth and old-growth timber under the six alternatives for each of the viewsheds. The table also includes the total acres of each viewshed and the percent of each viewshed consisting of non-NFS lands. Acres that are seldom seen or unseen from any viewpoint along the travelway are excluded from the viewshed, which are displayed in Figure 3.11-1.

While the previous section of this effects analysis summarized overall effects by alternative, this section is intended to be a viewshed-specific assessment of effects. As such, it takes into account past harvest and represents a cumulative assessment of scenery effects. Listed below are some summary points that can be observed from the viewshed-specific assessment:

- Three of the 23 viewsheds (Hyder/Salmon River Highway, Stephens Passage, and Mendenhall Glacier) include less than 500 acres of suitable young growth in all alternatives.
- Six of the 23 viewsheds (Hyder/Salmon River Highway, Mendenhall Glacier, Stephens Passage, Ernest Sound, Lynn Canal, and Salmon Bay Lake) include less than 150 acres of suitable old growth in all alternatives.
- In most viewsheds, the highest effects on scenery would be associated with Alternatives 5 and 6, followed in order by Alternatives 4, 3, 2, and 1.
- Viewsheds with the highest potential for negative effects from young-growth harvest include Chatham Strait, Duncan Canal, Frederick Sound, Lynn Canal, and Stikine Strait, based on both the percent increase and the increase in acreage of young growth suitable and projected harvest relative to Alternative 1.
- Viewsheds with the highest potential for negative effects from old-growth harvest include Duncan Canal, Eastern Passage, Frederick Sound, Stikine Strait, Tenakee Inlet to Tenakee Springs, and Zimovia Strait, based on both the percent increase and the increase in acreage of old growth suitable and projected harvest relative to Alternative 1.

Table 3.11-3
Suitable/Projected Harvest (in acres) for Young Growth and Old Growth in Selected General Viewsheds [1,2]

Viewshed and Category	Alternative 1	2	3	4	5	6
Behm Canal (West)						
Suitable YG Acres by SIO & Dist. Zone						
High SIO-Foreground/Middleground	803	803	804	804	803	846
Very Low SIO-Foreground/Middleground	8,114	8,114	8,114	8,115	8,127	8,127
Suitable OG Acres – All SIOs and Dist. Zones	8,223	8,279	8,469	9,205	9,420	9,420
Projected YG Harvest Acres in Foreground/Middleground over 100 Years	7,592	7,344	7,267	7,265	7,236	7,204
Projected OG Harvest Acres in Foreground/Middleground over 100 Years	1,628	1,489	1,237	1,192	1,170	1,170
Total Acres in Viewshed (2% is Non-NFS)	48,956	48,956	48,956	48,956	48,956	48,956
Carroll Inlet						
Suitable YG Acres by SIO & Dist. Zone						
High SIO-Foreground/Middleground	86	90	90	90	90	91
Very Low SIO-Foreground/Middleground	7,026	7,312	7,312	7,312	7,312	7,312
Suitable OG Acres – All SIOs and Dist. Zones	6,288	7,154	9,110	9,756	9,756	9,756
Projected YG Harvest Acres in Foreground/Middleground over 100 Years	6,055	6,097	6,032	6,029	5,998	5,945
Projected OG Harvest Acres in Foreground/Middleground over 100 Years	1,559	1,626	1,686	1,543	1,514	1,514
Total Acres in Viewshed (6% is Non-NFS)	52,422	52,422	52,422	52,422	52,422	52,422
Chatham Strait						
Suitable YG Acres by SIO & Dist. Zone						
High SIO-Foreground/Middleground	2,326	2,316	2,316	2,337	2,326	2,898
Very Low SIO-Foreground/Middleground	4,850	4,850	4,875	4,938	4,940	4,940
Suitable OG Acres – All SIOs and Dist. Zones	8,136	8,309	10,495	12,449	12,516	12,516
Projected YG Harvest Acres in Foreground/Middleground over 100 Years	6,109	5,902	5,860	5,925	5,896	6,293
Projected OG Harvest Acres in Foreground/Middleground over 100 Years	651	657	728	617	592	592
Total Acres in Viewshed (4% is Non-NFS)	107,411	107,411	107,411	107,411	107,411	107,411
Cholmondeley Sound						
Suitable YG Acres by SIO & Dist. Zone						
High SIO-Foreground/Middleground	91	91	91	91	91	96
Very Low SIO-Foreground/Middleground	711	727	727	727	728	728
Suitable OG Acres – All SIOs and Dist. Zones	958	977	1,176	1,724	1,726	1,726
Projected YG Harvest Acres in Foreground/Middleground over 100 Years	682	673	666	666	664	662
Projected OG Harvest Acres in Foreground/Middleground over 100 Years	237	218	177	206	202	202
Total Acres in Viewshed (21% is Non-NFS)	36,157	36,157	36,157	36,157	36,157	36,157

Table 3.11-3 (continued)
Suitable/Projected Harvest (in acres) for Young Growth and Old Growth in Selected General Viewsheds [1,2]

Viewshed and Category	Alternative					
	1	2	3	4	5	6
Clarence Strait						
Suitable YG Acres by SIO & Dist. Zone						
High SIO-Foreground/Middleground	1,181	1,243	1,254	1,248	1,256	1,290
Very Low SIO-Foreground/Middleground	17,272	17,565	17,816	17,689	17,864	17,864
Suitable OG Acres – All SIOs and Dist. Zones	9,910	10,661	12,328	13,771	13,773	13,773
Projected YG Harvest Acres in Foreground/Middleground over 100 Years	15,702	15,490	15,538	15,424	15,493	15,379
Projected OG Harvest Acres in Foreground/Middleground over 100 Years	1,902	1,804	1,524	1,357	1,333	1,333
Total Acres in Viewshed (11% is Non-NFS)	200,380	200,380	200,380	200,380	200,380	200,380
Duncan Canal						
Suitable YG Acres by SIO & Dist. Zone						
High SIO-Foreground/Middleground	351	351	351	351	351	362
Very Low SIO-Foreground/Middleground	1,919	2,448	2,448	2,448	2,477	2,477
Suitable OG Acres – All SIOs and Dist. Zones	1,618	2,871	4,392	4,415	4,415	4,416
Projected YG Harvest Acres in Foreground/Middleground over 100 Years	1,933	2,305	2,281	2,280	2,292	2,280
Projected OG Harvest Acres in Foreground/Middleground over 100 Years	410	705	888	772	757	758
Total Acres in Viewshed (0% is Non-NFS)	69,641	69,641	69,641	69,641	69,641	69,641
Eastern Passage						
Suitable YG Acres by SIO & Dist. Zone						
High SIO-Foreground/Middleground	342	342	342	342	342	468
Very Low SIO-Foreground/Middleground	2,343	2,428	2,428	2,428	2,465	2,465
Suitable OG Acres – All SIOs and Dist. Zones	4,217	4,924	8,361	8,361	8,361	8,361
Projected YG Harvest Acres in Foreground/Middleground over 100 Years	2,286	2,282	2,257	2,256	2,275	2,355
Projected OG Harvest Acres in Foreground/Middleground over 100 Years	876	941	1,316	1,138	1,117	1,117
Total Acres in Viewshed (9% is Non-NFS)	135,673	135,673	135,673	135,673	135,673	135,673
Ernest Sound						
Suitable YG Acres by SIO & Dist. Zone						
High SIO-Foreground/Middleground	31	33	33	33	33	53
Very Low SIO-Foreground/Middleground	464	464	464	464	464	464
Suitable OG Acres – All SIOs and Dist. Zones	0	0	0	0	0	0
Projected YG Harvest Acres in Foreground/Middleground over 100 Years	421	409	405	405	403	415
Projected OG Harvest Acres in Foreground/Middleground over 100 Years	0	0	0	0	0	0
Total Acres in Viewshed (7% is Non-NFS)	36,131	36,131	36,131	36,131	36,131	36,131

Table 3.11-3 (continued)
Suitable/Projected Harvest (in acres) for Young Growth and Old Growth in Selected General Viewsheds [1,2]

Viewshed and Category	Alternative					
	1	2	3	4	5	6
Frederick Sound						
Suitable YG Acres by SIO & Dist. Zone						
High SIO-Foreground/Middleground	526	590	618	596	590	635
Very Low SIO-Foreground/Middleground	7,424	8,183	8,196	8,197	8,218	8,218
Suitable OG Acres – All SIOs and Dist. Zones	9,080	12,136	16,684	20,509	20,601	20,601
Projected YG Harvest Acres in Foreground/Middleground over 100 Years	6,769	7,225	7,182	7,162	7,137	7,108
Projected OG Harvest Acres in Foreground/Middleground over 100 Years	2,275	2,680	2,803	2,982	2,944	2,944
Total Acres in Viewshed (2% is Non-NFS)	163,068	163,068	163,068	163,068	163,068	163,068
Salmon Bay Lake						
Suitable YG Acres by SIO & Dist. Zone						
High SIO-Foreground/Middleground	256	256	256	256	256	256
Very Low SIO-Foreground/Middleground	1,103	1,103	1,103	1,103	1,103	1,103
Suitable OG Acres – All SIOs and Dist. Zones	12	12	14	14	14	14
Projected YG Harvest Acres in Foreground/Middleground over 100 Years	1,156	1,119	1,107	1,106	1,101	1,091
Projected OG Harvest Acres in Foreground/Middleground over 100 Years	4	3	3	3	3	3
Total Acres in Viewshed (0% is Non-NFS)	8,422	8,422	8,422	8,422	8,422	8,422
Icy Strait						
Suitable YG Acres by SIO & Dist. Zone						
High SIO-Foreground/Middleground	16	17	17	17	17	132
Very Low SIO-Foreground/Middleground	2,418	2,436	2,436	2,439	2,564	2,564
Suitable OG Acres – All SIOs and Dist. Zones	8,049	8,246	8,418	10,515	11,179	11,179
Projected YG Harvest Acres in Foreground/Middleground over 100 Years	2,072	2,020	1,999	2,001	2,091	2,165
Projected OG Harvest Acres in Foreground/Middleground over 100 Years	586	583	509	412	421	421
Total Acres in Viewshed (5% is Non-NFS)	71,116	71,116	71,116	71,116	71,116	71,116
Lynn Canal						
Suitable YG Acres by SIO & Dist. Zone						
High SIO-Foreground/Middleground	1	2	2	2	26	83
Very Low SIO-Foreground/Middleground	40	646	646	696	928	928
Suitable OG Acres – All SIOs and Dist. Zones	34	53	53	73	106	106
Projected YG Harvest Acres in Foreground/Middleground over 100 Years	34	534	528	569	774	812
Projected OG Harvest Acres in Foreground/Middleground over 100 Years	0	0	0	0	2	2
Total Acres in Viewshed (15% is Non-NFS)	233,552	233,552	233,552	233,552	233,552	233,552

Table 3.11-3 (continued)
Suitable/Projected Harvest (in acres) for Young Growth and Old Growth in Selected General Viewsheds [1,2]

Viewshed and Category	Alternative					
	1	2	3	4	5	6
Mendenhall Glacier						
Suitable YG Acres by SIO & Dist. Zone						
High SIO-Foreground/Middleground	0	0	0	0	0	0
Very Low SIO-Foreground/Middleground	0	0	0	0	0	0
Suitable OG Acres – All SIOs and Dist. Zones	0	0	0	0	0	0
Projected YG Harvest Acres in Foreground/Middleground over 100 Years	0	0	0	0	0	0
Projected OG Harvest Acres in Foreground/Middleground over 100 Years	0	0	0	0	0	0
Total Acres in Viewshed (3% is Non-NFS)	55,266	55,266	55,266	55,266	55,266	55,266
Peril Strait						
Suitable YG Acres by SIO & Dist. Zone						
High SIO-Foreground/Middleground	1,804	1,804	1,804	1,804	1,804	1,868
Very Low SIO-Foreground/Middleground	6,518	6,478	6,478	6,518	6,521	6,521
Suitable OG Acres – All SIOs and Dist. Zones	3,437	3,465	3,465	5,333	6,270	6,270
Projected YG Harvest Acres in Foreground/Middleground over 100 Years	7,086	6,821	6,748	6,778	6,746	6,736
Projected OG Harvest Acres in Foreground/Middleground over 100 Years	272	271	229	266	311	311
Total Acres in Viewshed (7% is Non-NFS)	189,194	189,194	189,194	189,194	189,194	189,194
Hyder						
Suitable YG Acres by SIO & Dist. Zone						
High SIO-Foreground/Middleground	0	0	0	0	0	0
Very Low SIO-Foreground/Middleground	160	160	160	160	180	207
Suitable OG Acres – All SIOs and Dist. Zones	3	3	3	21	24	24
Projected YG Harvest Acres in Foreground/Middleground over 100 Years	136	132	130	130	146	166
Projected OG Harvest Acres in Foreground/Middleground over 100 Years	1	1	1	1	4	4
Total Acres in Viewshed (3% is Non-NFS)	23,278	23,278	23,278	23,278	23,278	23,278
Stephens Passage						
Suitable YG Acres by SIO & Dist. Zone						
High SIO-Foreground/Middleground	21	21	21	21	21	156
Very Low SIO-Foreground/Middleground	120	124	124	145	258	258
Suitable OG Acres – All SIOs and Dist. Zones	0	0	1	36	49	50
Projected YG Harvest Acres in Foreground/Middleground over 100 Years	120	120	119	136	227	332
Projected OG Harvest Acres in Foreground/Middleground over 100 Years	0	0	0	0	1	1
Total Acres in Viewshed (26% is Non-NFS)	258,966	258,966	258,966	258,966	258,966	258,966

Table 3.11-3 (continued)
Suitable/Projected Harvest (in acres) for Young Growth and Old Growth in Selected General Viewsheds [1,2]

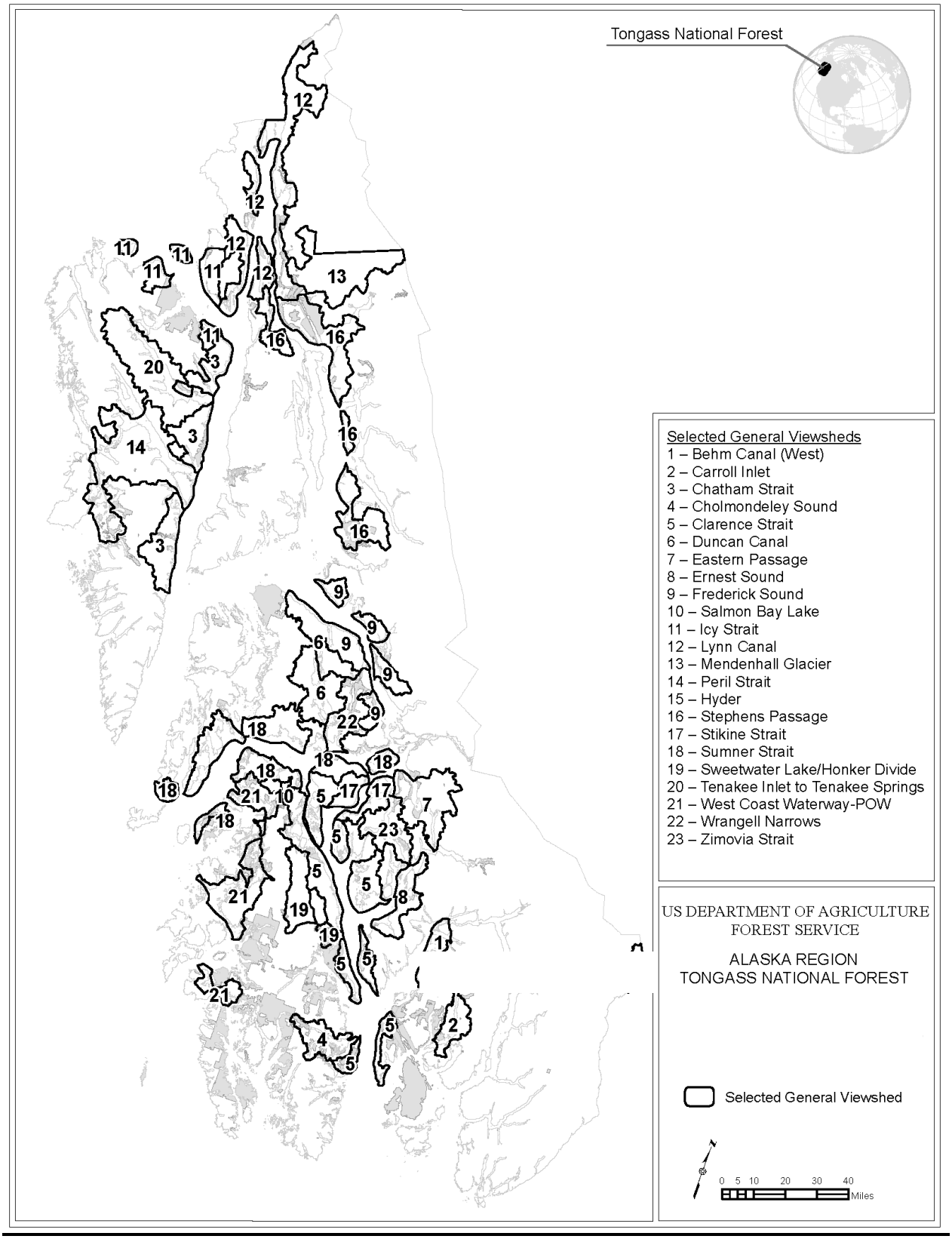
Viewshed and Category	Alternative					
	1	2	3	4	5	6
Stikine Strait						
Suitable YG Acres by SIO & Dist. Zone						
High SIO-Foreground/Middleground	350	361	367	367	361	511
Very Low SIO-Foreground/Middleground	3,222	3,800	3,801	3,857	3,958	3,958
Suitable OG Acres – All SIOs and Dist. Zones	2,025	2,327	2,344	4,150	5,281	5,281
Projected YG Harvest Acres in Foreground/Middleground over 100 Years	3,041	3,427	3,396	3,441	3,500	3,588
Projected OG Harvest Acres in Foreground/Middleground over 100 Years	464	476	388	602	767	767
Total Acres in Viewshed (0% is Non-NFS)	60,654	60,654	60,654	60,654	60,654	60,654
Sumner Strait						
Suitable YG Acres by SIO & Dist. Zone						
High SIO-Foreground/Middleground	898	906	906	906	906	936
Very Low SIO-Foreground/Middleground	20,226	20,238	20,253	20,279	20,291	20,291
Suitable OG Acres – All SIOs and Dist. Zones	13,339	13,445	13,616	16,170	16,175	16,175
Projected YG Harvest Acres in Foreground/Middleground over 100 Years	17,985	17,414	17,240	17,254	17,176	17,044
Projected OG Harvest Acres in Foreground/Middleground over 100 Years	3,163	2,896	2,371	2,381	2,338	2,338
Total Acres in Viewshed (5% is Non-NFS)	151,274	151,274	151,274	151,274	151,274	151,274
Sweetwater Lake/Honker Divide						
Suitable YG Acres by SIO & Dist. Zone						
High SIO-Foreground/Middleground	2,586	2,586	2,586	2,586	2,586	2,586
Very Low SIO-Foreground/Middleground	6.911	6,972	6,974	6,974	6,974	6,974
Suitable OG Acres – All SIOs and Dist. Zones	466	466	466	466	467	467
Projected YG Harvest Acres in Foreground/Middleground over 100 Years	8,085	7,871	7,789	7,786	7,746	7,676
Projected OG Harvest Acres in Foreground/Middleground over 100 Years	123	112	90	78	77	77
Total Acres in Viewshed (9% is Non-NFS)	107,353	107,353	107,353	107,353	107,353	107,353
Tenakee Inlet to Tenakee Springs						
Suitable YG Acres by SIO & Dist. Zone						
High SIO-Foreground/Middleground	1,146	1,146	1,146	1,146	1,146	1,149
Very Low SIO-Foreground/Middleground	2,600	2,607	2,607	2,607	2,641	2,641
Suitable OG Acres – All SIOs and Dist. Zones	4,795	4,094	5,168	9,628	9,628	9,629
Projected YG Harvest Acres in Foreground/Middleground over 100 Years	3,189	3,091	3,058	3,057	3,068	3,043
Projected OG Harvest Acres in Foreground/Middleground over 100 Years	133	134	197	144	138	138
Total Acres in Viewshed (1% is Non-NFS)	152,402	152,402	152,402	152,402	152,402	152,402

Table 3.11-3 (continued)
Suitable/Projected Harvest (in acres) for Young Growth and Old Growth in Selected General Viewsheds [1,2]

Viewshed and Category	Alternative					
	1	2	3	4	5	6
West Coast Waterway-POW						
Suitable YG Acres by SIO & Dist. Zone						
High SIO-Foreground/Middleground	2,009	2,024	2,024	2,024	2,024	2,057
Very Low SIO-Foreground/Middleground	10,779	10,821	10,822	10,834	10,838	10,839
Suitable OG Acres – All SIOs and Dist. Zones	5,483	5,926	6,564	6,880	6,880	6,880
Projected YG Harvest Acres in Foreground/Middleground over 100 Years	10,888	10,579	10,466	10,472	10,422	10,354
Projected OG Harvest Acres in Foreground/Middleground over 100 Years	1,357	1,326	1,136	1,023	1,005	1,005
Total Acres in Viewshed (15% is Non-NFS)	139,547	139,547	139,547	139,547	139,547	139,547
Wrangell Narrows						
Suitable YG Acres by SIO & Dist. Zone						
High SIO-Foreground/Middleground	513	562	562	562	562	587
Very Low SIO-Foreground/Middleground	2,257	2,394	2,394	2,394	2,432	2,432
Suitable OG Acres – All SIOs and Dist. Zones	5,860	6,326	6,434	8,410	8,872	8,872
Projected YG Harvest Acres in Foreground/Middleground over 100 Years	2,358	2,434	2,408	2,407	2,425	2,424
Projected OG Harvest Acres in Foreground/Middleground over 100 Years	1,289	1,287	1,062	1,223	1,281	1,281
Total Acres in Viewshed (26% is Non-NFS)	87,438	87,438	87,438	87,438	87,438	87,438
Zimovia Strait						
Suitable YG Acres by SIO & Dist. Zone						
High SIO-Foreground/Middleground	663	666	666	666	666	730
Very Low SIO-Foreground/Middleground	2,807	3,158	3,181	3,195	3,198	3,198
Suitable OG Acres – All SIOs and Dist. Zones	4,448	5,506	7,056	8,127	8,128	8,128
Projected YG Harvest Acres in Foreground/Middleground over 100 Years	2,954	3,149	3,134	3,144	3,131	3,154
Projected OG Harvest Acres in Foreground/Middleground over 100 Years	1,023	1,061	1,114	1,160	1,139	1,139
Total Acres in Viewshed (12% is Non-NFS)	82,695	82,695	82,695	82,695	82,695	82,695

[1] SIO terms are defined in the *Affected Environment* portion of this section.
[2] The numbers in this table are approximate acres seen from a Visual Priority Travel Route and Use Area.

Figure 3.11-1
Map of Selected General Viewsheds



Behm Canal (West)
All alternatives would have similar acres of suitable young growth in the Behm Canal West viewshed. Suitable old-growth acres would be similar for Alternatives 1, 2, and 3 and would be 10 to 15 percent higher for Alternatives 4, 5, and 6.

However, projected harvest in this viewshed would generally decrease for both young growth and old growth for the alternatives that include greater acreages of suitable lands. This is because harvest levels would remain the same under all alternatives and alternatives with greater acreages of suitable lands would experience a lower harvest rate on a per acre basis. Therefore, the total harvest acres for a viewshed depends on the total suitable acres in the viewshed relative to the total suitable acres in all other viewsheds.

In some areas, particularly on the Revilla Island side of the west Canal, existing harvest is likely near the level allowed by the adopted SIOs. Additional harvest may need to be deferred in some areas in the coming decade. A high portion of the existing harvest acres are along the beach fringe in all alternatives.

Clearcutting and patch cutting, with up to 10-acre openings, are allowed, but a 200-foot shoreline buffer would be maintained, which would help conceal the opening created by clearcuts. Therefore, all alternatives could have localized higher effects during the first few decades.

Carroll Inlet
Suitable acres of young growth in Carroll Inlet would increase by about 4 percent for all action alternatives relative to Alternative 1. Suitable acres of old growth would increase by 14 and 45 percent under Alternatives 2 and 3, respectively, relative to Alternative 1, and by 55 percent under Alternatives 4, 5, and 6. Again, however, projected harvest levels would decrease or increase slightly under each of the action alternatives because the constant harvest levels dictated by the Forest Plan would be spread over larger acreages of suitable forest lands.

Carroll Inlet has experienced relatively heavy past harvest and existing harvest is likely near the level allowed by the adopted SIOs in some areas. Additional harvest may need to be deferred in localized areas in the coming decade depending on the SIO. A high portion of young-growth acres are scattered along the beach fringe in all alternatives. Clearcutting and patch cutting, with up to 10-acre openings, are allowed, but a 200-foot shoreline buffer would be maintained, which would help conceal the opening created by clearcuts. Therefore, all alternatives could have localized moderate effects during the first few decades.

Chatham Strait (West side)
Suitable young-growth acres in this viewshed would be similar under Alternatives 1, 2, 3, 4, and 5, varying by about 1 percent or less, and increasing by about 9 percent under Alternative 6. Suitable old-growth acres would also be similar under Alternatives 1 and 2, would increase by 29 percent under Alternative 3, and would increase by about 53 to 54 percent under Alternatives 4, 5, and 6. Again however, young-growth and old-growth projected harvest under the action alternatives would be the same or less than under Alternative 1, with the exception of young-growth harvest under Alternative 6, which would increase by about 3 percent.

Chatham Strait has experienced relatively high past harvest but much of it is in seldom seen areas. Further, the number of young-growth acres of harvestable age within the next decade is very limited (USDA Forest Service 2016b, Table 3.16-5). Therefore, all of the alternatives are expected to have low effects during the first few decades.

Cholmondeley Sound
In this viewshed, suitable young-growth acres would be similar under all alternatives, varying by less than 3 percent. Using Alternative 1 as the baseline, suitable old-growth acres, however, would increase by 23 percent under Alternative 3, and by 80 percent under Alternatives 4, 5, and 6. Suitable old-growth acres would be almost identical under Alternatives 1 and 2. Projected young-growth and old-growth harvest would be less than the Alternative 1 level for all alternatives.

Cholmondeley Sound has experienced limited past harvest on NFS lands, but high past harvest on non-NFS lands. About 21 percent of the viewshed consists of non-NFS lands. The number of young-growth acres of harvestable age within the next decade is very limited (USDA Forest Service 2016b, Table 3.16-5) and the projected harvest of old growth is less than 200 acres over the next 100 years. Therefore, with the possible exception of Alternatives 5 and 6, all of the alternatives are expected to have relatively low effects during the first few decades. However, additional harvest may need to be deferred in localized areas near non-NFS land, especially where harvest includes openings in the beach fringe.

Clarence Strait

Clarence Strait is a large viewshed (over 200,000 acres), extending along both sides of the strait, from its northern end south to Gravina Island. The viewshed includes portions of the South Etolin Wilderness Area, which would have an SIO of High under all alternatives; however, a Very High SIO would likely be achieved.

Relative to Alternative 1, the suitable young-growth acres would vary by 4 percent (Alternatives 5 or 6) or less and suitable old-growth acres would increase by up to 39 percent (under Alternatives 4, 5, and 6). However, because of the constant overall harvest level under all alternatives, projected harvest acreage would be at Alternative 1 levels or less for both young growth and old growth.

Clarence Strait has experienced considerable past harvest, but much of it is not readily visible from the Strait, so much of the viewshed appears relatively pristine. However, the number of young-growth acres of harvestable age within the next decade is considerable (USDA Forest Service 2016b, Table 3.16-5). A number of these acres are scattered along the beach fringe, especially along Prince of Wales and adjacent islands. Therefore, all alternatives could have localized moderate effects during the first few decades.

Duncan Canal

In the Duncan Canal viewshed, suitable young-growth acres would increase from 23 to 25 percent and the projected harvest would increase by 19 percent under all action alternatives. However, suitable old-growth acres would increase from 77 to 173 percent and projected harvest would increase from 72 to 166 percent under the action alternatives.

Duncan Canal has experienced considerable past harvest on the east side of the Canal, but much of it is not readily visible from the Strait. However, the number of young-growth acres of harvestable age within the next decade exceeds 100 acres (USDA Forest Service 2016b, Table 3.16-5). A number of these acres are scattered along the beach fringe in all alternatives. Therefore, all alternatives could have local effects along the travelway during the first few decades.

Eastern Passage

Suitable young-growth acres for each alternative vary by only 9 percent, with the highest acreage in Alternatives 5 and 6. The increase in suitable old-growth acres relative to Alternative 1 would range up to 98 percent in Alternatives 4, 5, and 6. Projected young-growth harvest would vary by 4 percent or less under the alternatives but projected old-growth harvest would range up to 28 percent more acres than under Alternative 1.

Eastern Passage has experienced considerable past harvest on the Wrangell Island side, but much of it is not readily visible from the Passage. A few older young-growth acres are scattered along the beach fringe in all alternatives.

Therefore, all alternatives could have local effects along the travelway during the first few decades.

Ernest Sound

Both suitable and projected harvest acres in the Ernest Sound viewshed for young growth and old growth do not vary significantly among the alternatives. There are no suitable old-growth acres under any alternative.

Ernest Sound has experienced considerable past harvest on Deer Island and along the beach to the north. A considerable number of young-growth acres of harvestable age during the next decade occur

within the viewshed (USDA Forest Service 2016b, Table 3.16-5) and most of these acres are along the beach fringe in all alternatives. Clearcutting and patch cutting, with up to 10-acre openings, are allowed, and a 200-foot shoreline buffer would mitigate opening size.

Therefore, all alternatives could have localized effects during the first few decades.

Frederick Sound

In the Frederick Sound viewshed, suitable young-growth acres would increase from 10 to 11 percent and the projected harvest would increase from 5 to 6 percent under all action alternatives. However, suitable old-growth acres would increase more substantially under all alternatives ranging from 34 percent under Alternative 2 to 127 percent under Alternatives 5 and 6. Projected harvest would increase from 18 percent under Alternative 2 to 31 percent under Alternative 4.

Frederick Sound is a large viewshed (163,000 acres) along Kupreanof Island and the mainland. Frederick Sound has experienced considerable past harvest in local areas on Kupreanof Island and along the mainland. It includes a substantial acreage of young-growth of harvestable age within the next decade (USDA Forest Service 2016b, Table 3.16-5). Some of these acres are along the beach fringe in all alternatives. Clearcutting and patch cutting, with up to 10-acre openings, are allowed, and a 200-foot shoreline buffer would mitigate opening size. Therefore, all alternatives could have localized moderate effects during the first few decades.

Salmon Bay Lake

In the Salmon Bay Lake Viewshed, suitable acres of young growth and old growth would remain the same as Alternative 1 acres under all alternatives. Projected harvest would remain the same as Alternative 1 or be slightly lower. Harvest of old growth would be 2 acres or less.

None of the alternatives would have any young-growth acres that would be of harvestable age within the next decade (USDA Forest Service 2016b, Table 3.16-5). Therefore, none of the alternatives are expected to have more than minor effects on scenery in the next few decades.

Icy Strait

Icy Strait would experience limited effects due partly to the Wilderness LUDs on Pleasant and Lemesurier Islands and the LUD II at Point Adolphus. Wilderness areas would have an SIO of High under all alternatives, but would likely achieve an SIO of Very High.

Suitable young growth and projected harvest acres would be similar under Alternatives 1, 2, 3, and 4 varying by only 22 suitable acres and up to 4 percent for projected harvest acres. Under Alternatives 5 and 6, suitable young growth would increase by about 11 percent. For suitable old-growth acreage, Alternatives 1, 2, and 3 would vary by up to 5 percent, while these acres would increase by 31 to 39 percent under Alternatives 4, 5, and 6. Projected old-growth harvest, however, would be lower under all action alternatives because of the fact that Forest-wide harvest would be constant under all alternatives.

No young-growth acres of harvestable age within the next decade occur in the viewshed (USDA Forest Service 2016b, Table 3.16-5). Therefore, minor effects are expected to occur under any alternatives during the first few decades.

Lynn Canal

Scenic effects within the Lynn Canal Viewshed would be very limited under Alternative 1 because of minor suitable acreages of young growth and old growth. In addition, very minor differences would result under all alternatives for old growth suitable (34-106 acres) and projected harvest acreages (0-2 acres). In contrast, young-growth suitable and projected harvest acreages would increase considerably for all action alternatives, especially for Alternatives 5 and 6. However, projected young-growth harvest over 100 years would be less than 900 acres for all alternatives, or less than 0.4 percent of this large viewshed (234,000 acres).

Mendenhall Glacier
No effects would occur in the Mendenhall Glacier Viewshed under any of the alternatives. No suitable young growth or old growth occurs within the viewshed.

Peril Strait/Neva-Olga Strait/Sitka
This viewshed is a large one (189,000 acres) that begins near Sitka and wraps around the northern end of Chichagof Island and the southern end of Baranof Island. Young growth suitable acres would vary insignificantly under all alternatives, and projected harvest acres for young growth under all action alternatives would be less than under Alternative 1. Suitable old-growth acres would be relatively constant for Alternatives 1, 2, and 3, but would increase by 55 to 82 percent under Alternatives 4, 5, and 6. Projected old-growth harvest acres would be less than Alternative 1 for Alternatives 2, 3, and 4, but would be 6 percent higher under Alternatives 5 and 6.

The Peril Strait complex has experienced considerable past harvest in local areas, mostly on Chichagof, Kruzof, and adjacent small islands. The number of young-growth acres of harvestable age within the next decade is substantial for all alternatives (USDA Forest Service 2016b, Table 3.16-5). Many of these acres are along the beach fringe in all alternatives. Clearcutting or patch cutting, with up to 10-acre openings, are allowed in the beach fringe, along with a 200-foot shoreline buffer, which would mitigate opening size. Therefore, all alternatives could have local moderate effects during the first few decades.

Hyder/Salmon River
Only minor amounts of suitable young-growth and old-growth acres occur in this viewshed under all of the alternatives. Therefore, little to no impacts related to scenic quality are expected to occur.

Stephens Passage
Stephens Passage is a large viewshed (259,000 acres) running between Admiralty Island and the mainland. It excludes the majority of the wilderness portion of the Admiralty National Monument.

Young growth suitable acres are relatively minor under all alternatives and old growth suitable acres are insignificant. Only Alternatives 5 and 6 have a projected young-growth harvest over 200 acres. Although many of the young-growth acres are older stands in the beach fringe, they are scattered throughout the large viewshed.

Stikine Strait
This viewshed covers the corridors between Etolin, Zarembo, and Woronkofski Islands. Suitable young growth would increase under the action alternatives by 16 percent for Alternatives 2 and 3 and by 18 to 25 percent for Alternatives 4, 5, and 6. Projected young-growth harvest would also increase under all action alternatives ranging from 12 percent for Alternative 3, to 18 percent for Alternative 6. Suitable old growth would be about 15 percent higher under Alternatives 2 and 3, but up to 161 percent higher under Alternatives 4, 5, and 6. Projected old-growth harvest would be similar under Alternatives 1, 2, and 3, ranging from 3 percent higher to 16 percent lower than Alternative 1, but would be 30 percent higher under Alternative 4 and 65 percent higher under Alternatives 5 and 6.

The Stikine Strait Viewshed has experienced considerable past harvest in most areas within the viewshed. The number of young-growth acres of harvestable age within the next decade are relatively low, but many of these acres are along the beach fringe. Because of the low number of acres of young-growth of harvestable age within the next decade, harvest of young growth is expected to produce low scenery effects.

Sumner Strait
The Sumner Strait Viewshed is a large viewshed (152,000 acres) along northern Prince of Wales, Kosciusko, Kuiu, Kupreanof, Zarembo, and other islands. It includes portions of the Kuiu Wilderness and the Mt. Calder/Mt. Holbrook and Salmon Bay LUD II areas. These areas would have an SIO of High but would likely achieve an SIO of Very High.

Suitable young-growth acres in this viewshed are essentially the same under all alternatives. Suitable old-growth acres are also similar for Alternatives 1, 2, and 3, but increase by 21 percent for Alternatives 4, 5,

and 6. Projected old-growth and young-growth harvest, however, would decrease for the action alternatives because all alternatives would have the same overall harvest level. The number of young-growth acres of harvestable age within the next decade is relatively high (USDA Forest Service 2016b, Table 3.16-5), and many of these acres are along the beach fringe in all alternatives. Clearcutting and patch cutting, with up to 10-acre openings, are allowed in addition to a 200-foot shoreline buffer, which would mitigate opening size. Therefore, all alternatives could have relatively high effects along the shoreline during the first few decades.

Sweetwater Lake/Honker Divide

Suitable young-growth and old-growth acres are essentially the same under all alternatives in this viewshed. Therefore, there would be little difference among the alternatives; however, both young-growth and old-growth harvest would steadily decline from Alternative 1 through Alternatives 2, 3, 4, 5, and 6, in that order.

The Sweetwater Lake/Honker Divide Viewshed has experienced relatively heavy past harvest in some portions. Additional harvest may need to be deferred in localized areas in the coming decade.

Tenakee Inlet to Tenakee Springs

This is a large viewshed (152,000 acres), which contains the Trap Bay and Kadashan LUD II areas, which have an SIO of High under all alternatives. The viewshed also contains land designated as Research Natural Area and Wild River LUDs, which also have a High SIO under all alternatives.

Suitable young-growth acres are essentially the same under all alternatives in this viewshed, so there would be little difference among the alternatives in terms of young growth. Old-growth suitable acres, however, would decrease by 15 percent under Alternative 2 and increase by 8 percent under Alternative 3 and by 101 percent under Alternatives 4, 5, and 6. Projected harvest would increase by 1 percent for Alternative 2, by 48 percent for Alternative 3, and by 4 to 8 percent for Alternatives 4, 5, and 6.

The Tenakee Inlet to Tenakee Springs Viewshed has experienced considerable past harvest in many areas within the viewshed. The number of young-growth acres of harvestable age within the next decade is considerable (USDA Forest Service 2016b, Table 3.16-5). Many of these acres are along the beach fringe in all alternatives. Clearcutting and patch cutting, with up to 10-acre openings, are allowed in addition to a 200-foot shoreline buffer, which would mitigate opening size. Therefore, all of the alternatives could have relatively high localized effects during the first few decades.

West Coast Waterway/Prince of Wales

This large viewshed (140,000 acres) contains the Mt. Calder/Mt. Holbrook LUD II area, which would have an SIO of High under all alternatives. Suitable young-growth acres and projected harvest acres would vary by only 1 and 5 percent, respectively, under all alternatives. Suitable old-growth acres would generally increase and range up to 25 percent (Alternatives 4, 5, and 6) higher under the action alternatives relative to Alternative 1. However, projected old-growth harvest in the viewshed would decline under the action alternatives relative to Alternative 1, because of the fact that all alternatives would have the same overall harvest level and the action alternatives would spread that harvest over a larger suitable area.

The West Coast Waterway/Prince of Wales Viewshed has experienced relatively heavy past harvest in many areas within the viewshed. The number of young-growth acres of harvestable age within the next decade is relatively high (USDA Forest Service 2016b, Table 3.16-5). Many of these acres are along the beach fringe in all alternatives. Clearcutting and patch cutting, with up to 10-acre openings, are allowed along with a 200-foot shoreline buffer, which would mitigate opening size. Therefore, the alternatives could have relatively high localized effects during the first few decades.

Wrangell Narrows

Suitable young-growth acres would be up to 9 percent higher for the action alternatives relative to Alternative 1, and projected harvest acres would be up to 3 percent higher under the action alternatives. Suitable old-growth acres would generally increase and range up to 51 percent (Alternatives 5 and 6) higher under the action alternatives relative to Alternative 1. However, projected old-growth harvest acres

in the viewshed would decline by up to 18 percent under the action alternatives relative to Alternative 1, because all alternatives would have the same overall harvest level and the action alternatives would spread that harvest over a larger suitable area.

The Wrangell Narrows Viewshed has experienced relatively high past harvest in many areas within the viewshed and includes 26 percent non-NFS lands.

However, the number of young-growth acres of harvestable age within the next decade is relatively low. Most of these acres are along the beach fringe and, therefore, all of the alternatives could have localized effects during the first few decades.

Zimovia Strait

The Zimovia Strait Viewshed runs between Etolin and Wrangell Islands. Suitable young-growth acres would be 10 to 13 percent higher for the action alternatives relative to Alternative 1 and projected young-growth harvest acres would be about 7 percent higher under all action alternatives. Suitable old-growth acres would generally increase and range from 24 percent (Alternative 2) up to 83 percent (Alternatives 4, 5, and 6) higher under the action alternatives relative to Alternative 1. Projected old-growth harvest acres in the viewshed would also increase ranging up to 13 percent higher under the action alternatives relative to Alternative 1.

The Zimovia Strait Viewshed has experienced relatively high past harvest in some areas within the viewshed. There are a considerable number of young-growth acres of harvestable age over the next decade within the viewshed (USDA Forest Service 2016b, Table 3.16-5). Most of these acres are along the beach fringe in all alternatives and, therefore, all alternatives could have localized moderate effects during the first few decades if these isolated beach units are harvested. Actual effects depend on the type of harvest implemented.

Non-Timber Actions

A range of other developments may occur within areas removed from roadless designation or in areas where roadless designations have been modified, as occurs under the action alternatives. These other developments include mining related actions, energy development, transmission lines, state highway development, and others. Essentially all of these developments are allowed under Alternative 1 so changes in their likelihood are expected to be minor.

Effects from these projects on scenery would heavily depend on site-specific plans. In general, project activities that would impact scenery could include mine development and expansion; new access road construction; forest clearing and ground disturbance; dam, powerhouse, and penstock construction; transmission line construction; and others. There is a wide range of types and sizes for these disturbances and facilities and the eventual impacts to scenery will depend on the location and design features. All potential impacts to scenery resources would be addressed during the permitting and licensing of the projects, and would include National Environmental Policy Act assessment.

The impacts to scenery associated with the action alternatives are expected to be similar to those associated with Alternative 1, as these alternatives would make only minor changes to regulations that affect the potential for their development. Impacts associated with Alternative 1 are expected to be slightly lower because of the development of slightly fewer projects over the long term; however, the Alternative 1 standards and guidelines for scenery related to these other projects are similar to the plan components of the action alternatives.

Although on a site-specific basis differences would occur, on a Forest-wide basis the scenery effects associated with all of the alternatives would show little differences because of the small number of projects likely to be developed.

Cumulative Effects

This section considers the incremental effects of the alternatives when added to other past, present, and reasonably foreseeable actions. The effects of past and present actions on scenery are included in the *Affected Environment* portion of this section, which discusses the level of scenic quality on the Tongass.

Past actions include past timber harvest and road building, as well as the development of facilities and mines, which have resulted in reduced ESIs in many areas.

Present actions include the impacts of current management policies on scenery; these have resulted in modifications to SIOs.

Reasonably foreseeable actions on NFS lands include the projected levels of future timber harvest and other developments that are used in the preceding analysis to assess the potential impacts of the alternatives on the scenic quality. Other reasonably foreseeable actions include regional transportation development as defined by the State Transportation Plan and the Forest Service Alaska Region Long-Range Transportation Plan, as well as road paving on Prince of Wales Island, the closing of roads, and construction of the Angoon Airport. In addition, the expansion of cities like Juneau, Ketchikan, and Sitka, recreational cabin development, land auctions by the State, and land adjustments could include additional road construction, timber harvest, and facility construction.

It is not possible at this time to predict exactly which roads, energy projects, or other projects would be developed or their likely impact on future scenic integrity. Human settlement expansion is expected to occur around the region's larger cities with residential expansion also expected as a result of state land auctions. These developments would likely result in increased impacts on scenery. Mining activities are expected to expand at existing sites, including Greens Creek on Admiralty Island and Kensington Gold Mine north of Juneau, as well as possible future sites, including the Bokan Mountain and Niblack sites on the southern end of Prince of Wales Island. Mining projects are for the most part expected to have a negative local effect on scenery. Overall, the cumulative effects of past, present, and future actions on scenery are expected to be adverse, but are not expected to be substantially different than the effects associated with the actions addressed under direct and indirect effects.

Subsistence

Affected Environment

Harvest and use of natural resources for food, shelter, clothing, transportation, handicrafts, and trade, commonly called "subsistence," has a long history in Alaska. Alaska Native peoples engaged in subsistence for thousands of years prior to statehood; living off the land is the core of Alaska Native peoples' culture. In more recent history, non-Native people living in rural Alaska have come to rely on natural resources for their livelihoods as well (Office of Subsistence Management 2016). A number of people providing testimony during the subsistence hearings held for this rulemaking stated a preference for the term "way of life," rather than subsistence. The term subsistence as used in this EIS is consistent with the definition provided in ANILCA Section 803.

Within the context of Southeast Alaska's seasonal and cyclical resource-based employment, subsistence harvest of fish and wildlife resources takes on special importance. The use of these resources may play a major role in supplementing cash incomes during periods when the opportunity to participate in the wage economy is either marginal or nonexistent. Because of high prices of commercial products provided through the retail sector of the cash economy, especially in remote communities, the economic role of locally available fish and game takes on added importance.

Rural Native and non-Native communities both have high subsistence participation rates and rely heavily on wild foods, with approximately 79 percent of rural households in Southeast Alaska using wild game and 95 percent using fish (Fall 2016). The opportunity to participate in subsistence activities reinforces a variety of cultural and related values in both Native and non-Native communities. For example, the distribution of harvested fish and wildlife contributes to the cohesion of kinship groups and community stability through the sharing of resources.

Subsistence resources provide the foundation for Native culture, forming the basis for different clans and potlatch ceremonies, as well as reinforcing basic values of respect for the earth and its resources. Participating in subsistence activities contributes to the self-reliance, independence, and ability to provide for oneself; values that social surveys indicate are important reasons why many non-Native people move to or remain in Southeast Alaska (USDA Forest Service 1997a).

The Legal Context for Subsistence Use

Congress defined subsistence use in Title VIII of the 1980 Alaska National Interest Lands Conservation Act (ANILCA). Section 803 of ANILCA as:

> "the customary and traditional uses by rural Alaska residents of wild renewable resources for direct, personal, or family consumption as food, shelter, fuel, clothing, tools, or transportation; for the making and selling of handicraft articles out of non-edible byproducts of fish and wildlife resources taken for personal or family consumption; for barter, or sharing for personal or family consumption; and for customary trade."

ANILCA provides for "the continuation of the opportunity for subsistence uses by rural residents of Alaska, including both Natives and non-Natives, on the public lands." The provisions in ANILCA established a harvest priority for rural residents in an attempt to protect subsistence resource harvest. Under ANILCA, in times of resource scarcity or when demand exceeds biologically sound harvest levels, subsistence harvests have priority over other consumptive use of resources. Such a priority shall be implemented through appropriate limitations based on the application of the following criteria: (1) customary and direct dependence upon the populations as the mainstay of livelihood; (2) local residency; and (3) the availability of alternative resources. In practice, state or federal fish and wildlife management authorities would limit commercial, sport, or other harvests before subsistence harvests are limited. The Alaska legislature subsequently passed a regulation to comply with ANILCA, but in 1989, the Alaska Supreme Court ruled in *McDowell v. State of Alaska* that a harvest priority for rural residents conflicted with the state constitution, which guarantees all Alaskans equal access to the state's natural resources. This ruling took the state out of compliance with ANILCA, and the federal government has managed

subsistence resources on federal lands in Alaska since 1990. As a result, federal subsistence harvests of fish and wildlife on the Tongass are presently managed by the Forest Service and the Federal Subsistence Management Program (Schroeder and Mazza 2005).

ANILCA requires the evaluation of the potential effects of all actions on subsistence resources and uses and needs on federal lands in Alaska. This evaluation typically focuses on those food-related resources most likely to be affected by habitat degradation associated with land management activities. If significant restrictions to subsistence uses are identified, prior to putting the federal action into effect, notice and hearings must occur. Per ANILCA Sec. 810(a)(3), the following three determinations must be made: "(A) such a significant restriction of subsistence uses is necessary, consistent with sound management principles for the utilization of the public lands, (B) the proposed activity will involve the minimal amount of public lands necessary to accomplish the purposes of such use, occupancy, or other disposition, and (C) reasonable steps will be taken to minimize adverse impacts upon subsistence uses and resources resulting from such actions." To make these three determinations, the Forest Service shall analyze the following: 1) resource distribution and abundance, 2) access to resources, and 3) competition for the use of resources. These factors are discussed in general terms in the following paragraphs.

Abundance and Distribution

Southeast Alaska subsistence resources include terrestrial wildlife (including deer, moose, mountain goat, black and brown bear, furbearers, and small game), waterfowl (including ducks, geese, and seabirds), marine mammals (harbor seal), salmon, other finfish, marine invertebrates, plants, and firewood. The abundance and distribution of subsistence resources on the Tongass is described in the 1997 Forest Plan EIS (USDA Forest Service 1997a) and other sections of this EIS provide detailed information on wildlife, fish, and plants (especially see the *Biological Diversity, Wildlife*, and *Fish* sections under *Key Issue 3*).

Access

Road building, a byproduct of timber harvesting and, to a lesser extent, mining, is an important agent of change in Southeast Alaska. New road networks often provide greater access to previously unconnected areas and can affect subsistence both positively and negatively by providing access, dispersing hunting and fishing pressure, and creating the potential for increased competition. On Prince of Wales Island, for example, areas that have become connected by road are now more easily reached by local residents and other nearby communities. Road systems tend to bring more people into an area and also give subsistence hunters access to previously remote regions and provide a greater opportunity for subsistence harvest.

Southeast Alaska comprises isolated islands unconnected by road systems; however, with the transportation means available (floatplanes, ferry systems, automobiles, and boats), Southeast Alaska residents are very mobile in their subsistence resource use activities. Wrangell, the fifth-largest community in Southeast Alaska, for example, has documented their subsistence gathering from the southern tip of Prince of Wales Island to Yakutat, covering most of the islands in between (Kruse and Muth 1990).

Competition

The Tongass, with nearly 17 million acres of largely undeveloped land, includes extensive subsistence resources. These resources are not, however, distributed or used evenly across the Forest. Where the resources are confined to island groups or river systems and access is costly or nonexistent, use of the resources is low. Where the resource is abundant, and a community is present but access by other communities is costly, the resource tends to be used primarily by the community that resides in the area. Where resources are abundant and access is readily available to local and other communities of Southeast Alaska, competition for resources may exist.

Increased competition may result when less expensive access to the area or within the area is provided. Such is the case when road systems are established to local communities. When areas historically not used for subsistence purposes are made available because of easier, more cost-effective access, the new area then tends to be used. When communities with road access to abundant resources are

connected to a ferry system or to commercial air services, competition for the resources may be generated from outside communities with lower abundance of the same resource.

Examples of the effect of ease of access are readily available in Southeast Alaska. Chichagof Island, Prince of Wales Island, and the Yakutat Forelands at one time were isolated portions of the Tongass with small amounts of use by communities in the vicinity. Today, road construction, primarily a result of timber harvest activities, has created relatively large areas that are easily accessed from local communities. Access provided by ferry systems and small commuter planes to Chichagof and Prince of Wales Islands allows relatively easy access from off-island communities. Access to the Yakutat Forelands has been made easier because of commercial jet service and ferry service to the community of Yakutat.

Subsistence Users

Under ANILCA, only rural Alaska residents qualify for priority use of subsistence hunting and fishing on federal lands. Alaska residents living in urban areas can harvest under State subsistence, sport, personal use, or commercial regulations on federal public lands, but not under federal subsistence regulations. Following the Alaska Supreme Court's 1989 ruling in *McDowell v. State of Alaska*, all Alaska residents qualify as subsistence users on state lands with federal lands continuing to be managed under ANILCA.

In 2019, Southeast Alaska had an estimated population of 72,373, with the majority (about 91 percent) living in established communities (either incorporated cities or Census Designated Places [CDP]) (Alaska Department of Labor [DOL] 2019).

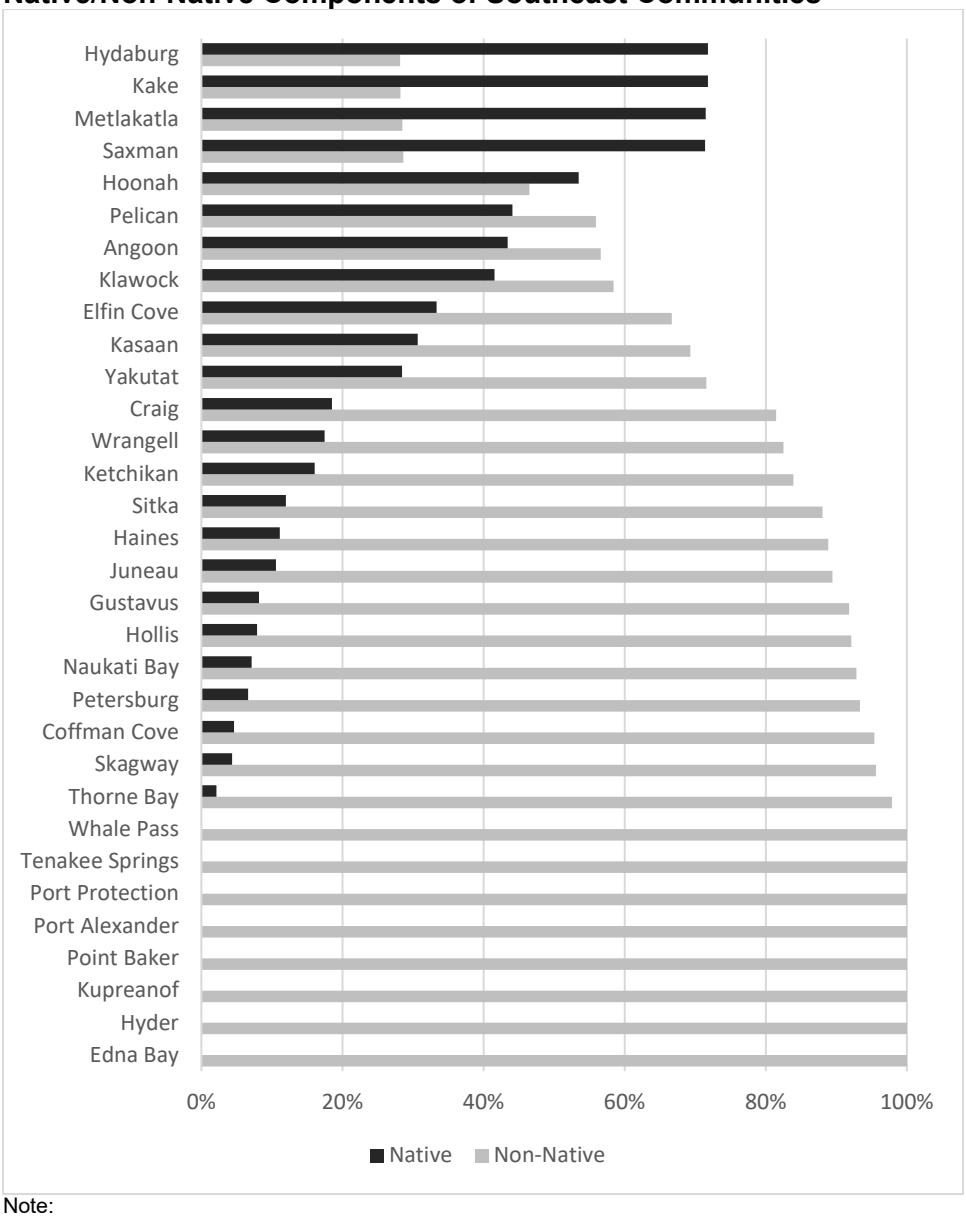
Almost two-thirds (63 percent) of the area's population lived in the city and borough of Juneau (44 percent) or Ketchikan Gateway Borough (19 percent), the only two communities considered as urban areas for subsistence purposes. An additional 23 percent of the area's population resided in the communities of Sitka, Petersburg, Wrangell, and Haines. The remaining share of the population living in established communities lived in communities ranging in size from Elfin Cove with 11 people to Metlakatla with 1,359 people (Alaska DOL 2018).

A relatively small number of Southeast Alaska residents live at remote isolated locations. These include people living at home sites throughout Southeast Alaska, at summer fishing sites along the outer coast, tree thinners camped near areas where they have Forest Service contracts, trappers, and people living on floathouses and fishing boats. This diverse group is typically transient, generally has very low cash income, and is closely tied to non-commercial harvest of fish, game, and other renewable natural resources.

Alaska Natives made up an estimated 15 percent of the region's population in 2019 (including Juneau and Ketchikan), and an estimated 21 percent for rural communities (excluding Juneau and Ketchikan) (Figure 3.12-1). These rural communities include places that are predominately Native, such as Hydaburg, Kake, Saxman, and Metlakatla where Alaska Natives make up an estimated 72 percent (Hydaburg and Kake) and 71 percent (Saxman and Metlakatla) of the population; other communities that are predominately non-Native, like Edna Bay, Point Baker, and Whale Pass; and places with more mixed ethnicity where Alaska Natives range from about one-third to two-thirds of the population (Figure 3.12-1).

The Bureau of Indian Affairs identifies 17 federally recognized Indian tribes in the region, including the Metlakatla of the Annette Island Reserve. At the time of contact, indigenous people occupied seasonal camps and temporary villages throughout traditional territories. In the late 1800s, the individual tribes of the region coalesced at what had been their winter villages. The area's extant tribes live within their earlier territories and use a similar set of subsistence resources and in this way maintain long standing ties to place. For Native people, this tie to place and the harvest, trade, and use of traditional foods are key elements in fostering Native cultural identity (Alaska Native Heritage Center 2014).

Figure 3.12-1
Native/Non-Native Components of Southeast Communities



Note:
[1] Estimates are annual totals developed as part of the 2014-2018 American Community Survey 5-Year Estimates.
Source: U.S. Census Bureau 2019a

Subsistence Economy

Subsistence use of fish and wildlife has been and continues to be an important component of the economies of Southeast Alaska communities. In Native communities, harvest and use of wild resources supported the subsistence-based economy that predated the introduction of cash income. In the modern era, beginning in the late-1700s, the economies of Native communities have undergone a progressive transformation, incorporating cash income into the subsistence-based system. Southeast Alaska communities that were settled primarily by non-Native immigrants have also depended on a mix of subsistence use of wild resources and cash income.

Cash income in most Southeast Alaska rural communities is limited and intermittent, and frequently supports the purchase of fuel and equipment that are part of subsistence harvest technology.

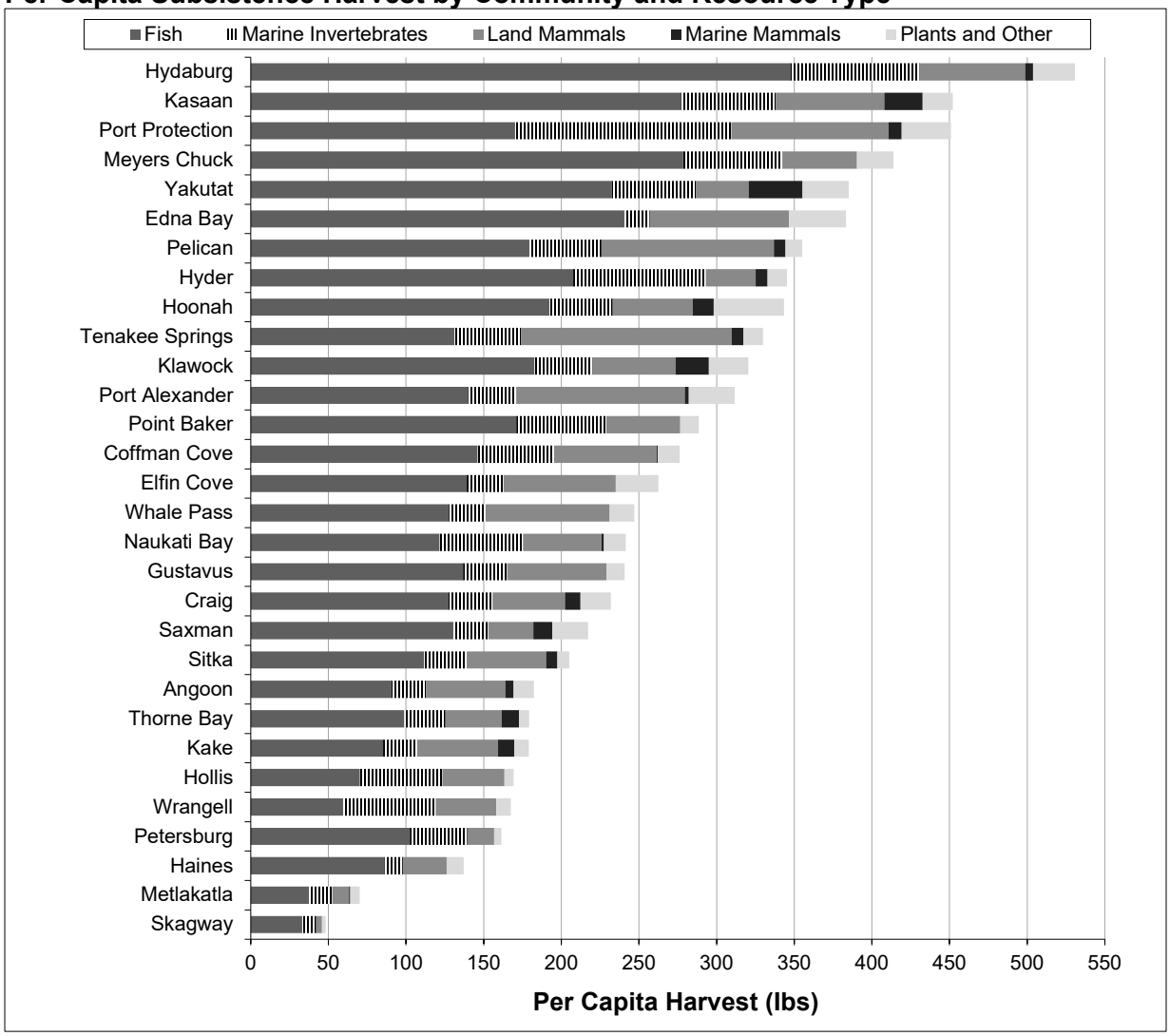
Subsistence harvests have been found to fill essential food needs in rural communities in the region. These harvests are also customarily shared among community residents and between members of different communities. Some subsistence products are traded and bartered within the region. Subsistence harvests are not geared toward market sale or commercial profit. A mixed subsistence-market economy in which subsistence harvests and cash income are complementary characterizes the economies of most of the region's rural communities and provides the economic basis for a way of life that is highly valued in these communities (Wolfe 2004; Wolfe and Walker 1987).

A compilation of traditional knowledge about the fisheries of Southeast Alaska demonstrated the continuing importance of sharing and trade of wild resources as a traditional practice across the region (Brock and Coiley-Kenner 2009). This compilation identified sharing as one of the most important activities associated with harvesting salmon, for example, with many respondents saying that sharing subsistence harvests is a core Tlingit value. Households who do not fish for salmon are often given fish by family and friends. Pride and respect were also identified as key concepts in the distribution of wild resources. Wild resources are traded in local communities and throughout the region, with sockeye salmon, for example, traded for other types of wild resources or trade items (Brock and Coiley-Kenner 2009). These concepts documented in the above compilation were also expressed with respect to other subsistence resources during the subsistence public hearings held for this rulemaking. People providing testimony in Hoonah, for example, noted that when they hunt and gather, it is not for one household, but for many, and also reiterated that sharing harvest is an integral part of Tlingit culture.

Subsistence research conducted in Southeast Alaska over the past two decades has included detailed community studies, use area mapping, household surveys, and studies of specific subsistence harvests. During the 1980s, the Forest Service supported research that examined the impacts of timber harvests on the Tongass on subsistence resources in the area. The Tongass Resource Use Cooperative Survey (TRUCS) was completed in 1988. Data from TRUCS are summarized in the 1997 Tongass Land Management Plan Revision FEIS (USDA Forest Service 1997a).

From 1987 to 2001, interviews were conducted with 1,064 households in 24 Southeast Alaska communities as part of the Tongass Land and Resource Management Plan (Forest Plan) subsistence administrative studies. This fieldwork was conducted cooperatively with the participation of the Forest Service, Alaska Department of Fish and Game (ADF&G), and the area's tribes and communities. Summary data from this and more recent community harvest assessments were compiled from the ADF&G Subsistence Community Profile Database (www.state.ak.us) and harvest levels are presented by community and species in Figure 3.12-2. The data presented in this figure are the most recent available in the ADF&G database. The year these data were collected does, however, vary by community, and the data summarized should be considered a general overview of harvest patterns rather than an exact representation of current harvest activities.

Figure 3.12-2
Per Capita Subsistence Harvest by Community and Resource Type



Notes:
The year these data were collected varies by community, as follows:
1987: Elfin Cove, Gustavus, Hyder, Metlakatla, Meyers Chuck, Pelican, Port Alexander, Skagway, and Tenakee Springs
1996: Kake, Point Baker, Port Protection, and Sitka
1997: Craig, Hydaburg, and Klawock
1998: Coffman Cove, Edna Bay, Hollis, Kasaan, Naukati Bay, and Thorne Bay
1999: Saxman
2000: Petersburg, Wrangell, and Yakutat
2012: Angoon, Haines, Hoonah, Hydaburg, and Whale Pass
Source: ADF&G 2006, 2018b

The findings of this research are summarized in an unpublished paper by Schroeder and Mazza (2005) who identify a number of key subsistence characteristics that are evident in these data and generally consistent with the following past findings:

- Wild foods account for a large share of the diet for residents of the studied communities, ranging from 48 pounds per capita for Skagway in 1987 to over 500 pounds per capita for Hydaburg in 2012 (Figure 3.12-2). The average American diet includes about 225 pounds of meat, fish, and poultry on a per capita basis. In more than half of the identified communities, wild foods came close to, or

exceeded, this national average (Figure 3.12-2). Although residents of subsistence communities purchase food, most could meet their entire protein need from wild sources.

- Marine resources, including fish, mammals, and plants, comprise the majority of subsistence harvests in all communities when measured by food weight. Marine resources account for more than half of total per capita harvest in all Southeast Alaska communities, ranging from 55 percent in Tenakee Springs to 88 percent in Skagway (Figure 3.12-2).
- More recent subsistence harvest levels in the main Native communities and the larger non-Native communities appear very similar to harvest levels estimated in the late 1980s or before. Harvest levels identified in the recent assessments conducted in Angoon, Hoonah, Hydaburg, Kake, Petersburg, Wrangell, and Yakutat, for example, are very similar to those identified in earlier studies. In a few communities, such as Coffman Cove, Kasaan, Klawock, and Port Protection, there are larger differences in harvest levels over time. However, these differences seem to be more influenced by special events or small community sizes than by patterned changes in subsistence harvests.
- Subsistence harvest levels vary considerably from community to community. Recent research and other data suggest that intercommunity variability may not be fully explained by ethnicity, income, community size, or access to resources. Other factors, such as community demographic composition, cultural traditions and orientations, and community history, may have a larger influence on harvest levels than more easily analyzed standard socioeconomic variables.
- Subsistence harvesters use a wide variety of species, but use tends to be concentrated on a relatively small number of species. In Yakutat, for example, individual subsistence harvesters use as many as 65 of the 150 different species that are harvested in the community, but 84 percent of overall community harvest (in food weight) involves just 10 species. That said, the contribution of a particular species to the total subsistence harvest generally appears to vary from year to year, although the overall total harvest in food weight may remain nearly constant.
- A small number of high harvesting households account for a disproportionate share of the total community harvest and tend to harvest more fish and wildlife than their family members can consume. The surplus is distributed to other subsistence users through a kinship network and through barter and trade. These networks are also used to distribute specialty subsistence products such as herring roe and eulachon (hooligan) oil, which are produced in large quantities in only a few communities. In Yakutat, for example, just 25 percent of subsistence households account for about 75 percent of total community subsistence harvest (in terms of food weight), with the lowest harvesting 50 percent of households taking just 8 percent of the total community harvest.

Subsistence Use Areas

Historically, subsistence use occurred where access to the resources cost less in energy than the resources gathered. Many of the gathering activities occurred in easily accessible areas. These activities occurred close to settlements where they could be accessed by foot or boat. Over time, as new technology developed, ease of access meant a movement outward into new resource use areas. The advent of motorized boats and the development of road systems associated with timber harvest activities have had a substantial influence on subsistence gathering activity in Southeast Alaska. Today, all communities use motorized boats and many are tied to nearby lands by road systems.

The distribution of subsistence harvest activity is described in further detail in the 1997 Tongass Land Management Plan Revision FEIS, with traditional household deer hunting areas mapped in Appendix H. These areas were identified based on the 1987 TRUCS (Kruse and Muth 1990). The traditional household deer hunting areas mapped in Appendix H show that the road systems are extensively used. This is particularly true on Prince of Wales Island. These maps also show that subsistence use tends to be concentrated in close proximity to individual communities and along beaches.

Each of the communities in Southeast Alaska has a distinct home range where concentrated use occurs, with a wide range of use typically occurring on a less concentrated scale outside the normal home range. More than half (54 percent) of all households surveyed in rural Southeast Alaska in 1987 traveled a minimum of 11 miles by boat to reach the one reliable deer hunting area that they chose to describe in TRUCS (Kruse and Muth 1990). An additional 18 percent of all households also used boats to reach their

reliable deer hunting area, but traveled shorter distances (10 miles or less). Only 15 percent of all households used cars or trucks to travel to their most reliable areas. Thirteen percent used some other form of transportation, such as airplanes, walking, all-terrain vehicles, and the Alaska Marine Highway System (Kruse and Muth 1990).

While the majority of use occurs within about a 15-mile radius of rural communities, nearly all of the forested lands of the Tongass are used to some degree for subsistence deer hunting (USDA Forest Service 1997a). Appendix H in the 1997 Tongass Land Management Plan Revision FEIS also displays, by community, the individual WAAs where approximately 75 percent of the average annual deer harvest occurred.

Kruse and Muth (1990) found that nearly one-half of the households harvesting deer mentioned the existence of clearcuts of various ages occurring in presently reliable areas (44 percent), most-often-used areas (48 percent), and areas no longer used (55 percent). They also reported that old-growth forests were mentioned as most reliable by 90 percent of households harvesting deer, were most-often-used areas by 91 percent of households, and were areas no longer used by 90 percent of those households harvesting deer.

Many of the fish and wildlife resource values of Southeast Alaska watersheds, based on the VCU classification of the Tongass, are summarized in the 1998 Tongass Fish and Wildlife Resource Assessment (ADF&G 1998). This report shows the relative value of areas for black bear, brown bear, deer, sport fishing, salmon production, and subsistence use. This resource assessment also included a ranking of the VCUs that have the highest community values.

Environmental Consequences

The following section provides a Forest-wide evaluation that assesses the three factors related to subsistence uses identified by ANILCA: abundance and distribution, access, and competition. This general analysis relies on the community discussions presented in Appendix E and also on the Forest-wide effects analyses from the related resource sections (primarily *Fish* and *Wildlife* from the *Key Issue 3* discussion) where abundance and distribution are of concern. The community discussions presented in Appendix E include information related to each community use area and assess potential subsistence impacts by community and alternative. Originally identified as part of the 1997 Forest Plan Revision (USDA Forest Service 1997a), community use areas represent the general area commonly used or related to by many of the community's residents in their local day-to-day work, recreational, and subsistence activities. These areas do not necessarily define the limits of a community's use or represent traditional use areas or territories. Community residents may also work or pursue recreation or subsistence activities elsewhere on the Forest. Traditional territories are shown in Appendix F, which presents maps from Goldschmidt and Haas' (1946) landmark ethnographic study of Alaska Native land use, occupancy, and possession in Southeast Alaska.

Section 810 of ANILCA requires the Forest Service, in determining whether to withdraw, reserve, lease, or otherwise permit the use, occupancy, or disposition of NFS lands in Alaska, to evaluate the potential effects on subsistence uses and needs, followed by specific notice and determination procedures should there be a significant possibility of a significant restriction of subsistence uses. The Alaska Land Use Council's definition of "significantly restrict subsistence use" is one guideline used in the evaluation:

> "A proposed action shall be considered to significantly restrict subsistence uses, if after any modification warranted by consideration of alternatives, conditions, or stipulations, it can be expected to result in a substantial reduction in the opportunity to continue subsistence uses of renewable resources."

Considerations of abundance and distribution, access, and competition (by non-rural residents) are mentioned.

It should be noted that the term "significant" as used in this context does not have the same definition as used in the implementing regulations for the NEPA. See 40 CFR 1508.27 for definitions of "significant" in a NEPA context.

The U.S. District Court Decision of Record in *Kunaknana v. Watt* provided additional clarification. In part it states:

> "restrictions for subsistence uses would be significant if there were large reductions in abundance or major redistribution of these resources, substantial interference with harvestable access to active subsistence-use sites, or major increases in non-rural resident hunting."

Direct and Indirect Effects

Abundance and Distribution

Based on the 1987 survey information compiled as part of TRUCS, 61 percent of subsistence resources (by weight) are fish or marine invertebrates, 21 percent are deer, 4 percent are other land mammals, and another 3 percent are marine mammals. More recent community data compiled by ADF&G (2014) indicate that fish and marine invertebrates still comprise the majority of subsistence harvest per capita (in pounds). As shown in Figure 3.12-2, the share of total subsistence harvest that consists of fish and marine invertebrates ranges from 55 percent in Tenakee Springs to 88 percent in Skagway.

The subsistence analysis conducted for the 1997 Forest Plan Revision FEIS found that the primary subsistence resource likely to be significantly affected by the alternatives was Sitka black-tailed deer. Some effects to fish habitat may also result from land management activities, but the analysis concluded that the magnitude of the effects could not be calculated. Alternatives with more roads and timber production within riparian management areas and/or beach and estuary fringe were found to generally have the highest potential for adverse effects to fish and wildlife resources in the Tongass. As a result of their association with old-growth forest habitat, which is the main terrestrial habitat type affected by the alternatives, deer are considered the "indicator" for potential subsistence resource consequences concerning the abundance and distribution of the resources. Effects to subsistence resources have the potential to affect subsistence users.

Both the 1997 Forest Plan Revision FEIS and 2008 Forest Plan Amendment FEIS concluded that deer habitat capabilities in several portions of the Tongass may not be adequate to sustain the current levels of deer harvests, and that implementation of any of the 1997 and 2008 alternatives could, therefore, be accompanied by a significant possibility of a significant restriction on the abundance and/or distribution of subsistence uses of deer. This possibility was largely due to the continuation of reduced habitat capabilities resulting from past habitat alterations, which is why it applied to all alternatives.

The 2016 Forest Plan Amendment EIS found that the possibility of a significant restriction, resulting from a change in abundance or distribution, would be less than the possibility under the 1997 Forest Plan or 2008 Forest Plan for all of the alternatives considered in that EIS because of the lower anticipated rates of timber harvest. Further, although the harvest of old growth is likely to have negative effects on deer habitat, the vast majority of the harvest proposed under the 2016 Forest Plan Amendment EIS alternatives represented the harvest of young-growth stands that are currently in the stem exclusion stage of plant succession.

The interagency deer habitat capability model was used to assess existing habitat capability within the planning area. Table 3.3-16 (*Wildlife* section) summarizes the modeled deer habitat capability by biogeographic provinces. Forest-wide, approximately 89 percent of the original (1954) habitat capability remains, ranging from 72 to 100 percent depending on the biogeographic province. The greatest reductions in deer habitat capability have occurred in provinces where timber harvest has been concentrated (the North Central Prince of Wales, East Baranof, and Etolin Island and vicinity biogeographic provinces). Harvesting these stands currently in the stem exclusion stage would convert them to the stand initiation stage or open them up to provide more light to forage, which is generally of much higher value to deer. As a result, the harvest under all of the 2016 Forest Plan Amendment EIS alternatives would have both adverse and beneficial effects on deer habitat, depending on the stand.

The alternatives evaluated in this EIS would all harvest approximately the same amounts of young-growth and old-growth acres and, therefore, the risk of a significant restriction would be the same under all of the alternatives. The transition from predominantly old-growth harvest to young-growth management would continue to slow the long-term decrease in deer habitat capability due to the reduction in POG harvest,

under all of the alternatives. Because long-term POG harvest and road densities are not expected to differ significantly among alternatives, effects on old-growth–dependent wildlife species, including deer, are expected to be almost identical to those predicted under the 2016 Forest Plan Amendment EIS. Localized effects would likely vary by alternative (depending on the specific projects identified and implemented), but future harvest and road building is not expected to result in large reductions in abundance or a major redistribution of deer under any of the alternatives.

In the short term, the effects of past harvest would override the effects of new harvest during the next 10 years. In the long term, future harvesting of old growth would decrease substantially following the young-growth transition under all of the alternatives, reducing the risk of a significant restriction when viewed in the context of past Forest Plan harvest projections. Total maximum old-growth harvest over 100 years would be approximately 42,500 acres under all of the alternatives. While harvest levels are expected to be the same or similar under all alternatives, the distribution of acres harvested is likely to vary by alternative. Maps showing the distribution of suitable old-growth and young-growth timber acres by alternative are provided in Appendix D for the community use areas identified for each of the 32 communities evaluated in this EIS (see Appendix E).[33, 34] The areas shown in these maps represent the distribution of suitable acres, not projected harvest acres, which would generally be a smaller subset of the areas shown. Appendix E presents an assessment of subsistence for each community. This assessment presents suitable old-growth and projected old-growth harvest by the most frequently used WAAs by community and alternative.

Access

Subsistence users typically hunt and fish in traditional areas surrounding their communities. Many of the communities in Southeast Alaska are compact, centralized places surrounded by undeveloped land with limited infrastructure. Most subsistence food production is supported by a central or core use area surrounding a community. Traditional household deer hunting areas are identified for 32 communities in Southeast Alaska in Appendix H to the 1997 Forest Plan EIS. Access to and use of surrounding areas for subsistence activities may be guided by local customary rules, as well as federal and state regulation and economic considerations, with traditional use areas for different communities often overlapping at their margins. Customary rules guiding subsistence harvest may be related to local histories and social customs of clans and communities (Wolfe 2004).

This EIS is programmatic, meaning that it examines direction and allowable activities for broad land areas and does not schedule specific activities in specific locations. This makes it difficult to evaluate the effects of the alternatives on particular groups of subsistence users or resources. The following discussion addresses potential impacts at the programmatic or forest scale and assesses relative potential impacts in terms of overall proposed road construction and timber management activities.

Viewed at this scale, none of the alternatives would directly limit the use of public lands for the purposes of subsistence gathering activities. Traditional access methods would remain available under all the alternatives for present and foreseeable future activities. Access methods differ by Game Management Unit (GMU). Those subsistence users who use a boat as their primary method of access may have temporary and localized disruptions where young-growth harvest occurs in the beach fringe.

Data on documented deer harvest by transportation type are available at the GMU level. Data from the 2013 Deer Management Report are presented by transportation type and GMU in Table 3.12-1. GMU 4, the ABC Islands (Admiralty, Baranof, and Chichagof Islands), accounted for slightly more than half (52 percent) of reported deer harvested in Southeast Alaska in 2013 (5,434 deer), with GMU 2, Prince of Wales Island, accounting for more than a third (36 percent) (3,702 deer). Hunters accessing hunting areas by boat accounted for 53 percent of total deer harvest in 2013. Hunters accessing the area by

[33] These maps are available electronically only. They are included on the electronic storage device accompanying this document and are also available online at: https://www.fs.usda.gov/project/?project=54511

[34] The suitable old-growth acres shown in these maps include medium and high volume old growth only. In addition, the maps show only those suitable acres in VCUs with higher stumpage values as estimated for the 2008 Forest Plan using the Spectrum model. Old-growth harvest is assumed to be more likely to occur in these areas, with the majority of harvest expected to occur on the five south ranger districts (Craig, Ketchikan Misty Fjords, Petersburg, Thorne Bay, and Wrangell).

highway vehicle accounted for 33 percent of total deer harvest. The relative share of harvest by transportation type varies by GMU, with boat access, for example, accounting for 84 percent of harvest in GMU 1B, but just 27 percent in GMUs 1C and 2. Highway vehicle was the most frequently used method of access in GMU 2, Prince of Wales Island, accounting for almost two-thirds (65 percent) of deer harvest in 2013 (Table 3.12-1). This relatively high share reflects the more densely roaded nature of Prince of Wales Island and may be considered generally indicative of the effects of timber harvest and associated road building in areas connected to communities and the marine highway system.

New road construction is likely to result in the development of some new use patterns around some communities, but these changes are not likely to lead to a significant possibility of a significant restriction of subsistence access to the resources. Localized effects would likely occur and would vary by alternative (depending on the specific projects identified and implemented), but future harvest and road building are not expected to result in substantial interference with access to active subsistence use sites. New use patterns may, however, favor some subsistence groups and disadvantage others. Subsistence access may be via a number of different transportation types and often involves more than one form of transportation.

Subsistence users may, for example, access an area via boat followed by road (and on-foot) or via boat and on-foot, with types of access varying by location and user. Some hunters may access specific areas using more than one form of transportation, but others may favor one form of transportation over another, say highway vehicle over on-foot.

Table 3.12-1
Deer Harvest by Game Management Unit and Transportation Type, 2013

			Percent of Deer Harvested by Transportation Type[3]					
GMU Number[1]	Area[2]	Deer Harvested	Airplane	Boat	3- or 4-Wheeler	Highway Vehicle	Foot	Unknown
1A	Ketchikan[4]	265	NA	NA	NA	NA	NA	NA
1B	Petersburg[5]	89	1	84	4	1	6	4
1C	Juneau	413	0	27	0	47	21	5
2[5]	Prince of Wales Island	3,702	3	27	NA	65	2	3
3	Central Islands	474	2	38	8	42	3	7
4	ABC Islands[6]	5,434	8	73	0	9	3	7
	Total[7]	**10,377**	**556**	**5,333**	**41**	**3,289**	**343**	**549**
	Percent of Total	100	5	53	0	33	3	5

Notes:
NA = not available; ABC Islands = Admiralty, Baranof, and Chichagof Islands
[1] Game Management Units (GMUs) are a geographic unit of measurement established and used by ADF&G.
[2] Harvest estimates are reported totals only and do not include estimates of unreported and illegal harvest.
[3] These data were compiled as part of ADF&G's mandatory hunt report cards issued in conjunction with deer harvest tickets. Hunters report transportation method for traveling to their hunting areas. Numbers may not sum to 100 percent due to rounding.
[4] Airplane data are not available for this GMU.
[5] The foot category for this GMU includes 1 percent of hunters that used a horse/dog team to access their hunting area.
[6] In GMU 2, 3- or 4-Wheelers were accounted for in the Highway Vehicle category.
[7] Total deer harvested by transportation type exclude Unit 1A, where transportation information is not available.
Source: ADF&G 2015

While there would be some new road access under all alternatives in the long run, nearly all new roads constructed under the alternatives would be closed following harvest, based on current transportation management practices. These roads would, therefore, not be available for use by highway vehicles or high-clearance vehicles. They may, however, be available for access by other methods (e.g., all-terrain vehicle or on foot) and would, as a result, have the potential to affect existing subsistence use patterns, especially in the short term. The action alternatives would increase the acres available for timber harvest, but harvest levels are expected to remain the same across all alternatives. As a result, the amount of new or reconstructed road miles would be similar across the alternatives, but would be lowest under

Alternatives 1 and 2 and highest under Alternatives 4, 5, and 6. Alternative 3 would likely result in more roads than Alternatives 1 and 2, and fewer than Alternatives 4 through 6 (Table 3.3-21).

Some subsistence users have a preference for unroaded areas. Viewed at a programmatic level, Alternatives 1 and 2 would likely have the lowest impact on subsistence users who prefer unroaded areas because timber harvest would be limited to areas outside existing IRAs under Alternative 1 and areas outside IRAs and roaded roadless under Alternative 2. These alternatives would, therefore, tend to increase road density in already developed areas rather than provide new access to presently undeveloped areas. More harvest is likely to occur in the vicinity of existing roads under these alternatives with corresponding potential impacts to subsistence use.

Another potential access impact relates to the effects of clearcut harvesting on the landscape. Subsistence hunters have varying opinions on the effects of clearcut harvest on hunting success. Some hunters say that timber harvest clearcuts are productive for some years after harvest, while others prefer not to use clearcuts. Hunters interviewed on Prince of Wales Island, for example, reported that the best hunting in clearcut areas begins approximately 2 years after an area is logged, with hunt quality typically starting to decline 9 years after the area was cut (Brinkman 2006). Concern has been expressed by hunters that clearcuts in the process of regrowth become impassable to hunters after a period of time (Galginaitus 2004). Young-growth harvest would likely improve hunting in many previously harvested areas, particularly those stands that are currently in the stem exclusion stage of plant succession. Harvesting these stands would convert them to the stand initiation stage which would initially increase forage quantity and quality for deer, and therefore provide for increased hunting opportunities in these areas for a period of time (see the *Wildlife* section).

In addition to long-term access effects, timber management activities may also have short-term, temporary displacement effects for subsistence users because it is standard practice to close logging roads to outside traffic when logging is taking place. Subsistence users who use existing roads for access would be preempted from using those roads for the duration of logging activity in the affected area. These types of effects would, however, be short term and temporary, and would not be likely to lead to a significant possibility of a significant restriction of subsistence access to the resources. In addition, as previously noted, most or all new roads would be closed following harvest.

Competition

More than half (55 percent) of the population in Southeast Alaska in 2019 resided in Juneau (44 percent) or Ketchikan city (11 percent) and is, therefore, considered non-rural from a subsistence perspective (Alaska DOL 2019).

Residents in the remaining communities are considered rural. Competition for the more abundant wildlife and fisheries resources near rural communities is affected by a number of factors, including fish and game regulations, the mobility of community residents, the Forest-wide distribution of game species, decreases in resource populations as a result of habitat reductions and/or over-harvest, and types of community access, such as roads, ferries, and commercial air services.

The following assumptions were made for the purposes of evaluating potential impacts to competition:

- New road construction adjacent to communities with ferry access will result in increased competition from outside communities.
- New road construction adjacent to existing road systems where interties between communities exist will result in increased competition from surrounding communities associated with the interconnected roads.
- Habitat reductions will result in increased competition if regulations allow sport use to remain constant, with the same number of users seeking fewer huntable resources.
- The demand for resources will remain constant or increase slightly as the habitat capability remains the same or declines over time.

Given these assumptions, the 1997 Forest Plan Revision FEIS concluded that implementation of the Selected Alternative (Alternative 11) would result in a significant possibility of a significant restriction of subsistence use of deer by increasing competition for some subsistence resources by non-rural, as well as rural residents. This was judged most likely to occur on Chichagof, Baranof, and/or Prince of Wales Islands, where competition for deer and some other land mammals was identified as heavy, and habitat capability had already been reduced as a result of timber harvest.

The significant possibility of a significant restriction, resulting from a change in competition, still exists but would be less than the possibility under the 1997 Forest Plan Revision and 2008 amended Forest Plan for all of the alternatives considered in this EIS because of the much lower anticipated rates of timber harvest and road construction. This finding is consistent with the finding for the 2016 Forest Plan Amendment EIS. Viewed at a programmatic level, Alternatives 1, 2, and 3 would have a higher potential to result in additions to existing road systems because harvest would be limited to areas outside existing IRAs with the exception of roaded roadless (Alternatives 2 and 3) and logical extension areas (Alternative 3). Harvest could also occur in these areas under Alternatives 4, 5, and 6, but additional acres in presently undeveloped areas would also be available for harvest under these alternatives.

Cumulative Effects

Cumulative effects are discussed in four categories.

1. **Effects Resulting from Timber Harvesting of Private Lands**. Alaska Native corporation lands adjacent to the Tongass support extensive timber harvest operations, and old-growth forest wildlife habitat capability on Alaska Native corporation lands (especially that for deer) has declined. This decline has occurred primarily on North Chichagof, Kupreanof, Admiralty (localized), and Prince of Wales Islands, as well as in some mainland areas. The resulting lower habitat capabilities on these private lands are likely to increase hunting demands in adjacent National Forest areas, increasing competition and potentially leading to reduced hunter success, reduced or eliminated sport seasons, and in some places reduced or eliminated subsistence seasons.
2. **Effects from Past Activities**. Timber harvest has been more influential in changing the landscape than any other use of the resources of the Tongass. Timber harvest has historically been accompanied by road building, log transfer facility development, and reductions in old-growth forest habitat.
3. **Effects of Present Activities**. Implementation of the 2016 Forest Plan established an annual average PTSQ of 46 MMBF prior to the young-growth transition, with annual old-growth harvest stabilized at 5 MMBF following the transition to support small operators and specialty products. Under this plan, an estimated total of 24,000 acres of old-growth habitat would be converted to young-growth habitat after 25 years, with a total of 42,500 old-growth acres converted after 100 years. These estimates are assumed to remain the same under all of the alternatives considered in this EIS, with similar miles of road construction and reconstruction anticipated under each alternative, as discussed in the *Effects* section, above. Two mining operations, the Greens Creek Mine on Admiralty Island and Kensington Mine north of Juneau, are currently operating.
4. **Effects of Reasonably Foreseeable Future Activities**. Timber harvest activities have typically been accompanied by new access and often increased use of subsistence resources by rural and non-rural residents. The effects of timber harvest on deer habitat capability would be reduced over time as harvest areas transition from old growth to young growth under all alternatives.

   Counting all lands in Southeast Alaska, an estimated 86 percent of the original old growth remains today. After 100 years of implementing any of the alternatives, it is estimated that the percentage of the original old growth remaining would be 82 percent, due to combined harvest on NFS and non-NFS lands, assuming maximum rates of harvest. The *Biological Diversity* section (see *Key Issue 3,* above) quantifies the estimated effects of cumulative future harvest on the amount of old growth by biogeographic province for all of Southeast Alaska (see Tables 3.3-10, 3.3-11, and 3.3-12).

Timber harvest of Alaska Native corporation lands is anticipated to continue at a relatively low but constant level over the next decade. New land conveyances under Public Law 113-291 could result in some previously unharvested areas being logged.

Actual mineral development is difficult to predict, but effects to subsistence resources would be highly localized where it does occur. Appendix B provides a full list of all the projects considered in the cumulative effects analysis.

ANILCA Determination

An ANILCA Section 810 evaluation and determination is not required for approval of the proposed Alaska Roadless Rule, which is a rulemaking process and a programmatic level decision and not a determination whether to "withdraw, reserve, lease, or otherwise permit the use, occupancy, or disposition" of National Forest land. This EIS is part of that rulemaking process and, therefore, does not require an ANILCA Section 810 evaluation and determination. However, in the spirit of cooperation, the Record of Decision voluntarily provides a forest-wide evaluation of the selected alternative for the Alaska Roadless Rule in accordance with ANILCA Section 810 (16 U.S.C. § 3120).

Public hearings on subsistence issues for the proposed Alaska Roadless Rule were held in 18 communities throughout Alaska (Angoon, Craig, Ketchikan, Petersburg, Sitka, Tenakee Springs, Wrangell, Yakutat, Point Baker, Hoonah, Skagway, Gustavus, Haines, Thorne Bay, Kake, Kasaan, Hydaburg, and Pelican) between the Draft and Final versions of this EIS.

Environmental Justice

Affected Environment

Executive Order 12898, Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations, requires each federal agency to make the achievement of environmental justice part of its mission by identifying and addressing disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority and low-income populations. The Order further stipulates that the agencies conduct their programs and activities in a manner that does not have the effect of excluding persons from participating in, denying persons the benefits of, or subjecting persons to discrimination under such programs, policies, and activities because of their race, color, or national origin.

Race and ethnicity are shown by borough in Table 3.13-1. According to the most recent Census estimates, approximately 63 percent of the population of Southeast Alaska is White. American Indian and Alaska Native was identified as the largest minority group, accounting for 15 percent of the total Southeast Alaska population. Table 3.13-1 indicates that there are relatively large proportions of Alaska Natives in Prince of Wales-Hyder, Hoonah-Angoon, and Yakutat. The populations of Haines, Juneau, Petersburg, and Skagway in contrast, have relatively low proportions of Alaska Natives, below the Southeast Alaska average of 15 percent.

Alaska Native populations are identified as a percentage of total population by community in Table E-1 in Appendix E. This information is presented graphically in Figure 3.12-1 (in the *Subsistence* section). These data indicate that 16 of Southeast Alaska's 32 communities have Alaska Native populations that comprise a larger share of total population than the regional average. Alaska natives comprised a particularly large share of total population in Hydaburg (72 percent), Kake (72 percent), Saxman (71 percent), Metlakatla (71 percent), and Hoonah (54 percent), all considered traditional Native communities. Other communities considered traditional Native communities include Angoon, Klawock, Kasaan, Saxman, and Yakutat.

Table 3.13-1
Race/Ethnicity by Borough/Census Area[1]

		Percent of Total Population				
Geographic Area	Total Population	White[2]	American Indian and Alaska Native[2]	Hispanic or Latino	Other Race[2,3]	Two or More Races[2]
Haines Borough	2,518	78	8	4	3	7
Hoonah-Angoon CA	2,132	43	36	7	6	8
Juneau City and Borough	32,330	65	11	7	9	9
Ketchikan Gateway Borough	13,804	64	14	5	9	8
Petersburg Borough	3,255	63	7	10	10	9
Prince of Wales-Hyder CA	6,474	45	39	4	2	9
Sitka City and Borough	8,738	62	12	6	8	11
Skagway Municipality	1,061	84	4	5	3	4
Wrangell City and Borough	2,484	66	17	5	3	8
Yakutat City and Borough	689	42	27	7	11	12
Southeast Alaska	**73,485**	**63**	**15**	**6**	**8**	**9**
Alaska	738,516	61	14	7	11	7

CA = Census Area
[1] Estimates are annual totals developed as part of the 2014-2018 American Community Survey 5-Year Estimates.
[2] Non-Hispanic only. The Federal Government considers race and Hispanic/Latino origin (ethnicity) to be two separate and distinct concepts. People identifying as Hispanic or Latino origin may be of any race. In this table people identifying as Hispanic or Latino are included in the Other Race category only.
[3] The "Other Race" category presented here includes census respondents identified as Black or African American, Asian, Native Hawaiian and Other Pacific Islander, or Some Other Race.
Source: U.S. Census Bureau 2019a

Median household income and the percent of households below the poverty line are presented by borough in Table 3.13-2. Statewide, the estimated share of the population below the poverty line was 10.8 percent in 2018. Median household income was approximately $76,700. Juneau is the only borough in the region with median household income above the state median. Median household income as a share of the state median in the other boroughs ranged from 71 percent in Prince of Wales-Hyder to 94 percent in Skagway (Table 3.13-2). The share of the population below the poverty level in 2018 ranged from 5.3 percent in Skagway to 15.2 percent in Prince of Wales-Hyder (Table 3.13-2).

The percent of households below the poverty line and the median household income are identified by community in Table E-1 in Appendix E. The U.S. Census identified 16 communities in Southeast Alaska with 10 percent or more of their population below the poverty line. All but three of the communities identified in Table E-1 where data are available had median household incomes below the state average.

Table 3.13-2
Income and Poverty by Borough/Census Area[1]

Geographic Area	Median Household Income		Population Below the Poverty Level (Percent)
	2018 Dollars	Percent of State Median	
Haines Borough	64,342	84	9.0
Hoonah-Angoon CA	63,603	83	9.7
Juneau City and Borough	88,213	115	7.9
Ketchikan Gateway Borough	70,356	92	10.5
Petersburg Borough	66,907	87	8.2
Prince of Wales-Hyder CA	54,191	71	15.2
Sitka City and Borough	71,534	93	7.5
Skagway Municipality	72,237	94	5.3
Wrangell City and Borough	57,583	75	7.8
Yakutat City and Borough	65,833	86	6.7
Alaska	**76,715**	**100**	**10.8**

CA = Census Area
[1] Estimates are annual totals developed as part of the 2014-2018 American Community Survey 5-Year Estimates.
Source: U.S. Census Bureau 2019b, 2019c

Environmental Consequences

As discussed elsewhere, this EIS is programmatic and, as such, examines direction and allowable activities for broad land areas, rather than schedules specific activities in specific locations. The action alternatives would increase the acres available for timber harvest, but harvest levels are expected to remain the same across all alternatives. In addition, while there may be some variation by alternative, the amount of new or reconstructed road miles is expected to be broadly similar across all alternatives. Similarly, the distribution of harvest is likely to vary by alternative, but it is difficult to predict this variation with any degree of accuracy because it depends on the specific projects proposed, economic conditions, and many other factors. This makes it difficult to evaluate the effects of the alternatives on particular communities or populations.

The potential effects of the alternatives on the economic and social environment of Southeast Alaska are discussed in the *Key Issue 2* section of this document. The principal regional effects would be those associated with changes in the timber industry and recreation and tourism. There could also be potential effects upon subsistence use and cultural resources that have particular significance for Alaska Native populations. The effects of the alternatives on communities are discussed by community in Appendix E. Changes in roadless management and acres are estimated for each community use area. Impacts to subsistence are discussed in the *Subsistence* section.

Overall, small increases in risk to cultural resources may occur under all action alternatives (with Alternatives 4, 5, and 6 having the highest risk) because of slightly greater road lengths and activities in

areas currently protected from development, associated with harvest activities. However, the potential effects of the alternatives upon cultural resources are expected to be the lower than under the 2008 Forest Plan because of the much lower allowable timber harvest.

Areas designated as Roadless Priority and Community Priority ARAs would explicitly allow the cutting, utilization, customary trade, and removal of trees for the purposes of Alaska Native customary and traditional uses, as well as road construction deemed necessary by a federally recognized Tribe for access to Alaska Native cultural sites. This type of use would also be allowed in Timber Priority ARAs, which allow timber harvest and road construction.

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CHAPTER 4
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CHAPTER 5
LIST OF DOCUMENT RECIPIENTS AND THOSE NOTIFIED OR CONSULTED

List of Document Recipients and Those Notified or Consulted

This section provides a list of the agencies that were notified of the draft EIS. This list includes federal, state, and local governments, elected officials, and federally recognized tribes who submitted comments or requested to be on the mailing list for this draft EIS. It does not include the thousands of individuals and organizations on the mailing list who were notified of the draft EISs availability on the Internet, depending on the preference they expressed. This information is available upon request.

Federal Agencies and Tribal Governments

Federal Energy Regulatory Commission, Environmental Compliance Branch
Federal Highway Administration, Division Administrator
Library of Congress
National Oceanic and Atmospheric Administration (NOAA), NWS Office of Strategic Planning and Policy
National Oceanic and Atmospheric Administration (NOAA), National Marine Fisheries Service, Habitat Conservation Division, Alaska Region
National Environmental Coordinator, NRCS
US Government Accountability Office
US Government Publishing Office, Federal Digital System
US Advisory Council on Historic Preservation, Planning and Review
US Army Corps of Engineers, Pacific Ocean Division
US Coast Guard, Environmental Management CG-443
US Coast Guard, Coast Guard Commandant CG47th
USDA, APHIS PPD/EAD
USDA, National Agricultural Library
USDA, Natural Resources Conservation Service
USDA, Rural Development, Rural Utilities Service
US Department of Energy, Office of NEPA Policy and Compliance
US Department of the Interior, Bureau of Land Management, Alaska State Office
US Department of the Interior, Bureau of Land Management, Anchorage District
US Department of the Interior, Bureau of Land Management, Fairbanks District
US Department of the Interior, Federal Subsistence Management Program
US Department of the Interior, Office of Environmental Policy and Compliance
US Department of the Interior, US Geological Survey Alaska Science Center
US Department of Transportation, Federal Aviation Administration, Office of the Regional Director
US Department of Transportation, Federal Highway Administration, Alaska Division Administrator
US Environmental Protection Agency, Environmental Review and Sediment Management Unit
US Environmental Protection Agency, Region 10
US Fish and Wildlife Service, Anchorage Field Office
US Fish and Wildlife Service, Juneau Field Office
US Navy, Energy and Environmental Readiness Division
US Navy, Office of the Chief of Navy Operations
USGS Alaska Science Center

Federal Congressional Representatives

Lisa Murkowski, U.S. Senator
Dan Sullivan, U.S. Senator
Don Young, U.S. Representative

Alaska Native Tribes and Corporations

Alaska Native Brotherhood Grand Camp
Alaska Native News
Alaska Tribal Leader Committee
Angoon Community Association
Alaska Native Sisterhood Grand Camp
Cape Fox Corporation
Central Council Tlingit & Haida Indian Tribes of Alaska
Chilkat Indian Village
Chilkoot Indian Association
Craig Tribal Association
Douglas Indian Association
Goldbelt, Incorporated
Haida Corporation
Hoonah Indian Association
Huna Totem Corporation
Hydaburg Cooperative Association
Kake Tribal Corporation
Kavilco Inc.
Ketchikan Indian Community
Klawock Cooperative Association
Klawock Heenya Corporation
Klukwan Inc.
Kootznoowoo Inc.
Metlakatla Indian Community
Organized Village of Kake
Organized Village of Kasaan
Organized Village of Saxman
Petersburg Indian Association
Sealaska Corporation

Individuals

Notifications of the availability of the final Environmental Impact Statement were also sent to over 62,000 individuals.

Consultation

The following organizations and agencies were consulted with on the development of this EIS:

- **Advisory Council on Historic Preservation:** The Advisory Council was contacted for advice on the determination of whether this rulemaking effort constitutes an undertaking as defined under Section 106 of the National Historic Preservation Act.

- **Alaska State Historic Preservation Office:** The Forest Service notified the Alaska State Historic Preservation office of the proposed rule and that the agency determined that the proposed rule was not an undertaking as defined under Section 106 of the National Historic Preservation Act.
- **Angoon Community Association; Central Council Tlingit and Haida Indian Tribes of Alaska; Hoonah Indian Association; Hydaburg Cooperative Association; Organized Village of Kake; and Organized Village of Kasaan:** These six tribes worked with the Forest Service as cooperating agencies providing input on the development of this EIS.
- **State of Alaska:** The State of Alaska submitted the petition which provided the foundation for developing the proposed rule. The State worked with the Forest Service as a cooperating agency assisting in public meetings held throughout the state and providing input on the development of this EIS.
- **U.S. Environmental Protection Agency:** The Forest Service contacted the Environmental Protection Agency early in the process to discuss their concerns regarding the proposed rule and analysis expectations.
- **U.S. Fish and Wildlife Service:** The Forest Service contacted the U.S. Fish and Wildlife Service early in the process to discuss the proposed rule and their concerns regarding wildlife issues and analyses.
- **U.S. National Marines Fisheries Service:** The Forest Service contacted the National Marine Fisheries Service early in the process to discuss the proposed rule and their concerns regarding wildlife issues and analyses.

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CHAPTER 6
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CHAPTER 7
GLOSSARY

Glossary

These definitions apply to Forest Service land management and planning. Meanings may differ when used in another context. Glossary definitions are not legal unless otherwise noted. Some definitions were shortened, paraphrased, or adapted to conditions in Southeast Alaska or on the Tongass National Forest and for ease of understanding.

A

Adjacent

Objects or parcels of land that are not widely separated, though perhaps they are not actually touching.

Alaska National Interest Lands Conservation Act (ANILCA)

Act of December 2, 1980. Public Law 96 487, 96th Congress, 94 Stat. 2371-2551.

Alaska Native corporation

One of the regional, urban, and village native corporations formed under the Alaska Native Claims Settlement Act of 1971.

Alaska Roadless Areas (ARA) (as proposed for Alaska Roadless Rule)

Areas identified in the set of ARA maps which the Alaska Roadless Rule applies to. These represent new roadless designations and are tied to new roadless rule language.

Alaska Roadless Categories (as proposed for Alaska Roadless Rule)

Areas identified with varying degrees of exceptions and prohibitions, designed based on land management priority.

Alpine

Parts of mountains above tree growth.

Alternative

An option proposed for decision making.

Anadromous fish

Fish that mature and spend much of their adult life in the ocean, returning to inland waters to spawn. Salmon and steelhead are examples.

Annual demand

As used in this document, the amount of timber that buyers are willing to purchase each year. Estimates of annual timber demand are based on a number of factors, including Pacific Northwest projections, installed mill capacity, utilization rates and market trends.

Aquaculture

Culture or husbandry of salmon or other aquatic fauna or flora.

Aquatic ecosystem

A stream channel, lake or estuary bed, the water itself, and the biotic communities that occur therein.

B

Background

The visible area greater than 5 miles and less than 15 miles from a visual priority route. (See the definitions for foreground and middleground.)

Bank

The continuous margin along a river or stream where all upland vegetation ceases.

Beach fringe

The area inland from salt water shorelines that is typically forested.

Benthic

Pertaining to the sea bottom or organisms that live on the sea bottom.

Best Management Practices (BMPs)

Methods, measures, or practices selected by an agency to meet its nonpoint source control needs. BMPs include but are not limited to structural and nonstructural controls and operation and maintenance procedures. BMPs can be applied before, during, and after pollution-producing activities to reduce or eliminate the introduction of pollutants into receiving waters (36 CFR 219.19). BMPs are selected on the basis of site-specific conditions that reflect natural background conditions and political, social, economic, and technical feasibility. BMPs are found in the National Core BMP Technical Guide, FS-990a (USDA Forest Service 2012) and Forest Service Handbook 2509.22, Alaska Region Amendment.

Biogeographic provinces

Twenty-one ecological subdivisions of Southeast Alaska that are identified by generally similar physiogeography, climate, vegetation patterns and physical barriers such as mountains or saltwater (distinct ecological and biogeographic features). Plant and animal species composition, climate, and geology within each province are generally more similar within than among adjacent provinces. Historical events (such as glaciers, wind, and tectonic uplifting) are important to the nature of the province and to the barriers that distinguish each province (Martin and Alaback 1990).

Biological assessment

A "biological evaluation" conducted for major federal construction projects requiring an environmental impact statement, in accordance with legal requirements under section 7 of the Endangered Species Act of 1973, as amended (16 U.S.C. 1536(c)). The purpose of the assessment and resulting document is to determine whether the proposed action is likely to affect an endangered, threatened, or proposed species. (FSM 2600, Ch. 2670)

Biological diversity

The variety of life forms and processes, including the complexity of species, communities, gene pools, and ecological functions, within the area covered by a land management plan.

The variety and abundance of life forms, processes, functions, and structures of plants, animals and other living organisms, including the relative complexity of species, communities, gene pools and ecosystems at the spatial scales that range from local through regional to global. 2. An index of richness in a community, ecosystem or landscape and the relative abundance of these species – Note: 1. There are commonly five levels of biodiversity: (a) genetic diversity, referring to the genetic variation within a

species; (b) species diversity, referring to the variety of species in an area; (c) community or ecosystem diversity, referring to the variety of communities or ecosystems in and area; and (d) regional diversity, referring to the variety of species, communities, ecosystems or landscapes within a specific geographic region – Note: each level of biodiversity has three components: (a) compositional diversity or the number of parts or elements within a system, indicated by such measures as the number of species, genes, communities or ecosystems; (b) structural diversity or the variety of patterns or organizations within a system, such as habitat structure, population structure, or species morphology; and (c) functional diversity or the number of ecological processes within a system such as disturbance regimes, roles played by species within a community, and nutrient cycling within a forest (Helm 1998).

Biological evaluation

A documented Forest Service review of Forest Service programs or activities in sufficient detail to determine how an action or proposed action may affect any threatened, endangered, proposed, or sensitive species. (FSM 2600, Ch. 2670)

Biomass

Organic matter available on a renewable basis; includes forest and mill residues, agricultural crops and wastes, wood and wood residues, animal wastes, livestock operation residues, aquatic plants, fast-growing trees and plants, and municipal waste and industrial residues; can be used to produce liquid transportation fuels, chemicals and other bioproducts, electric power, steam, and heat. Also refers to the total mass of living organisms in a given area or volume; recently dead plant material is often included as dead biomass.

Blowdown

See windthrow.

Board foot

A unit of timber measurement equaling the amount of wood contained in an unfinished board 1 inch thick, 12 inches long, and 12 inches wide.

Buffer

An area of vegetation of varying size, shape, and character managed to mitigate effects on a particular resource.

C

Catastrophic event

Events resulting from a great and sudden calamity or disaster. In the case of forest stands, such events may include windstorms, wildfire, floods, snow slides, and insect outbreaks. Whether a disturbance event is called catastrophic is dependent on the context within which the event occurs, the scale of the event, and the effects of the event.

Capability

The potential of an area of land to produce resources, supply goods, and services, and allow resource uses under an assumed set of management practices and at a given level of management intensity.

Carrying capacity

The estimated maximum number (or biomass) of organisms of a given species that can be sustained or survive on a long-term basis within an ecosystem.

Cave

Cave is legally defined under federal law as “any naturally occurring void, cavity, recess, or system of interconnected passages which occurs beneath the surface of the earth or within a cliff or ledge and which is large enough to permit an individual to enter, whether or not the entrance is naturally formed or human-made. Such term shall include any natural pit, sinkhole or other feature which is an extension of the surface,” (Federal Cave Resource Protection Act of 1988). Speleologists use “cave” to refer to all parts, regardless of size, of an underground system that links openings and chambers and that may connect the system to the surface. Included in the term caves are tree molds and lava tubes associated with lava flows, erosional caves, and those formed by dissolution of bedrock.

Census designated place (CDP)

A concentration of population identified by the United States Census Bureau for statistical purposes. CDPs are delineated for each decennial census as the statistical counterparts of incorporated places, such as cities, towns, and villages.

Channel

A natural waterway of perceptible extent that periodically or continuously contains moving water. It has a definite bed and banks that serve to confine the water.

The bed where a natural body of surface water flows or may flow; a natural passageway or depression of perceptible extent containing continuously or periodically flowing water, or forming a connecting link between two bodies of water, a water course (Haskins et al. 1998).

Clearcutting

An even-aged regeneration method in which essentially all trees have been removed in one operation to create an even-aged stand that is composed of a single age class in which tree ages are usually +/- 20 percent of rotation. The area harvested may be a patch, stand, or strip large enough to be mapped or recorded as a separate age class in planning.

Code of Federal Regulations (CFR)

The codification of the general and permanent rules published in the Federal Register by the departments and agencies of the Federal Government. It is divided into 50 titles that represent broad areas subject to Federal regulation. The 50 subject matter titles contain one or more individual volumes, which are updated once each calendar year, on a staggered basis. Each title is divided into chapters, which usually bear the name of the issuing agency. Each chapter is further subdivided into parts that cover specific regulatory areas. Large parts may be subdivided into subparts. All parts are organized in sections, and most citations to the CFR refer to material at the section level.

Commercial forest land

Forest land that is producing or is capable of producing crops of industrial wood and (a) has not been withdrawn by Congress, the Secretary, or the Chief; (b) existing technology and knowledge is available to ensure timber production without irreversible damage to soils productivity, or watershed conditions; and (c) existing technology and knowledge, as reflected in current research and experience, provides reasonable assurance that adequate restocking can be attained within 5 years after final harvesting.

Commercial timber

Trees, portions of trees, and other forest products on National Forest System lands may be sold for the purpose of achieving the policies set forth in the Multiple-Use Sustained-Yield Act of 1960, as amended (74 Stat. 215; 16 U.S.C. 528-531), the Forest and Rangeland Renewable Resources Planning Act of 1974, as amended (88 Stat. 476; as amended, 16 U.S.C. 1600-161), and the Program thereunder. (See 36 CFR 223.1 Authority to sell timber.)

Connectivity (landscape)

A measure of the extent that forest areas between or outside Old-growth habitat reserves and other Non-development LUDs provide habitat for breeding, feeding, dispersal, and movement.

Connectivity (ecosystem)

Ecological conditions that exist at several spatial and temporal scales that provide landscape linkages that permit the exchange of flow, sediments and nutrients; the daily and seasonal movements of animals within home ranges; the dispersal and genetic interchange between populations; and the long distance range shifts of species, such as in response to climate change (FSM 1909.12, Ch. 10; 36 CFR 219.19).

Convey

To pass or transmit the title to property from one to another.

Conveyance

An instrument by which some estate or interest in lands is transferred from one person to another (Black 1979); a transfer of legal title to land.

Corridor (transportation)

A linear strip of land defined for the present or future location of transportation rights-of-way within its boundaries.

Corridor (wildlife)

Habitats, often linear, that facilitate dispersal and movement of wildlife between patches of suitable habitat. (Also see the definition for connectivity.)

Created opening

Openings in the forest canopy created by silvicultural practices, including shelterwood regeneration cutting, clearcutting, seed tree cutting, or group selection cutting.

Critical habitat

For a threatened or endangered species, (1) the specific areas within the geographical area occupied by the species, at the time it is listed in accordance with the provision of section 4 of the Endangered Species Act (ESA) (16 USC 1533), on which are found those physical or biological features (a) essential to the conservation of the species, and (b) which may require special management considerations or protections; and (2) specific areas outside the geographical area occupied by the species at the time it is listed in accordance with the provisions of section 4 of the ESA (16 USC 1533), upon a determination by the Secretary that such areas are essential for the conservation of the species. ESA, sec. 3 (5) (A), (16 USC 1532 (3) (5) (A). Critical habitat is designated through rulemaking by the Secretary of Interior or Commerce. ESA, sec. 4 (a) (3) and (b) (2) (16 USC 1533 (a)(3) and (b)(2)).

Cultural resource

“An object or definite location of human activity, occupation, or use identifiable through field survey, historical documentation, or oral evidence. Cultural resources are prehistoric, historic, archeological, or architectural sites, structures, places, or objects and traditional cultural properties.…cultural resources include the entire spectrum of resources for which the Heritage Program is responsible from artifacts to cultural landscapes without regard to eligibility for listing on the National Register of Historic Places” (FSM 2360.5).

D

Demand

The quantity of a commodity or service that buyers are willing to purchase at a given price over a specific time period.

Demographic

Pertaining to the study of the characteristics of populations, such as size, growth, density, distribution, and vital statistics.

Detrimental soil disturbance

The condition where established threshold values of soil properties are exceeded and result in significant change or impairment to long-term soil productivity.

Developed recreation

The type of recreation that occurs where modifications (improvements) enhance recreation opportunities and accommodate intensive recreation activities in a defined area.

Developed Recreation Site

A discrete place containing a concentration of facilities, infrastructure, and services used to provide recreation opportunities to the public and evidencing a significant investment in facilities and management (FSH 2309.13- recreation site handbook) (such as campgrounds, picnic areas, and trailheads with recreation facilities.)

Development LUDs

Land use designations that permit commercial timber harvest and other commercial activities (Timber Production, Modified Landscape, Scenic Viewshed, and Experimental Forest) and convert some of the old-growth forest to early-to mid-successional, regulated forests.

Distance zone

Areas of landscapes denoted by specified distances from the observer (foreground, middleground, or background). Used as a frame of reference in which to discuss landscape characteristics of management activities. (Also see the definitions for foreground, middleground, and background.)

Distinct population segment (DPS)

A DPS, or a distinct population segment, is a vertebrate population or group of populations that is discrete from other populations of the species and significant in relation to the entire species. The Endangered Species Act provides for listing species, subspecies, or distinct population segments of vertebrate species.

Disturbance

Any relatively discrete event in time that disrupts ecosystem, watershed, community, or species population structure and/or function and changes resources, substrate availability, or the physical environment (36 CFR 219.19).

E

Easement

An interest or right in land owned by another that entitles its holder to a specific limited use.

Ecological integrity

The quality or condition of an ecosystem when its dominant ecological characteristics (for example, composition, structure, function, connectivity, and species composition and diversity) occur within the natural range of variation and can withstand and recover from most perturbations imposed by natural environmental dynamics or human influence (36 CFR 219.19).

Ecological sections

Ecosystems may be subdivided into ecological sections that consist of ecological subsections. There are 14 ecological sections on the Tongass National Forest.

One mapping level of the National Hierarchical Framework of Ecological Units which delimits areas of different biological and physical potentials at varying geographical scales ranging from global to local. Ecological sections areas delimited at the sub regional scale and are characterized by combinations of climate, geomorphic processes, topography and stratigraphy that influence moisture availability and exposure to radiant solar energy, which in turn directly control hydrologic function, soil forming processes, and potential plant community distributions. Sections and subsections are the two ecological units mapped at this scale. Sections are broad areas of similar geomorphic process, stratigraphy, geologic origin, drainage networks, topography and regional climate. Such areas are often inferred by relating geologic maps to potential natural vegetation (series) groups as mapped by Kuchler (1964). The Tongass is divided into 14 ecological subsections, which are smaller areas of sections having similar surficial geology, lithology geomorphic processes; soil groups sub regional climate and potential natural communities (USDA 1993).

Ecosystem

A spatially explicit, relatively homogenous area that includes all interacting organisms and the abiotic environment components. An ecosystem can be of various sizes (e.g., a log, a pond, a forest, or the earth's biosphere).

Ecosystem services

Ecosystem services include the full suite of goods and services that are vital to human health and livelihood provided by ecosystems—in this case, ecosystems on the Tongass National Forest.

Edge effect

The effect of adjoining vegetative communities on the population structure along the margin, which provides for greater numbers of species and higher population densities than either adjoining community. Edge may also result in negative effects, since habitat along the edge is different than within the patch, reducing the effective area of the habitat patch.

The modified environmental conditions or habitat along the margins (edges) of forest stands or patches (Helms 1998).

Effects

Environmental effects and impacts as used in the Council on Environmental Quality's (CEQ) regulations (40 CFR parts 1508.7 and 1508.8) implementing the procedural provisions of the National Environmental Policy Act (NEPA) of 1969, as amended (42 U.S.C. parts 4321 *et seq.*) are synonymous and include:

Direct effects, which are caused by the action and occur at the same time and place;

Indirect effects, which are caused by the action and are later in time or farther removed in distance, but are still reasonably foreseeable; and

Cumulative impact, which is the impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of

what agency (federal or non-federal) or person undertakes such other actions. Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time.

Effects may also include those resulting from actions which may have both beneficial and detrimental effects, even if on balance the agency believes that the effect will be beneficial.

Endangered species

Any species that the Secretary of the Interior or the Secretary of Commerce has determined is in danger of extinction throughout all or a significant portion of its range. Endangered species are listed at 50 CFR sections 17.11, 17.12, and 224.101 (FSM 1090.12).

Endemic

Living in or restricted to a particular locality. In this document the term endemic is used in two ways. First, it is used to describe plant and animal species, subspecies, or lineages that are native and restricted in their distribution to an island, a portion of Southeast Alaska, or Southeast Alaska. Second, it is used to describe a type of windthrow event that is a very localized windthrow event, where individual trees are blown over (see the definition for Windthrow in this Glossary).

Indigenous to (native) or characteristic of a particular restricted geographical area (Helms 1998).

Endemism

The ecological state of a species being unique to a defined geographic location, such as an island or other defined zone or habitat type; organisms that are indigenous to a place are not endemic to it if they are also found elsewhere.

Enhance

To improve, reinforce, enrich, or strengthen the existing condition, value, or beauty of a resource.

Environment

All the conditions, circumstances, and influences surrounding and affecting the development of an organism, or group of organisms.

Epikarst

The upper surface of karst, consisting of a network of intersecting fissures and cavities that collect and transport surface water and nutrients underground; epikarst depth can range from a few centimeters to tens of meters.

Erosion

The wearing away of the land surface by running water, wind, ice, gravity, or other geological activities.

Essential fish habitat (EFH)

Those waters and substrate necessary to fish for spawning, breeding, feeding, or growth to maturity for federally managed species as per 50 CFR 600, “Magnuson-Stevens Act Provisions.” For the purpose of interpreting the definition of essential fish habitat: “Waters” include aquatic areas and their associated physical, chemical, and biological properties that are used by fish and may include aquatic areas historically used by fish where appropriate; “substrate” includes sediment, hard bottom, structures underlying the waters, and associated biological communities, “necessary” means the habitat required to support a sustainable fishery and the managed species’ contribution to a healthy ecosystem; and “spawning, breeding, feeding growth to maturity” covers a species full life cycle.

Estuary

An ecological system at the mouth of a stream where fresh water and salt water mix, and where salt marshes and intertidal mudflats are present. The landward extent of an estuary is the limit of salt-intolerant vegetation, and the seaward extent is a stream's delta at mean low water.

Exceptions (as proposed for Alaska Roadless Rule)

Activities that would be allowed in different categories of ARAs.

F

Falldown

The difference between the number of acres planned for timber harvest and those actually harvested, usually experienced as a reduction in acres. Falldown results from many factors, including unmapped unsuitable timber land, newly available information, and project-level consideration of site-specific issues and non-timber resource needs. (Also see the definition for Management Implementation Reduction Factor.)

Federally recognized Indian tribe

An Indian tribe, band, nation, or other organized group or community, including a native village, regional corporation or village corporation, as those terms are defined in Section 3 of the Alaska Native Claims Settlement Act (43 U.S.C. 1602)(ANCSA), which is recognized as eligible for the special programs and services provided by the United States to Indians because of their status as Indians.

Fiscal Year (FY)

October 1 to September 30. The Fiscal Year is referred to by the calendar year, which begins on January 1. For example, October 1, 1996, to September 30, 1997, is referred to as Fiscal Year 1997.

Fish passage

The ability of both adult and juvenile fish to move both up and down stream.

Foreground

The visible area within 0.5 mile of a visual priority route. (See the definitions for background and middleground.)

Forest health

The perceived condition of a forest derived from concerns about such factors as its age, structure, composition, function, vigor, presence of unusual levels of insects or disease, and resilience to disturbance.

Forest Plan

Source of management direction for an individual forest, specifying activity and output levels for a period of 10 to 15 years. Management direction in the Forest Plan is based on the issues identified at the time of the plan's development.

Forest transportation system

The system of National Forest System (NFS) roads, trails, and airfields on NFS lands (36 CFR 212.1).

Fragmentation

The process by which a landscape is broken into smaller patches of forest within a mosaic of other forms of land use or ownership.

G

Game Management Unit

Geographical areas defined by the Alaska Department of Fish and Game to manage wildlife populations. Legal hunting and trapping regulations govern each unit.

Group selection

An uneven aged regeneration method in which trees are removed and new age classes are established in small groups where the widths of groups are commonly approximately twice the height of the mature trees. Note: the management unit or stand in which regeneration growth and yield are regulated consists of an aggregation of groups.

H

Habitat

A unit area of environment. 2. The place, natural or otherwise, (including climate, food, cover and water) where animal, plant, or populations naturally or normally lives and develops (Helms 1998).

Habitat capability

The estimated maximum number of fish or wildlife that can be supported by the amount and distribution of suitable habitat in an area.

Haul out

Areas used by marine mammals for resting and other social/biological activities that occur in the intertidal zone.

Historic property

“Any prehistoric or historic district, site, building, structure, or object included in, or eligible for inclusion in, the National Register of Historic Places maintained by the Secretary of the Interior. This term includes artifacts, records, and remains that are related to and located within such properties. The term includes properties of traditional religious and cultural importance to an Indian tribe or Native Hawaiian organization and that meet the National Register criteria” [36 CFR 800.16(I)(1)].

I

Industrial wood

All commercial roundwood products, except fuelwood.

Infrastructure

The facilities, utilities, and transportation systems needed to meet public and administrative needs.

Inherent capability

The ecological capacity or ecological potential of an area characterized by the interrelationship of its physical elements, its climatic regime, and natural disturbances (36 CFR 219.19).

Interdisciplinary Team (IDT)

A group of individuals with different training assembled to solve a problem or perform a task. The team is assembled out of recognition that no one scientific discipline is sufficiently broad to adequately solve the problem. Through interaction, participants bring different points of view and a broader range of expertise to bear on the problem.

Interior old-growth forest

The region of a forested stand that has a stable microclimate relative to light, wind, humidity, moisture regime, etc. Natural forest ecotones “seal” a forest’s edge and stabilize these microclimate features. Ecotones created by management such as the old growth, clearcut edge may have “edge” effects that extend into a forest for several hundred feet (estimated 2 to 3 tree heights) before stable “interior forest” conditions are achieved and microclimatic effects of the edge are no longer evident.

Invasive species

An alien species whose introduction does or is likely to cause economic or environmental harm or harm to human health. A species that causes, or is likely to cause, harm and that is exotic to the ecosystem it has infested. Invasive species infest both aquatic and terrestrial areas and can be identified within any of the following four taxonomic categories: Plants, Vertebrates, Invertebrates, and Pathogens (Executive Order 13112).

Inventoried roadless area (IRA)

Areas identified in a set of inventoried roadless area maps, contained in Forest Service Roadless Area Conservation, Final Environmental Impact Statement, Volume 2, dated November 2000, which are held at the National headquarters office of the Forest Service, or any subsequent update or revision of those maps. (36 CFR 294.11).

Invertebrates

Animals without backbones. Land invertebrates include insects, snails, and slugs; freshwater invertebrates include aquatic insects; and marine invertebrates include crab, shrimp, and clams.

Irretrievable commitments

A term that applies to the loss of production, harvest, or use of natural resources. For example, some or all of the timber production from an area is lost irretrievably while an area is serving as a winter sports site. The production lost is irretrievable, but the action is not irreversible. If the use changes, it is possible to resume timber production.

Irreversible commitments

A term that describes the loss of future options. Applies primarily to the effects of use of nonrenewable resources, such as minerals or cultural resources, or to those factors, such as soil productivity, that are renewable only over long periods of time.

Issue

A point, matter, or section of public discussion or interest to be addressed or decided.

J
K

Karst

A type of topography that develops in areas underlain by soluble rocks, primarily limestone. Dissolution of the subsurface strata results in areas of well-developed, surface drainage that are sinkholes, collapsed channels, or caves.

L

Land allocation

The decision to use land for various resource management objectives to best satisfy the issues, concerns, and opportunities, and meet assigned forest output targets.

Land exchange

A land adjustment transaction whereby the United States trades federal land, interests in land, and/or timber for not less than equal value of non-Federal land and/or interests in land needed for National Forest purposes, or programs. Some exchanges provide for cash equalization to equalize values.

Land Use Designation (LUD)

Defined areas of the Forest that are allocated for different uses or activities and have the same set of applicable plan components, but do not have to be spatially contiguous. (36 CFR 219.19)

Land Use Designation (LUD) II

Statutory land use designations managed in a roadless state to retain their wildland character as defined in the TTRA (Pub. L. 101-626, Title II, Section 201) and the National Defense Authorization Act for Fiscal Year 2015 (Pub. L. 113-291, 128 Stat. 3729, Section 3720(f)).

Landscape

A defined area irrespective of ownership or other artificial boundaries, such as a spatial mosaic of terrestrial and aquatic ecosystems, landforms, and plant communities, repeated in similar form throughout such a defined area (36 CFR 219.19).

Landslides

The moderately rapid to rapid downslope movement of soil and rock materials that may or may not be water-saturated.

Large woody debris (LWD)

Any piece of relatively stable woody material, having a diameter of 4 inches or greater and a length greater than 3 feet, that intrudes into a stream channel. Formerly called large organic debris.

A term used to describe logs, tree boles, rootwads, and limbs that are in, on or near the stream channel, having a diameter of 4 inches or greater and a length equal to or greater than 3 feet, that intrudes into a stream channel.

Leasable minerals

Generally includes minerals such as coal, oil, gas, phosphate, sodium, potassium, oil shale, sulfur, and geothermal steam.

Lease

A type of special use authorization (usually granted for uses other than linear rights-of-way) that is used when substantial capital investment is required and when conveyance of a conditional and transferable interest in National Forest System lands is necessary or desirable to serve or facilitate authorized long-term uses, and that may be revocable and compensable according to its terms.

Legacy trees

A tree, usually mature or old growth that is retained on a site after harvesting or natural disturbance to provide a biological legacy.

Locatable minerals

Include, but not limited to, minerals such as gold, silver, lead, zinc, copper, and mercury.

Log transfer facilities (LTF)

Log transfer facilities include the site and structures used for moving logs and timber products from land-based transportation forms to water-based transportation forms (or vice versa).

M

Managed stand

A forested stand whose natural structure has been purposely altered through some regeneration or stocking control treatment.

Management Indicator Species

Plant or animal species, communities, or special habitats selected for emphasis in planning, and which are monitored during forest plan implementation to assess the effects of management activities on their populations and the populations of other species with similar habitat needs that they may represent.

Management practices

The activities applied to a defined area of land (land use designation as defined in the Forest Plan) to attain multiple-use and other goals and objectives.

Management prescription

Management practices and intensity selected and scheduled for application on a specific area (e.g., a land use designation) to attain multiple-use and other goals and objectives.

Mariculture

The cultivation of plants and animals in saltwater, with no freshwater component. Mariculture does not include anadromous fish farming.

Marine access point

An area that is used by humans to transfer items to saltwater generally where there is a trail that leads to saltwater and that has no associated structures.

Matrix

A term used in the Old-growth habitat conservation strategy that refers to the lands with LUD allocations where commercial timber harvest may occur.

Mean annual increment (MAI)

The total increment of a tree or stand, up to a given age in years, divided by that age.

Memorandum of Understanding (MOU)

An agreement between the Forest Service and other agencies resulting from consultation between agencies that states specific measures the agencies will follow to accomplish a large or complex project. A memorandum of understanding is not a fund obligating document.

Microsale

A microsale is a timber sale proposed by a prospective purchaser consisting of dead or down timber of approximately 50 thousand board feet (MBF) or less and the District Ranger agrees to offer for bidding.

Middleground

The visible area between foreground and background of a visual priority route. (See the definitions for foreground and background.)

Million board feet (MMBF)

A measurement of the number of millions of board feet of timber. The letter "M" is borrowed from Roman numerals, but instead of "MM" representing the value 2,000, the industry treats them as variables in algebra and interprets them based on the rules of mathematics (where two adjacent variables are multiplied), thus the product is 1 million (1,000 times 1,000) board feet of timber.

Mineral development

The activities and facilities associated with extracting mineral deposits.

Mineral entry

Filing a mining claim on public land to obtain the right to mine any minerals it may contain. Also the filing for a mill site on federal land for the purpose of processing off-site minerals.

Mineral exploration

The search for valuable minerals on lands open to mineral entry.

Mineral lease

A lease that authorizes the development and production of leasable minerals from public lands.

Mining claims

A geographic area of the public lands held under the general mining laws in which the right of exclusive possession is vested in the locator of a valuable mineral deposit.

Mitigate

To avoid, minimize, rectify, reduce, or compensate the adverse environmental impacts associated with an action.

Mixed conifer

In Southeast Alaska, mixed conifer stands usually consist of the following species: western hemlock, mountain hemlock, and yellow-cedar, redcedar, and Sitka spruce. Shorepine may occasionally be present depending on individual sites. Redcedar is not usually in mixed conifer stands on the central and northern portions of the Tongass. Mixed conifer sites indicate poor drainage and/or shallow soils.

Model

An idealized representation of reality developed to describe, analyze, or understand it; a mathematical representation of the relationships under study (e.g., Woodstock, wildlife habitat capability models).

Model Implementation Reduction Factor (MIRF)

An adjustment made to the timber outputs of the computer model to account for anticipated effects on timber availability that cannot be accounted for in the computer model. (Also see the definition for falldown.)

Monitoring

A systematic process of collecting information to evaluate effects of actions or changes in conditions or relationships (36 CFR 219.19).

Multiple use

The management of all the various renewable surface resources of the National Forest System so that they are used in the combination that will best meet the needs of the American people; making the most judicious use of the land for some or all of these resources or related services over areas large enough to provide sufficient latitude for periodic adjustments in use to conform to changing needs and conditions; that some land will be used for less than all of the resources; and harmonious and coordinated management of the various resources, each with the other, without impairment of the productivity of the land, with consideration being given to the relative values of the various resources, and not necessarily the combination of uses that will give the greatest dollar return or the greatest unit output, consistent with the Multiple-Use Sustained-Yield Act of 1960 (16 U.S.C. 528–531) (36 CFR 219.19).

Municipal Watershed

A watershed, designated on the Forest Plan Land Use Designation Map, which provides municipal water supplies. On the Tongass these include the municipal watersheds for Ketchikan, Petersburg, Sitka, Juneau, Wrangell, Kake, Klawock, Craig, and Hydaburg. Compare to public water supply definition.

Muskeg

Algonquin term for peatland. Usually applied to areas with sphagnum mosses, tussocky sedges, and an open growth of scrubby trees.

N

National Environmental Policy Act of 1969 (NEPA)

An act declaring a national policy to encourage productive and enjoyable harmony between man and his environment, to promote efforts which will prevent or eliminate damage to the environment and the biosphere and stimulate the health and welfare of man, to enrich the understanding of the ecological systems and natural resources important to the Nation and to establish a Council on Environmental Quality.

National Forest Management Act (NFMA)

A law passed in 1976 that amends the Forest and Rangeland Renewable Resources Planning Act and requires the preparation of Forest Plans.

National Forest System (NFS) land

Federal lands that have been designated by Executive Order or statute as National Forests, National Grasslands, or Purchase Units, or other lands under the administration of the Forest Service.

National Forest System (NFS) road

A forest road other than a road which has been authorized by a legally documented right-of-way held by a state, county, or local public road authority (36 CFR 212.1). The term “National Forest System road” is synonymous with the term “forest development road” as used in 23 U.S.C. 205.

National Historic Preservation Act

The National Historic Preservation Act (NHPA), 54 U.S.C. § 300101 et seq., is the primary federal law governing the preservation of cultural and historic resources in the United States.

National Marine Fisheries Service

An office of the National Oceanic and Atmospheric Administration that is responsible for the stewardship of the nation's ocean resources and their habitat with authorities under the Marine Mammal Protection Act and the Endangered Species Act.

National Wild and Scenic River System

Rivers with outstanding scenic, recreational, geological, fish and wildlife, historic, cultural, or other similar values designated by Congress under the Wild and Scenic Rivers Act for preservation of their free-flowing condition.

Net sawlog volume

Trees suitable in size and quality for producing logs that can be processed into lumber.

No-Action Alternative

The most likely condition expected to exist in the future if current management direction were to continue unchanged. There are two distinct interpretations of "no action" depending on the nature of the proposal being evaluated. The first situation might involve an action such as updating a land management plan where ongoing programs initiated under existing legislation and regulations will continue, even as new plans are developed. In these cases "no action" is "no change" from current management direction or level of management intensity. To construct an alternative that is based on no management at all would be a useless academic exercise. Therefore, the "no action" alternative may be thought of in terms of continuing with the present course of action until that action is changed.

The second interpretation of "no action" is illustrated in instances involving federal decisions on proposals for projects. "No action" in such cases would mean the proposed activity would not take place, and the resulting environmental effects from taking no action would be compared with the effects of permitting the proposed activity or an alternative activity to go forward.

Non-development LUDs

Land use designations that do not permit commercial timber harvest.

Wilderness and Natural Setting LUDs make up the non-development LUDs. These LUDs are:

- Wilderness
- Wilderness National Monument
- Non-wilderness National Monument
- LUD II
- Remote Recreation
- Semi-Remote Recreation
- Municipal Watershed
- Old-Growth Habitat (except young-growth as allowed by Chapter 5 plan content)
- Research Natural Area
- Special Interest Area
- Wild River
- Scenic River
- Recreational River

Non-System road (Unauthorized Road)

A road or trail that is not a Forest road or trail or a temporary road or trail and that is not included in a Forest transportation atlas (36 CFR 212.1).

O

Old-growth forest

The (usually) late successional stage of forest development. Old-growth forests are defined in many ways; generally, structural characteristics used to describe old-growth forests include a) live trees: number and minimum size of both seral and climax dominants; b) canopy conditions: commonly including multi-layering; c) snags: minimum number and specific size; and d) logs and large (coarse) woody debris.

Old-growth habitat conservation strategy

An integrated science-based old-growth forest habitat conservation strategy developed and adopted during the 1997 Forest Plan Revision process. The old-growth strategy has two basic components: 1) a forest-wide reserve network that protects the integrity of the old-growth forest by retaining blocks of intact, largely undisturbed habitat; and 2) management of the matrix (that is, lands that are suitable for timber harvest). (See Appendix D of the 2016 Forest Plan Amendment EIS)

Old-growth reserve (OGR)

A contiguous unit of old-growth forest habitat to be managed to maintain the integrity of the old-growth forest ecosystem.

Overstory

The portion of trees in a forest that forms the uppermost canopy layer.

Overstory removal

The cutting of trees constituting an upper canopy layer to release trees or other vegetation in an understory.

P

Personal use (free use)

Bona fide settlers, miners, residents, and prospectors for minerals in Alaska may take free of charge green or dried timber from the National Forests in Alaska for personal use but not for sale. Permits will be required for green saw timber. Other material may be taken without permit. The amount of material granted to any one person in one year shall not exceed 10,000 board feet of saw timber and 25 cords of wood, or an equivalent volume in other forms. Persons obtaining materials shall, on demand, forward to the supervisor a statement of the quantity taken and the location from which it was removed (36 CFR 223.10).

Plan components

The parts of a land management plan that guide future project and activity decision-making. Specific plan components may apply to the entire plan area, to specific management areas or geographic areas, or to other areas as identified in the plan. Every plan must include the following plan components: desired conditions, objectives, standards, guidelines, and suitability of lands. A plan may also include goals as an optional component. Plan components can only be changed through plan amendment or revision.

Plan implementation

To carry out or fulfill Standards and Guidelines and other direction contained in the Land and Resource Management Plan (Forest Plan).

Plan of Operations

A Plan of Operations is required from anyone who proposed operations, under the 1872 Mining Law, would cause, “significant surface disturbance.” See 36 CFR 228, Subpart A.

Plan period

The period of time a Forest Plan is in effect, typically 10 years, but no longer than 15 years.

Planning area

All the lands addressed in a land management plan. For this document, it is the Tongass National Forest.

Planning cycle demand

As used in this document, the amount of timber that buyers are estimated to be willing to purchase over the next 10 to 15 years. Also see the definition for annual demand.

Planning horizon

The overall time period considered in the planning process that spans all activities covered in the analysis or plan, and all future conditions and effects of proposed actions that would influence the planning decisions more than 100 years.

Planning period

Generally a 10- to 15-year period. The time interval within the planning horizon that is used to show incremental changes to yields, costs, effects, and benefits.

Planning record

A system that records decisions and activities that result from the process of developing a forest plan, revision, or significant amendment.

Plant association

A plant community type based on land management potential, successional patterns, and species composition.

Plant communities

An assemblage of plants that, in general, occur together on similar site conditions.

Population viability

Probability that a population will persist for a specified period of time across its range despite normal fluctuations in population and environmental conditions.

Precommercial Thinning

See the definition for thinning.

Prescribed fire

A wildland fire burning under planned conditions to accomplish specific land and resource objectives. It may result from either a management or natural ignition.

Priority use

A Forest Service commitment to the holder of a permit for outfitting and guiding to give priority consideration to granting the holder a specific amount of available future use.

Authorization of use for up to 10-years, based on the holder's past use and performance and applicable programmatic or project decisions to allocate use. Except as provided in 36 CFR 251, Subpart E, authorizations providing for priority use are subject to renewal (FSH 2709.14, section 53.1m).

Productive old growth (POG)

Old-growth forest capable of producing at least 20 cubic feet of wood fiber per acre per year, or having greater than 8,000 board feet per acre.

Programmatic Environmental Impact Statement (PEIS)

The document disclosing the environmental consequences of a program or plan that guides or prescribes the use of resources, allocates resources, or establishes rules and policies in contrast to disclosure of the environmental consequences of a site-specific project.

Prohibitions (as proposed for Alaska Roadless Rule)

Activities that would not be allowed in different categories of ARAs.

Project

An organized effort to achieve an outcome on National Forest System lands identified by location, tasks, outputs, effects, times, and responsibilities for execution (36 CFR 219.19).

Projected Timber Sale Quantity (PTSQ)

A subset of the projected wood sale quantity and is an estimate of the quantity of timber expected to be sold during the plan period. The volume in the projected timber sale quantity is the volume that meets utilization standards (FSH 1909.12, Chapter 60, section 64.34). Except as provided in section 64.33 of FSH1909.12 (departure from sustained yield limit), the projected timber sale quantity must be equal to or below the sustained yield limit for each decade of the plan.

PTSQ must take into account the fiscal capability of the planning unit and be consistent with all plan components. Estimates of the projected timber sale quantity do not include any volumes anticipated from salvage or sanitation harvests.

Projected Wood Sale Quantity (PWSQ)

An estimate of the volume of all timber and other wood products that is expected to be sold during the plan period from expected harvests for any purpose (except salvage harvest or sanitation harvest) on all lands in the plan area. The projected wood sale quantity includes all woody material likely to be sold from these harvests whether or not the woody material meets the utilization standards (FSH 1909.12, Chapter 60, section 64.34).

PWSQ must take into account the fiscal capability of the planning unit and be consistent with all plan components. Estimates of the projected wood sale quantity do not include any volumes anticipated from salvage or sanitation harvests.

Q
R

Rare plants

Rare plants include plant species identified on the Alaska Natural Heritage Program (ANHP) Rare Vascular Plant Tracking List that are known to occur on the Tongass (ANHP, 2008), is considered globally rare (G1/T1, G2/T2) and/or rare in the State (S1, S2 and some S3 are considered); or is considered rare because of a range extension or disjunct populations on the Tongass but not yet given a state ranking on the ANHP list.

Recreation Opportunity Spectrum (ROS)

A system for planning and managing recreation resources that categorizes recreation opportunities into seven classes. Each class is defined in terms of the degree to which it satisfies certain recreation experience needs based on the extent to which the natural environment has been modified, the type of facilities provided, the degree of outdoor skills needed to enjoy the area and the relative density of recreation use. The seven classes are:

Primitive. An unmodified environment generally greater than 5,000 acres in size and located generally at least 3 miles from all roads and other motorized travel routes. A very low interaction between users (generally less than 3 group encounters per day) results in a very high probability of experiencing solitude, freedom, closeness to nature, tranquility, self-reliance, challenge, and risk. Evidence of other users is low. Restrictions and controls are not evident after entering the land unit. Motorized use is rare.

Semi-Primitive Non-Motorized. A natural or natural-appearing environment generally greater than 2,500 acres in size and generally located at least 0.5 mile (greater or less depending on terrain and vegetation, but no less than 0.25 mile) but not further than 3 miles from all roads and other motorized travel routes. Concentration of users is low (generally less than 10 group encounters per day), but there is often evidence of other users. There is a high probability of experiencing solitude, freedom, closeness of nature, tranquility, self-reliance, challenge, and risk. There is a minimum of subtle on-site controls. No roads are present in the area.

Semi-Primitive Motorized. A natural or natural-appearing environment generally greater than 2,500 acres in size and generally located within 0.5 mile of primitive roads and other motorized travel routes used by motor vehicles; but not closer than 0.5 mile (greater or less depending on terrain and vegetation, but no less than 0.25 mile) from better-than-primitive roads and other motored travel routes. Concentration of users is low (generally less than 10 group encounters per day), but there is often evidence of other users. There is a moderate probability of experiencing solitude, closeness to nature, and tranquility along with a high degree of self-reliance, challenge, and risk in using motorized equipment. Local roads may be present, or along saltwater shorelines there may be extensive boat traffic.

Roaded Natural. Resource modification and utilization are evident, in a predominantly naturally-appearing environment generally occurring within 0.5 mile (greater or less depending on terrain and vegetation, but no less than 0.25 mile) from better-than-primitive roads and other motorized travel routes. Interactions between users may be moderate to high (generally less than 20 group encounters per day), with evidence of other users prevalent. There is an opportunity to affiliate with other users in developed sites but with some chance for privacy. Self-reliance on outdoor skills is only of moderate importance with little opportunity for challenge and risk. Motorized use is allowed.

Roaded Modified. Vegetative and landform alterations typically dominate the landscape. There is little on-site control of users except for gated roads. There is moderate evidence of other users on roads (generally less than 20 group encounters per day), and little evidence of others or

interactions at campsites. There is opportunity to get away from others but with easy access. Some self-reliance is required in building campsites and use of motorized equipment. A feeling of independence and freedom exists with little challenge and risk. Recreation users will likely encounter timber management activities.

Rural. The natural environment is substantially modified by land use activities. Opportunity to observe and affiliate with other users is important as is convenience of facilities. There is little opportunity for challenge and risk and self-reliance on outdoor skills is of little importance. Recreation facilities designed for group use are compatible. Users may have more than 20 group encounters per day.

Urban. Urbanized environment with dominant structures, traffic lights and paved streets. May have natural appearing backdrop. Recreation places may be city parks and large resorts. Opportunity to observe and affiliate with other users is very important as is convenience of facilities and recreation opportunities. Interaction between large numbers of users is high. Outdoor skills, risk, and challenge are unimportant except for competitive sports. Intensive on-site controls are numerous.

Recreation places

Identified geographical areas having one or more physical characteristics that are particularly attractive to people engaging in recreation activities. They may be beaches, streamside or roadside areas, trail corridors, hunting areas of the immediate area surrounding a lake, cabin site, or campground.

Reforestation

The re-establishment of forest cover either naturally (natural seeding, coppice, or root suckers) or artificially (direct seeding or planting).

Research Natural Area (RNA)

An area in as near a natural condition as possible, which exemplifies typical or unique vegetation and associated biotic, soil, geologic, and aquatic features. The area is set aside to preserve a representative sample of an ecological community primarily for scientific and educational purposes; commercial and most public uses are not allowed.

Reserve Trees

Dead, dying, defective, or damaged trees left standing after harvest to provide wildlife habitat.

Resident fish

Fish that are not migratory and complete their entire life cycle in fresh water.

Resource values

The tangible and intangible worth of forest resources.

Responsible official

The Forest Service employee who has the delegated authority to make a specific decision.

Retention

The amount of commercial forest land removed from the timber base to protect other resource values.

Riparian area

Riparian areas encompass the zone of interaction between aquatic and terrestrial environments associated with streamsides, lakeshores, and floodplains, and display distinctive ecological conditions characterized by high species diversity, wildlife value, and resource productivity.

Riparian management area (RMA)

Land areas delineated in the Forest Plan to provide for the management of riparian resources. Specific standards and guidelines, by stream process group, are associated with riparian management areas. Riparian management areas standards and guidelines may be modified by watershed analysis.

Portions of a watershed where riparian-dependent resources receive primary emphasis, and for which plans include plan components to maintain or restore riparian functions and ecological functions (36 CFR 219.19).

Road

A motor vehicle route over 50 inches wide, unless identified and managed as a trail (36 CFR 212.1).

Road construction or reconstruction

Supervising, inspecting, actual building of the subgrade, base course or surfacing coarse of a roadway, and incurrence of all costs incidental to the construction or reconstruction of a road (36 CFR 212.1).

Road decommissioning

Activities that result in the restoration of unneeded roads to a more natural state (FSM 7734).

Road density

The number of road miles per square mile of land area.

Roaded roadless

Portions of inventoried roadless areas (IRAs) that were roaded before the 2001 Roadless Rule or during the 2001 Roadless Rule exemption period for the Tongass. Includes areas that have been substantially altered due to road construction and/or timber harvest.

Roadless area

See Inventoried roadless area (IRA) definition. Within this document, roadless areas may also be used to describe areas proposed to be designated as Alaska Roadless Areas.

Recreation Opportunity Spectrum (ROS)

The ROS system portrays the combination of activities, settings, and experience expectations along a continuum that ranges from highly modified to primitive environments. See Appendix I to the 2016 Forest Plan (USDA Forest Service 2016a).

Rotation

In even-age systems, the period between regeneration establishment and final cutting.

S

Sacred sites

Executive Order 13007 defines a sacred site as “any specific, discrete, narrowly delineated location on federal land that is identified by an Indian tribe or Indian individual determined to be an appropriately authoritative representative of an Indian religion, as sacred by virtue of its established religious significance to, or ceremonial use by, an Indian religion; provided that the tribe or appropriately authoritative representative of an Indian religion has informed the agency of the existence of such a site.”

Salmonid

Any fish belonging to the family *Salmonidae*, which includes salmon and trout.

Salvage cutting/sales

The removal of dead trees or trees damaged or dying because of injurious agents other than competition to recover economic value that would otherwise be lost.

Sawlogs (Sawtimber)

The portion of a tree that is suitable in size and quality for the production of dimension lumber, collectively known as sawtimber.

Scenic Integrity Objective (SIO)

A desired level of scenic quality and diversity of natural features based on physical and sociological characteristics of an area. Refers to the degree of acceptable alterations of the characteristic landscape. The adopted SIO is the SIO to be achieved as a result of management direction identified in the approved Forest Plan. SIOs are described below:

Very High: Landscapes where the landscape character is intact with only minute, if any, deviations. The existing landscape character and sense of place is expressed at the highest possible level.

High: Landscapes where the landscape character "appears" intact. Deviations may be present but must repeat the form, line, color, texture, and pattern common to the landscape character so completely and at such scale that they are not evident.

Moderate: Landscapes where the landscape character "appears slightly altered." Noticeable deviations must remain visually subordinate to the landscape being viewed.

Low: Landscapes where the landscape character "appears moderately altered." Deviations begin to dominate the landscape character being viewed but borrow valued attributes such as size, shape, edge effect, and pattern of natural openings, vegetative type changes, or architectural styles outside the landscape being viewed. They should not only appear as valued character outside the landscape being viewed but compatible or complimentary to the character within.

Very Low: Landscapes where the landscape character "appears heavily altered." Deviations may strongly dominate the landscape character. They may not borrow from attributes such as size, shape, edge effect, and pattern of natural openings, vegetative type changes, or architectural styles within or outside the landscape being viewed. However, deviations must be shaped and blended with the natural terrain so that elements such as unnatural edges, roads, landings, and structures do not dominate the composition.

Unacceptably Low: Landscapes where the valued landscape character being viewed appears extremely altered. Deviations are extremely dominant and borrow little if any form, line, color, texture, pattern or scale from the landscape character. Landscapes at this level of integrity need rehabilitation.

Scoping

The issues for consideration in the planning phase are identified in the NEPA document through public and governmental participation opportunities provided in the early stages of the planning process. Governments, agencies, and the public may submit any additional or new scientific information for consideration in the planning process, and the Responsible Official shall determine whether any such information is the best available scientific information.

Second-growth forest

Trees that cover an area after the removal of the original stand, as by cutting or fire. (American Heritage Dictionary of the English Language, Fifth Edition 2011).

Also referred to as young-growth forest and used interchangeably in places within the 1997 Forest Plan revision, as amended.

Secondary succession

The process of re-establishing vegetation after normal succession is disrupted by fire, cultivation, lumbering, windthrow, or any similar disturbance.

Sediment

Solid material, both mineral and organic, that is in suspension, is being transported, or has been moved from its site of origin by air, water, gravity, or ice and has come to rest on the earth's surface either above or below sea level.

Sensitive species

Plant or animal species that are susceptible or vulnerable to habitat alterations or management activities resulting in a viability concern for the species long-term persistence. Sensitive species may be those species under consideration for official listing as endangered or threatened species, are on an official state list, or are recognized by the Regional Forester as needing special consideration to ensure viable populations and to prevent their being placed on federal or state lists.

Sensitive travel route

A road system or marine water way that receives a moderate to high degree of use by the public, both Alaskan residents and tourists.

Silvicultural system

A planned series of treatments for tending, harvesting, and re-establishing a stand. Note: The individual system name is based on the number of age classes (even-aged, two-aged, uneven-aged) or the regeneration method (clearcutting, seed tree, shelterwood, selection) used.

Small sale

Timber sales that are generally less than 10 million board feet (MMBF).

Smolt

A young silvery-colored salmon or trout that has undergone physiological changes to move from freshwater environment to saltwater.

Snag

A dead standing tree usually greater than 5 feet tall and 6 inches in diameter at breast height. The interior of the snag may be sound or rotted.

Soil productivity

The capacity of a soil, in its normal environment, to produce a specific plant or sequence of plants under a specific system of management.

Special Interest Areas (SIA)

A designation for areas possessing unique or unusual scenic, historic, prehistoric, geodesic scientific or other characteristics.

Special use authorization

A written permit, term permit, lease, or easement that authorizes use or occupancy of National Forest System lands and specifies the terms and conditions under which the use or occupancy may occur. (36 CFR 251.51)

Stand

A contiguous group of trees sufficiently uniform in composition, age class distribution, and growing on a site of sufficiently uniform quality, to be a distinguishable unit.

Standard

A mandatory constraint on project and activity decision-making, established to help achieve or maintain the desired condition or conditions, to avoid or mitigate undesirable effects, or to meet applicable legal requirements. (36 CFR 219.12)

Size Density Model (SDM)

A forest-mapping model based on average tree size (quadratic mean diameter) and average tree density (stand density index), used to describe stand structural characteristics. SDM uses timber volume class, hydric soil class, and aspect to characterize forest structure.

State Historic Preservation Officer (SHPO)

The official appointed or designated pursuant to Section 101(b)(1) of the National Historic Preservation Act of 1966, as amended, to administer the State Historic Preservation Program.

Stream bed

The substrate plane bounded by the stream banks, over which the water column moves. Also called the stream bottom.

Stream bank

The portion of the channel cross section that restricts lateral movement of water at normal water levels. The bank often has a gradient steeper than 45 degrees and exhibits a distinct break in slope from the stream bottom. An obvious change in substrate may be a reliable delineation of the bank.

Stream class

A means to categorize stream channels based on their fish production values. There are four stream classes on the Tongass National Forest *(FSH 2090.21 (2001) Chapter 10, Section 12)*.

Structure

A term in ecology referring to the arrangement of plant communities or ecosystems across a landscape and how they are connected, and to variations in tree heights and diameters within a stand or between stands.

Subsistence

Section 803 of the Alaska National Interest Lands Conservation Act defines subsistence use as, “the customary and traditional uses by rural Alaska residents of wild renewable resources for direct, personal or family consumption as food, shelter, fuel, clothing, tools, or transportation; for the making and selling of handicraft articles out of nonedible byproducts of fish and wildlife resources taken for personal or family consumption; for barter, or sharing for personal or family consumption; and for customary trade.”

Subspecies

An aggregate of similar populations of a species generally inhabiting a geographic subdivision of the range of the species and differing taxonomically (e.g., different size or color) from other populations of the species.

Substantially altered areas

In this document, this includes areas where road construction and/or timber harvest have occurred (see roaded roadless.)

Suitability of Lands

A determination that specific lands within a plan area may be used, or not, for various multiple uses or activities, based on the desired conditions applicable to those lands. The suitability of lands determinations need not be made for every use or activity, but every plan must identify those lands that are not suitable for timber production (FSH 1909.12 chapter 20, section 22.15). (See FSH 1909.12 chapter 60 for timber production suitability.)

Suitable Timber Lands

Forested lands that have been determined to be suitable for timber production. See 2016 Forest Plan Appendix A.

Sustained yield

The yield that a forest can continuously produce at a given intensity of management.

T

Taxa

For the purposes of this Plan and FEIS, taxa are animal species or sub-species.

Temporary roads

Roads authorized by contract, permit, lease, or emergency operation, not intended to be part of the forest transportation system and not necessary for long-term resource management.

The Nature Conservancy/Audubon conservation priority watersheds

Watersheds identified by The Nature Conservancy and Audubon Alaska that include high-value intact watersheds in primarily intact conditions and generally encompass the highest current ecological values within each province.

Thinning

A silvicultural treatment made to reduce stand density of trees primarily to improve growth, enhance forest health, or recover potential mortality. Thinning may also be done to manipulate stand characteristics to improve wildlife or riparian habitat, or to enhance scenery. Types of thinning include:

Precommercial (PCT). The removal of trees not for immediate financial return but to reduce stocking to concentrate growth on the more desirable trees.

Commercial (CT). Any type of thinning producing merchantable material at least equal to the value of the direct costs of harvesting.

Threatened species

A plant or animal species likely to become an endangered species within the foreseeable future throughout all or a significant portion of its range. Threatened species are identified and defined in accordance with the 1973 Endangered Species Act and published in the Federal Register.

Any species that the Secretary of the Interior or the Secretary of Commerce has determined is likely to become an endangered species within the foreseeable future throughout all or a significant portion of its range. Threatened species are listed at 50 CFR sections 17.11, 17.12, and 223.102.

Tiering

Elimination of repetitive discussions of the same issue by incorporating, by reference, the general discussion in an environmental impact statement (EIS) of broader scope. For example, a project environmental assessment could be tiered to the Forest Plan EIS.

Timber

Wood, other than fuelwood, potentially useable for lumber.

Timber classification

Forested land is classified under each of the land management alternatives according to how it relates to the management of the timber resource. The following are definitions of timber classifications used for this purpose:

Non-Forest. Land that has never supported forests, and land formerly forested where use for timber production is precluded by development or other uses.

Forest. Land at least 10 percent stocked (based on crown cover) by forest trees of any size, or formerly having had such tree cover and not currently developed for non-forest use.

Suitable. Land to be managed for timber production on a regulated basis.

Unsuitable. Land withdrawn from timber utilization by statute or administrative regulation (e.g., Wilderness), or identified as inappropriate for timber production in the Forest planning process.

Commercial Forest. Land tentatively suitable for the production of continuous crops of timber and that has not been withdrawn.

Timber harvest (as proposed for Alaska Roadless Rule)

The cutting and removal, and/or sale of trees.

Timber Land Suitability

See *suitability of lands*.

Timber production

The purposeful growing, tending, harvesting, and regeneration of regulated crops of trees to be cut into logs, bolts, or other round sections for industrial or consumer use. (36 CFR 219.19)

Timber production suitability (lands suited and not suited for timber production)

A forest plan must identify the lands that are suited and not suited for timber production. (FSH 1909.12, chapter 60).

Timber stand

A contiguous group of trees sufficiently uniform in age class distribution, composition, and structure, and growing on a site of sufficiently uniform quality, to be a distinguishable unit, such as mixed, pure, even-aged, and uneven-aged stands.

Tongass 77 (T77)

The Tongass 77 (T77) refers to value comparison units (VCUs), which approximate major watersheds located on National Forest System lands that Trout Unlimited, Alaska Program identified as priority salmon watersheds.

T77 Watersheds and The Nature Conservancy (TNC)/Audubon Conservation Priority Areas

Through involvement of private and public groups and agencies, a number of watersheds and Value Comparison Units (VCUs) in the Tongass were previously evaluated for relative importance for several metrics relating to fish and wildlife. Included among these are conservation priority areas identified by the The Nature Conservancy (TNC) and Audubon Alaska (Audubon Alaska and The Nature Conservancy 2007), and the “Tongass 77” (T77) watersheds identified by Trout Unlimited. The Tongass 77 (T77) refers to value comparison units (VCUs), which approximate major watersheds located on the Tongass National Forest that Trout Unlimited, Alaska Program identified as priority salmon watersheds within the 2016 Tongass National Forest Land and Resource Management Plan (USDA Forest Service 2016a).

Tongass Resource Use Cooperative Survey (TRUCS)

A study done to gather information on subsistence uses of the Forest.

Topography

The configuration of a land surface including its relief, elevation, and the position of its natural and human-made features.

Traditional Cultural Property (TCP)

A traditional cultural property is generally one that is eligible for inclusion in the National Register because of its association with cultural practices or beliefs of a living community that (a) are rooted in that community's history, and (b) are important in maintaining the continuing cultural identity of the community. Examples include a rural community whose organization, buildings and structures, or patterns of land use reflect the cultural traditions valued by its long-term residents; or a location where Native American religious practitioners have historically gone, and are known or thought to go today, to perform ceremonial activities in accordance with traditional cultural rules of practice.

Transmission line (electric)

An interconnected group of lines and associated equipment for the movement or transfer of electric energy between points of supply and points at which it is transformed for delivery to customers or is delivered to other electric systems.

Transportation Systems Corridors (TSC)

Existing and future transportation systems such as those identified by the State of Alaska in the current version of the Southeast Alaska Transportation Plan (SATP) and applicable laws (for example, Section 4407 of Public Law 109-59, Title XI of the Alaska National Interest Lands Conservation Act (Public Law 96-487).

Transportation/Utility corridor

A linear strip of land identified for the present location of transportation or utility rights-of-way within its boundaries.

Travel Management Plan

The plan for the system of access roads, trails, and airfields needed for the protection, administration, and utilization of the National Forests and other lands administered by the Forest Service, or the development and use of resources upon which communities within or adjacent to the National Forests are dependent (36 CFR 212.1). The plan also addresses permanent or temporary road closures necessary for resource protection or public safety.

Turbidity

An expression of the optical property that causes light to be scattered and absorbed rather than transmitted in straight lines through a water sample; turbidity in water is caused by the presence of suspended matter such as clay, silt, finely divided organic and inorganic matter, plankton, and other microscopic organisms.

Two-aged management

A regeneration method that regenerates and maintains a stand with two-age classes where the reserved trees are distributed somewhat evenly as individual or clumps and represent 15 percent or more of the stand's pre-treatment basal area. The resulting stand may be two-aged or trend towards an uneven-aged condition as a consequence of both an extended period of regeneration establishment and the retention of reserved trees that may represent one or more age classes. Two-aged stands are created using these regeneration methods:

1. Clearcutting with reserves
2. Seed tree with reserves
3. Shelterwood with reserves.

The reserved trees are not harvested to attain goals other than regeneration.

U

Understory vegetation

All forest vegetation growing under an overstory.

Undertaking

"A project, activity, or program funded in whole or in part under the direct or indirect jurisdiction of a Federal agency, including those carried out by or on behalf of a Federal agency; those carried out with Federal financial assistance; and those requiring a Federal permit, license or approval" (36 CFR 800.16(y)).

Uneven-aged management

A planned sequence of treatments designed to maintain and regenerate a stand with three or more age classes.

Unproductive forest land

Forest land incapable of yielding crops of industrial wood because of adverse site conditions.

Unsuitable lands

Forest land not managed for timber production because: 1) Congress, the Secretary, or the Chief has withdrawn it; 2) it is not producing or capable of producing industrial wood; 3) technology is not available to prevent irreversible damage to soils productivity or watershed conditions; 4) there is no reasonable assurance, based on existing technology and knowledge, that it is possible to restock lands within 5 years after final harvest; 5) there is, at present, a lack of adequate information about responses to timber

management activities; or 6) timber management is inconsistent with or not cost efficient in meeting the management requirements and multiple-use objectives specified in the Forest Plan.

Upland

Areas that do not classify as wetlands or riparian areas.

Utility system

A system that provides a community or communities with services such as municipal water or wastewater, natural gas, telephone, and electricity. This applies whenever the project or proposal is developed to supply services for public use or consumption

V

Value Comparison Unit (VCU)

First developed for the 1979 Tongass Land Management Plan as distinct geographic areas that generally encompass a drainage basin containing one or more large stream systems. Boundaries usually follow easily recognizable watershed divides. There are 926 units established to provide a common set of areas for which resource inventories could be conducted and resource value interpretations made.

Viable population

For forest planning purposes, a fish or wildlife population that has the estimated number and distribution of reproductive individuals to insure its continued existence is well distributed in the National Forest.

A population of a species that continues to persist over the long term with sufficient distribution to be resilient and adaptable to stressors and likely future environments. (36 CFR 219.19)

Viewshed

An expansive landscape or panoramic vista seen from a road, marine waterway, or specific viewpoint.

The area that is potentially seen from a specific viewing point using a planimetric approach.

W

Watershed

A region or land area drained by a single stream, river, or drainage network; a drainage basin (36 CFR 219.19). Typically, watersheds are delineated as hierarchical Hydrologic Units in the national Watershed Boundary Dataset, cooperatively managed by state and federal agencies. In the context of the Forest Plan, watersheds may correspond to VCU or LUD boundaries which may or may not correspond to the boundaries delineated in the Watershed Boundary Dataset.

Wetlands

Areas that are inundated or saturated by surface or groundwater at a frequency and duration sufficient to support, and that under normal circumstances do support, a prevalence of vegetation typically adapted to life in saturated soil conditions. Wetlands generally include swamps, marshes, bogs, and similar areas.

Wild and Scenic Rivers

A river designated by Congress as part of the National Wild and Scenic Rivers System that was established in the Wild and Scenic Rivers Act of 1968 (16 U.S.C. 1271 (note), 1271–1287) (36 CFR 219.19).

Wilderness

Areas designated by congressional action under the 1964 Wilderness Act or subsequent Acts. Wilderness is defined as undeveloped federal land retaining its primeval character and influence without permanent improvements or human habitation. Wilderness areas are protected and managed to preserve their natural conditions, which generally appear to have been affected primarily by the forces of nature, with the imprint of human activity substantially unnoticeable; have outstanding opportunities for solitude or for a primitive and confined type of recreation; include at least 5,000 acres or are of sufficient size to make practical their preservation, enjoyment, and use in an unimpaired condition; and may contain features of scientific, educational, scenic, or historic value as well as ecologic and geologic interest. On the Tongass National Forest, Wilderness has been designated by the Alaska National Interest Lands Conservation Act of 1980 and Tongass Timber Reform Act of 1990.

Wildlife Analysis Area

A division of land used by the Alaska Department of Fish and Game for wildlife analysis (WAA).

Windthrow

The act of trees being uprooted by the wind. In Southeast Alaska, Sitka spruce and hemlock trees are shallow rooted and susceptible to windthrow. There are generally three types of windthrow—endemic where individual trees are blown over; catastrophic where a major windstorm can destroy hundreds of acres; and management related, where the clearing of trees in an area make the adjacent standing trees vulnerable to windthrow.

Withdrawal

The withholding of an area of federal land from settlement, sale, location, or entry under some or all of the general land laws for the purpose of limiting activities under those laws in order to maintain other public values in the area.

Y

Yarding

To convey logs or trees to a landing by cable, helicopter or other systems. Shovel- yarding is also used in Southeast Alaska.

Young growth

Forest growth that has regenerated naturally or has been planted after some disturbance (e.g., clearcut harvest, serious fire, catastrophic windthrow, or insect attack) to the previous forest growth.

The term young growth is synonymous with second growth.

Young-growth forest

A relatively young forest that has been regenerated naturally or artificially after some drastic interference such as extensive cutting, wildfire, insect or disease attack, or blowdown (Helms 1998). On the Tongass a forest younger than 150 years is considered young-growth forest.

Z

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CHAPTER 8
INDEX

Index

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APPENDIX A
STATE OF ALASKA'S PETITION FOR RULEMAKING

Appendix A
State of Alaska's Petition for Rulemaking

Note: The full petition, including exhibits, can be found here:
https://www.fs.usda.gov/project/?project=54511

THE STATE of ALASKA
GOVERNOR BILL WALKER

Department of Natural Resources
COMMISSIONER'S OFFICE
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Main: 907.269.8431
Fax: 907.269.8918

January 19, 2018

U.S. Department of Agriculture
Attention Sonny Perdue, Secretary of Agriculture
1400 Independence Avenue, S.W.
Washington, DC 20250

Dear Secretary Perdue,

Enclosed you will find a request from the State of Alaska to consider a petition for rulemaking on the applicability of the 2001 Roadless Rule to the Tongass National Forest in Alaska. The history of the exemption and the ensuing legal challenges are covered in detail in our petition and exhibits. The State also lays out clear and sound rationale for why an exemption should be addressed through the rulemaking process.

The State appreciates your interest in this topic. We see this as one of many significant opportunities to work with you to support a diverse and robust forest products sector in Southeast Alaska. Rebuilding this sector will create jobs and prosperity for our rural communities located in the Tongass National Forest.

The State looks forward to participating in the process and is available to answer questions you or your staff may have on this subject.

Sincerely,

Andrew Mack

Andrew T. Mack
Commissioner

cc:
Bill Walker, Governor of Alaska
U.S. Senator Lisa Murkowski, Chairman, Senate Energy & Natural Resources Committee
U.S. Senator Daniel S. Sullivan
U.S. Representative Don Young
Tony Tooke, Chief USFS
Cathy Giessel, State Senator and Chair Senate Resources Committee
Geran Tarr, State Representative and Co-chair House Resources Committee
Andy Josephson, State Representative and Co-chair House Resources Committee

Appendix A

Before the Department of Agriculture
Washington, DC 20250

To: George Ervin "Sonny" Perdue, Secretary of Agriculture

From: The State of Alaska, Department of Natural Resources

Re: The Department of Agriculture Roadless Area Conservation Rule and
The 2016 Tongass National Forest Land and Resource Management Plan

Date: January 19, 2018

STATE OF ALASKA
PETITION FOR USDA RULEMAKING TO EXEMPT THE TONGASS NATIONAL FOREST FROM APPLICATION OF THE ROADLESS RULE AND OTHER ACTIONS

I. SUMMARY

In a 2003 Record of Decision (ROD) Ex. 1, the USDA promulgated a regulation (Tongass Exemption) exempting the Tongass National Forest (Tongass) from the Roadless Area Conservation Rule (Roadless Rule). In this ROD, the USDA provided in-depth analysis of the requirements and limitations of the Tongass Timber Reform Act (TTRA) and the Alaska National Interest Lands Conservation Act (ANILCA) if the Roadless Rule were applied to the Tongass. After this statutory analysis, the USDA concluded that the best way to implement the spirit and the letter of these laws was to exempt the Tongass from the Roadless Rule.

The USDA also concluded that exempting the Tongass was consistent not only with the intent of Congress, but also with sound management of the Tongass because roadless areas in the Tongass are adequately protected without adding the additional restrictions in the Roadless Rule. USDA stated that roadless areas are common, not rare in the Tongass and the vast majority of the 9.34 million acres of roadless areas have restrictions on road building and timber harvest irrespective of the Roadless Rule. Even without the Roadless Rule, only about four percent of the Tongass is designated as suitable for timber harvest. *See* ROD, Ex. 1.

In its decision to exempt the Tongass, USDA weighed the value of imposing these unnecessary additional restrictions against the very significant social and economic costs to Southeast Alaska that were discussed in depth in the 2001 Roadless Rule decisional documents. When USDA reconsidered the same facts in this second rulemaking that it had considered in 2001, the USDA this time concluded that the needs of the people of

Alaska outweighed adding more restrictions when roadless areas in the Tongass are adequately protected without the Roadless Rule.

After environmental interest groups challenged the Tongass Exemption in 2009, the USDA aggressively defended the rule in its 2010 opening brief in the Federal District Court for the District of Alaska. *See* USDA Brief Ex. 2. USDA argued that "the Tongass Exemption was a well-reasoned decision, supported by the evidence" and that after reweighing the same economic, social and environmental factors considered in the 2001 ROD, USDA concluded that "the roadless values on the Tongass could be protected and social and economic impacts minimized by exempting the Tongass from the Roadless Rule. USDA Brief at 1-4.

The District Court nevertheless invalidated the Tongass Exemption, but upon appeal, a three-judge panel of the Ninth Circuit Court of Appeals reversed and upheld the Exemption. However, in a 6-5 *en banc* decision, the Ninth Circuit struck down the Tongass Exemption on a procedural ruling, holding that the USDA failed to adequately explain its change of position from the 2001 Roadless Rule to the 2003 Tongass Exemption. *See En Banc* Opinion, Ex.3. The Court did not find any substantive legal infirmities with the Tongass Exemption, that is, the Court did not hold that the USDA analysis or rationale could not support exempting the Tongass, or that the USDA reached the wrong decision, but only that USDA failed to provide an adequate explanation of its change of position from 2001. No judge questioned the fact that the USDA had a right to change position on exempting the Tongass, if the change was adequately explained. *Id.*

The rationale USDA provided for exempting the Tongass in the 2003 ROD and again in the 2010 USDA Brief remains valid today. The extensive damage resulting from the application of the Roadless Rule to the economic and social fabric of Southeast Alaska remains as real today as it was 15 years ago, while the Tongass roadless values remain more than adequately protected without the Roadless Rule. Therefore, for the reasons more fully explained below, the State of Alaska (State) respectfully requests that the Secretary of Agriculture grant this petition and direct the USDA and USFS to immediately undertake a rulemaking to consider once again exempting the Tongass from the Roadless Rule.

In addition, the State requests that the Secretary also direct the USFS to undertake a revision to the 2016 Tongass Land & Resource Management Plan (TLMP). In a recent amendment to the TLMP, the USFS implemented the Roadless Rule by including many of the most restrictive provisions and prohibitions of the Roadless Rule into the fabric of the TLMP. As a result, even if the Tongass is once again exempted from the Roadless Rule, these Roadless provisions would remain in the TLMP and be independently applicable unless also removed from the TLMP. A Forest Plan amendment or revision under the 2012 USFS planning rules is the mechanism for the Executive Branch to

remove these provisions. The State also requests that the provisions inserted into the TLMP in 2016 requiring a rapid transition from old growth to young growth timber harvest also be revised.

II. HISTORY OF THE TONGASS EXEMPTION

Controversy over federal management of the Tongass goes back many decades. The most relevant history regarding whether to exempt the Tongass from the Roadless Rule begins at the turn of the 21st Century in the waning days of the Clinton Administration. Entire books have been written on the high-profile policy and legal battles over the Tongass spanning many decades, and the basic facts have been set forth in many legal briefs and judicial decisions. *See e.g.* USDA Brief Ex.2 at 1-5; State Brief in the Federal District Court for the District of Columbia (State Roadless Rule Brief), Ex. 4 at 1-3; and *State of Alaska v. USDA,* case 11-1122 RLJ, Opinion filed 9/20/17, Ex. 5 at 7-15. Therefore, only a very brief summary is presented here in addition to the more comprehensive discussions in the attached exhibits.

Beginning with an interim rule in 1999, as the USDA developed the Roadless Rule, the administration's preferred approach was to exempt the Tongass or to limit its application. USDA Brief, Ex. 2 at 1-2. It was not until the final decision in the 2001 ROD, at the very conclusion of the rulemaking process, that USDA unexpectedly fully and immediately applied the Roadless Rule to the Tongass. *Id.*

During the rulemaking process, USDA recognized that the Tongass would be so uniquely and severely impacted by the Roadless Rule that what was effectively a separate rulemaking within a rulemaking was conducted for the Tongass. USDA recognized that the Roadless Rule would severely interfere with seeking to meet timber demand as required by Tongass Timber Reform Act, that the social and economic impact on Southeast Alaska would be severe, and that adequate protections were in place to protect the environmental values of the Tongass without the Roadless Rule. *Id.* at 2-5. These were the rationale stated throughout the process for choosing limited, if any, application to the Tongass as the USDA preferred alternative; at least until the surprise ending when in the final ROD the Roadless Rule was made immediately fully applicable to the Tongass. *Id.* For example, the USDA preferred alternative in the draft environmental impact statement was "Tongass exempt". *Id.*

Many lawsuits immediately followed promulgation of the Roadless Rule, including one by the State of Alaska challenging its application to Alaska national forests. In 2003, a temporary rule exempting the Tongass (Tongass Exemption) was promulgated to satisfy a settlement of Roadless Rule litigation between USDA and the State of Alaska. It is this temporary rule that was invalidated by the Federal District Court in Alaska in 2011. The rulemaking to promulgate permanent exemptions for both

national forests in Alaska – also a term of the settlement agreement – was never commenced after the 2005 State Petitions Rule replaced and effectively (at least temporarily) repealed the Roadless Rule nationwide. *Id.*

However, a federal court in California invalidated the State Petitions rule in 2006 and reinstated the Roadless Rule nationwide even though it had been invalidated by a federal court in Wyoming and was enjoined nationwide. The reinstatement of the Roadless Rule was, however, explicitly made subject to the Tongass Exemption rule, and therefore the Tongass remained exempt until the District Court in Alaska invalidated it in 2011. *Id.*

The Tongass Exemption rule then remained in litigation until the United States Supreme Court on March 29, 2016 declined the State's Petition for Certiorari for review of the Ninth Circuit *en banc* decision invalidating the Tongass Exemption rule due to the argued inadequate explanation of USDA's change in policy.

Following the loss of the Tongass Exemption, the State and many supporting intervenors continue to appeal the Roadless Rule and the Roadless Rulemaking decision to apply the rule to the two national forests in Alaska in the United States Court of Appeals for the District of Columbia Circuit. If the Court rules in the favor of the State, three different remedies are possible depending upon which claim(s) the case is decided; the Roadless Rule could be invalidated nationwide, it could be invalidated as applied to Alaska or it could be invalidated solely as applied to the Tongass.

III. CONTINUING RATIONALE FOR EXEMPTING THE TONGASS

A. Good Policy

Rationales for exempting the Tongass from the Roadless Rule in a new USDA rulemaking are not entirely equivalent to Alaska's legal claims and arguments challenging the Roadless Rule in federal court. The most important difference is that USDA can enact or change policy via a rulemaking whether such action is legally mandated or just good policy as determined by the agency. The *en banc* decision of the Ninth Circuit striking down the Tongass Exemption did not in any way cast doubt on USDA's authority to set policy on the Roadless or on the Tongass other than to clarify the extent to which the agency must explain its rationale in the record of decision. *See En Banc* Opinion Ex. 3.

Therefore, the first and most compelling reason that USDA should grant this petition to undertake a rulemaking to restore an exemption for the Tongass is that it remains good policy. The 2010 USDA brief (Ex. 2) supporting the policy decision to exempt the Tongass remains as persuasive today as it was then. No federal court has

opined that there was any issue with the policy choice to exempt the Tongass, but instead ruled only on the procedural flaw of not including a sufficient explanation for the change in policy from the 2001 ROD. The State is therefore requesting that USDA now correct this procedural problem through a new rulemaking and in effect reinstate the Tongass Exemption based on the same sound policy decision it made in 2003. All of the rationales that USDA offered for exempting the Tongass in the 2003 ROD remain valid today. ROD Ex. 1.

B. Compliance with Federal Law

In 2003, USDA offered rationales for exempting the Tongass as policy decisions that the State contends are legal requirements that mandate a Tongass or Alaska exemption. In particular, this includes compliance with ANILCA and the TTRA.

USDA devoted a considerable portion of the 2003 ROD to discussion of these two statutes and ultimately stated that the Tongass Exemption Rule

> "reflects the Department's assessment of how to best implement the letter and spirit of congressional direction along with public values, in light of the abundance of roadless values on the Tongass, the protection of the roadless values already included in the Tongass Forest Plan, and the socioeconomic costs to the local communities of applying the roadless rule's prohibitions." Ex. 1 at 75142.

USDA further stated that ANILCA and the TTRA "provide important congressional determinations, findings, and information relating to management of National Forest System lands on the Tongass." *Id.*

More specifically, USDA explained that in ANILCA Congress set aside another 5.5 million acres of the Tongass wilderness and found that this additional wilderness set aside represents "a proper balance between the reservation of national conservation system units and those public lands necessary and appropriate for more intensive use and disposition" and that no additional conservation areas will be needed in the future on the Tongass. *Id.* Congress attempted to prevent the Executive Branch from circumventing this directive by prohibiting "future executive branch action which withdraws more than five thousand acres, in the aggregate, of public lands within the State of Alaska" without the approval of Congress. 16 U.S.C. §3213(a).

There is a fine line between the USDA's statement in the 2003 ROD that the Tongass Exemption implements "the letter and spirit of congressional direction" and the State's legal argument in the current litigation that by failing to exempt the Tongass from the Roadless Rule USDA has violated ANILCA by withdrawing millions of acres from

more intensive use without the consent of Congress. State Roadless Rule Brief, Ex.4 at 43-44. USDA may view exempting the Tongass as policy to implement the letter and the spirit of congressional direction in ANILCA or as a legal mandate to comply with ANILCA. Either way, complying with congressional intent as set forth in ANILCA is a powerful rationale for a new rulemaking to restore the Tongass Exemption.

The TTRA presents a similar rationale for a new rulemaking. In 1990, Congress amended ANILCA with the TTRA, which included a directive to the USDA Secretary to "seek to provide a supply of timber from the Tongass National Forest, which (1) meets the annual market demand for timber and (2) meets the market demand for timber for each planning cycle" consistent with multiple use and sustained yield management and the requirements of the National Forest Management Act. ROD, Ex.1 at 75142. USDA analyzed the demand numbers for the Tongass timber and the effect of the road construction and timber harvest prohibitions of the Roadless Rule and concluded that "the roadless prohibitions operate as an unnecessary and complicating factor limiting where timber harvesting may occur." *Id.* at 75141.

The State fully concurs with the USDA policy decision that further timber harvest restrictions were not necessary and complicated compliance with the TTRA directive to seek to meet timber demand. However, as with ANILCA, the State continues to argue in federal court that the timber harvest and road construction restrictions of the Roadless Rule limit the ability of the Tongass Forest Supervisor to plan and execute timber sales to the extent that it is impossible to even seek to meet timber demand. Intentionally tying your own agency's hands with such unnecessary restrictions that ensure failure to meet timber demands is a violation of the TTRA provisions to seek to meet demand. The State's full argument why the TTRA legally mandates a Tongass Exemption from the Roadless Rule is presented in the State Roadless Rule Brief, Ex. 4 at 38-43.

As with ANILCA, in 2003 USDA viewed an exemption as policy to implement the letter and the spirit of TTRA while the State determined that TTRA legally mandates an exemption. But again, implementing the directive of Congress is a powerful rationale for a new rulemaking under either analysis.

C. Compelling Case for Exemption Rulemaking

Addressing the serious socioeconomic consequences to Alaskans and complying with ANILCA and TTRA are all compelling rationale for a Tongass Exemption today, as they were in 2003. Other rationales offered by USDA in the 2003 ROD and supported by counsel in the 2010 USDA brief also remain valid today. As noted above, the Ninth Circuit did not invalidate the Tongass Exemption due to flawed rationales, but rather only because of an inadequate explanation for the change in policy. The State respectfully

submits this petition for a rulemaking to exempt the Tongass from the Roadless Rule in the interest of the socioeconomic well-being of its residents.

IV. CONTENT OF REQUESTED RULE

The Tongass Exemption Rule that was invalidated by the Ninth Circuit was a single sentence under 36 CFR § 294.14. The invalidated language in CFR § 294.14 can be replaced by new similar language as simple as: "This subpart does not apply to the Tongass National Forest."

V. OTHER REQUESTED ACTION

In 2016, the USFS completed an extensive amendment process to the TLMP. Among the changes that were made to the TLMP, significant changes included the implementation of the Roadless Rule and the implementation of the Transition Strategy intended to rapidly shift timber harvest in the Tongass from primarily old-growth to young-growth timber. The State was among many objectors to this TLMP amendment based on a wide range of procedural issues and substantive issues in forestry, transportation and resource development. The State's August 30, 2016 formal objection to the 2016 TLMP amendment is attached as Exhibit F. The exhibits filed with the objection can be accessed on the USFS Tongass website at:

https://cloudvault.usda.gov/index.php/s/l6my9KpoJk90wUa.

The State's objections did not result in changes to the final TLMP.

In addition to requesting that USDA commence a rulemaking to exempt the Tongass from the Roadless Rule, the State also requests that the USDA Secretary direct the USFS to commence a new amendment or revision process for the TLMP as amended in 2016. The State asks that this new TLMP process reconsider all of the objections in the State's objection letter in Exhibit 6. However, section III "The Amended Forest Plan violates the TTRA and ANILCA" is of particular relevance to this petition. Ex. 6 at 6.

This section explains that the Roadless Rule violates both the TTRA and ANILCA as is also discussed above. *Id.* It also explains that in adopting this TLMP amendment "USFS now compounds this violation of federal law by selecting an alternative that not only fully implements the Roadless Rule in the management plan governing the Tongass, but also implements a transition plan to young-growth timber with a rapid phase out of the old-growth timber on which the timber industry is dependent." *Id.*

As a result of implementing the Roadless Rule restrictions in the TLMP, along with additional restrictions on old-growth timber harvest outside of roadless areas, a new

Tongass Exemption rule alone will not provide relief to Southeast Alaska. The Roadless Rule and the 2016 TLMP now each independently restrict road construction and timber harvest to such a degree as to have devastating socioeconomic effects on Alaskans. A more complete discussion of the effects of the TLMP on Alaska and the reasons why the TLMP violates TTRA and ANILCA are set forth in Exhibit 6.

VI. CONCLUSION

Beginning in 2003, USDA has recognized that roadless values in the Tongass are well protected without the Roadless Rule. USDA has also recognized that the prohibitions on road construction and timber harvest in the Roadless Rule come with severe socioeconomic consequences to Alaskans that outweigh any value of adding unnecessary restrictions to those already in place. With this understanding, USDA exempted the Tongass from the Roadless Rule from 2003 until 2011 when a federal court invalidated the Exemption based on a procedural flaw in the 2003 ROD. During this court battle, USDA fully defended USDA's above stated rationale for the exemption.

Subsequent to the court imposing the Roadless Rule on the Tongass, the situation has only been compounded by the USFS's incorporation of the restrictions on roadbuilding and timber harvest into the TLMP. Therefore, both an exemption rulemaking and a TLMP plan revision or amendment are now necessary to reinstate USDA's policy of Tongass exemption set forth in the 2003 ROD.

For the reasons set forth above, the State of Alaska respectfully requests that this petition for rulemaking be granted and that the USDA promptly commences a rulemaking proposing a rule to permanently exempt the Tongass National Forest from application of the Roadless Rule. The State also requests that the Secretary of Agriculture direct the USFS to commence a TLMP revision or amendment to remove provisions of the Roadless Rule that have been incorporated into the plan and to reconsider the State objections set forth in Ex. 6 that were not addressed in the final TLMP.

Respectfully submitted,

Andrew Mack

Andrew T. Mack, Commissioner
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Appendix A

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APPENDIX B
CUMULATIVE EFFECTS

Appendix B
Cumulative Effects

CONTENTS

TABLES

Appendix B
Cumulative Effects

Introduction

Prior to September 14, 2020[1], the Council on Environmental Quality (CEQ) regulations defined cumulative effects as "the impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (Federal or non-Federal) or person undertakes such other actions. Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time" (40 Code of Federal Regulations [CFR] 1508.7). Cumulative actions are defined as "actions, which when viewed with other proposed actions, have cumulatively significant impacts and should therefore be discussed in the same impact statement" (40 CFR 1508.25). Cumulative effects are discussed in detail for each resource in the Environmental Impact Statement (EIS). This document discusses the projects considered and records which projects were considered for each resource.

For cumulative impacts to accrue, there must first be an impact from the action under review that can then be added to the impacts of other past, present, or reasonably foreseeable future actions that affect the same resource. The proposed Alaska Roadless Rule alternatives would affect management of roadless areas on the Tongass, as it relates to what and where harvests and road building could occur under the 2016 Tongass Land and Resource Management Plan (Forest Plan). The 2016 Forest Plan in turn will guide the management the Forest.

For most resources, the analysis area for the Alaska Roadless Rule constitutes lands within the boundaries of the Tongass National Forest (approximately 17.9 million acres, including 1.2 million acres of non-National Forest System [NFS] lands). However, the effect to Roadless Areas is considered both locally, at the Forest-scale, and nationally. At the national scale, the affected environment for the Alaska Roadless Rule constitutes all NFS lands currently, or in the past, managed under the Roadless Rule. As noted in CEQ's guidance memorandum of June 24, 2005 (CEQ 2005), the effects of past actions can generally be captured by a description of the affected environment, which is detailed in the Chapter 3 of this EIS. Cumulative effects to Roadless Areas nationwide are presented in Chapter 3, *Key Issue 1 – Protection of Roadless Area Characteristics*.

The Forest Service and U.S. Department of Agriculture (USDA) have a number of ongoing or recently finalized rulemaking and policy efforts that alone or in combination with the Alaska Roadless rule might affect management of NFS lands and resources. As these rules and policies are finalized, the Agency can integrate or clarify certain provisions within each rule or policy to ensure consistency, clarity, and effectiveness with other ongoing initiatives. The relationships of these efforts to the proposed and alternative planning rules are discussed below.

Cumulative effects have been discussed throughout Chapter 3. The discussion of effects for many of the resources explores the effects of the alternatives in combination with other ongoing initiatives, strategies, policies, laws, etc.

[1] On September 14, 2020, the Council on Environmental Quality's revised NEPA regulations became effective (see 85 FR 43304). Those regulations apply to NEPA processes begun after September 14, 2020 (40 CFR 1506.13). While agencies may apply CEQ's revised regulations to ongoing activities and environmental documents begun before September 14, 2020, the Forest Service has elected to complete this NEPA process using the prior regulations, recognizing that where existing agency NEPA procedures are inconsistent with CEQ's revised regulations CEQ's revised regulations govern unless there is a clear and fundamental conflict with the requirements of another statute.

Appendix B

Assumptions

Projects and actions included in the cumulative effects analysis were identified by reviewing past records, reviewing scoping comments, interviewing knowledgeable individuals, analyzing the existing condition of the project area using the Tongass and other geographic information system (GIS) layers, reviewing current plans, and, where necessary, making reasonable assumptions. An underlying assumption throughout this EIS is that none of the Alaska Roadless Rule alternatives propose or authorized specific actions on the ground. Although road construction and/or timber harvest could potentially increase within some roadless areas, none of the alternatives predict a projected timber sale quantity (PTSQ) greater than the amount disclosed in the 2016 Forest Plan Amendment EIS (46 million board feet [MMBF] per year). On-the-ground activities, which would result in both direct and indirect effects, would be based on site-specific proposals, which are currently unknown, and would be addressed in subsequent project environmental analyses, including cumulative effects.

Timeframe for Analysis

The timeframe for this cumulative effects analysis encompasses past and future activities. Past activities include timber harvest and other activities that date back over 70 years, while future activities consider timber harvest up to 100 years in the future. Most other future activities can only be considered as reasonably foreseeable about 25 years or less into the future because of uncertainties beyond that point.

Relevant Past, Present, and Reasonably Foreseeable Actions

Rulemaking and Policy

Roadless Rules

In determining the cumulative effects, the Agency considered the current status of the various roadless rules:

- The Roadless Area Conservation Rule, issued in 2001 (36 CFR Part 294);
- The Idaho Roadless Rule, issued in 2008 (36 CFR Part 294 subpart C);
- The Colorado Roadless Rule, issued in (36 CFR Part 394 subpart D); and
- Utah petition for a Utah Roadless Rule.

The Agency also considered current roadless area guidance, including Secretary's Memorandum 1042-157 (USDA 2012) and the Forest Service Chief's delegation of authority to approve exceptions to the 2001 Roadless Rule (USDA Forest Service 2018). The potential for combined effects of the alternatives in this programmatic EIS were considered with the anticipated effects of the Idaho Roadless Rule, the Colorado State Roadless Rule, and the Utah State rulemaking petition and preliminary alternatives. While it is possible that changes to roadless area conservation could happen at a national scale, by future congressional or executive action, these possibilities for change are too speculative and, therefore, are not analyzed.

The effects of the Idaho Roadless Rule, the Colorado State Roadless Rule, and the Utah State rulemaking petition would not overlap; together they would modify the Roadless Rule or remove roadless lands. See Chapter 3, *Key Issue 1 – Protection of Roadless Area Characteristics* for discussion.

Locatable and Leasable Minerals

In September 2018, the Forest Service published two separate Advance Notices of Proposed Rulemaking (ANPR) in the *Federal Register* as first steps to update the agency's regulations that address surface activities associated with exploration and development of locatable minerals, and to update regulations that address leasing and subsequent development of oil and gas resources. Revision of the regulations governing both locatable minerals and oil and gas resources (36 CFR 228 Subparts A & E) will help achieve more efficient permitting processes, which in turn reduces regulatory burdens. This would have a

positive effect on locatable and leasable mineral development. While development of locatable minerals within the Tongass would not be measurably affected by any of the Roadless Rule alternatives, access to leasable minerals could be improved within Roadless and Timber Priority Alaska Roadless Areas (ARAs), which would be a cumulative positive effect on leasable mineral development.

Tongass Forest Plan – Karst Amendment

The Tongass National Forest amended the Tongass Forest Plan in August 2020. The amendment removed Forest Plan Standard S-YG-KC-02 related to commercial timber harvest of young growth on lands identified as moderate vulnerability karst, modify Standard S-YG-KC-03. The purpose is to broaden the availability of young growth that is suitable for timber production by making the restrictions comparable to those for old-growth harvest on moderate vulnerability karst. The changes allow the transition to predominantly young-growth harvest to proceed more efficiently.

Tongass Forest Plan – Central Tongass and South Revilla Project-specific Scenery Standard Amendment

The Tongass National Forest is considering a project-specific amendment to the Tongass Forest Plan to allow the Central Tongass Project and the South Revilla Project to proceed in a manner that fulfills each project's stated purpose and need while otherwise being consistent with the Plan. The amendment would be to relax the Scenic Integrity Objectives (Forest Plan, p. 4-54) on portions of Mitkof, Zarembo, and Wrangell Islands, and Portage Bay located on Kupreanof Island and on Revilla Island, to improve timber sale economics for the commercial timber sales undertaken as part of this project only.

2012 Planning Rule

The 2012 planning rule for land management planning for the National Forest System was published in the *Federal Register* (FR) on April 9, 2012 (77 FR 21162), and it became effective on May 9, 2012. It was developed through the most collaborative rulemaking effort in Agency history to ensure an adaptive land management planning process that is inclusive, efficient, collaborative and science-based to promote healthy, resilient, diverse and productive National Forests and Grasslands. In January 2015, the Forest Service published the final planning directives, the key set of agency guidance documents that direct implementation of the 2012 planning rule. The 2016 Forest Plan Amendment was consistent with the new planning rule. Future Plan amendments or revisions would be consistent with the rule as well.

Subsistence Regulations for Tongass National Forest Submerged Lands

In May 2018, the Secretaries of the Departments of Agriculture and the Interior published the final rule for the Federal Subsistence Management Regulations for the Tongass National Forest Submerged Lands. This rule added submerged public lands within the Tongass National Forest to the subsistence regulations. Additional listings will be published as the Bureau of Land Management and the Forest Service continue their review of pre-statehood withdrawals. This rule would not affect the roadless areas, and none of the Alaska Roadless Rule alternatives would affect access or use of submerged lands for subsistence purposes.

USDA Strategic Plan 2018 – 2022

The USDA Strategic Plan for 2018–2022 (USDA 2018) includes a goal to ensure national forests and grasslands are managed to ensure productive and sustainable use. Objectives of this goal include contributing to the economic health of rural communities through use and access opportunities and ensuring lands and watersheds are sustainable, healthy, and productive.

The Forest Service's Strategic Plan for 2015-2020 (USDA Forest Service 2015) goals and objectives include sustaining the Nation's forests and grasslands by fostering resilient, adaptive ecosystems to

mitigate climate change; mitigating wildfire risk; and delivering benefits to the public by providing abundant clean water, strengthening communities, and connecting people to the outdoors.

Tongass Young-growth Transition

On July 2, 2013, Secretary of Agriculture Thomas Vilsack issued Memorandum 1044-009, Addressing Sustainable Forestry in Southeast Alaska (USDA 2013). The memorandum directs management of the Tongass National Forest to expedite the transition away from old-growth timber harvesting and towards a forest products industry that uses predominantly second-growth – or young-growth – forests. Secretary Vilsack's memorandum also directs that the transition must be implemented in a manner that preserves a viable timber industry that provides jobs and opportunities for Southeast Alaska residents. USDA's goal is to effectuate this transition, over the next 10 to 15 years, so that at the end of this period the vast majority of timber sold by the Tongass will be young growth. The Forest Plan was amended in 2016 to effectuate this transition.

Each of the Alaska Roadless Rule action alternatives would help facilitate this transition by making more forest, including young growth, available for planning and offering timber sales under the 2016 Plan and increasing the Forest Service's flexibility in locating harvests. None of the alternatives would alter the PTSQ. It is expected that the each of the Alaska Roadless Rule alternatives would improve the agency's goal of transitioning away from old-growth harvesting towards a predominantly young-growth based industry.

Actions within the Boundaries of the Tongass National Forest

The 2016 Forest Plan FEIS, Appendix C (USDA Forest Service 2016) provides a full and detailed list of all the projects considered in the cumulative effects analysis, which has not changed substantially to date. Such reasonably foreseeable activities include, but are not limited to, timber harvest, residential development, mining, recreation and tourism, and road construction. This section summarizes and updates the list of past, present, and future activities considered based on a review of published material and available information about the Tongass National Forest and adjoining lands on various agency websites and the scoping process. It also examines other past projects, but most importantly, by looking hard at current conditions, residual effects of past human actions and natural events are captured, regardless of which particular action or event contributed those effects. The CEQ issued an interpretive memorandum on June 24, 2005 regarding analysis of past actions which states, "agencies can conduct an adequate cumulative effects analysis by focusing on the current aggregate effects of past actions without delving into the historical details of individual past actions." For these reasons, the primary method of analyzing past actions is based on the cumulative change in environmental conditions to the present, as described in the affected environment sections of the EIS. To keep the cumulative effects analysis useful, manageable, and concentrated on the effects that are meaningful, greater effort is given to future activities that are more certain and geographically close to the affected lands with a focus on issues of greatest concern.

Table B-1 lists and describes the past, present, and reasonably foreseeable projects and activities that are considered for analysis of cumulative effects. Table B-2 identifies the primary areas with potential interactions among the identified projects and actions and the primary resource areas.

Table B-1
Regional Projects Considered in Cumulative Effects Analyses

Action or Activity	Location	Timing	Description
Past Actions			
Timber harvests and road construction	Throughout Southeast Alaska	1950s to present	Over 460,000 acres of forest have been harvested and 9,400 miles of road have been constructed on Forest as of 2016. Additionally, there have been over 450,000 acres of forest land harvested on non-National Forest System (NFS) lands within the Forest boundary. Harvests and road construction have been concentrated on Prince of Wales and adjacent islands with large portions on Wrangell, Mitkof, Kupreanof, Kuiu, Revillagigedo, and Baranof Islands.

Table B-1 (continued)
Regional Projects Considered in Cumulative Effects Analyses

Action or Activity	Location	Timing	Description
Land Adjustments	Throughout Southeast Alaska	Various	NFS lands have been conveyed to non-federal parties under the Native Allotment Act, Alaska Native Claims Settlement Act (ANCSA), Alaska National Interest Lands Conservation Act (ANILCA) and other authorities. In 2015, Sealaska Corporation received its final ANSCA entitlement and conveyance of 70,075 acres. Public Law 113-291 added 8 new Land Use Designation (LUD) II areas, containing 152,000 acres. Other land adjustments have occurred in the past and the Forest Service began acquiring lands at Cube Cove on Admiralty Island in 2016 and continues through the present.
Mining	Throughout Southeast Alaska	1800s to present	Historic mines include the Treadwell Mine and the Alaska Juneau Mine in Juneau; the Kensington and Jualin mines north of Juneau (recently reopened); the Ross-Adams uranium mine on Prince of Wales Island; the undeveloped Quartz Hill molybdenum deposit in the non-Wilderness Misty-Fjord National Monument; copper mines in the Ketchikan area; and many other deposits that were explored or developed throughout the Tongass. Mineral exploration and extraction have continued, at some level, since the first discoveries. More recently, the Greens Creek mine has been operating since the late 1980s, less three years during a shutdown in the 1990s, and the Kensington Mine reopened in 2010.
Energy	Throughout Southeast Alaska	1800s to present	There are about 20 existing hydropower projects on the Forest with a total capacity of about 200 megawatts.
Recreation and Tourism	Throughout Southeast Alaska	1800s to present	Tourism has occurred in Southeast Alaska since the late 1800s. Over 1.2 million people visited Southeast Alaska in 2016. Tourism activities on the Forest include use hunting and fishing outfitters and guides, helicopter landings and tours, access of the Forest from lodges, and enjoying Forest Service visitor centers. Dispersed recreation has steadily increased in Southeast Alaska along with the growth of the tourism industry, the growth of communities, and the development of roads.
Community Development	Throughout Southeast Alaska	1800s to present	Settlement and community development in Southeast Alaska occurred primarily from the late 1800s to the present. Mining, fishing, and fish canneries were the primary early factors encouraging settlement, later followed by logging. Today there are 32 communities in Southeast Alaska. Eleven of these communities have less than 100 people ranging up to Juneau with over 33,000. The footprint of these communities ranges in size from a few acres to several thousand acres. Road development is associated with community development and is covered above under timber harvest activities.
Fish and Wildlife Habitat Enhancement and Regulatory Actions	Forest-Wide	1960s to present	A range of fish and wildlife habitat enhancement projects has occurred throughout Southeast Alaska. These projects were designed to improve forest, riparian, and stream habitats for fish and wildlife. They include extensive pre-commercial thinning, riparian thinning, snag creation, instream and riparian rehabilitation; placement of large woody debris in streams; improving fish passage; and decommissioning roads. The number of locations and number of projects will vary year to year based on funding and need.

Table B-1 (continued)
Regional Projects Considered in Cumulative Effects Analyses

Action or Activity	Location	Timing	Description
Yellow cedar decline	Throughout Southeast Alaska	Past 50 years	Yellow-cedar decline and mortality has dramatically changed many of the forests of Southeast Alaska and this decline is believed to have been climate related. Aerial surveys have mapped approximately 585,000 acres of decline in a wide band from western Chichagof and Baranof Islands to the Ketchikan area (USDA Forest Service and ADNR 2015).
Fire	Throughout Southeast Alaska	Historical	Because of high precipitation levels, fire has not been a major factor in shaping the forests of Southeast Alaska. However, approximately 400 to 500 acres have burned annually on the Tongass.
Windthrow Events	Throughout Southeast Alaska	Historical	Small-scale windthrow events are very common throughout Southeast Alaska forests. These small events involve individual trees or small groups of trees. The open gaps in the canopy that result, allow young trees to colonize and fill the openings. Therefore, over time, complex, mixed-aged stands are produced.
Present and Reasonably Foreseeable Actions			
Timber harvests and road construction	Throughout Southeast Alaska	Present + 100 years	Harvests and road construction will continue under the Forest Plan and may vary year to year. The 2016 Forest Plan FEIS predicted harvests of old- and young-growth over 42,000 and 284,000 acres, respectively, over the next 100 years with about 1,000 miles of new road. Harvests would affect an estimated 3.5 percent of the 9.7 million acres of forested land, 6 percent of all productive forest land, and less than 1 percent of productive old growth forests on the Tongass over 100 years. Harvests and road construction are expected to continue as described in the 2016 Forest Plan FEIS and transition to a young-growth based industry over 15 years. Additional harvests and road construction are expected on other lands.
Land Adjustments	Forest-wide	2018-2019	Public Law 115-31 authorized land exchange between the Alaska Mental Health Trust Authority and the Forest Service. The land exchange encompasses lands from nine remote Alaska communities and comprises approximately 18,000 non-federal acres and 21,000 federal acres. Timber harvests are prohibited on the lands received from the Alaska Mental Health Trust Authority but are expected to occur on the lands provided. On the Tongass National Forest, the State of Alaska has approximately 12,145 acres remaining of land entitlement under the Alaska Statehood Act (43 CFR 2627.1(a)). The Forest Service began purchasing lands at Cube Cove and continues through the present and into the near future. At almost 23,000 acres, it was the largest single in-holding in the Admiralty Island National Monument.

Table B-1 (continued)
Regional Projects Considered in Cumulative Effects Analyses

Action or Activity	Location	Timing	Description
Mining	Throughout Southeast Alaska	Present and beyond	Mineral exploration and development are expected to continue on the Forest and adjacent lands. Both the Greens Creek Mine on Admiralty Island and the Kensington Mine north of Juneau are active mines and expected to continue for some years based on successful continued exploration. As a result of successful exploration, the Greens Creek Mine has periodically sought and been authorized to expand its tailings tailings—the material left after the minerals have been removed—storage facility, most recently in 2013. Continued expansion is expected at both mines. Active mines generate waste water, waste rock, air emissions, and tailings. Several other sites are being prospected and explored with the intent to develop new mines. Development of leasable minerals, including geothermal, could occur, but there are no current leasable mineral activities on the Tongass and they are unlikely soon.
Energy	Throughout Southeast Alaska	Present and beyond	Hydropower will continue to be an important source of energy on the in Southeast Alaska. New sites, such as Angoon Hydroelectric and Sweetheart Lake, are expected to be developed and decrease community reliance on diesel. Transmission lines will be constructed to deliver energy to communities.
Recreation and Tourism	Throughout Southeast Alaska	Present and beyond	Over the long-term, recreation and tourism are expected to continue and increase in the future. In the near-term, levels of recreation and tourism are uncertain. At the time of writing, industry and government restrictions indicate that there will be no big cruise ships traveling to Southeast Alaska until at least July (Hseih 2020) due to the ongoing coronavirus pandemic. The effects of the travel restrictions on recreation and tourism are uncertain, but it is expected there will be sharp decline in 2020.
General – Climate Change	Throughout Southeast Alaska	Present and beyond	Some climate models for Southeast Alaska predict rising temperatures, a 10 percent decrease in summer precipitation in portions of the region, and decreased soil moisture due to increased evaporation during warmer, drier summer weather. These factors may lead to an increase in fire frequency and severity, further yellow-cedar decline, higher rates of insect and disease infestations, more severe windthrow events, and uncertain effects on stream flows, water temperature, and fisheries.
Fish and Wildlife Habitat Enhancement	Throughout Southeast Alaska	Present and beyond	Fish and wildlife habitat enhancement projects will continue to be implemented on the Forest and other lands.
Yellow Cedar Decline	Throughout Southeast Alaska	Present and beyond	As the climate continues to warm, yellow-cedar decline is likely to continue to spread, especially in the south and east. Conversely, yellow-cedar appears to be spreading northward as climate warms, into areas that retain snow longer into the spring.
Fire	Throughout Southeast Alaska	Present and beyond	Approximately 400 to 500 acres burn annually on the Tongass National Forest. Due to climate change, there may be an increased risk of forest fires but the effects are likely to be minor at the forest level.
Regional Transportation	Throughout Southeast Alaska	Present and beyond	The State of Alaska will continue to maintain and improve its regional transportation system including road and marine systems. As funding allows, new road systems may be developed to connect communities.

Table B-1 (continued)
Regional Projects Considered in Cumulative Effects Analyses

Action or Activity	Location	Timing	Description
Other Transportation Projects	Throughout Southeast Alaska	2016 and beyond	The Forest Service will conduct transportation projects which will vary year to year based on funding and need. These include maintaining or improving existing roads and bridges, placing roads in storage, paving existing dirt roads, and improving fish passage at culverts. The State and local communities will also implement various transportation projects such as paving or resurfacing roads, road realignments, safety improvements, vessel and marine terminal improvements, etc.

Table B-2
Interactions Between Resources and Actions or Projects

Actions or Projects	Roadless Areas	Resource-based Industries	Fish, Wildlife and Biodiversity	Climate	Karst	Sensitive and Invasive Plants	Transportation	Energy	Timber	Minerals	Recreation	Scenery	Subsistence
Past													
Timber harvests and road construction	X	X	X		X	X	X		X		X	X	X
Land Adjustments		X	X		X	X	X	X	X	X	X	X	X
Mining	X	X	X		X								
Energy	X		X	X		X	X	X	X	X	X	X	
Recreation and Tourism	X	X	X	X		X					X	X	
Community Development		X	X	X		X	X	X			X	X	X
Fish and Wildlife Habitat Enhancement			X			X							X
Yellow-cedar decline		X	X	X					X				
Fire			X	X					X				
Windthrow Events			X	X					X				
Present and Reasonably Foreseeable													
Timber harvests and road construction	X	X	X		X	X	X		X		X	X	X
Land Adjustments		X	X		X	X	X	X	X	X	X	X	X
Mining	X	X	X		X								
Energy	X		X	X		X	X	X	X	X	X	X	
Recreation and Tourism	X	X	X	X		X					X	X	
General – Climate Change			X	X		X		X	X		X		X
Fish and Wildlife Habitat Enhancement			X			X							X
Yellow Cedar Decline			X	X					X				
Fire		X	X					X					
Regional Transportation	X	X	X	X		X	X	X		X	X	X	X
Other Transportation Projects	X	X	X	X		X	X	X		X	X	X	X

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APPENDIX C
REFERENCE DATA TABLES FROM THE 2016 FOREST PLAN AMENDMENT FEIS BY RESOURCE

Appendix C
Outfitter/Guide Use Area Data Tables

Table C-1
Reported Outfitter/Guide Service Days by Outfitter/Guide Use Area

Outfitter/Guide Use Area	Reported Service Days						
	2013	2014	2015	2016	2017	Grand Total	Annual Average
01-01 SKAGWAY AREA	5,392	3,716	3,496	3,561	3,411	19,576	3,915
01-02 HAINES AREA	0	0	0	0	0	0	0
01-03 EAST CHILKATS	446	454	179	146	246	1,471	294
01-04A BERNERS BAY	70	0	95	0	6	171	34
01-04B N. JUNEAU COAST	175	72	121	89	6	463	93
01-04C TAKU INLET	10	0	0	0	30	40	8
01-04D SLOCUM INLET	264	109	90	171	108	742	148
01-04E JUNEAU ICEFIELD	0	0	28	72	72	172	34
01-05A TAKU HARBOR	91	113	93	256	171	724	145
01-05B PORT SNETTISHAM	798	1,009	736	606	748	3,897	779
01-05C WINDHAM BAY	784	805	873	1,080	638	4,180	836
01-05D TRACY ARM	97	134	145	152	181	709	142
01-05E FORDS TERROR	197	170	244	152	138	901	180
01-05F ENDICOTT ARM	268	510	653	808	584	2,823	565
04-01A GUT BAY, BARANOF	304	255	237	214	211	1,221	244
04-01B PORT ARMSTRONG	125	88	113	130	68	524	105
04-01C NELSON BAY	3	11	11	0	44	69	14
04-02A REDOUBT LAKE	296	117	171	223	30	837	167
04-02B WHALE BAY	269	229	289	235	173	1,195	239
04-02C NECKER ISLANDS	143	86	71	56	90	446	89
04-02D SW BARANOF	26	24	10	12	40	112	22
04-03 SITKA AREA	5,213	4,733	6,005	5,614	6,597	28,162	5,632
04-04A RODMAN BAY	250	428	385	347	508	1,918	384
04-04B KELP BAY	4,048	4,427	5,316	5,343	5,494	24,628	4,926
04-04C BARANOF WARM SPRINGS	103	152	91	64	102	512	102
04-05 SW ADMIRALTY	263	341	220	278	398	1,500	300
04-05B MITCHELL BAY	118	4	6	6	118	252	50
04-06A PYBUS BAY	704	731	623	580	644	3,282	656
04-06B ELIZA HARBOR	108	113	133	249	241	844	169
04-07A GAMBIER BAY	151	114	138	110	96	609	122
04-07B CANOE ROUTE	61	115	129	171	108	584	117
04-08 NE ADMIRALTY	5	0	197	152	147	501	100
04-09A SEYMOUR CANAL	48	65	105	93	88	399	80
04-09B PACK CREEK	692	915	710	1,202	1,020	4,539	908
04-10A GREENS CREEK	221	401	358	178	272	1,430	286
04-10B NW ADMIRALTY	103	103	93	79	88	466	93
04-11A PORT FREDERICK	10	15	78	1,358	3,021	4,482	896
04-11B FRESHWATER BAY	178	228	1,838	2,235	2,468	6,947	1,389
04-12 TENAKEE INLET	95	89	108	230	407	929	186
04-13 PERIL STRAIT	744	1,057	1,473	1,254	1,368	5,896	1,179
04-14 SLOCUM ARM	54	101	86	106	120	467	93
04-15A LISIANSKI	68	3	82	33	14	200	40
04-15B WEST YAKOBI ISLAND	13	12	74	119	100	318	64
04-15C STAG BAY	0	0	0	0	0	0	0
04-15D PORTLOCK HARBOR	0	0	0	0	0	0	0
04-16A POINT ADOLPHUS	343	136	776	547	507	2,309	462
04-16B NORTH CHICHAGOF	32	61	236	218	188	735	147
04-16C IDAHO INLET	1,249	1,509	1,776	1,174	1,357	7,065	1,413
04-16D PLI WILDERNESS	9	7	82	109	124	331	66
04-16E PORT ALTHORP	1,330	1,469	1,711	1,917	1,820	8,247	1,649
CRD 00-00NO AREA DESIGNATED	2,574	1,920	2,125	1,798	926	9,343	1,869
J01 JUNEAU ICEFIELD 1 - GILKEY BACKCOUNTRY	1,979	847	1,004	678	477	4,985	997
J02 JUNEAU ICEFIELD 2 - EAGLE	36	0	0	8	0	44	9
J03 JUNEAU ICEFIELD 3 - HERBERT	8,777	10,727	11,368	13,934	14,436	59,242	11,848

Table C-1 (continued)
Reported Outfitter/Guide Service Days by Outfitter/Guide Use Area

Outfitter/Guide Use Area	Reported Service Days						
	2013	2014	2015	2016	2017	Grand Total	Annual Average
J04 JUNEAU ICEFIELD 4 - MENDENHALL	498,478	513,379	526,612	526,179	519,867	2,584,515	516,903
J05 JUNEAU ICEFIELD 5 - LEMON	0	3	145	129	70	347	69
J06 JUNEAU ICEFIELD 6 - DEATH VALLEY	47	0	0	9	32	88	18
J07 JUNEAU ICEFIELD 7 - NORRIS	9,832	8,801	8,433	9,087	7,531	43,684	8,737
J08 JUNEAU ICEFIELD 8 - TAKU	8,190	6,308	8,316	3,853	4,895	31,562	6,312
J09 JUNEAU ICEFIELD 9 - TWIN	0	0	0	0	0	0	0
K01 WEST MISTY	28	30	26	9	4	97	19
K02 NORTHEAST MISTY	138	90	63	25	67	383	77
K03 SOUTH MISTY	35	70	76	38	19	238	48
K04 DUKE ISLAND	0	0	0	0	0	0	0
K05 SOUTH MISTY LAKES	26	20	56	50	15	167	33
K06 MISTY CORE LAKES	8,635	7,228	5,861	5,474	5,140	32,338	6,468
K07 WALKER CHICKAMIN	30	44	15	15	6	110	22
K08 BURROUGHS UNUK	16	40	19	33	10	118	24
K09 ALAVA PRINCESS MANZANITA		4	17	8	57	86	17
K10 RUDYERD WINSTANLEY	72	70	80	14	48	284	57
K11 GRAVINA ISLAND	0	0	0	0	0	0	0
K12 BELL ISLAND	402	376	461	471	441	2,151	430
K13 EAST CLEVELAND	0	0	8	0	0	8	2
K14 WEST CLEVELAND	3	9	0	0	0	12	2
K15 WILSON BAKEWELL	50	28	88	118	52	336	67
K16 KETCHIKAN CORE SPNW	2	1	0	0	0	3	1
K17 GEORGE CARROLL THORNE	41	59	70	108	56	334	67
K18 CENTRAL REVILLA SPNW	0	0	0	0	0	0	0
K19 NORTH REVILLA	217	269	101	286	193	1,066	213
K20 HYDER SPNW	0	0	0	0	0	0	0
K21 PERCY HOTSPUR MARY	0	0	0	0	0	0	0
K22 HYDER NA	190	569	225	451	423	1,858	372
K23 BETTON ISLAND	8	7,517	7,505	8,861	7,347	31,238	6,248
K24 KETCHIKAN CORE NA	536	1,368	1,058	1,297	1,999	6,258	1,252
K25 SOUTH REVILLA	0	0	0	0	0	0	0
K26 CENTRAL REVILLA NA	0	0	28	15	74	117	23
K27 MARGARET BAY	1,682	1,929	1,954	1,914	2,309	9,788	1,958
K28 NAHA BAY	0	0	0	0	7	7	1
P01 MITKOF ISLAND	1,179	1,106	1,105	681	568	4,639	928
P02 DUNCAN CANAL - WEST SIDE	130	80	111	61	110	492	98
P04 DUNCAN CANAL - EAST SIDE	0	0	0	0	0	0	0
P05 WRANGELL NARROWS/WOEWODSKI IS.	27	23	13	0	52	115	23
P06 KUPREANOF ISLAND - NORTH SHORE	92	137	235	172	114	750	150
P07 PETERSBURG CREEK/DUNCAN SALT CHUCK	1,050	851	884	2,105	2,591	7,481	1,496
P08 NORTH LINDENBERG PENINSULA	200	227	482	224	255	1,388	278
P09 CENTRAL KUPREANOF ISLAND/ROAD SYSTEM	0	3	0	64	0	67	13
P10 SOUTHWEST KUPREANOF ISLAND	263	405	398	349	337	1,752	350
P11 ROWAN BAY/BAY OF PILLARS	907	822	540	459	613	3,341	668
P12A SAGINAW/SECURITY/ WASHINGTON BAYS	548	696	808	1,225	1,764	5,041	1,008

Table C-1 (continued)
Reported Outfitter/Guide Service Days by Outfitter/Guide Use Area

Outfitter/Guide Use Area	Reported Service Days						
	2013	2014	2015	2016	2017	Grand Total	Annual Average
P12B KUIU ISLAND ROAD SYSTEM	167	91	174	156	108	696	139
P13 TEBENKOF BAY/KUIU WLDN	156	179	60	85	117	597	119
P14 KEKU STRAIT/PORT CAMDEN	403	454	496	806	506	2,665	533
P15 SOUTH KUIU ISLAND	116	157	0	56	19	348	70
P16 REID/NO NAME BAYS	80	64	0	35	2	181	36
P21 MUDDY RIVER AREA	474	330	411	263	257	1,735	347
P22 THOMAS BAY/POINT VANDEPUT	2,150	2,146	1,329	1,838	1,873	9,336	1,867
P23 FARRAGUT BAY/CAPE FANSHAW	81	85	108	150	180	604	121
P24 BAIRD/PATTERSON GLACIERS	13	8	30	16	33	100	20
SKAGWAY ICEFIELD - DENVER	8,950	10,109	7,319	7,271	9,816	43,465	8,693
SI-EF SKAGWAY ICEFIELD - EAST FORK	0	0	0	0	0	0	0
SI-LG SKAGWAY ICEFIELD - LE GRANDE	0	0	0	0	0	0	0
SI-M SKAGWAY ICEFIELD - MEADE	13,324	14,352	15,219	15,204	16,751	74,850	14,970
SI-S SKAGWAY ICEFIELD - SCHUBEE	0	173	0	0	0	173	35
TBRD 00-00NO AREA DESIGNATED	1,872	1,495	953	1,006	870	6,196	1,239
W10 STIKINE - LECONTE WILDERNESS	1,115	15	9	24	8	1,171	234
W100 NORTH ETOLIN ISLAND	1,205	31	19	8	10	1,273	255
W120 SOUTH ETOLIN ISLAND WILDERNESS	794	7	9	0	12	822	164
W130 VANK ISLAND GROUP	52	0	0	0	0	52	10
W140 KASHEVAROF GROUP	125	14	24	93	210	466	93
W150 LECONTE BAY (S-LC WILDERNESS)	285	162	156	317	287	1,207	241
W30 GARNET/MILL CREEK	31	24	0	221	158	434	87
W40 MADAN/BOULDER	589	0	41	11	15	656	131
W50 BRADFIELD CANAL AND RIVER	136	2	7	0	0	145	29
W60 ANAN CREEK	2,396	350	235	340	285	3,606	721
W70 CLEVELAND PEN./DEER ISLAND	963	10	0	0	0	973	195
W80 WRANGELL ISLAND	756	3	0	0	0	759	152
W90 ZAREMBO	95	26	26	8	11	166	33
Y01 YAKUTAT BAY	0	0	46	0	0	46	9
Y02 LOST TAWAH	20	0	35	12	0	67	13
Y03 KUNYOSH SEAL CREEKS	0	0	12	0	0	12	2
Y04 AHRNKLIN ANTLEN	0	0	213	0	0	213	43
Y05 PIKE LAKES MOSER CREEK	0	0	0	0	0	0	0
Y06 DANGEROUS RIVER	0	144	11	0	0	155	31
Y07 OLD MIDDLE ITALIO	229	670	364	232	0	1,495	299
Y08 ITALIO	61	180	87	45	0	373	75
Y09 LOWER AKWE	184	238	604	400	0	1,426	285
Y10 UPPER AKWE	0	2	28	5	0	35	7
Y11 USTAY TANIS	11	4	0	0	0	15	3
Y12 DRY BAY ALSEK	286	388	175	5	0	854	171
Y13 BRABAZONS	0	0	10		0	10	2
Y14 HARLEQUIN LAKE	0	6	79	11	0	96	19
Y15 RUSSELL NUNATAK FJORDS	0	4	33	33	28	98	20
Y16 SITUK RIVER	345	1,787	2,897	1,955	2,278	9,262	1,852

Source: Most recent five years of data (2013-2017) from the Tongass National Forest Outfitter/Guide Database.

Table C-2
Change in Roadless Area Acres by Outfitter/Guide Use Area and Alternative

Outfitter/Guide Use Area	Total Acres	Total Roadless Acres	Change in Roadless Acres from Alt 1					
		Alt 1	Alt 2	Alt 3	Alt 4a*	Alt 4b**	Alt 5	Alt 6
01-01 SKAGWAY AREA	255,036	252,160	2,876	2,876	0	-2,168	-2,168	-252,160
01-02 HAINES AREA	19,514	18,369	46	46	-2	-2,671	-7,735	-18,369
01-03 EAST CHILKATS	361,545	244,171	-2,259	-2,259	-2,259	-18,638	-50,978	-244,171
01-04A BERNERS BAY	239,889	237,760	-691	-46,139	-708	-18,450	-20,787	-237,760
01-04B N. JUNEAU COAST	49,659	45,584	-1,084	-1,084	-1,088	-1,088	-17,091	-45,584
01-04C TAKU INLET	259,153	255,094	1,987	1,987	-387	-387	-33,494	-255,094
01-04D SLOCUM INLET	17,214	16,665	0	0	0	0	-13,446	-16,665
01-04E JUNEAU ICEFIELD	230,787	230,758	-3	-5	-3	-3	-25,933	-230,758
01-05A TAKU HARBOR	19,639	18,332	0	0	0	0	-5,393	-18,332
01-05B PORT SNETTISHAM	370,367	366,502	837	837	0	0	-32,573	-366,502
01-05C WINDHAM BAY	161,216	159,929	625	625	0	-44,063	-118,146	-159,929
01-05D TRACY ARM	330,739	20	0	0	0	0	0	-20
01-05E FORDS TERROR	24,386	-	0	0	0	0	0	0
01-05F ENDICOTT ARM	368,545	69	0	0	0	-20	-42	-69
04-01A GUT BAY, BARANOF	93,986	9	0	0	0	0	0	-9
04-01B PORT ARMSTRONG	70,962	70,897	21	21	0	0	0	-70,897
04-01C NELSON BAY	44,166	44,159	2	2	0	0	0	-44,159
04-02A REDOUBT LAKE	45,074	41,918	-150	-150	-500	-5,617	-6,049	-41,918
04-02B WHALE BAY	221,835	13	5	5	0	0	0	-13
04-02C NECKER ISLANDS	6,197	3,205	1,749	1,749	0	-20	-20	-3,205
04-02D SW BARANOF	54,366	54,104	239	239	0	0	0	-54,104
04-03 SITKA AREA	345,862	296,576	456	456	-1,479	-26,870	-60,038	-296,576
04-04A RODMAN BAY	75,427	45,371	7,639	7,639	-423	-5,405	-34,452	-45,371
04-04B KELP BAY	144,680	131,182	230	230	-228	-11,569	-22,462	-131,182
04-04C BARANOF WARM SPRINGS	28,929	28,929	0	0	0	0	0	-28,929
04-05 SW ADMIRALTY	114,955	-	0	0	0	0	0	0
04-05B MITCHELL BAY	61,008	-	0	0	0	0	0	0
04-06A PYBUS BAY	55,674	-	0	0	0	0	0	0
04-06B ELIZA HARBOR	85,206	-	0	0	0	0	0	0
04-07A GAMBIER BAY	119,252	-	0	0	0	0	0	0
04-07B CANOE ROUTE	86,687	-	0	0	0	0	0	0
04-08 NE ADMIRALTY	128,063	40,137	-177	-177	-199	-199	-2,443	-40,137
04-09A SEYMOUR CANAL	88,164	59	0	0	0	0	0	-59
04-09B PACK CREEK	65,426	-	0	0	0	0	0	0
04-10A GREENS CREEK	2,575	448	0	0	0	0	0	-448
04-10B NW ADMIRALTY	256,234	39,783	-72	-72	-76	-76	-10,879	-39,783

Table C-2 (continued)
Change in Roadless Area Acres by Outfitter/Guide Use Area and Alternative

Outfitter/Guide Use Area	Total Acres	Total Roadless Acres	Change in Roadless Acres from Alt 1					
		Alt 1	Alt 2	Alt 3	Alt 4a*	Alt 4b**	Alt 5	Alt 6
04-11A PORT FREDERICK	112,512	88,043	3,278	3,122	-368	-25,213	-48,870	-88,043
04-11B FRESHWATER BAY	160,078	97,513	-1,319	-11,085	-11,714	-49,397	-49,438	-97,513
04-12 TENAKEE INLET	312,435	247,557	7,869	-47,029	-16,774	-46,470	-104,363	-247,557
04-13 PERIL STRAIT	232,130	168,913	19,926	-64,777	-1,120	-7,308	-53,059	-168,913
04-14 SLOCUM ARM	97,008	146	8	5	0	0	-95	-146
04-15A LISIANSKI	90,638	89,243	117	-54,256	-32	-32	-4,752	-89,243
04-15B WEST YAKOBI ISLAND	39,706	20	0	-1	0	0	-2	-20
04-15C STAG BAY	26,663	18	0	-1	0	0	0	-18
04-15D PORTLOCK HARBOR	107,904	25	0	-25	0	0	0	-25
04-16A POINT ADOLPHUS	8,888	8,888	0	-6,806	0	0	0	-8,888
04-16B NORTH CHICHAGOF	64,726	59,828	12	-41,102	12	-15,065	-15,263	-59,828
04-16C IDAHO INLET	53,504	53,437	67	-53,338	67	66	-94	-53,437
04-16D PLI WILDERNESS	23,079	-	0	0	0	0	0	0
04-16E PORT ALTHORP	19,475	19,341	127	-14,622	5	5	0	-19,341
CRD 00-00NO AREA DESIGNATED	925,877	735,240	-4,049	-157,633	-39,977	-125,853	-268,322	-735,240
J01 JUNEAU ICEFIELD 1 - GILKEY BACKCOUNTRY	315,751	315,751	0	-164	0	0	0	-315,751
J02 JUNEAU ICEFIELD 2 - EAGLE	10,300	10,300	0	0	0	0	0	-10,300
J03 JUNEAU ICEFIELD 3 - HERBERT	12,636	12,636	0	0	0	0	-226	-12,636
J04 JUNEAU ICEFIELD 4 - MENDENHALL	38,095	36,528	-531	-531	-531	-531	-9,728	-36,528
J05 JUNEAU ICEFIELD 5 - LEMON	12,427	12,427	0	0	0	0	-1,542	-12,427
J06 JUNEAU ICEFIELD 6 - DEATH VALLEY	54,498	54,498	0	0	0	0	0	-54,498
J07 JUNEAU ICEFIELD 7 - NORRIS	37,781	37,781	0	0	0	0	0	-37,781
J08 JUNEAU ICEFIELD 8 - TAKU	35,343	35,343	0	0	0	0	0	-35,343
J09 JUNEAU ICEFIELD 9 - TWIN	61,660	61,660	0	0	0	0	0	-61,660
K01 WEST MISTY	192,830	573	0	-106	-106	-181	-226	-573
K02 NORTHEAST MISTY	1,300,687	132,415	0	0	0	-41	-70	-132,415
K03 SOUTH MISTY	628,890	2,532	0	0	0	0	0	-2,532
K04 DUKE ISLAND	40,202	39,757	380	380	0	0	0	-39,757
K05 SOUTH MISTY LAKES	14,878	1,022	0	0	0	0	0	-1,022
K06 MISTY CORE LAKES	57,861	25	0	0	0	0	0	-25
K07 WALKER CHICKAMIN	14,320	-	0	0	0	0	0	0
K08 BURROUGHS UNUK	29,455	-	0	0	0	0	0	0
K09 ALAVA PRINCESS MANZANITA	20,568	5	1	1	0	0	0	-5
K10 RUDYERD WINSTANLEY	20,285	-	0	0	0	0	0	0
K11 GRAVINA ISLAND	39,700	38,265	-333	-333	-591	-3,604	-17,105	-38,265

Table C-2 (continued)
Change in Roadless Area Acres by Outfitter/Guide Use Area and Alternative

Outfitter/Guide Use Area	Total Acres	Total Roadless Acres	Change in Roadless Acres from Alt 1					
		Alt 1	Alt 2	Alt 3	Alt 4a*	Alt 4b**	Alt 5	Alt 6
K12 BELL ISLAND	137,694	137,358	36	31	-9	-9	-21,837	-137,358
K13 EAST CLEVELAND	87,531	85,189	-329	-329	-462	-462	-34,417	-85,189
K14 WEST CLEVELAND	73,232	73,137	-1,139	-1,139	-1,216	-1,216	-28,633	-73,137
K15 WILSON BAKEWELL	13,440	10,981	-134	-134	-154	-154	-154	-10,981
K16 KETCHIKAN CORE SPNW	46,341	44,886	-122	-9,169	-5,539	-8,999	-18,459	-44,886
K17 GEORGE CARROLL THORNE	137,434	117,781	-5,237	-25,165	-25,022	-48,596	-57,294	-117,781
K18 CENTRAL REVILLA SPNW	92,792	62,011	-707	-31,452	-9,182	-30,385	-28,006	-62,011
K19 NORTH REVILLA	70,401	59,814	-426	-426	-427	-9,602	-13,347	-59,814
K20 HYDER SPNW	121,348	117,841	-111	-111	-111	-111	-35,363	-117,841
K21 PERCY HOTSPUR MARY	6,924	5,329	689	689	-4	-4	-4	-5,329
K22 HYDER NA	7,261	4,065	-21	-21	-21	-21	-3,878	-4,065
K23 BETTON ISLAND	5,028	4,351	-575	-575	-1,126	-1,126	-1,126	-4,351
K24 KETCHIKAN CORE NA	19,239	15,148	-743	-1,429	-1,429	-1,487	-1,484	-15,148
K25 SOUTH REVILLA	40,219	8,460	-4,609	-5,780	-5,660	-7,337	-7,001	-8,460
K26 CENTRAL REVILLA NA	15,451	405	-22	-398	-398	-405	-405	-405
K27 MARGARET BAY	9,707	627	-82	-328	-306	-507	-506	-627
K28 NAHA BAY	5,273	5,264	9	-4,961	-65	-65	-166	-5,264
P01 MITKOF ISLAND	109,302	35,054	-286	-4,244	-4,376	-18,048	-22,476	-35,054
P02 DUNCAN CANAL - WEST SIDE	73,636	67,468	180	180	-31	-9,677	-29,826	-67,468
P04 DUNCAN CANAL - EAST SIDE	53,325	31,441	-5,988	-17,748	-17,817	-24,557	-22,933	-31,441
P05 WRANGELL NARROWS/WOEWODSKI IS.	17,033	15,293	235	40	-311	-1,605	-12,225	-15,293
P06 KUPREANOF ISLAND - NORTH SHORE	11,303	11,244	-4	-130	-133	-1,579	-1,454	-11,244
P07 PETERSBURG CREEK/DUNCAN SALT CHUCK	49,950	1,469	1,343	1,167	-203	-223	-207	-1,469
P08 NORTH LINDENBERG PENINSULA	75,605	59,007	-10,681	-28,098	-28,123	-38,976	-48,981	-59,007
P09 CENTRAL KUPREANOF ISLAND/ROAD SYSTEM	223,302	190,321	-12,963	-16,236	-16,662	-52,068	-132,338	-190,321
P10 SOUTHWEST KUPREANOF ISLAND	93,507	87,142	-567	-33,846	-723	-10,820	-43,283	-87,142
P11 ROWAN BAY/BAY OF PILLARS	28,721	24,944	520	-19,688	-35	-35	-35	-24,944
P12A SAGINAW/SECURITY/ WASHINGTON BAYS	32,450	25,571	-560	-562	-776	-1,152	-1,250	-25,571
P12B KUIU ISLAND ROAD SYSTEM	134,852	41,428	2,529	-4,458	-8,197	-19,049	-30,932	-41,428
P13 TEBENKOF BAY/KUIU WILDERNESS	127,218	299	31	-75	0	0	-36	-299
P14 KEKU STRAIT/PORT CAMDEN	102,299	97,504	975	939	-595	-3,415	-22,559	-97,504
P15 SOUTH KUIU ISLAND	62,824	62,150	313	313	-3	-3	-3	-62,150

Table C-2 (continued)
Change in Roadless Area Acres by Outfitter/Guide Use Area and Alternative

Outfitter/Guide Use Area	Total Acres	Total Roadless Acres	Change in Roadless Acres from Alt 1					
		Alt 1	Alt 2	Alt 3	Alt 4a*	Alt 4b**	Alt 5	Alt 6
P16 REID/NO NAME BAYS	43,191	27,185	13,874	10,588	-110	-868	-11,915	-27,185
P21 MUDDY RIVER AREA	63,357	43,101	-233	-7,917	-7,924	-26,689	-28,919	-43,101
P22 THOMAS BAY/POINT VANDEPUT	76,810	74,892	-95	-95	-124	-4,117	-12,122	-74,892
P23 FARRAGUT BAY/CAPE FANSHAW	66,716	66,026	-106	-106	-182	-2,994	-33,655	-66,026
P24 BAIRD/PATTERSON GLACIERS	402,216	402,198	0	0	0	-9	-1,651	-402,198
SI-D SKAGWAY ICEFIELD - DENVER	19,600	19,600	0	0	0	0	0	-19,600
SI-EF SKAGWAY ICEFIELD - EAST FORK	499	499	0	0	0	0	0	-499
SI-LG SKAGWAY ICEFIELD - LE GRANDE	640	640	0	0	0	0	0	-640
SI-M SKAGWAY ICEFIELD - MEADE	25,730	25,730	0	0	0	0	0	-25,730
SI-S SKAGWAY ICEFIELD - SCHUBEE	2,934	2,934	0	0	0	0	0	-2,934
TBRD 00-00NO AREA DESIGNATED	901,506	364,798	-13,619	-193,327	-80,038	-112,386	-133,003	-364,798
W10 STIKINE - LECONTE WILDERNESS	263,581	192	0	0	0	0	-47	-192
W100 NORTH ETOLIN ISLAND	151,750	121,633	-5,213	-19,838	-21,021	-35,299	-74,491	-121,633
W120 SOUTH ETOLIN ISLAND WILDERNESS	82,517	180	-12	-12	-12	-89	-176	-180
W130 VANK ISLAND GROUP	22,927	13,121	-40	-40	-76	-76	-8,857	-13,121
W140 KASHEVAROF GROUP	11,470	4,773	1,040	1,040	-41	-41	-41	-4,773
W150 LECONTE BAY (S-LC WILDERNESS)	175,361	894	14	14	0	-50	-50	-894
W30 GARNET/MILL CREEK	56,850	56,830	0	0	0	0	-46,032	-56,830
W40 MADAN/BOULDER	105,035	104,872	-316	-316	-358	-358	-22,198	-104,872
W50 BRADFIELD CANAL AND RIVER	516,308	488,672	206	176	-76	-125,730	-147,741	-488,672
W60 ANAN CREEK	38,615	38,305	0	-37,926	-116	-279	-247	-38,305
W70 CLEVELAND PEN./DEER ISLAND	48,383	38,451	-4,237	-8,086	-8,605	-15,986	-29,415	-38,451
W80 WRANGELL ISLAND	113,539	69,791	-5,177	-20,655	-21,019	-38,878	-51,543	-69,791
W90 ZAREMBO	116,402	54,049	-8,562	-12,204	-12,220	-32,237	-32,228	-54,049
Y01 YAKUTAT BAY	69,745	9,378	94	-8,307	-8,787	-8,787	-386	-9,378
Y02 LOST TAWAH	9,112	3,330	-283	-283	-283	-3,279	-3,330	-3,330
Y03 KUNYOSH SEAL CREEKS	49,765	47,087	-593	-593	-593	-5,274	-5,381	-47,087
Y04 AHRNKLIN ANTLEN	30,315	28,637	-92	-92	-92	-2,121	-2,158	-28,637
Y05 PIKE LAKES MOSER CREEK	43,577	10,681	-72	-72	-72	-5,452	-5,492	-10,681
Y06 DANGEROUS RIVER	27,110	26,328	268	-18,797	-4,855	-5,231	-440	-26,328
Y07 OLD MIDDLE ITALIO	20,869	20,869	-38	-20,869	-2,904	-2,904	-38	-20,869
Y08 ITALIO	23,500	23,464	0	-23,199	-48	-48	0	-23,464
Y09 LOWER AKWE	3,234	1,641	-125	-1,641	-1,423	-1,423	-125	-1,641
Y10 UPPER AKWE	43,230	42,503	0	-32,801	-183	-183	0	-42,503
Y11 USTAY TANIS	53,356	52,180	-62	-24,319	-559	-559	-62	-52,180
Y12 DRY BAY ALSEK	53,339	51,712	16	-29,232	-4,015	-4,015	0	-51,712

Table C-2 (continued)
Change in Roadless Area Acres by Outfitter/Guide Use Area and Alternative

Outfitter/Guide Use Area	Total Acres	Total Roadless Acres	Change in Roadless Acres from Alt 1					
		Alt 1	Alt 2	Alt 3	Alt 4a*	Alt 4b**	Alt 5	Alt 6
Y13 BRABAZONS	436,629	426,364	0	0	0	0	0	-426,364
Y14 HARLEQUIN LAKE	103,270	75,526	0	-293	0	-1,080	-1,088	-75,526
Y15 RUSSELL NUNATAK FJORDS	214,066	1,851	-64	-64	-64	-64	-64	-1,851
Y16 SITUK RIVER	38,676	19,868	-8,227	-10,016	-10,072	-11,676	-10,263	-19,868
Total	**16,730,220**	**9,368,434**	**-32,163**	**-1,144,256**	**-393,934**	**-1,151,291**	**-2,321,230**	**-9,368,434**

*The first set of estimates for Alternative 4 (4a) shows the net change in acres classified as roadless.
**The second set of estimates for Alternative 4 (4b) also subtracts the acres that would be managed as Timber Priority because road construction would be allowed in these areas.

Table C-3
Change in Development LUD Acres without Roadless Protection by Outfitter/Guide Use Area and Alternative

Outfitter/Guide Use Area	Total Acres	Total Development LUD Acres	Change in Development LUD Acres from Alt 1				
		Alt 1	Alt 2	Alt 3	Alt 4	Alt 5	Alt 6
01-01 SKAGWAY AREA	255,036	0	0	0	0	2,168	2,168
01-02 HAINES AREA	19,514	480	2	2	2	5,263	5,263
01-03 EAST CHILKATS	361,545	16,105	2,049	2,049	2,049	50,441	50,441
01-04A BERNERS BAY	239,889	990	581	581	581	19,466	19,466
01-04B N. JUNEAU COAST	49,659	610	2	2	2	3,064	3,064
01-04C TAKU INLET	259,153	1,416	297	297	297	30,382	30,382
01-04D SLOCUM INLET	17,214	504	0	0	0	13,446	13,446
01-04E JUNEAU ICEFIELD	230,787	11	0	0	0	14	14
01-05A TAKU HARBOR	19,639	189	0	0	0	5,358	5,358
01-05B PORT SNETTISHAM	370,367	808	0	0	0	32,569	32,569
01-05C WINDHAM BAY	161,216	584	-149	-149	0	117,850	117,852
01-05D TRACY ARM	330,739	0	0	0	0	0	0
01-05E FORDS TERROR	24,386	0	0	0	0	0	0
01-05F ENDICOTT ARM	368,545	0	0	0	0	42	42
04-01A GUT BAY, BARANOF	93,986	0	0	0	0	0	0
04-01B PORT ARMSTRONG	70,962	0	0	0	0	0	0
04-01C NELSON BAY	44,166	0	0	0	0	0	0
04-02A REDOUBT LAKE	45,074	1,686	301	301	301	5,849	5,849
04-02B WHALE BAY	221,835	0	0	0	0	0	0
04-02C NECKER ISLANDS	6,197	0	0	0	0	20	20
04-02D SW BARANOF	54,366	0	0	0	0	0	0
04-03 SITKA AREA	345,862	24,386	465	465	467	58,947	58,951
04-04A RODMAN BAY	75,427	24,368	-6,257	-6,257	302	34,306	34,306
04-04B KELP BAY	144,680	10,447	182	182	195	22,341	22,341
04-04C BARANOF WARM SPRINGS	28,929	0	0	0	0	0	0
04-05A SW ADMIRALTY	114,955	0	0	0	0	0	0
04-05B MITCHELL BAY	61,008	0	0	0	0	0	0
04-06A PYBUS BAY	55,674	0	0	0	0	0	0
04-06B ELIZA HARBOR	85,206	0	0	0	0	0	0
04-07A GAMBIER BAY	119,252	0	0	0	0	0	0
04-07B CANOE ROUTE	86,687	0	0	0	0	0	0
04-08 NE ADMIRALTY	128,063	0	0	0	0	0	0
04-09A SEYMOUR CANAL	88,164	0	0	0	0	0	0
04-09B PACK CREEK	65,426	0	0	0	0	0	0
04-10A GREENS CREEK	2,575	0	0	0	0	0	0
04-10B NW ADMIRALTY	256,234	0	0	0	0	0	0
04-11A PORT FREDERICK	112,512	14,815	-3,051	-2,957	209	48,677	48,677

Table C-3 (continued)
Change in Development LUD Acres without Roadless Protection by Outfitter/Guide Use Area and Alternative

Outfitter/Guide Use Area	Total Acres	Total Development LUD Acres	Change in Development LUD Acres from Alt 1				
		Alt 1	Alt 2	Alt 3	Alt 4	Alt 5	Alt 6
04-11B FRESHWATER BAY	160,078	47,176	1,667	10,737	10,737	49,119	49,120
04-12 TENAKEE INLET	312,370	47,494	-7,562	2,825	11,844	104,096	104,100
04-13 PERIL STRAIT	232,130	49,419	-17,470	-17,464	712	52,386	52,391
04-14 SLOCUM ARM	97,008	0	0	0	0	95	95
04-15A LISIANSKI	90,638	0	0	0	0	0	0
04-15B WEST YAKOBI ISLAND	39,706	0	0	0	0	0	0
04-15C STAG BAY	26,663	0	0	0	0	0	0
04-15D PORTLOCK HARBOR	107,904	0	0	0	0	0	0
04-16A POINT ADOLPHUS	8,888	0	0	0	0	0	0
04-16B NORTH CHICHAGOF	64,726	4,789	34	34	34	15,204	15,204
04-16C IDAHO INLET	53,504	0	0	0	0	94	94
04-16D PLI WILDERNESS	23,079	0	0	0	0	0	0
04-16D PORT ALTHORP	19,475	0	0	0	0	0	0
CRD 00-00NO AREA DESIGNATED	925,876	66,339	16,393	37,161	41,389	244,548	256,527
J01 JUNEAU ICEFIELD 1 - GILKEY BACKCOUNTRY	315,751	0	0	0	0	0	0
J02 JUNEAU ICEFIELD 2 - EAGLE	10,300	0	0	0	0	0	0
J03 JUNEAU ICEFIELD 3 - HERBERT	12,636	0	0	0	0	0	0
J04 JUNEAU ICEFIELD 4 - MENDENHALL	38,095	0	0	0	0	0	0
J05 JUNEAU ICEFIELD 5 - LEMON	12,427	0	0	0	0	0	0
J06 JUNEAU ICEFIELD 6 - DEATH VALLEY	54,498	0	0	0	0	0	0
J07 JUNEAU ICEFIELD 7 - NORRIS	37,781	0	0	0	0	0	0
J08 JUNEAU ICEFIELD 8 - TAKU	35,343	0	0	0	0	0	0
J09 JUNEAU ICEFIELD 9 - TWIN	61,660	0	0	0	0	0	0
K01 WEST MISTY	192,830	35	0	106	106	225	225
K02 NORTHEAST MISTY	1,300,687	0	0	0	0	41	41
K03 SOUTH MISTY	628,890	0	0	0	0	0	0
K04 DUKE ISLAND	40,202	0	0	0	0	0	0
K05 SOUTH MISTY LAKES	14,878	0	0	0	0	0	0
K06 MISTY CORE LAKES	57,861	0	0	0	0	0	0
K07 WALKER CHICKAMIN	14,320	0	0	0	0	0	0
K08 BURROUGHS UNUK	29,455	0	0	0	0	0	0
K09 ALAVA PRINCESS MANZANITA	20,568	0	0	0	0	0	0
K10 RUDYERD WINSTANLEY	20,285	0	0	0	0	0	0
K11 GRAVINA ISLAND	39,700	1,044	358	358	358	16,218	16,218
K12 BELL ISLAND	137,694	62	0	0	0	21,784	21,785

Table C-3 (continued)
Change in Development LUD Acres without Roadless Protection by Outfitter/Guide Use Area and Alternative

Outfitter/Guide Use Area	Total Acres	Total Development LUD Acres	Change in Development LUD Acres from Alt 1				
		Alt 1	Alt 2	Alt 3	Alt 4	Alt 5	Alt 6
K13 EAST CLEVELAND	87,531	156	137	137	137	33,504	33,505
K14 WEST CLEVELAND	73,232	0	0	0	0	24,216	24,216
K15 WILSON BAKEWELL	13,440	0	0	0	0	0	0
K16 KETCHIKAN CORE SPNW	46,341	1,255	27	5,245	5,245	18,349	18,349
K17 GEORGE CARROLL THORNE	137,434	16,590	4,471	23,611	23,612	56,195	56,196
K18 CENTRAL REVILLA SPNW	92,792	24,899	634	6,697	6,697	27,933	27,934
K19 NORTH REVILLA	70,401	9,377	303	303	303	13,208	13,209
K20 HYDER SPNW	121,348	98	0	0	0	4,013	4,100
K21 PERCY HOTSPUR MARY	6,924	0	0	0	0	0	0
K22 HYDER NA	7,261	2,953	6	6	6	3,279	3,333
K23 BETTON ISLAND	5,028	0	0	0	0	0	0
K24 KETCHIKAN CORE NA	19,239	1,616	13	695	695	754	754
K25 SOUTH REVILLA	40,219	29,389	4,186	4,899	4,899	6,576	6,576
K26 CENTRAL REVILLA NA	15,451	12,318	22	398	398	405	405
K27 MARGARET BAY	9,707	7,090	72	295	295	497	497
K28 NAHA BAY	5,273	0	0	67	67	166	166
P01 MITKOF ISLAND	109,302	56,859	140	4,098	4,098	22,198	22,199
P02 DUNCAN CANAL - WEST SIDE	73,636	1,823	9	9	9	29,788	29,795
P04 DUNCAN CANAL - EAST SIDE	53,325	19,011	5,417	14,660	14,729	22,363	22,364
P05 WRANGELL NARROWS/WOEWODSKI IS.	17,033	489	-194	1	309	12,130	12,130
P06 KUPREANOF ISLAND - NORTH SHORE	11,303	0	0	1	1	1,446	1,446
P07 PETERSBURG CREEK/DUNCAN SALT CHUCK	49,950	0	27	114	114	207	207
P08 NORTH LINDENBERG PENINSULA	75,605	13,525	10,157	24,318	24,335	48,445	48,446
P09 CENTRAL KUPREANOF ISLAND/ROAD SYSTEM	223,302	28,963	12,924	14,527	14,527	131,863	131,868
P10 SOUTHWEST KUPREANOF ISLAND	93,507	3,241	355	355	355	42,877	42,877
P11 ROWAN BAY/BAY OF PILLARS	28,721	46	0	0	0	0	0
P12A SAGINAW/SECURITY/WASHINGTON BAYS	32,450	4,006	635	636	636	1,098	1,099
P12B KUIU ISLAND ROAD SYSTEM	134,852	76,994	-2,558	4,425	7,913	30,622	30,622
P13 TEBENKOF BAY/KUIU WILDERNESS	127,218	13	-13	-13	0	36	36
P14 KEKU STRAIT/PORT CAMDEN	102,299	1,134	415	450	485	22,275	22,284
P15 SOUTH KUIU ISLAND	62,824	0	0	0	0	0	0
P16 REID/NO NAME BAYS	43,191	13,380	-11,862	-11,862	292	11,892	11,892

Table C-3 (continued)
Change in Development LUD Acres without Roadless Protection by Outfitter/Guide Use Area and Alternative

Outfitter/Guide Use Area	Total Acres	Total Development LUD Acres	Change in Development LUD Acres from Alt 1				
		Alt 1	Alt 2	Alt 3	Alt 4	Alt 5	Alt 6
P21 MUDDY RIVER AREA	63,357	16,651	236	7,796	7,796	28,713	28,713
P22 THOMAS BAY/POINT VANDEPUT	76,810	1,160	114	114	114	12,111	12,111
P23 FARRAGUT BAY/CAPE FANSHAW	66,716	166	76	76	76	33,546	33,546
P24 BAIRD/PATTERSON GLACIERS	402,216	0	0	0	0	1,651	1,651
SI-D SKAGWAY ICEFIELD - DENVER	19,600	0	0	0	0	0	0
SI-EF SKAGWAY ICEFIELD - EAST FORK	499	0	0	0	0	0	0
SI-LG SKAGWAY ICEFIELD - LE GRANDE	640	0	0	0	0	0	0
SI-M SKAGWAY ICEFIELD - MEADE	25,730	0	0	0	0	0	0
SI-S SKAGWAY ICEFIELD - SCHUBEE	2,934	0	0	0	0	0	0
TBRD 00-00NO AREA DESIGNATED	901,507	326,652	12,415	60,737	61,064	127,126	127,126
W10 STIKINE - LECONTE WILDERNESS	263,581	0	0	0	0	47	47
W100 NORTH ETOLIN ISLAND	151,750	26,040	5,977	18,098	18,253	73,999	74,002
W120 SOUTH ETOLIN ISLAND WILDERNESS	82,517	0	12	12	12	176	176
W130 VANK ISLAND GROUP	22,927	9,420	74	74	74	8,850	8,850
W140 KASHEVAROF GROUP	11,470	5,507	-4	-4	0	0	0
W150 LECONTE BAY (S-LC WILDERNESS)	175,361	0	0	0	0	50	50
W30 GARNET/MILL CREEK	56,850	0	0	0	0	45,821	45,821
W40 MADAN/BOULDER	105,035	88	34	34	34	14,610	14,632
W50 BRADFIELD CANAL AND RIVER	516,308	17,806	64	64	64	147,638	147,638
W60 ANAN CREEK	38,615	0	0	62	62	247	247
W70 CLEVELAND PEN./DEER ISLAND	48,383	8,245	4,848	6,435	6,435	29,268	29,269
W80 WRANGELL ISLAND	113,539	30,549	5,109	16,538	16,538	51,069	51,069
W90 ZAREMBO	116,402	49,859	6,402	9,921	9,922	30,043	30,043
Y01 YAKUTAT BAY	69,745	57	0	0	0	0	0
Y02 LOST TAWAH	9,112	4,483	234	234	234	3,280	3,280
Y03 KUNYOSH SEAL CREEKS	49,765	2,547	535	535	535	5,323	5,323
Y04 AHRNKLIN ANTLEN	30,315	1,608	60	60	60	2,126	2,126
Y05 PIKE LAKES MOSER CREEK	43,577	2,604	69	69	69	5,489	5,489
Y06 DANGEROUS RIVER	27,110	421	23	23	23	436	436
Y07 OLD MIDDLE ITALIO	20,869	0	0	0	0	0	0
Y08 ITALIO	23,500	0	0	0	0	0	0
Y09 LOWER AKWE	3,234	0	0	0	0	0	0
Y10 UPPER AKWE	43,230	0	0	0	0	0	0
Y11 USTAY TANIS	53,356	0	0	0	0	0	0
Y12 DRY BAY ALSEK	53,339	0	0	0	0	0	0
Y13 BRABAZONS	436,629	0	0	0	0	0	0

Table C-3 (continued)
Change in Development LUD Acres without Roadless Protection by Outfitter/Guide Use Area and Alternative

Outfitter/Guide Use Area	Total Acres	Total Development LUD Acres	Change in Development LUD Acres from Alt 1				
		Alt 1	Alt 2	Alt 3	Alt 4	Alt 5	Alt 6
Y14 HARLEQUIN LAKE	103,270	415	0	0	0	1,088	1,088
Y15 RUSSELL NUNATAK FJORDS	214,066	727	64	64	64	64	64
Y16 SITUK RIVER	38,676	7,664	3,829	3,829	3,829	5,809	5,809
Total	**16,725,517**	**1,151,654**	**53,333**	**247,113**	**305,000**	**2,148,933**	**2,161,125**

Table C-4
Change in Old-Growth Suitable Acres by Outfitter/Guide Use Area and Alternative

Outfitter/Guide Use Area	Total Acres	Old-Growth Suitable Acres	Change in Old-Growth Suitable Acres from Alt 1				
		Alt 1	Alt 2	Alt 3	Alt 4	Alt 5	Alt 6
01-01 SKAGWAY AREA	255,036	0	0	0	0	0	0
01-02 HAINES AREA	19,514	0	0	0	0	0	0
01-03 EAST CHILKATS	361,545	6,345	291	291	3,421	4,350	4,350
01-04A BERNERS BAY	239,889	34	19	19	40	69	69
01-04B N. JUNEAU COAST	49,659	0	0	0	0	0	0
01-04C TAKU INLET	259,153	0	0	0	0	13	13
01-04D SLOCUM INLET	17,214	0	0	0	0	0	0
01-04E JUNEAU ICEFIELD	230,787	0	0	0	0	0	0
01-05A TAKU HARBOR	19,639	0	0	0	0	0	0
01-05B PORT SNETTISHAM	370,367	0	0	0	0	0	0
01-05C WINDHAM BAY	161,216	0	0	0	114	114	114
01-05D TRACY ARM	330,739	0	0	0	0	0	0
01-05E FORDS TERROR	24,386	0	0	0	0	0	0
01-05F ENDICOTT ARM	368,545	0	0	0	10	12	12
04-01A GUT BAY, BARANOF	93,986	0	0	0	0	0	0
04-01B PORT ARMSTRONG	70,962	0	0	0	0	0	0
04-01C NELSON BAY	44,166	0	0	0	0	0	0
04-02A REDOUBT LAKE	45,074	7	8	8	12	12	12
04-02B WHALE BAY	221,835	0	0	0	0	0	0
04-02C NECKER ISLANDS	6,197	0	0	0	0	0	0
04-02D SW BARANOF	54,366	0	0	0	0	0	0
04-03 SITKA AREA	345,862	2,322	20	20	2,529	2,530	2,530
04-04A RODMAN BAY	75,427	749	61	61	2,661	2,662	2,662
04-04B KELP BAY	144,680	2,524	66	66	3,880	3,880	3,880
04-04C BARANOF WARM SPRINGS	28,929	0	0	0	0	0	0
04-05A SW ADMIRALTY	114,955	0	0	0	0	0	0
04-05B MITCHELL BAY	61,008	0	0	0	0	0	0
04-06A PYBUS BAY	55,674	0	0	0	0	0	0
04-06B ELIZA HARBOR	85,206	0	0	0	0	0	0
04-07A GAMBIER BAY	119,252	0	0	0	0	0	0
04-07B CANOE ROUTE	86,687	0	0	0	0	0	0
04-08 NE ADMIRALTY	128,063	0	0	0	0	0	0
04-09A SEYMOUR CANAL	88,164	0	0	0	0	0	0
04-09B PACK CREEK	65,426	0	0	0	0	0	0
04-10A GREENS CREEK	2,575	0	0	0	0	0	0
04-10B NW ADMIRALTY	256,234	0	0	0	0	0	0
04-11A PORT FREDERICK	112,512	1,502	19	73	3,766	3,867	3,867

Table C-4 (continued)
Change in Old-Growth Suitable Acres by Outfitter/Guide Use Area and Alternative

Outfitter/Guide Use Area	Total Acres	Old-Growth Suitable Acres	Change in Old-Growth Suitable Acres from Alt 1				
		Alt 1	Alt 2	Alt 3	Alt 4	Alt 5	Alt 6
04-11B FRESHWATER BAY	160,078	16,587	530	3,646	12,120	12,236	12,236
04-12 TENAKEE INLET	312,370	13,299	-1,348	1,736	11,727	11,735	11,736
04-13 PERIL STRAIT	232,130	2,998	28	28	1,537	2,536	2,536
04-14 SLOCUM ARM	97,008	0	0	0	0	0	0
04-15A LISIANSKI	90,638	0	0	0	0	0	0
04-15B WEST YAKOBI ISLAND	39,706	0	0	0	0	0	0
04-15C STAG BAY	26,663	0	0	0	0	0	0
04-15D PORTLOCK HARBOR	107,904	0	0	0	0	0	0
04-16A POINT ADOLPHUS	8,888	0	0	0	0	0	0
04-16B NORTH CHICHAGOF	64,726	0	0	0	0	0	0
04-16C IDAHO INLET	53,504	0	0	0	0	0	0
04-16D PLI WILDERNESS	23,079	0	0	0	0	0	0
04-16D PORT ALTHORP	19,475	0	0	0	0	0	0
CRD 00-00NO AREA DESIGNATED	925,876	12,932	4,312	9,921	14,856	15,847	15,851
J01 JUNEAU ICEFIELD 1 - GILKEY BACKCOUNTRY	315,751	0	0	0	0	0	0
J02 JUNEAU ICEFIELD 2 - EAGLE	10,300	0	0	0	0	0	0
J03 JUNEAU ICEFIELD 3 - HERBERT	12,636	0	0	0	0	0	0
J04 JUNEAU ICEFIELD 4 - MENDENHALL	38,095	0	0	0	0	0	0
J05 JUNEAU ICEFIELD 5 - LEMON	12,427	0	0	0	0	0	0
J06 JUNEAU ICEFIELD 6 - DEATH VALLEY	54,498	0	0	0	0	0	0
J07 JUNEAU ICEFIELD 7 - NORRIS	37,781	0	0	0	0	0	0
J08 JUNEAU ICEFIELD 8 - TAKU	35,343	0	0	0	0	0	0
J09 JUNEAU ICEFIELD 9 - TWIN	61,660	0	0	0	0	0	0
K01 WEST MISTY	192,830	23	0	15	15	27	27
K02 NORTHEAST MISTY	1,300,687	0	0	0	0	0	0
K03 SOUTH MISTY	628,890	0	0	0	0	0	0
K04 DUKE ISLAND	40,202	0	0	0	0	0	0
K05 SOUTH MISTY LAKES	14,878	0	0	0	0	0	0
K06 MISTY CORE LAKES	57,861	0	0	0	0	0	0
K07 WALKER CHICKAMIN	14,320	0	0	0	0	0	0
K08 BURROUGHS UNUK	29,455	0	0	0	0	0	0
K09 ALAVA PRINCESS MANZANITA	20,568	0	0	0	0	0	0
K10 RUDYERD WINSTANLEY	20,285	0	0	0	0	0	0
K11 GRAVINA ISLAND	39,700	70	94	1,032	1,030	1,045	1,045
K12 BELL ISLAND	137,694	0	0	0	0	0	0

Table C-4 (continued)
Change in Old-Growth Suitable Acres by Outfitter/Guide Use Area and Alternative

Outfitter/Guide Use Area	Total Acres	Old-Growth Suitable Acres	Change in Old-Growth Suitable Acres from Alt 1				
		Alt 1	Alt 2	Alt 3	Alt 4	Alt 5	Alt 6
K13 EAST CLEVELAND	87,531	0	0	0	0	116	116
K14 WEST CLEVELAND	73,232	0	0	0	0	0	0
K15 WILSON BAKEWELL	13,440	0	0	0	0	0	0
K16 KETCHIKAN CORE SPNW	46,341	408	22	3,282	2,628	3,311	3,311
K17 GEORGE CARROLL THORNE	137,434	3,829	1,638	7,393	9,671	9,673	9,673
K18 CENTRAL REVILLA SPNW	92,792	6,140	220	1,568	5,266	5,266	5,266
K19 NORTH REVILLA	70,401	2,181	103	103	2,384	2,654	2,655
K20 HYDER SPNW	121,348	0	0	0	0	9	9
K21 PERCY HOTSPUR MARY	6,924	0	0	0	0	0	0
K22 HYDER NA	7,261	3	0	0	0	12	12
K23 BETTON ISLAND	5,028	0	0	0	0	0	0
K24 KETCHIKAN CORE NA	19,239	417	6	87	87	87	87
K25 SOUTH REVILLA	40,219	8,007	1,627	1,887	2,266	2,266	2,266
K26 CENTRAL REVILLA NA	15,451	3,564	8	218	221	221	221
K27 MARGARET BAY	9,707	2,058	31	121	203	203	203
K28 NAHA BAY	5,273	0	0	0	0	0	0
P01 MITKOF ISLAND	109,302	15,527	9	1,431	3,385	3,572	3,572
P02 DUNCAN CANAL - WEST SIDE	73,636	0	0	0	0	0	0
P04 DUNCAN CANAL - EAST SIDE	53,325	3,760	2,352	4,570	6,365	6,595	6,595
P05 WRANGELL NARROWS/WOEWODSKI IS.	17,033	118	-97	-49	361	509	509
P06 KUPREANOF ISLAND - NORTH SHORE	11,303	0	0	0	0	0	0
P07 PETERSBURG CREEK/DUNCAN SALT CHUCK	49,950	0	2	28	30	36	36
P08 NORTH LINDENBERG PENINSULA	75,605	4,661	3,263	7,320	8,770	8,862	8,862
P09 CENTRAL KUPREANOF ISLAND/ROAD SYSTEM	223,302	8,367	457	5,794	5,799	5,799	5,799
P10 SOUTHWEST KUPREANOF ISLAND	93,507	0	0	0	0	0	0
P11 ROWAN BAY/BAY OF PILLARS	28,721	4	0	0	0	0	0
P12A SAGINAW/SECURITY/WASHINGTON BAYS	32,450	311	0	0	0	0	0
P12B KUIU ISLAND ROAD SYSTEM	134,852	14,741	-1,351	1,049	4,247	4,248	4,248
P13 TEBENKOF BAY/KUIU WILDERNESS	127,218	0	0	0	0	0	0
P14 KEKU STRAIT/PORT CAMDEN	102,299	61	0	905	930	930	930
P15 SOUTH KUIU ISLAND	62,824	0	0	0	0	0	0
P16 REID/NO NAME BAYS	43,191	0	0	0	297	297	297

Table C-4 (continued)
Change in Old-Growth Suitable Acres by Outfitter/Guide Use Area and Alternative

Outfitter/Guide Use Area	Total Acres	Old-Growth Suitable Acres	Change in Old-Growth Suitable Acres from Alt 1				
		Alt 1	Alt 2	Alt 3	Alt 4	Alt 5	Alt 6
P21 MUDDY RIVER AREA	63,357	2,891	115	3,180	6,764	6,772	6,772
P22 THOMAS BAY/POINT VANDEPUT	76,810	0	0	0	0	0	0
P23 FARRAGUT BAY/CAPE FANSHAW	66,716	0	0	0	0	0	0
P24 BAIRD/PATTERSON GLACIERS	402,216	0	0	0	0	0	0
SI-D SKAGWAY ICEFIELD - DENVER	19,600	0	0	0	0	0	0
SI-EF SKAGWAY ICEFIELD - EAST FORK	499	0	0	0	0	0	0
SI-LG SKAGWAY ICEFIELD - LE GRANDE	640	0	0	0	0	0	0
SI-M SKAGWAY ICEFIELD - MEADE	25,730	0	0	0	0	0	0
SI-S SKAGWAY ICEFIELD - SCHUBEE	2,934	0	0	0	0	0	0
TBRD 00-00NO AREA DESIGNATED	901,507	62,326	3,114	14,383	20,349	21,299	21,299
W10 STIKINE - LECONTE WILDERNESS	263,581	0	0	0	0	4	4
W100 NORTH ETOLIN ISLAND	151,750	3,207	35	1,604	2,980	4,102	4,102
W120 SOUTH ETOLIN ISLAND WILDERNESS	82,517	0	0	0	20	20	20
W130 VANK ISLAND GROUP	22,927	459	0	0	0	0	0
W140 KASHEVAROF GROUP	11,470	706	0	0	0	0	0
W150 LECONTE BAY (S-LC WILDERNESS)	175,361	0	0	0	0	0	0
W30 GARNET/MILL CREEK	56,850	0	0	0	0	1	1
W40 MADAN/BOULDER	105,035	0	0	0	0	0	0
W50 BRADFIELD CANAL AND RIVER	516,308	1	0	0	0	0	0
W60 ANAN CREEK	38,615	0	0	12	12	13	13
W70 CLEVELAND PEN./DEER ISLAND	48,383	1,529	122	351	1,697	1,697	1,697
W80 WRANGELL ISLAND	113,539	8,186	1,869	9,711	9,711	9,713	9,713
W90 ZAREMBO	116,402	14,334	1,871	2,825	8,432	8,528	8,528
Y01 YAKUTAT BAY	69,745	0	0	0	0	0	0
Y02 LOST TAWAH	9,112	52	0	0	0	0	0
Y03 KUNYOSH SEAL CREEKS	49,765	0	0	0	0	0	0
Y04 AHRNKLIN ANTLEN	30,315	0	0	0	0	0	0
Y05 PIKE LAKES MOSER CREEK	43,577	0	0	0	0	0	0
Y06 DANGEROUS RIVER	27,110	0	0	0	0	0	0
Y07 OLD MIDDLE ITALIO	20,869	0	0	0	0	0	0
Y08 ITALIO	23,500	0	0	0	0	0	0
Y09 LOWER AKWE	3,234	0	0	0	0	0	0
Y10 UPPER AKWE	43,230	0	0	0	0	0	0
Y11 USTAY TANIS	53,356	0	0	0	0	0	0
Y12 DRY BAY ALSEK	53,339	0	0	0	0	0	0
Y13 BRABAZONS	436,629	0	0	0	0	0	0

Table C-4 (continued)
Change in Old-Growth Suitable Acres by Outfitter/Guide Use Area and Alternative

Outfitter/Guide Use Area	Total Acres	Old-Growth Suitable Acres	Change in Old-Growth Suitable Acres from Alt 1				
		Alt 1	Alt 2	Alt 3	Alt 4	Alt 5	Alt 6
Y14 HARLEQUIN LAKE	103,270	0	0	0	0	0	0
Y15 RUSSELL NUNATAK FJORDS	214,066	0	0	0	0	0	0
Y16 SITUK RIVER	38,676	10	2	2	2	2	2
Total	**16,725,517**	**227,251**	**19,518**	**84,692**	**160,596**	**167,749**	**167,755**

Table C-5
Change in Young-Growth Suitable Acres by Outfitter/Guide Use Area and Alternative

Outfitter/Guide Use Area	Total Acres	Young-Growth Suitable Acres	Change in Young-Growth Suitable Acres from Alt 1				
		Alt 1	Alt 2	Alt 3	Alt 4	Alt 5	Alt 6
01-01 SKAGWAY AREA	255,036	0	0	0	38	38	38
01-02 HAINES AREA	19,514	654	0	0	0	5	75
01-03 EAST CHILKATS	361,545	3,777	687	687	688	1,061	1,105
01-04A BERNERS BAY	239,889	3	2	2	15	39	95
01-04B N. JUNEAU COAST	49,659	2	0	0	0	0	0
01-04C TAKU INLET	259,153	4	7	7	7	79	79
01-04D SLOCUM INLET	17,214	4	0	0	0	43	43
01-04E JUNEAU ICEFIELD	230,787	0	0	0	0	0	0
01-05A TAKU HARBOR	19,639	18	0	0	0	0	104
01-05B PORT SNETTISHAM	370,367	69	0	0	0	0	0
01-05C WINDHAM BAY	161,216	66	0	0	24	24	55
01-05D TRACY ARM	330,739	0	0	0	0	0	0
01-05E FORDS TERROR	24,386	0	0	0	0	0	0
01-05F ENDICOTT ARM	368,545	0	0	0	0	0	0
04-01A GUT BAY, BARANOF	93,986	0	0	0	0	0	0
04-01B PORT ARMSTRONG	70,962	0	0	0	0	0	0
04-01C NELSON BAY	44,166	0	0	0	0	0	0
04-02A REDOUBT LAKE	45,074	702	41	41	41	41	60
04-02B WHALE BAY	221,835	0	0	0	0	0	0
04-02C NECKER ISLANDS	6,197	0	0	0	0	0	0
04-02D SW BARANOF	54,366	0	0	0	0	0	0
04-03 SITKA AREA	345,862	9,849	1	9	9	9	37
04-04A RODMAN BAY	75,427	7,508	-44	-44	0	0	0
04-04B KELP BAY	144,680	3,535	1	1	1	1	6
04-04C BARANOF WARM SPRINGS	28,929	0	0	0	0	0	0
04-05A SW ADMIRALTY	114,955	0	0	0	0	0	0
04-05B MITCHELL BAY	61,008	0	0	0	0	0	0
04-06A PYBUS BAY	55,674	0	0	0	0	0	0
04-06B ELIZA HARBOR	85,206	0	0	0	0	0	0
04-07A GAMBIER BAY	119,252	0	0	0	0	0	0
04-07B CANOE ROUTE	86,687	0	0	0	0	0	0
04-08 NE ADMIRALTY	128,063	0	0	0	0	0	0
04-09A SEYMOUR CANAL	88,164	0	0	0	0	0	0
04-09B PACK CREEK	65,426	0	0	0	0	0	0
04-10A GREENS CREEK	2,575	0	0	0	0	0	0
04-10B NW ADMIRALTY	256,234	0	0	0	0	0	0

Table C-5 (continued)
Change in Young-Growth Suitable Acres by Outfitter/Guide Use Area and Alternative

Outfitter/Guide Use Area	Total Acres	Young-Growth Suitable Acres	Change in Young-Growth Suitable Acres from Alt 1				
		Alt 1	Alt 2	Alt 3	Alt 4	Alt 5	Alt 6
04-11A PORT FREDERICK	112,512	3,789	2	2	13	18	126
04-11B FRESHWATER BAY	160,078	12,373	171	196	316	363	1,205
04-12 TENAKEE INLET	312,370	10,114	94	94	95	140	174
04-13 PERIL STRAIT	232,130	9,063	99	99	126	129	188
04-14 SLOCUM ARM	97,008	0	0	0	0	0	0
04-15A LISIANSKI	90,638	0	0	0	0	0	0
04-15B WEST YAKOBI ISLAND	39,706	0	0	0	0	0	0
04-15C STAG BAY	26,663	0	0	0	0	0	0
04-15D PORTLOCK HARBOR	107,904	0	0	0	0	0	0
04-16A POINT ADOLPHUS	8,888	0	0	0	0	0	0
04-16B NORTH CHICHAGOF	64,726	855	0	0	3	3	3
04-16C IDAHO INLET	53,504	0	0	0	0	0	0
04-16D PLI WILDERNESS	23,079	0	0	0	0	0	0
04-16D PORT ALTHORP	19,475	0	0	0	0	0	0
CRD 00-00NO AREA DESIGNATED	925,876	16,958	2,916	3,929	3,937	4,093	4,242
J01 JUNEAU ICEFIELD 1 - GILKEY BACKCOUNTRY	315,751	0	0	0	0	0	0
J02 JUNEAU ICEFIELD 2 - EAGLE	10,300	0	0	0	0	0	0
J03 JUNEAU ICEFIELD 3 - HERBERT	12,636	0	0	0	0	0	0
J04 JUNEAU ICEFIELD 4 - MENDENHALL	38,095	0	0	0	0	0	0
J05 JUNEAU ICEFIELD 5 - LEMON	12,427	0	0	0	0	0	0
J06 JUNEAU ICEFIELD 6 - DEATH VALLEY	54,498	0	0	0	0	0	0
J07 JUNEAU ICEFIELD 7 - NORRIS	37,781	0	0	0	0	0	0
J08 JUNEAU ICEFIELD 8 - TAKU	35,343	0	0	0	0	0	0
J09 JUNEAU ICEFIELD 9 - TWIN	61,660	0	0	0	0	0	0
K01 WEST MISTY	192,830	5	0	0	0	0	0
K02 NORTHEAST MISTY	1,300,687	0	0	0	0	0	0
K03 SOUTH MISTY	628,890	0	0	0	0	0	0
K04 DUKE ISLAND	40,202	0	0	0	0	0	0
K05 SOUTH MISTY LAKES	14,878	0	0	0	0	0	0
K06 MISTY CORE LAKES	57,861	0	0	0	0	0	0
K07 WALKER CHICKAMIN	14,320	0	0	0	0	0	0
K08 BURROUGHS UNUK	29,455	0	0	0	0	0	0
K09 ALAVA PRINCESS MANZANITA	20,568	0	0	0	0	0	0
K10 RUDYERD WINSTANLEY	20,285	0	0	0	0	0	0
K11 GRAVINA ISLAND	39,700	331	133	408	133	417	475
K12 BELL ISLAND	137,694	8	0	0	0	37	37
K13 EAST CLEVELAND	87,531	117	21	21	21	69	80

Table C-5 (continued)
Change in Young-Growth Suitable Acres by Outfitter/Guide Use Area and Alternative

Outfitter/Guide Use Area	Total Acres	Young-Growth Suitable Acres	Change in Young-Growth Suitable Acres from Alt 1				
		Alt 1	Alt 2	Alt 3	Alt 4	Alt 5	Alt 6
K14 WEST CLEVELAND	73,232	0	9	9	9	31	56
K15 WILSON BAKEWELL	13,440	0	0	0	0	0	0
K16 KETCHIKAN CORE SPNW	46,341	501	11	80	19	60	103
K17 GEORGE CARROLL THORNE	137,434	4,166	324	337	381	380	382
K18 CENTRAL REVILLA SPNW	92,792	7,655	4	19	53	48	80
K19 NORTH REVILLA	70,401	2,278	5	5	133	144	154
K20 HYDER SPNW	121,348	5	0	0	0	1	15
K21 PERCY HOTSPUR MARY	6,924	0	0	0	0	0	0
K22 HYDER NA	7,261	169	0	0	0	28	46
K23 BETTON ISLAND	5,028	0	0	0	0	0	0
K24 KETCHIKAN CORE NA	19,239	267	0	43	24	24	43
K25 SOUTH REVILLA	40,219	8,224	425	427	435	434	435
K26 CENTRAL REVILLA NA	15,451	4,575	0	2	2	2	2
K27 MARGARET BAY	9,707	2,505	0	1	1	0	7
K28 NAHA BAY	5,273	0	0	0	0	0	0
P01 MITKOF ISLAND	109,302	9,756	5	6	23	31	57
P02 DUNCAN CANAL - WEST SIDE	73,636	647	0	0	0	33	44
P04 DUNCAN CANAL - EAST SIDE	53,325	4,356	826	826	826	826	826
P05 WRANGELL NARROWS/WOEWODSKI IS.	17,033	71	0	0	0	35	35
P06 KUPREANOF ISLAND - NORTH SHORE	11,303	11	0	9	0	0	9
P07 PETERSBURG CREEK/DUNCAN SALT CHUCK	49,950	0	0	0	0	0	0
P08 NORTH LINDENBERG PENINSULA	75,605	3,685	742	756	756	804	815
P09 CENTRAL KUPREANOF ISLAND/ROAD SYSTEM	223,302	6,887	1,312	1,359	1,347	1,368	1,404
P10 SOUTHWEST KUPREANOF ISLAND	93,507	1,632	102	102	102	124	124
P11 ROWAN BAY/BAY OF PILLARS	28,721	288	0	0	0	0	0
P12A SAGINAW/SECURITY/WASHINGTON BAYS	32,450	390	0	9	14	14	14
P12B KUIU ISLAND ROAD SYSTEM	134,852	19,585	0	2	25	34	49
P13 TEBENKOF BAY/KUIU WILDERNESS	127,218	0	0	0	0	0	0
P14 KEKU STRAIT/PORT CAMDEN	102,299	332	64	92	82	104	124
P15 SOUTH KUIU ISLAND	62,824	0	0	0	0	0	0
P16 REID/NO NAME BAYS	43,191	381	-53	-53	36	41	67
P21 MUDDY RIVER AREA	63,357	4,218	0	0	0	0	13
P22 THOMAS BAY/POINT VANDEPUT	76,810	384	0	0	0	0	0
P23 FARRAGUT BAY/CAPE FANSHAW	66,716	12	0	0	0	0	49

Table C-5 (continued)
Change in Young-Growth Suitable Acres by Outfitter/Guide Use Area and Alternative

Outfitter/Guide Use Area	Total Acres	Young-Growth Suitable Acres	Change in Young-Growth Suitable Acres from Alt 1				
		Alt 1	Alt 2	Alt 3	Alt 4	Alt 5	Alt 6
P24 BAIRD/PATTERSON GLACIERS	402,216	0	0	0	0	0	0
SI-D SKAGWAY ICEFIELD - DENVER	19,600	0	0	0	0	0	0
SI-EF SKAGWAY ICEFIELD - EAST FORK	499	0	0	0	0	0	0
SI-LG SKAGWAY ICEFIELD - LE GRANDE	640	0	0	0	0	0	0
SI-M SKAGWAY ICEFIELD - MEADE	25,730	0	0	0	0	0	0
SI-S SKAGWAY ICEFIELD - SCHUBEE	2,934	0	0	0	0	0	0
TBRD 00-00NO AREA DESIGNATED	901,507	126,994	1,241	1,296	1,351	1,353	1,560
W10 STIKINE - LECONTE WILDERNESS	263,581	0	0	0	0	0	0
W100 NORTH ETOLIN ISLAND	151,750	4,459	521	553	593	959	1,143
W120 SOUTH ETOLIN ISLAND WILDERNESS	82,517	0	0	0	0	0	0
W130 VANK ISLAND GROUP	22,927	4,426	2	2	2	81	95
W140 KASHEVAROF GROUP	11,470	2,812	0	0	0	0	0
W150 LECONTE BAY (S-LC WILDERNESS)	175,361	0	0	0	0	0	0
W30 GARNET/MILL CREEK	56,850	0	0	0	0	49	221
W40 MADAN/BOULDER	105,035	27	0	0	0	12	12
W50 BRADFIELD CANAL AND RIVER	516,308	4,572	0	0	25	26	35
W60 ANAN CREEK	38,615	1	0	0	0	0	0
W70 CLEVELAND PEN./DEER ISLAND	48,383	1,641	0	0	0	0	3
W80 WRANGELL ISLAND	113,539	5,841	488	506	496	503	512
W90 ZAREMBO	116,402	13,985	755	879	931	931	1,094
Y01 YAKUTAT BAY	69,745	42	1	206	206	1	206
Y02 LOST TAWAH	9,112	727	0	0	0	0	0
Y03 KUNYOSH SEAL CREEKS	49,765	462	4	4	4	4	4
Y04 AHRNKLIN ANTLEN	30,315	76	1	352	351	355	355
Y05 PIKE LAKES MOSER CREEK	43,577	190	5	929	694	695	929
Y06 DANGEROUS RIVER	27,110	227	14	225	198	225	225
Y07 OLD MIDDLE ITALIO	20,869	0	0	0	0	0	0
Y08 ITALIO	23,500	0	0	0	0	0	0
Y09 LOWER AKWE	3,234	0	0	0	0	0	0
Y10 UPPER AKWE	43,230	0	0	0	0	0	0
Y11 USTAY TANIS	53,356	0	0	0	0	0	0
Y12 DRY BAY ALSEK	53,339	0	0	0	0	0	0
Y13 BRABAZONS	436,629	0	0	0	0	0	0
Y14 HARLEQUIN LAKE	103,270	184	0	218	213	219	219
Y15 RUSSELL NUNATAK FJORDS	214,066	345	0	0	0	0	0
Y16 SITUK RIVER	38,676	3,935	338	349	348	351	361
Total	**16,725,517**	**333,729**	**11,278**	**15,003**	**15,146**	**16,939**	**20,152**

APPENDIX D
SUITABLE TIMBER BY COMMUNITY

Appendix D
Suitable Timber by Community

Suitable timber maps for each community are available on the electronic storage device accompanying this document and available online at: https://www.fs.usda.gov/project/?project=54511.

Suitability maps were created for each community use area and alternative. These maps show suitable old-growth and young-growth. However, to better approximate where future old-growth harvest might occur, some suitable old growth is not shown because it is less desirable low-volume old growth or for poor economics. These maps do not reflect the fact that most harvest currently occurs on the southern ranger districts. These maps support the analysis in the FEIS and in Appendix E and are provided as another tool to help reviewers understand where harvests might occur.

Readers wishing to view unaltered old-growth suitability maps are referred to Maps 7-12 on the thumb drive and website, which show suitability by alternative.

APPENDIX E
COMMUNITIES

Appendix E
Communities

CONTENTS

Appendix E

List of Tables

Appendix E

Appendix E

Appendix E

List of Figures

Communities

Affected Environment

Southeast Alaska includes more than 30 towns and villages located in and around the Forest (Table E-1). The communities identified in Table E-1 include incorporated places, as well as Census Designated Places (CDPs). CDPs are statistical areas delineated by the U.S. Census Bureau. CDPs typically represent areas with local population, but have no legal status. Estimated population totals by community ranged from less than 20 (Elfin Cove, Point Baker, and Kupreanof) to almost 32,000 (Juneau) in 2019. More than one-third (12) of the 32 Southeast communities identified in Table E-1 lost population between 2010 and 2019, with estimated decreases ranging from -1 percent (Coffman Cove) to -45 percent (Elfin Cove). Viewed in absolute terms, losses ranged from less than 10 residents (Elfin Cove, Hyder, Point Baker, and Coffman Cove) to more than 100 (Sitka, Craig, and Yakutat), reflecting the relative size of the affected communities. The regional population total fluctuated over this period, increasing from 71,664 in 2010 to a high of 74,518 in 2014 and has since dropped five years in a row (Alaska DOL 2019a; see *Key Issue 2* in this EIS, Figure 2-1).

Table E-1
Southeast Alaska Community Statistics

	Population			Median Household Income		Percent Below Poverty Line in 2018[2]	Subsistence Use (lbs per capita)[4]
Community	2019[1]	Percent Change 2010 to 2019	Percent Native in 2018[2]	2018[2]	Percent of State Median[3]		
Angoon	404	-12	43	43,542	59	17.4	182
Coffman Cove	174	-1	5	56,250	76	0.0	276
Craig	1,074	-11	19	64,853	87	14.7	232
Edna Bay	47	12	0	na	na	91.2	383
Elfin Cove	11	-45	33	na	na	na	263
Gustavus	537	21	8	80,000	108	1.7	241
Haines	1,784	4	11	75,833	102	4.0	137
Hollis	132	18	8	na	na	7.9	169
Hoonah	782	3	54	63,750	86	11.1	343
Hydaburg	397	6	72	34,028	46	39.1	531
Hyder	78	-10	0	na	na	na	345
Juneau	31,986	2	11	88,213	119	7.9	na
Kake	570	2	72	54,625	73	9.4	179
Kasaan	85	73	31	45,000	61	14.7	452
Ketchikan	8,103	1	16	59,132	80	12.6	na
Klawock	761	1	42	54,821	74	19.5	350
Kupreanof	17	-37	0	na	na	na	na
Metlakatla	1,359	-3	71	53,409	72	14.4	70
Naukati Bay	137	21	7	na	na	25.0	242
Pelican	69	-22	44	70,500	95	8.6	355
Petersburg	2,963	1	7	69,514	94	8.1	161
Point Baker	12	-20	0	na	na	na	289
Port Alexander	57	10	0	69,375	93	9.3	312
Port Protection	29	-40	0	na	na	73.7	451
Saxman	434	6	71	42,083	57	16.2	217
Sitka	8,532	-4	12	71,534	96	7.5	205
Skagway	1,045	14	4	71,500	96	5.6	48
Tenakee Springs	140	7	0	55,833	75	3.9	330
Thorne Bay	562	19	2	55,682	75	6.9	118
Whale Pass	57	84	0	41,154	55	na	247

Table E-1 (continued)
Southeast Alaska Community Statistics

Community	Population			Median Household Income		Percent Below Poverty Line in 2018[2]	Subsistence Use (lbs per capita)[4]
	2019[1]	Percent Change 2010 to 2019	Percent Native in 2018[2]	2018[2]	Percent of State Median[3]		
Wrangell	2,400	1	17	57,583	77	7.8	168
Yakutat	540	-18	28	65,833	89	6.9	386

na = not available
[1] Population estimates are from the Alaska DOL (2019).
[2] Estimates are annual totals developed as part of the 2014-2018 American Community Survey (ACS) 5-Year Estimates. Total population estimates developed as part of the ACS differ in some cases from those prepared by the Alaska DOL.
[3] Median state income in Alaska was $74,346 in 2018 (U.S. Census Bureau 2019b).
[4] The year these data were collected varies by community, as follows:
1987: Elfin Cove, Gustavus, Hyder, Metlakatla, Pelican, Port Alexander, Skagway, and Tenakee Springs;
1996: Kake, Point Baker, Port Protection, and Sitka.
1997: Craig and Klawock.
1998: Coffman Cove, Edna Bay, Hollis, Kasaan, Naukati Bay, and Thorne Bay.
1999: Saxman
2000: Petersburg, Wrangell, and Yakutat.
2012: Angoon, Haines, Hoonah, Hydaburg, and Whale Pass.
Source: ADF&G 2018; Alaska DOL 2019a; U.S. Census Bureau 2019a, 2019b, 2019c

Alaska Natives made up an estimated 15 percent of the region's population in 2019 (including Juneau and Ketchikan) and an estimated 21 percent for rural communities (excluding Juneau and Ketchikan). These rural communities include places that are predominately Native, such as Hydaburg, Kake, Saxman, and Metlakatla where Alaska Natives make up an estimated 72 percent (Hydaburg and Kake) and 71 percent (Saxman and Metlakatla) of the population; other communities that are predominately non-Native, like Edna Bay, Point Baker, and Whale Pass; and places with more mixed ethnicity where Alaska Natives range from about one-third to two-thirds of the population (Table E-1; see also Figure 3.12-1 in the *Subsistence* section).

U.S. Census estimates identified 12 communities in Southeast Alaska with 10 percent or more of their population below the poverty line in 2018. All but three of the communities identified in Table E-1 where data are available had estimated median household incomes below the state average in 2018. The three communities with estimated median household incomes above the state average were Juneau, Gustavus, and Haines. It should, however, be noted that using standard socioeconomic indicators to characterize communities in Southeast Alaska is challenging due to the small population sizes, alternative lifestyle choices and values, and the mixing of cash and subsistence economies. What may be perceived as a low-income community by standard economic metrics may more accurately be characterized as a community where residents practice subsistence activities, value a homestead culture, and earn seasonal or project-based income.

Wild foods account for a large share of the diet for residents of the studied communities, ranging from 48 pounds per capita for Skagway in 1987 to over 500 pounds per capita for Hydaburg in 2012 (Table E-1). The average American diet includes about 225 pounds of meat, fish, and poultry on a per capita basis (Schroeder and Mazza 2005). In more than half of the identified communities, wild foods came close to, or exceeded, this national average (Table E-1). Although residents of subsistence communities purchase food, most could meet their entire protein need from wild sources.

Marine resources, including fish, mammals, and plants, comprise the majority of subsistence harvests in all communities when measured by food weight. Marine resources account for more than half of total per capita harvest in all Southeast Alaska communities, ranging from 55 percent in Tenakee Springs to 88 percent in Skagway (see Figure 3.12-2 in the *Subsistence* section of this EIS). As a result, management activities that restrict access for subsistence harvest of land mammals have had a relatively small effect on overall subsistence harvest by weight (Schroeder and Mazza 2005).

Employment and business license data are presented by Southeast Alaska community in Table E-2. These measures, as explained in the table footnotes, provide different perspectives on the presence of natural resource- and visitor-related business activities by communities. An estimated total of 29,500 residents were employed in Southeast Alaska communities in 2016, with 3 percent of total employed in the natural resources and mining industry and 10 percent employed in the leisure and hospitality industry (Table E-2).

Table E-2
Southeast Alaska Community Employment and Business License Data

Community	Total Employment (2016)[1]	Percent of Total Employed		Total Number of Business Licenses (2018)[2]	Percent of Total Business Licenses	
		Natural Resources and Mining Industry (2016)[2]	Leisure and Hospitality Industry (2016)[3]		Forest Products Industry (2018)[2,3]	Visitor Industry (2018)[2,4]
Angoon	176	4%	10%	23	0%	52%
Coffman Cove	74	7%	0%	59	8%	17%
Craig	474	8%	6%	251	6%	17%
Edna Bay	12	25%	0%	17	18%	0%
Elfin Cove	13	0%	0%	0	0%	0%
Gustavus	180	2%	9%	134	3%	23%
Haines	720	4%	16%	465	3%	13%
Hollis	66	6%	6%	27	7%	22%
Hoonah	382	4%	28%	116	6%	18%
Hydaburg	125	1%	3%	19	5%	21%
Hyder	20	5%	10%	20	0%	25%
Juneau	15,431	3%	9%	3,824	0%	8%
Kake	211	4%	1%	16	0%	19%
Kasaan	102	3%	3%	11	0%	18%
Ketchikan	3,559	1%	13%	2,221	1%	10%
Klawock	396	8%	7%	118	7%	19%
Kupreanof	na	na	na	3	0%	0%
Metlakatla	632	0%	1%	19	0%	0%
Naukati	41	5%	5%	30	13%	7%
Pelican	32	0%	3%	30	0%	23%
Petersburg	1,113	2%	8%	466	2%	9%
Point Baker	6	0%	0%	4	0%	0%
Port Alexander	24	0%	0%	17	6%	41%
Port Protection	16	0%	6%	3	33%	33%
Saxman	173	1%	17%	1	0%	100%
Sitka	3,642	1%	10%	1,332	0%	11%
Skagway	425	0%	17%	324	0%	22%
Tenakee Springs	42	2%	0%	24	17%	17%
Thorne Bay	187	6%	12%	98	14%	12%
Whale Pass	22	18%	9%	24	17%	29%
Wrangell	882	2%	7%	308	2%	11%
Yakutat	276	1%	13%	119	2%	35%
Total	**29,500**	**3%**	**10%**	**10,133**	**2%**	**11%**

na = not available

[1] Employment data by community were compiled for 2016, the most recent year available, from Alaska Department of Labor and Workforce Development, Research and Analysis, Alaska Local and Regional Information (ALARI) data (Alaska DOL 2019b). These data are a combination of Census data and Alaska's Permanent Fund Dividend information. Employment estimates are for the resident workforce only and do not include summer season transients.

[2]The Natural Resources and Mining Industry includes two economic sectors: 1) Agriculture, Forestry, Fishing, and Hunting; and 2) Mining, Quarrying, and Oil and Gas Extraction (Alaska DOL 2019b).

[3]The Leisure and Hospitality Industry includes the Arts, Entertainment, and Recreation; Accommodation and Food Services; Repair and Maintenance; and Personal and Laundry Services sectors, among others (Alaska DOL 2019b).

[4] These counts and percentages are based on a point-in-time analysis of business license data from December 2018. Data were reviewed at the six-digit North American Industry Classification System (NAICS) code level based on the physical location of the business, rather than the mailing address (as identified in the Alaska DCCED database).

[5] This assessment used the same definition of the Forest Products industry as a previous review conducted in 2012 (Alaska DCCED 2012). This definition identified 34 forestry-related business types (at the six-digit NAICS level) that make up the Forest Products industry, including timber harvesting, timber processing, direct and indirect forestry support, and manufacturing activities. Business licenses in 16 of these 34 sectors were identified in Southeast Alaska communities.

[6] Recreation and tourism-related employment is difficult to accurately quantify because visitors spend their money throughout the local economy. Recreation and tourism is not classified or measured as a standard industrial category. Components of travel and tourism activities are instead partially captured in other economic sectors, such as retail trade (e.g., grocery stores and gift shops), transportation, hotels and other lodging places, and amusement and recreation services. This assessment identified business licenses in 24 six-digit NAICS sectors that are primarily visitor-oriented, and did not include business licenses for gasoline stations, grocery stores, or food and drinking establishments, which may be partially supported by visitors.

Sources: Alaska DCCED 2018, Alaska DOL 2019b

Shares of total employment in the natural resources and mining industry ranged from 0 (in seven communities) to 18 percent (Whale Pass) and 25 percent (Edna Bay). Natural resources and mining employment accounts for a relatively large share of employment in Whale Pass and Edna Bay, but due to the small size of the communities represents less than 5 jobs in each case. Viewed in terms of absolute employment, Juneau employed the largest number of workers in the natural resources and mining industry, with 463 workers. Craig and Klawock also had relatively large shares of employment in natural resources and mining, which accounted for 8 percent of total employment in each community. Employment in the leisure and hospitality industry by community ranged from 0 (in six communities) to 28 percent (Hoonah). Six other communities also had more than 10 percent of total employment in the leisure and hospitality industry (Table E-2). Viewed in absolute terms, Juneau employed the largest number of workers in the leisure and hospitality industry, with almost 1,400 workers.

Review of the state business license database identified more than 10,000 business licenses in Southeast Alaska communities, with forest products businesses accounting for 2 percent and the visitor industry making up 11 percent of the total (Table E-2). Viewed at the community level, forest products businesses ranged from 0 to 33 percent of total business licenses. Visitor-related business licenses as a share of the total ranged from 0 to 100 percent. In both cases, the upper ranges reflect the small number of total licenses in the affected community (Table E-2).

In the event a subsistence harvest priority is needed for rural residents, the state or federal fish and wildlife management authorities would first limit commercial, sport, and non-local subsistence harvests to mitigate impacts to local subsistence harvests.

Individual Community Profiles

The following community profiles are presented alphabetically. Data cited in the profiles are from Table E-1 unless otherwise noted.

Angoon (Aangóon)

Angoon is a Tlingit village and the only settlement on Admiralty Island located on the southwest coast of Kootznahoo Inlet. The population totaled 404 residents in 2019. Angoon is located 55 air miles southwest of Juneau and 41 air miles northeast of Sitka. Angoon residents practice a subsistence activities and participate in commercial fishing. The community is only accessible by floatplane or boat. Scheduled and charter floatplane services are available from the state-owned seaplane base on Kootznahoo Inlet. Angoon's facilities also include a deep draft dock, small boat harbor, and an Alaska Marine Highway System ferry terminal.

Coffman Cove (Shaan da)

Coffman Cove is located on the northeast coast of Prince of Wales Island. It was first settled as a logging camp during the 1950s and incorporated as a city government in 1989. Residents that remained after closure of the pulp mills have largely transitioned to livelihoods such as value-added niche forest products, tourism, and seafood products. Population has fluctuated over the past two decades; as of 2019, the estimated population totaled 174 residents. Coffman Cove is accessible by floatplane, boat, and paved road from Hollis, where the ferry terminal is located. Nearby recreational opportunities including camping, hiking, biking, kayaking, and wildlife viewing attract visitors to the community.

Craig

Craig is located on the west coast of Prince of Wales Island. Tlingit and Haida tribes historically used the area around Craig for its rich natural resources. Cold storage, fish processing, canneries, and a nearby sawmill have been mainstays of Craig’s local economy since the early 1900s. Craig includes a city government, federally-recognized tribe (Craig Tribal Association), and a village corporation established via the 1971 Alaska Native Claims Settlement Act (Shaan-Seet Incorporated). Craig’s estimated

population was 1,074 in 2019. The community serves as the Prince of Wales Island regional hub for medical services, retail goods and services, arts and entertainment, educational opportunities, and gatherings for island residents. With the decline of the timber industry, Craig has worked to diversify its economy including adding marine infrastructure, encouraging independent tourism, and improving an industrial park.

Edna Bay

Edna Bay is a small, remote community on Kosciusko Island, located off Prince of Wales Island's northwest coast. It is one of Alaska's newest city governments, incorporating in 2014. Edna Bay was originally established as a company logging camp for assembling ocean-going log rafts. Currently, Edna Bay is largely a community of commercial fishing families and includes both seasonal and year-round residents. Year-round residents are largely either retired or work in commercial fishing or forest products. Because of Edna Bay's remote location, household livelihoods are supplemented with subsistence hunting, fishing, and gathering. Edna Bay's population has declined by about half from 1990 to 2019, from 86 to 47 residents.

Elfin Cove

Elfin Cove, located on Chichagof Island at Cross Sound, is a fish-buying and supply center for the commercial fishing industry. The population is highly seasonal as residents participate in commercial fishing, sport fishing, and charter services. The estimated population in 2019 was 11 residents. There are several lodges located in Elfin Cove that operate on a seasonal basis. Additional retail businesses that serve visitors also provide employment opportunities. A state-owned seaplane base is available with air taxi service from Juneau. Skiffs provide local transportation.

Gustavus

Gustavus is the gateway community to Glacier Bay National Park and attracts a large quantity of seasonal residents and recreation enthusiasts. The estimated population was 537 in 2019. Glacier Bay National Park is the largest employer in the community followed by a variety of tourism establishments. Gustavus offers a state-owned airport with year-round daily air taxi service and jet service during the summer season. Floatplanes also land at nearby Bartlett Cove. Air traffic is relatively high during peak summer months, and several cruise ships include Glacier Bay in their itinerary, but do not visit the Gustavus community. There is a 10-mile paved road connecting the national park with the airport. Gustavus residents use portions of the project area for their recreation use and subsistence gathering. There are also outfitters and guides who use National Forest System lands who have businesses originating in Gustavus.

Haines

Haines is a northern terminus of the Alaska Marine Highway System, a cruise ship port of call, and hub for transportation to and from Southeast Alaska. The estimated population was 1,784 residents in 2019. Many jobs are seasonal, with tourism businesses and access to the interior Alaska highway system becoming increasingly important. Haines is a major transshipment point because of its ice-free deep-water port and dock and year-round road access to Canada and interior Alaska. Air service is provided daily via the Haines airport and seaplane base.

Hollis

Hollis is situated on the east side of Prince of Wales Island on Twelvemile Arm. Hollis was originally a mining town in the early 1900s with nearby gold and silver deposits. During the 1950s, Hollis transitioned to a company logging camp and timber operations base for Ketchikan's pulp mill. Today, Hollis is considered a community that provides timber and recreation industry support services, and contains a growing number of seasonal residences. Hollis also serves as the island's transportation gateway; the

year-round, daily ferry service between Ketchikan and Hollis is a key mode of access to Prince of Wales Island. The estimated population was 132 residents in 2019.

Hoonah (Xunaa)

Hoonah is the largest Tlingit village in Alaska, with an estimated population of 782 residents as of 2019. Many residents maintain a subsistence activities that includes hunting, fishing, and gathering edible plants and berries. The State of Alaska owns and operates the local airport and seaplane base. Air taxi services and the Alaska Marine Highway System provide regular access to Hoonah. Icy Strait Point, a restored cannery at Point Sophia owned by Huna Totem Corporation, opened as Southeast's newest cruise industry port of call in 2004. The introduction of cruise industry to Hoonah's local economy has yielded multiple economic benefits as new retail, leisure, and hospitality businesses have opened or increased operations to serve visitors. Hoonah is surrounded by an extensive road system on northwest Chichagof Island.

Hydaburg

Hydaburg is located on the southwest coast of Prince of Wales Island and is Alaska's largest Haida village, dating from the early 1700s. Current-day Hydaburg was established in the early 1900s and was incorporated as a city government during the 1960s. Hydaburg includes a federally-recognized tribe (Hydaburg Cooperative Association) and a village corporation established via the 1971 Alaska Native Claims Settlement Act (Haida Corporation). As of 2019, the estimated population totaled 397 residents. Fisheries are important to the community, both for subsistence and employment opportunities. Hydaburg is also home to world-renowned totem carvers, culture bearers, and other artisans practicing Haida art, culture, and tradition.

Hyder

Hyder is a small community located at the head of Portland Canal, a 70-mile-long fjord that forms part of the United States/Canadian border. As of 2019, Hyder had an estimated population of 78 residents. Historically, Nass River Tsimshians inhabited the area, which they called Skam-a-Kounst, "a safe place," prior to the coming of white prospectors in the late 1890s. The first official exploration and building at the town site occurred in 1896 by the U.S. Army Corps of Engineers, with an initial economic base in mining. Hyder's present-day economy is primarily based on tourism, mining, logging, fishing, and sport hunting/fishing, and, as such, is largely seasonal. Hyder is just 2 miles from Stewart, British Columbia, and the two towns share visitor services. Hyder is one of three Southeast Alaska communities connected by road to Canada and many tourists enter Hyder from Canada.

Juneau (Dzántik'I Héeni)

Juneau, Alaska's state capital, is the largest community in the analysis area with an estimated population of 31,986 in 2019. The community is a service and recreation center for residents and visitors alike. Tourism is a significant contributor to the local economy, especially during the summer months. The most popular local attractions include the Mendenhall Glacier, Mount Roberts Tram, Juneau Icefield, and Tracy Arm. Juneau is accessible by only air or water transportation. Scheduled commercial jet and air taxi service is available year-round at the Juneau International Airport. Marine facilities include multiple seaplane facilities, deep draft docks, small boat harbors, and a state ferry terminal. The Alaska Marine Highway System and commercial barge services provide year-round marine transportation access.

Kake (Kéex')

Kake (Kéex'), a predominantly Tlingit village, is located alongside Kupreanof Island's west side alongside Keku Strait and directly south of Admiralty Island. The estimated population totaled 570 residents in 2019. Kake is 38 air miles northwest of Petersburg and 95 air miles southwest of Juneau. Kake's economy is primarily based on government, education, tourism, and fishing employment. Subsistence activities and

resources are also an important component of Kake's economy and community fabric. The Organized Village of Kake, a federally-recognized tribe, was established during 1947. A first-class city government, incorporated under the laws of the State of Alaska, was incorporated during 1952. Kake Tribal Corporation, an Alaska Native village corporation, was established pursuant to the Alaska Native Claims Settlement Act during 1971. Kake community members, the Kéex' Kwaan people, uses Kuiu, Kupreanof, Admiralty, and Baranof Islands and mainland's Hobart Bay for subsistence activities.

Kasaan

Kasaan is located on eastern Prince of Wales Island in Kasaan Bay. Haidas migrated north from the Queen Charlotte Islands in the early 1700s to the Island and established the village known as "Old Kasaan." In 1898 the Copper Queen mine, camp, sawmill, post office, and store were built on Kasaan Bay, and the Haida people subsequently relocated to this new site in 1904. Kasaan was incorporated as a city government during the 1970s. It includes a federally-recognized tribe (Organized Village of Kasaan), and a village corporation established via the 1971 Alaska Native Claims Settlement Act (Kavilco Incorporated). In 2019, the estimated population totaled 85 residents. The majority of local residents are employed in the public sector. In recent years, Kasaan has also been encouraging tourism by marketing its Totems Historic District, newly-built Discovery Cabins, and reopening the Totem Trail Café.

Ketchikan (Kicháan)

Ketchikan is located on Revillagigedo Island near the southernmost boundary of Alaska, approximately 235 miles south of Juneau. As of 2019, Ketchikan had an estimated population of 8,103 residents. Historically, the Ketchikan area was a summer fishing camp for the Tlingit Alaska Natives. Its abundant fish and timber resources eventually attracted non-Natives, with the first cannery opening in Ketchikan in 1886 and four more by 1912. Currently, Ketchikan is an industrial center and a major port of entry in Southeast Alaska (it is the first Alaska port-of-call for northbound ships). It has a diverse economy, supported by a large fishing fleet, fish processing facilities, timber and tourism. While the timber industry remains important to the economy and a home base for several timber companies, the Ketchikan Pulp Corporation's pulp mill closed in 1997. Tourism and local retail are growing economic sectors, particularly related to cruise ship passengers.

Klawock (Lawáak)

Klawock is on the west coast of Prince of Wales Island, 7 miles from Craig, connected by paved road. Klawock had a total estimated population of 761 in 2019, and together, Klawock and Craig form the major population center of Prince of Wales Island. Originally, Klawock was used by the Tlingits as a summer fishing camp, later becoming a permanent village site. Currently, Klawock includes a federally-recognized tribe (Klawock Cooperative Association), and Alaska Native Claims Settlement Act (1971) village corporation (Klawock Heenya Corporation). Klawock's economy includes commercial fishing, retail and other service professionals, and the timber industry; Viking Lumber is located between Klawock and Craig. At the same time, many residents continue to pursue a subsistence activities. Klawock airport has the only runway that can accommodate wheeled-aircraft on Prince of Wales Island. The community maintains a strong Tlingit cultural tradition with the Klawock Totem Park, which includes restored totem poles, a heritage center, and a traditional long house.

Kupreanof

The City of Kupreanof is located across the Wrangell Narrows from Petersburg, on the northeast shore of Kupreanof Island. Incorporated as a city in 1975, the municipality has no full-time staff, few services, and no public utilities. Kupreanof is a small, non-Native community, with a total estimated population of 17 residents in 2019. The community is built entirely on the waterfront; there are no roads. Residents use skiffs to travel to Petersburg for schooling, goods, and services. The majority of Kupreanof's working residents are self-employed, although some commute by boat to jobs in Petersburg. Subsistence and

recreation uses of resources around Kupreanof supplement household incomes; deer, salmon, halibut, shrimp and crab are favorites.

Metlakatla

Metlakatla is located on Annette Island, 15 miles south of Ketchikan, with an estimated population of 1,359 in 2019. Believed to have been occupied at one time by Tlingit Indians, Metlakatla was settled in 1887 by Church of England minister William Duncan and about 830 Tsimshian followers from northern British Columbia. In 1891, an Act of Congress declared Annette Island an Indian Reservation (the Annette Island Reserve), the only one in Alaska. Today, Metlakatla is a traditional Tsimshian community with a subsistence activities. The 86,000-acre Island reservation and surrounding 3,000 feet of coastal waters are not subject to state jurisdiction. The Metlakatla Indian Community regulates commercial fishing in these waters, and as the largest employer, operates a salmon hatchery on Tamgas Creek, the tribal court, and all local services and utilities.

Naukati Bay

Naukati Bay, commonly referred to as “Naukati”, is located on the northwest coast of Prince of Wales Island. The estimated population totaled 137 residents in 2019. Naukati was originally established as a logging camp to support Ketchikan’s pulp mill. The community remained after the pulp mill closed and, while unincorporated as a city, residents are represented by two non-profit associations (*i.e.*, Naukati West and Naukati East) for addressing local issues and improving local infrastructure. Residents are primarily logging, small sawmill, and homesteading families, with growth in emerging tourism enterprises during the past decade. Many residents rely on subsistence activities to maintain cultural ties and support economic well-being. Naukati is also home to Shikat Bay Farm, an oyster nursery that raises oyster spat (seed) for oyster farmers across coastal Alaska.

Pelican

Pelican is a fishing community with most residents participating in commercial, sport, and subsistence fishing activities. Located in Chichagof Island’s remote Lisianski Inlet, Pelican is dependent on boats, floatplanes, and the Alaska Marine Highway System for service. Daily scheduled air taxi service is available from Juneau and Sitka. Additional community facilities include a state-owned seaplane base, a small boat harbor, dock, and state ferry terminal. As of 2019, the estimated population totaled 69 residents.

Petersburg (Gánti Yaaks Séedi)

Petersburg is located on the northern tip of Mitkof Island, with an estimated population of 2,963 in 2019. Petersburg’s economy is primarily based on the commercial fishing and timber industries. The city includes several fish processors operating cold storage, canneries, and custom packing services and the state-run Crystal Lake salmon hatchery. Petersburg also has two small active saw mills, and provides supplies and services for many of the area logging camps. Many residents also participate in subsistence gathering. While there is no deep-water dock suitable for large cruise ships, there are outfitters and guides who use National Forest System lands who have businesses originating in Petersburg.

Point Baker

Point Baker is on the northern tip of Prince of Wales Island and is only accessible via seaplane or boat, with an estimated population of 12 residents in 2019. Point Baker is considered a small fishing community, but neighboring lodges have been established providing sportfishing, wildlife viewing, and other outdoor experiences. The community’s proximity to Sumner Strait, an exceptional fishing site for all five species of Pacific salmon and halibut, makes Point Baker a particularly appealing fishing destination. Point Baker remains an unincorporated community where residents practice a subsistence and homestead lifestyle without city government.

Port Alexander

Port Alexander is a small community located on the south end of Baranof Island, 65 air miles south of Sitka. The estimated population totaled 57 residents in 2019. Port Alexander has long provided safe harbor for commercial fishing boats during Chatham Strait gales and storms. Commercial fishing, subsistence activities, and tourism are important elements of the local economy. Access to Port Alexander is by floatplane or boat. The State of Alaska owns and maintains a seaplane base. Residents and visitors fly to Port Alexander via commercial or chartered floatplane service from Sitka, Petersburg, Wrangell, and Juneau. Other local facilities include a breakwater, dock, and small boat harbor. There are no roads in Port Alexander; skiffs provide local transportation.

Port Protection

Port Protection is on the northern tip of Prince of Wales Island, near Point Baker, and is only accessible via seaplane or boat. The estimated population totaled 29 residents in 2019. Port Protection was established as a fish buying center that provided safe harbor, fuel, and supplies for commercial fishing vessels. Port Protection has remained a small fishing community with no roads, where residents practice a rural and subsistence activities. All homes and other buildings are located along docks or upland boardwalks.

Saxman

Saxman is located on west Revillagigedo Island on the Tongass Highway, about three miles south of Ketchikan. The estimated population totaled 434 residents in 2019. In 1894, Tlingits from the old Cape Fox and Tongass villages chose Saxman as the site for a new village and the location of a government school and a Presbyterian church, later incorporating as a municipality in 1929. In 1971 and 1973, respectively, Saxman was recognized and then certified as a Native village under the Alaska Native Claims Settlement Act. Most employment opportunities for Saxman residents are in the City of Ketchikan, though the City of Saxman, the Saxman Seaport, and the Cape Fox Corporation provide employment for some residents. The Saxman Totem Park, with a tribal house, a carving center, and a cultural hall for traditional Tlingit dance, has become an attraction for Ketchikan area visitors.

Sitka (Sheet'ká)

With an estimated population of 8,532 in 2019, Sitka is one of the larger communities in the analysis area and a popular visitor destination. Sitka is located on scenic Baranof Island and is a port of call for cruise ships throughout the summer season. Despite varied cruise ship visitation during the past decade, the leisure and hospitality industry remains an important part of Sitka's economy. Other economic sectors include fishing, fish processing, government, health care services, transportation, and retail. The local government operates five small boat harbors, a seaplane base, and an airport. The community is served by the Alaska Marine Highway System and goods are transported to the community via regular commercial barge service.

Skagway

Skagway, with a population of 1,045 in 2019, is an important port of call for cruise ships and a transfer site for interior bus tours, such as to the Klondike Gold Rush National Historic Park. More than 600,000 cruise ship passengers and numerous state ferry travelers visit Skagway each year. Skagway is also the site of trans-shipment of lead/zinc ore, fuel, and freight via the Port and Klondike Highway to and from Canada. The Klondike Highway and Alaska Highway provide road connections to British Columbia, the Yukon Territory, interior Alaska, and the Lower 48 states. Skagway is primarily accessed by air, road, and marine services. The State of Alaska owns the airport and seaplane base at the boat harbor with scheduled air service from Juneau.

Appendix E

Tenakee Springs

Tenakee Springs, located on Chichagof Island, has long been considered a retirement community and summer retreat for Juneau and Sitka residents, with limited opportunities for local employment. The estimated population totaled 140 residents in 2019. While fish processing has been a mainstay of its economy, tourism is growing in importance. Tenakee Springs is dependent on seaplanes and the Alaska Marine Highway Service for access. The City of Tenakee Springs operates a seaplane base and heliport with scheduled or chartered service from Juneau. The Alaska Marine Highway System provides access on a limited basis. Additional marine facilities include a small boat harbor and ferry terminal. Local transportation is primarily by bicycle or off-highway vehicle along a 3-mile local path.

Thorne Bay

Thorne Bay is on the east coast of Prince of Wales Island, with an estimated population of 562 residents in 2019. Originally established as a floating logging camp for the Ketchikan pulp mill in 1960, it grew substantially in 1962 when the Hollis logging camp was relocated there. A shop, log sort yard, and camp were built and soon thereafter, roads were constructed connecting Thorne Bay to Hollis, Craig, and Klawock. During the peak of island timber activities, Thorne Bay was considered the largest logging camp in North America. Today, Thorne Bay contains one of the log transfer sites on the island. Employment is primarily in barge and freight services, small sawmills, government, commercial fishing, and tourism as guided sport fishing charter opportunities increasingly attract visitors. To supplement incomes, residents engage in subsistence activities, fish, and trap.

Whale Pass

Whale Pass is a small community located on northern Prince of Wales Island, with an estimated population of 57 residents in 2019. It was originally established as a logging camp during the early 1960s and the camps remained through the early 1980s. Whale Pass is situated at a remote area of the island, but is connected to other island communities via a gravel road. State government land disposal sales facilitated the transition from company-owned logging camp to a year-round community that incorporated in 2016. The economy is dependent on natural resources and tourism, with high levels of employment in both the natural resources and mining and leisure and hospitality sectors. Residents also engage in subsistence activities.

Wrangell (Kaachxana.áak'w)

Wrangell is located on the north end of Wrangell Island, near the mouth of the Stikine River, an historic trade route to the Canadian interior. Wrangel had a total estimated population of 2,400 residents as of 2019. Wrangell began as an important Tlingit site primarily because of its proximity to the Stikine River. In 1867, a military post named Fort Wrangell was established as part of the Alaska Territory. The community continued to grow as a fur trading center, and as an outfitter for gold prospectors between 1861 and the 1930s. In 2008, residents decided by local election that the City of Wrangell should dissolve and incorporate as the City and Borough of Wrangell. This added the communities of Meyers Chuck, Union Bay, Thoms Place, Olive Cove, and Farm Island to the new unified city and borough. The Wrangell economy is primarily based on commercial fishing, fish processing, and tourism. While timber used to be part of the economy, by 2012 no timber-related employment was identified in Wrangell.

Yakutat (Yaakwdáat)

Yakutat is located along the northern Gulf of Alaska at the mouth of Yakutat Bay. The estimated population totaled 540 residents in 2019. The original settlers, believed to have been Eyak people from the Copper River area, were later conquered by the Tlingits. By the mid-1800s, foreign traders were well established along the coast. The contemporary town grew up around "the old village," which was established in 1889 by missionaries. Incorporated as a first-class city in 1948, Yakutat is governed by a mayor and a city council. Yakutat Borough, incorporated in 1992, expanded the original city boundaries to

include a large section of the Gulf Coast north of Cape Fairweather. Yakutat is accessible by jet service from Juneau and Anchorage. The economy is primarily dependent on fishing, fish processing, government, and tourism. Wrangell-Saint Elias National Park, Russell Fiords Wilderness, and Glacier Bay National Park are located northwest, northeast, and southeast of Yakutat, respectively.

Environmental Consequences

Analyzing Impacts to Communities

This EIS provides an assessment of the potential impacts that may result from the alternatives considered for a proposed Alaska Roadless Rule. This assessment and the proposed alternatives are programmatic, meaning that they establish direction and allowable activities for broad land areas, rather than schedule specific activities in specific locations. This makes it difficult to predict effects on individual communities. This is a common source of frustration to local residents, who want to know exactly how they and the places they care about could be affected. While many potentially affected outputs of forest management, such as scheduled timber harvest, generally translate into social and economic activity, such as employment in the timber industry, it is difficult to predict which communities would benefit the most from that activity. Forest Service activities provide economic opportunities to the private sector. How that sector and the various industries that comprise it respond depends on many variables in addition to Forest Service management. Communities that rely on a given resource-related industry would, however, be expected to be the first to benefit or lose from significant changes in planned output levels affecting that industry.

The 2016 Forest Plan Amendment EIS provides detailed assessments for the 32 communities addressed in the preceding section. In addition to providing detailed overviews of existing conditions, the 2016 EIS profiles evaluated potential effects to each community's use area. Originally identified as part of the 1997 Forest Plan Revision (USDA Forest Service 1997a), community use areas (CUA) represent the general area commonly used or related to by many of the community's residents in their local day-to-day work, recreational, and subsistence activities. These areas do not necessarily define the limits of a community's use or represent traditional use areas or territories. Community residents may work or pursue recreation or subsistence activities elsewhere on the Forest. Traditional territories are shown in Appendix F, which presents maps from Goldschmidt and Haas' landmark ethnographic study of Alaska Native land use, occupancy, and possession in Southeast Alaska.

The analysis presented here draws upon these information sources to assess the effects of the six alternatives under consideration by community. Each community discussion includes a map of that community's use area. These maps are accompanied by tables that summarize the Alaska Roadless Area (ARA) management designations and change in roadless area acres that would occur in the community's use area by alternative. The summary tables also identify changes in acres in development Land Use Designations (LUD), changes in suitable acres available for harvest, and changes in acres of estimated harvest over 100 years by alternative for each CUA. These CUA maps and tables are intended to help community residents (and other readers) gain a better understanding of what management direction is proposed for their immediate surroundings under each alternative. As noted above, these CUAs do not necessarily define the limits of a community's use or represent traditional use areas or territories.

The following assessment considers potential impacts to 32 Southeast Alaska CUAs using four primary measures by alternative: 1) acres by ARA management category and change in acres managed as roadless; 2) change in acres in development LUDs; 3) change in suitable old-growth acres available for harvest, and 4) changes in estimated harvest over 100 years.

Average annual deer harvest for 2004 to 2013 is presented by Wildlife Analysis Area (WAA) for each community where these data are available and provides another indication of areas used by different communities. WAAs are a division of land used by the Alaska Department of Fish & Game (ADF&G) for

wildlife analysis.[2] As part of the community assessments in the 2016 Forest Plan Amendment EIS (USDA Forest Service 2016), the Sitka black-tailed deer habitat capability model output was analyzed for the WAAs where each community obtained approximately 75 percent of their average annual deer harvest. This analysis originally prepared for the 1997 Forest Plan Revision FEIS (USDA Forest Service 1997b) was updated for the 2016 Forest Plan Amendment EIS. The results of the 2016 analysis for the current Forest Plan are used as part of the subsistence assessment presented below for each community. This assessment is discussed further below in the *Potential Impacts by Resource Area* section.

ARA Management Categories and Changes in Roadless Area Acres

Alternatives 2, 3, 4, and 5 propose to correct and modify inventoried roadless area (IRA) boundaries based on ownership changes and updated mapping. Updated roadless areas would be known as Alaska Roadless Areas (or ARAs) and the Alaska Roadless Rule would apply to those identified lands. ARAs would be assigned to one of five designations of Alaska roadless areas: LUD II Priority, Watershed Priority, Community Priority, Roadless Priority, and Timber Priority. These designations are described in Chapter 2 of this EIS and briefly summarized below:

- The LUD II Priority management category provides for lands to be managed in a roadless state to retain their wildland character in accordance with applicable LUD II requirements.
- The Watershed Priority management category is more protective than the 2001 Roadless Rule and provides for activities specific to aquatic habitat improvement and protection. Alternatives 2 and 3 are the only alternatives with lands that would be managed under this category.
- The Community Priority management category allows for small-scale timber harvest and associated road construction and reconstruction. In addition, it allows for infrastructure development to connect and support local communities and traditional Alaska Native cultural uses. This management category is only proposed under Alternative 3, and only lands adjacent to seven communities – Sitka, Wrangell, Juneau, Ketchikan, Kake, Hydaburg, and Yakutat – would be managed under this category.
- The Roadless Priority management category is similar to the 2001 Roadless Rule but is less restrictive and provides for Alaska specific concerns, specifically for infrastructure development to connect and support local communities, and road construction for leasable minerals.
- The Timber Priority management category exempts timber harvest and road construction/reconstruction within ARAs to facilitate timber management. This management category is only proposed for Alternative 4.

As described in Chapter 2, additional regulatory protection would also be applied to Tongass 77 (T77) and The Nature Conservancy (TNC)/Audubon Conservation Priority Areas (high-priority watershed areas) outside of the designated roadless area boundaries under Alternative 3. Old-growth harvest is currently prohibited in these areas under the existing 2016 Forest Plan. The additional protection would provide regulatory continuity for the T77 and TNC/Audubon Conservation Priority Areas in their entirety.

Management activities have the potential to have detrimental effects to roadless area characteristics. This is especially the case with timber harvest and associated road building. Additional timber harvest opportunities would primarily be provided by removing roadless protections for areas that are currently protected under the 2001 Roadless Rule (i.e., areas that are presently within IRAs). Timber harvest would also be allowed in ARAs assigned to the Timber Priority management category.

Under Alternative 3, roadless protection would be removed from the 826,000 LUD II acres that are currently within an IRA. LUD II acres removed from roadless designation would still retain their Congressionally-designated protections, which require that these areas be managed in a roadless state to retain their wildland character. Therefore, decreases shown for Alternative 3 tend to overstate the number of acres that would no longer be protected.

[2] ADF&G no longer compiles this data by WAA and, therefore, the summaries of harvest by WAA presented below use the data compiled for 2004 to 2013.

Changes in Development LUDs

Not all acres removed from roadless management would be available for development. LUD II acres removed from roadless designation under Alternative 3, for example, would, as noted above, still retain their Congressionally-designated protections, which require that these areas be managed in a roadless state to retain their wildland character. Other areas removed from roadless protection occur in non-development LUDs, such as Old-Growth Habitat and Remote and Semi-remote Recreation, which do not allow old-growth timber harvest. The change in acres in development LUDs (Timber Production, Modified Landscape, and Scenic Viewshed) managed as roadless serves as a measure of development potential. Approximately 7 percent (1,151,700 acres) of the Forest is presently managed in development LUDs. This total would increase under all action alternatives, with net gains ranging from about 53,300 acres (Alternative 2) to more than 2.1 million acres (Alternatives 5 and 6).

Changes in Suitable Timber

Not all lands allocated to development LUDs are available for timber management. As described in Appendix A to the 2016 Forest Plan, old-growth forest located within Phases 2 and 3 of the Tongass Timber Sale Program Adaptive Management Strategy or within the T77 Watersheds and The Nature Conservancy/Audubon Conservation Priority Areas is identified as not suitable for timber production. As a result, not all increases in development LUD acres would provide additional opportunities for timber harvest. Changes in suitable old-growth and young-growth acres available for harvest are, therefore, used as a relative measure of timber opportunity to differentiate between alternatives. These estimated changes do not represent estimates of how much harvest would occur under each alternative. Actual harvest locations would depend on the timber sales that are carried out during plan implementation.

Forest-wide, approximately 227,000 acres are presently considered suitable old-growth available for harvest. This total would increase under all the action alternatives, with gains ranging from about 20,000 acres (Alternative 2) to 168,000 acres (Alternatives 5 and 6). Approximately 334,000 acres are considered suitable for young-growth harvest, with estimated increases ranging from 3 to 6 percent of the existing total, about 11,000 acres (Alternative 2) to 20,000 acres (Alternative 6).

Appendix D presents suitable old-growth and young-growth timber maps by for each CUA by alternative. These maps are available electronically only. They are included on the electronic storage device accompanying this document and are also available online at: https://www.fs.usda.gov/project/?project=54511.

Estimated Timber Harvest over 100 Years

Total acres harvested are assumed to remain constant across all alternatives. After 25 years of Forest Plan implementation, an estimated 24,000 old-growth acres would be harvested. Old growth would continue to be harvested over time, but at a much reduced rate, with an estimated total of 42,500 old-growth acres expected to be harvested after 100 years. The corresponding totals for young-growth are 43,300 acres after 25 years and 284,100 acres after 100 years. Estimated harvest totals over 100 years show the amount of harvest likely to occur by alternative and CUA. Estimated harvest acres were distributed over the suitable old-growth base using the following assumptions: 1) all harvest acres were assigned to medium and high volume old-growth only; 2) based on historic harvest distributions, 95 percent of old-growth harvest was assumed to occur on the five south ranger districts (Craig, Ketchikan-Misty Fjords, Petersburg, Thorne Bay, and Wrangell); and 3) harvest was assumed to occur in Value Comparison Units with higher stumpage values as estimated for the 2008 Forest Plan using the Spectrum model. The resulting distributions represent best estimates based on the available information and the above assumptions. Viewed by CUA, this measure is sensitive to the relative distribution of Forest-wide suitable acres. Decreases in the share of total Forest-wide suitable acres (as adjusted based on the above assumptions) relative to Alternative 1, for example, result in corresponding decreases in estimated harvest over 100 years, despite an increase in suitable acres available for harvest. Actual harvest locations will depend on the timber sales that are carried out during plan implementation.

Appendix E

Potential Impacts by Resource Area

The alternatives have implications for specific places on the Forest and particular parts of the CUAs of various communities. They also have potential implications for resource dependent industries, infrastructure development, Alaska Native customary and traditional uses, and the availability of subsistence resources. The following paragraphs discuss these potential implications in general terms to provide some background for the following community assessments.

Forest Products

The action alternatives would all increase the suitable acres available for harvest, with the potential to provide additional opportunities for the Forest Service to develop economic timber sale offerings. Suitable acres would be added in three broad categories or areas: areas that have been substantially altered as identified by known prior road construction or timber harvest[3] (Alternatives 2 to 6); logical extension areas (Alternatives 3 to 6); and areas more distant from roads (Alternatives 4 to 6) (as discussed in Chapter 2 and the *Key Issue 2* section of this EIS). In addition, suitable old-growth acres would be added in Community Priority ARAs (Alternative 3). The added suitable acres in areas where roads already exist (roaded roadless) or could be logically extended (logical extensions) are generally considered relatively economic to harvest. Acres identified as more distant from roads are likely to be more expensive to harvest and less likely to be accessed for timber production under the current 2016 Forest Plan.

Estimated direct forest products employment in the first decade of implementation would be very similar under all six alternatives as discussed in the *Key Issue 2*. Estimated employment is presented as a range from a maximum allowable export of timber scenario based on the existing Region 10 limited export policy to a maximum domestic processing scenario that assumes only Alaska yellow-cedar would be exported unprocessed.

Recreation and Tourism

Changes in land management have the potential to affect recreation opportunities on the Forest. Impacts could occur where timber management and development activities conflict with recreation opportunities for community residents and/or commercial recreation operators and their clients. Changes in suitable old-growth and young-growth acres for harvest provide an indicator of potential timber opportunity for each CUA by alternative. For some recreation uses, additional development for timber harvest and other infrastructure could provide increased access to the Forest and more opportunities. Impacts to ROS settings and recreation places are assessed in the *Recreation* section of this EIS.

The *Recreation* section also assesses potential impacts to commercial outfitter/guide businesses. This assessment used changes in suitable old-growth acres in conjunction with information on existing outfitter/guide use to help focus on potentially affected areas. A screening review based on these factors identified 15 outfitter/guide use areas where potential conflicts between existing outfitter/guide use and future management could occur based on recent patterns of existing use. These are outfitter/guide use areas with recent outfitter/guide use where there would be increases in suitable old-growth acres under one or more of the action alternatives. These potential impacts are discussed in more detail in the *Recreation* section.

Infrastructure Development

With some exceptions, federal and state road development is presently limited in IRAs. Exceptions include roads with reserved or outstanding rights, roads provided for by statute or treaty, or road development related to a Federal Aid Highway. Roadless protection would be removed to various degrees under the action alternatives with corresponding implications for regional highway development. In most cases, changes in roadless management, as well as changes in the number of acres managed as

[3] Removed areas include both development and non-development LUDs. These areas are generally known as "roaded roadless" areas but also include additional areas considered to be substantially altered.

roadless, would be more permissive with respect to regional road systems. In addition to those roads presently excepted, Roadless Priority ARAs would also allow roads needed for the connection of communities and development of the regional transportation system as identified in the State of Alaska's SATP. Timber Priority ARAs and areas removed from roadless protection would remove all roadless rule-related restrictions on road building. As a result, more areas would be available for additional types of regional road development under Alternatives 4 to 6. Future road projects would be subject to funding constraints and evaluated in detail on a project-by-project basis. Potential transportation effects are discussed in more detail in the *Transportation, Energy, Communications, and Infrastructure* section of this EIS.

None of the alternatives are expected to substantially affect the development of energy projects or related infrastructure. Removing roadless designations in areas under Alternatives 2 through 6 would simplify the process for projects but would not necessarily result in an increase in the number of projects developed. In areas where new roadless areas are added or expanded, the permitting process could be more complicated, but projects would not be prohibited. An exemption for utility systems in Roadless Priority ARAs under Alternatives 2, 3, 4, and 5 and Community Priority ARAs (Alternative 3), would allow for tree cutting and road construction. Under Alternative 4, Timber Priority ARAs would not prohibit tree cutting or road construction at all. Where restrictions are removed, or exemptions added, the greatest effect may be in making the permitting process for developers less burdensome, resulting in more a rapid permitting process rather than an increase in the number of sites developed.

Alaska Native Customary and Traditional Uses

Areas allocated to Roadless Priority and Community Priority ARAs would explicitly allow the cutting, utilization, customary trade, and removal of trees for the purposes of Alaska Native customary and traditional uses, as well as road construction deemed necessary by a federally recognized Tribe for access to Alaska Native cultural sites. This type of use would also be allowed in Timber Priority ARAs, which allow all timber harvest and road construction. These types of uses would also be allowed in areas removed from roadless protection, subject to applicable Forest Plan standards and guidelines. Management under the Roadless Priority and Community Priority ARAs is generally assumed to be more beneficial in this context than management under the Timber Priority ARA or full exemption because it potentially allows access for Alaska Native cultural purposes without also allowing access for commercial timber harvest and other competing uses.

Subsistence

Marine resources, including fish, mammals, and plants, account for more than half of total per capita harvest in all Southeast Alaska communities, ranging from 55 percent in Tenakee Springs to 88 percent in Skagway (see Figure 3.12-2 in the *Subsistence* section of this EIS). These resources are not expected to be affected by any of the alternatives. Among the subsistence resources of greatest importance (salmon, other finfish, marine invertebrates, and deer), deer is the only one that could be potentially significantly affected by the alternatives evaluated in the 2016 Forest Plan Amendment EIS (USDA Forest Service 2016). Therefore, the subsistence analyses prepared for each community for that EIS used deer as a key indicator for potential impacts to subsistence resources. Effects to subsistence resources have the potential to affect subsistence users.

Extensive analysis on deer was done for the 1997 Forest Plan and subsequent 2008 and 2016 Forest Plan Amendments. Analyses conducted during the 2016 Forest Plan Amendment EIS also included information on summer and winter forage and effects of roadbuilding, noting that the expected ecological responses of deer to old-growth and mature young-growth timber harvest, road building, and vegetation succession will be similar to those predicted previously, but the extent of future impacts would be expected to be reduced from earlier analyses because lower levels of old-growth harvest are proposed in all action alternatives.

As part of the 2016 Forest Plan Amendment EIS, the interagency deer habitat capability model was used to assess existing habitat capability within the planning area. This analysis found that Forest-wide,

approximately 89 percent of the original (1954) habitat capability remains, ranging from 72 to 100 percent depending on the biogeographic province. The greatest reductions in deer habitat capability have occurred, and will continue to occur, in provinces where timber harvest has been concentrated (the North Central Prince of Wales, East Baranof, and Etolin Island biogeographic provinces). As noted above, the model output was also analyzed for the WAAs where each community obtained approximately 75 percent of their average annual deer harvest. This analysis originally prepared for the 1997 Forest Plan Revision FEIS was updated for the 2016 Forest Plan Amendment EIS (USDA Forest Service 2016). The results of the 2016 analysis for the current Forest Plan are used as part of the subsistence assessment presented below for each community.

In addition to evaluating projected changes in deer habitat capability by WAA, the 2016 analysis also drew upon the Deer Availability and Anticipated Demand analysis completed for the 1997 Forest Plan Revision FEIS which assessed the ability of the 1997 alternatives to provide sufficient habitat capability over the long term for deer hunted by local residents, all rural hunters, and all hunters for each community. All of the 1997 alternatives included substantially higher levels of timber harvest than the alternatives evaluated in the 2016 Forest Plan Amendment EIS and, therefore, potential impacts were expected to be lower under all of the 2016 alternatives, including the current Forest Plan. However, the 2016 Forest Plan Amendment EIS acknowledged that some impacts could still occur, with the subsistence use of deer potentially affected to the point in some areas that some restriction on hunting might be necessary over the long term, especially for non-rural hunters. The 2016 analysis identified this possibility for 19 of the 34 communities evaluated for all five alternatives analyzed in that EIS, with anticipated impacts largely due to past harvest in the affected areas. These communities were Coffman Cove, Craig, Haines, Hollis, Hoonah, Kake, Kasaan, Klawock, Naukati Bay, Petersburg/Kupreanof, Point Baker, Port Protection, Saxman, Sitka, Tenakee Springs, Thorne Bay, Whale Pass, Wrangell, and Yakutat. Impacts and possible restrictions were also identified for the non-rural communities of Juneau and Ketchikan.

The following assessment considers potential impacts to subsistence for 32 Southeast Alaska communities using the results of the 2016 Forest Plan Amendment EIS analysis and two primary measures by alternative: 1) change in suitable old-growth acres available for harvest, and 2) changes in projected old-growth harvest over 100 years.

All six alternatives evaluated in this EIS, including No Action, would result in a reduction in deer habitat capability from existing conditions due to the harvest of mature young-growth and productive old-growth (POG) forest. Over the long term, reductions in habitat capability would reduce carrying capacity, or the numbers of deer an area is capable of supporting given the available resources. This could lead to a decline in the deer population, particularly following severe winters, if the demand for resources (e.g., food or habitat) exceeds the amount available.

Timber harvest tends to affect deer-related subsistence activities in two ways. In the short run, approximately 20 to 30 years following harvest, deer populations tend to increase in harvested areas. In the long run, populations tend to decline as the canopy in even-aged forest stands closes, resulting in lower habitat quality. Reductions in habitat quality can be reduced through management (e.g., thinning) of young-growth stands. Deer populations in unharvested areas are likely to remain at fairly constant levels that are typically lower than a comparable harvested area in the short run, but higher in the long run. Road construction also affects subsistence by providing subsistence hunters with ready access to areas that may have been previously inaccessible. This effect may be perceived as either positive or negative depending on the parties involved, as increased access may lead to increased competition for resources. Potential effects are likely to vary by community and may be perceived differently by members of the same or neighboring communities.

While there would be some new road access under all alternatives in the long run, nearly all new roads constructed under the alternatives would be closed following harvest. These roads would, therefore, not be available for use by highway vehicles or high-clearance vehicles. They would, however, be available for access by other methods and would, as a result, have the potential to affect existing subsistence patterns.

In the event a subsistence harvest priority is needed for rural residents, the state or federal fish and wildlife management authorities would first limit commercial, sport, and non-local subsistence harvests to mitigate impacts to local subsistence harvests.

Individual Community Assessments

The following community assessments are presented in alphabetical order.

Angoon (Aangóon)

Community Use Area

Angoon's CUA encompasses a total of 1,092,036 acres (Figure E-1). Almost half of this area (43 percent) is presently managed as roadless (Table E-3). This share would drop to 36 percent under Alternative 3 and 26 percent under Alternative 5, with no acres managed as roadless under Alternative 6. The removal of LUD II acres under Alternative 3 accounts for the entire decrease in roadless acres under this alternative. These areas would retain their congressional protections and continue to be managed in a roadless state. Alternative 4 includes ARA acres that would be managed as Timber Priority and allow timber harvest and road building. Timber Priority acres account for 14 percent of the ARA in the Angoon CUA under Alternative 4. Areas allocated to Roadless Priority and Community Priority ARAs would explicitly allow the cutting, utilization, customary trade, and removal of trees for the purposes of Alaska Native customary and traditional uses, as well as road construction deemed necessary by a federally recognized Tribe for access to Alaska Native cultural sites. This type of use would also be allowed in Timber Priority areas, which allow all timber harvest and road construction.

Appendix E

Figure E-1
Angoon's Community Use Area

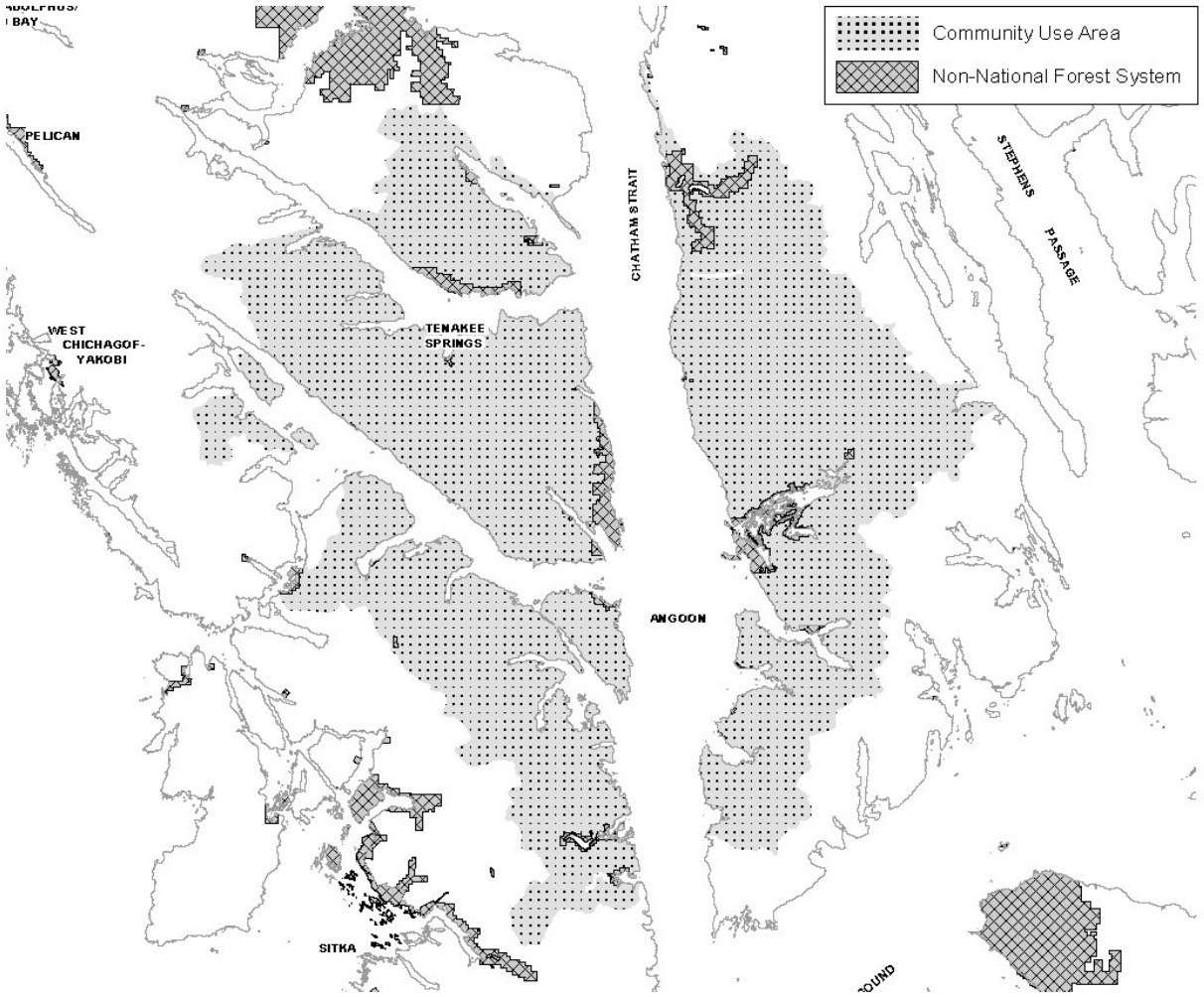

Table E-3
Roadless Areas, ARA Management Categories, and Development Opportunity in Angoon's Community Use Area

	Alternative					
Roadless Category (acres)	**1**	**2**	**3**	**4**	**5**	**6**
Total Community Use Area	1,092,036	1,092,036	1,092,036	1,092,036	1,092,036	1,092,036
Total Roadless Area	468,606	490,275	396,635	445,567	282,843	0
Roadless Share	43%	45%	36%	41%	26%	0%
ARA Management Categories (acres)						
LUD II Priority	na	73,141	0	73,141	73,062	0
Watershed Priority	na	218,369	297	0	0	0
Roadless Priority	na	198,765	177,968	311,309	209,781	0
Community Priority	na	0	297	0	0	0
Timber Priority	na	0	0	61,117	0	0
Development Opportunity						
Development LUDs (acres)	137,603	118,644	134,479	155,409	322,599	322,608

Table E-3 (continued)
Roadless Areas, ARA Management Categories, and Development Opportunity in Angoon's Community Use Area

	Alternative					
Roadless Category (acres)	**1**	**2**	**3**	**4**	**5**	**6**
Timber Opportunity (Acres Suitable for Harvest)						
Old-Growth	26,404	24,761	29,389	49,497	50,571	50,571
Young-Growth	34,326	34,378	34,378	34,460	34,475	34,816
Estimated Harvest over 100 Years (acres)						
Old-Growth	1,235	1,235	1,254	1,170	1,181	1,181
Young-Growth	29,226	28,313	28,011	28,067	27,935	27,955

na = not applicable

Not all acres removed from roadless management would be available for development. The change in acres in development LUDs serves as a measure of development potential as it presently exists by alternative. Approximately 13 percent (137,600 acres) of the Angoon CUA is presently managed in development LUDs (Table E-3). This total would increase under Alternatives 4, 5, and 6, with net gains ranging from about 17,800 acres (Alternative 4) to approximately 185,000 acres (Alternatives 5 and 6). Under Alternatives 2 and 3, the total area of the Angoon CUA managed in development LUDs would decrease by approximately 19,000 and 3,100 acres, respectively.

Suitable old-growth and young-growth acres available for harvest would increase under Alternatives 3 through 6, as well as for young-growth under Alternative 2. Estimated net gains in suitable old-growth range from about 3,000 acres (Alternative 3) to 24,200 acres (Alternatives 5 and 6). Under Alternative 2, suitable old-growth acres available for harvest would decrease by about 1,650 acres. Increases in suitable young-growth acres would be 1 percent or less under all action alternatives.

Total acres harvested are assumed to remain constant across all alternatives. Estimated old-growth harvest over 100 years ranges from about 1,200 acres (Alternatives 5 and 6) to 1,250 acres (Alternatives 1 to 3) in the Angoon CUA. This represents a small decrease relative to Alternative 1 for Alternatives 4 to 6, and very little change for Alternatives 2 and 3. Estimated young-growth harvest ranges from about 28,000 acres (Alternatives 3 to 6) to 29,200 acres (Alternative 1), with a decrease in potential young-growth harvest relative to Alternative 1 in all cases, with slightly larger decreases under Alternatives 5 and 6 (Table E-3).

Subsistence

No significant effect on salmon, other finfish, or invertebrate habitat capability is expected from implementation of any alternative. These resources account for 52 percent of the total edible pounds of subsistence resources harvested by Angoon households (Kruse and Frazier 1988). Marine resources (fish and marine invertebrates), primarily salmon, accounted for the majority (62 percent) of per capita subsistence harvest in Angoon in 2012 (ADF&G 2018).

The 1988 Tongass Resource Use Cooperative Survey (TRUCS) study found that deer accounted for 30 percent of the total edible pounds of subsistence resources harvested by Angoon households (Kruse and Frazier 1988). Deer accounted for 28 percent of per capita subsistence harvest by Angoon residents in 2012 (ADF&G 2018).

From 2004 to 2013, Angoon residents took approximately 75 percent of their deer from six WAAs, with the majority (59 percent) obtained from three WAAs on Admiralty Island (4042, 4054, and 4055) (Table E-4). The 2016 Forest Plan Amendment EIS found that none of the three most important WAAs would be affected by the current Forest Plan. The next two WAAs in importance contribute 12 percent of Angoon's deer harvest and would also not be affected by the current Forest Plan. The sixth WAA in importance, WAA 3308, with an annual average harvest of 4 deer, was found to be minimally affected by the current Forest Plan, with deer habitat capability forecast to decrease by 1 percent after 100 years, from 66 percent to 65 percent (Table E-4). Therefore, the 2016 Forest Plan Amendment EIS analysis concluded

that the current Forest Plan should be able to provide habitat capability for deer hunted by Angoon residents, as well as for all deer hunted within the WAAs, over the course of Forest Plan implementation.

Table E-4
Deer Harvest and Deer Habitat Capability on NFS Lands for the WAAs where Angoon Residents Obtain Approximately 75 Percent of their Average Annual Deer Harvest[1]

	Average Deer Harvest from 2004 to 2013			Deer Habitat Capability[3]		
WAA	Angoon Residents	All Rural Hunters[2]	All Hunters	2014	After 100 Years of Implementation	Change
4042	31	32	41	100%	100%	0%
4055	28	33	48	99%	99%	0%
4054	18	19	21	100%	100%	0%
3939	9	71	105	100%	100%	0%
4041	6	16	19	91%	91%	0%
3308	4	61	107	66%	65%	-1%

[1] Calculated based on harvest where location is known.
[2] The category "All Rural Hunters" includes residents of Southeast Alaska communities, excluding the cities of Juneau and Ketchikan.
[3] Deer habitat capability in 2014 and after 100 Years of full implementation is expressed as a percent of the 1954 habitat capability. Data presented for 100 Years of Implementation are estimates developed for the current Forest Plan in the 2016 Forest Plan Amendment EIS (USDA Forest Service 2016).

There are no suitable old-growth acres or projected harvest acres in the five most important WAAs under any of the alternatives evaluated in this EIS (Tables E-5 and E-6). The number of suitable old-growth acres would increase in WAA 3308, with net increases ranging from 100 acres (Alternative 2) to 3,510 acres (Alternative 6), but projected harvest is expected to decrease relative to Alternative 1 under all five action alternatives, dropping from 710 acres (Alternative 1) to 640 acres (Alternative 6). Therefore, no additional impacts are anticipated under any of the alternatives.

Table E-5
Suitable Old-Growth by WAA and Alternative for the WAAs where Angoon Residents Obtain Approximately 75 Percent of their Average Annual Deer Harvest

			Change from Alternative 1 (Acres)				
WAA	Total Acres	Alt 1	Alt 2	Alt 3	Alt 4	Alt 5	Alt 6
4042	52,983	-	-	-	-	-	-
4055	68,468	-	-	-	-	-	-
4054	66,419	-	-	-	-	-	-
3939	66,460	-	-	-	-	-	-
4041	55,265	-	-	-	-	-	-
3308	100,813	6,500	100	980	2,560	3,510	3,510

Table E-6
Projected Old-Growth Harvest by WAA and Alternative for the WAAs where Angoon Residents Obtain Approximately 75 Percent of their Average Annual Deer Harvest

			Change from Alternative 1 (Acres)				
WAA	Total Acres	Alt 1	Alt 2	Alt 3	Alt 4	Alt 5	Alt 6
4042	52,983	-	-	-	-	-	-
4055	68,468	-	-	-	-	-	-
4054	66,419	-	-	-	-	-	-
3939	66,460	-	-	-	-	-	-
4041	55,265	-	-	-	-	-	-
3308	100,813	710	-	(30)	(110)	(70)	(70)

Coffman Cove

Community Use Area

Coffman Cove's CUA encompasses a total of 1,195,299 acres (Figure E-2). Almost half of this area (48 percent) is presently managed as roadless (Table E-7). This share would drop to 28 and 30 percent under Alternatives 3 and 5, respectively, with no acres managed as roadless under Alternative 6. The removal of LUD II acres under Alternative 3 accounts for approximately 68 percent of the decrease in roadless acres under this alternative. These areas would retain their congressional protections and continue to be managed in a roadless state. Alternative 4 includes ARA acres that would be managed as Timber Priority and allow timber harvest and road building. Timber Priority acres account for 8 percent of the ARA in the Coffman Cove CUA. Areas allocated to Roadless Priority would explicitly allow the cutting, utilization, customary trade, and removal of trees for the purposes of Alaska Native customary and traditional uses, as well as road construction deemed necessary by a federally recognized Tribe for access to Alaska Native cultural sites. This type of use would also be allowed in Timber Priority areas, which allow all timber harvest and road construction.

Figure E-2
Coffman Cove's Community Use Area

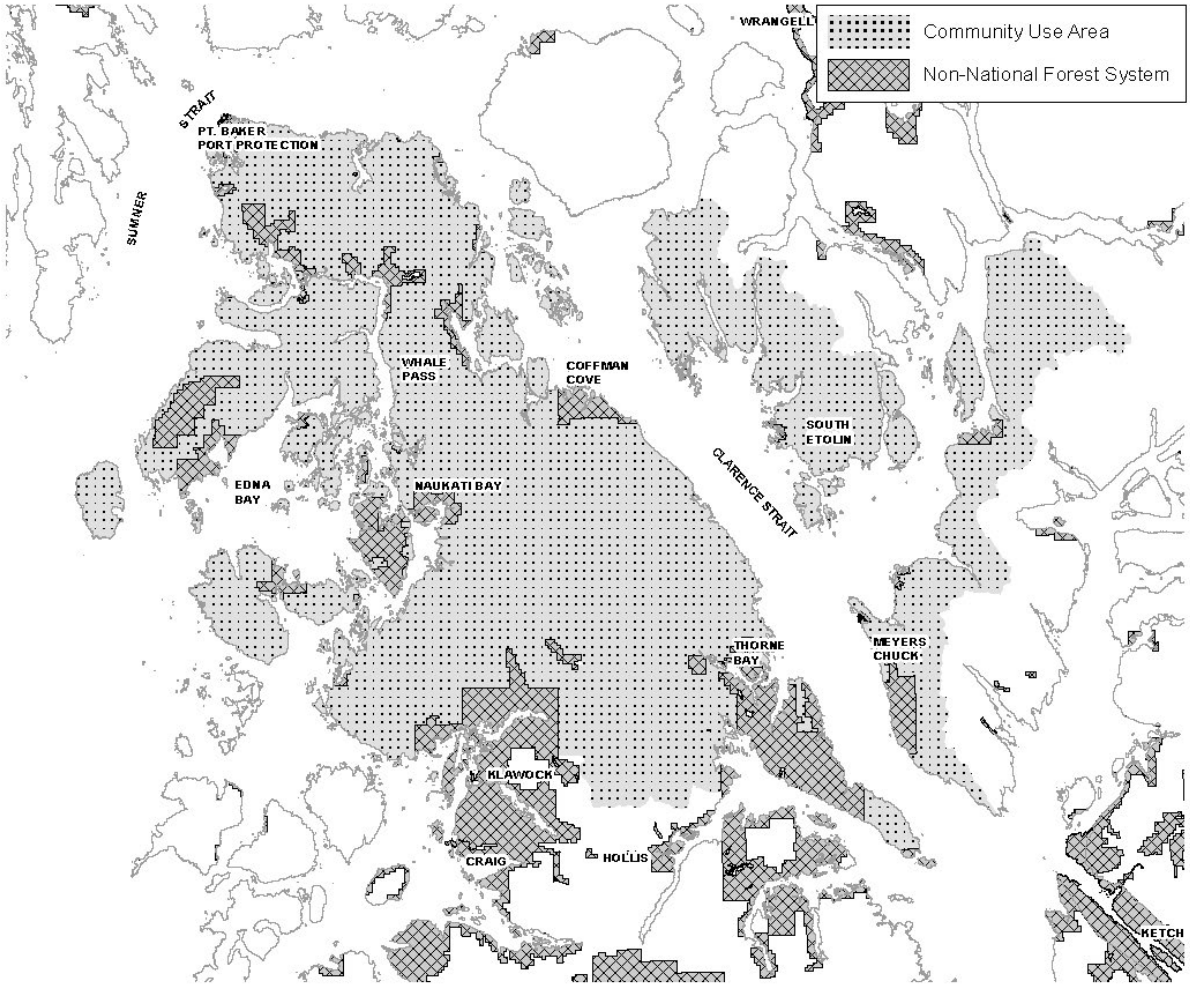

Table E-7
Roadless Areas, ARA Management Categories, and Development Opportunity in Coffman Cove's Community Use Area

Roadless Category (acres)	Alternative					
	1	2	3	4	5	6
Total Community Use Area	1,195,299	1,195,299	1,195,299	1,195,299	1,195,299	1,195,299
Total Roadless Area	578,856	561,853	340,328	488,512	354,946	0
Roadless Share	48%	47%	28%	41%	30%	0%
ARA Management Categories (acres)						
LUD II Priority	na	155,790	0	155,790	155,432	0
Watershed Priority	na	239,472	237,978	0	0	0
Roadless Priority	na	166,591	105,021	293,088	199,514	0
Community Priority	na	0	0	0	0	0
Timber Priority	na	0	0	39,633	0	0
Development Opportunity						
Development LUDs (acres)	353,074	370,420	420,407	420,893	566,305	566,314
Timber Opportunity (Acres Suitable for Harvest)						
Old-Growth	65,141	68,388	79,899	87,329	89,401	89,401
Young-Growth	133,766	134,995	135,051	135,131	135,502	135,851
Estimated Harvest over 100 Years (acres)						
Old-Growth	14,072	13,285	12,077	11,431	11,514	11,514
Young-Growth	113,892	111,181	110,038	110,059	109,796	109,080

na = not applicable

Not all acres removed from roadless management would be available for development. The change in acres in development LUDs serves as a measure of development potential as it presently exists by alternative. Approximately 30 percent (353,100 acres) of the Coffman Cove CUA is presently managed in development LUDs. This total would increase under all action alternatives, with net gains ranging from about 17,350 acres (Alternative 2) to 213,200 acres (Alternatives 5 and 6).

Suitable old-growth and young-growth acres available for harvest would increase under all action alternatives. Estimated net gains in suitable old growth range from about 3,250 acres (Alternative 2) to 24,300 acres (Alternatives 5 and 6). Increases in suitable young-growth acres would be equivalent to 2 percent or less of the existing total under all action alternatives.

Total acres harvested are assumed to remain constant across all alternatives. Estimated old-growth harvest over 100 years in the Coffman Cove CUA ranges from about 11,500 acres (Alternatives 5 and 6) to 14,100 acres (Alternative 1). Estimated young-growth harvest ranges from about 109,100 acres (Alternative 6) to 113,900 acres (Alternative 1), with a decrease in potential young-growth harvest relative to Alternative 1 in all cases, with larger decreases under Alternatives 3 to 6 (Table E-7).

Subsistence

No significant effect on salmon, other finfish, or invertebrate habitat capability is expected from implementation of any alternative. These resources account for 65 percent of the total edible pounds of subsistence resources harvested by Coffman Cove households (Kruse and Frazier 1988). Marine resources (fish and marine invertebrates) accounted for the majority (71 percent) of per capita subsistence harvest in the community in 1998 (ADF&G 2018).

The 1988 TRUCS study found that deer accounted for 32 percent of the total edible pounds of subsistence resources harvested by Coffman Cove households (Kruse and Frazier 1988). Deer accounted for 20 percent of per capita subsistence harvest by Coffman Cove residents in 1998 (ADF&G 2018).

Residents of Coffman Cove harvest the majority (70 percent) of their deer from two WAAs in the eastern half of north-central Prince of Wales Island (1420 and 1421). The Coffman Cove portion represents about one-quarter of the total harvest and about one-third of the rural hunter harvest in these WAAs. About 38 percent of the combined harvest in these WAAs is by non-rural hunters, suggesting that there is a harvest buffer that could be restricted, if necessary, before restrictions are placed on rural harvests.

All of the important WAAs used by Coffman Cove residents (the above two and WAA 1315) occur in an area with substantial past timber harvest and, therefore, deer habitat capabilities are currently estimated to be considerably below 1954 levels (Table E-8). The 2016 Forest Plan Amendment EIS analysis found that the current Forest Plan would reduce estimated habitat capabilities after 100 years by a further 4 to 6 percent of 1954 levels (Table E-8).

Table E-8
Deer Harvest and Deer Habitat Capability on NFS Lands for the WAAs where Coffman Cove Residents Obtain Approximately 75 Percent of their Average Annual Deer Harvest

	Average Deer Harvest from 2004 to 2013			Deer Habitat Capability[3]		
WAA	Coffman Cove Residents	All Rural Hunters[2]	All Hunters	2014	After 100 Years of Implementation	Change
1420	59	158	276	49%	44%	-5%
1421	31	76	102	68%	64%	-4%
1315	7	201	317	56%	50%	-6%

[1] Calculated based on harvest where location is known.
[2] The category "All Rural Hunters" includes residents of Southeast Alaska communities, excluding the cities of Juneau and Ketchikan.
[3] Deer habitat capability in 2014 and after 100 Years of full implementation is expressed as a percent of the 1954 habitat capability. Data presented for 100 Years of Implementation are estimates developed for the current Forest Plan in the 2016 Forest Plan Amendment EIS (USDA Forest Service 2016).

The 2016 Forest Plan Amendment EIS analysis found that use of most subsistence resources by Whale Pass residents (fish and marine invertebrates) was not expected to be affected by any of the alternatives. Based on the Deer Availability and Anticipated Demand analysis completed for the 1997 Forest Plan EIS, the 2016 analysis found that subsistence use of deer may be affected to the point that some restriction on hunting might be necessary over the long term, especially for non-rural hunters. The risk of hunting restrictions would be reduced somewhat, through more intensive management (e.g., thinning) of the existing and future closed-canopy, young-growth forests in this area. Indirect effects associated with increased competition for deer within Coffman Cove's subsistence use areas could also occur if hunters from other communities were displaced due to timber harvest activity.

Suitable old-growth acres would increase relative to Alternative 1 in all three of the WAAs under all of the action alternatives (Table E-9). However, projected old-growth harvest would decrease relative to Alternative 1 in these WAAs under all of the action alternatives (Table E-10). These relative changes in projected harvest are small in absolute terms (i.e., number of acres) and none of the alternatives are expected to affect the findings of the 2016 Forest Plan Amendment.

Table E-9
Suitable Old-Growth by WAA and Alternative for the WAAs where Coffman Cove Residents Obtain Approximately 75 Percent of their Average Annual Deer Harvest

			Change from Alternative 1 (Acres)				
WAA	Total Acres	Alt 1	Alt 2	Alt 3	Alt 4	Alt 5	Alt 6
1420	42,409	3,210	230	390	500	500	500
1421	90,038	2,510	-	-	40	110	110
1315	55,043	3,820	230	1,240	1,240	1,240	1,240

Table E-10
Projected Old-Growth Harvest by WAA and Alternative for the WAAs where Coffman Cove Residents Obtain Approximately 75 Percent of their Average Annual Deer Harvest

			Change from Alternative 1 (Acres)				
WAA	Total Acres	Alt 1	Alt 2	Alt 3	Alt 4	Alt 5	Alt 6
1420	42,409	960	(30)	(170)	(260)	(270)	(270)
1421	90,038	750	(70)	(200)	(270)	(260)	(260)
1315	55,043	1,140	(40)	(30)	(180)	(200)	(200)

Appendix E

Craig (Shaan da)

Community Use Area

Craig's CUA encompasses a total of 733,670 acres (Figure E-3). Over half of this area (57 percent) is presently managed as roadless (Table E-11). This share would drop to 33 percent under Alternatives 3 and 5, with no acres managed as roadless under Alternative 6. The removal of LUD II acres under Alternative 3 accounts for approximately 55 percent of the decrease in roadless acres under this alternative. These areas would retain their congressional protections and continue to be managed in a roadless state. Alternative 4 includes ARA acres that would be managed as Timber Priority and allow timber harvest and road building. Timber Priority acres account for 12 percent of the ARA in the Craig CUA. Areas allocated to Roadless Priority would explicitly allow the cutting, utilization, customary trade, and removal of trees for the purposes of Alaska Native customary and traditional uses, as well as road construction deemed necessary by a federally recognized Tribe for access to Alaska Native cultural sites. This type of use would also be allowed in Timber Priority areas, which allow all timber harvest and road construction.

Figure E-3
Craig's Community Use Area

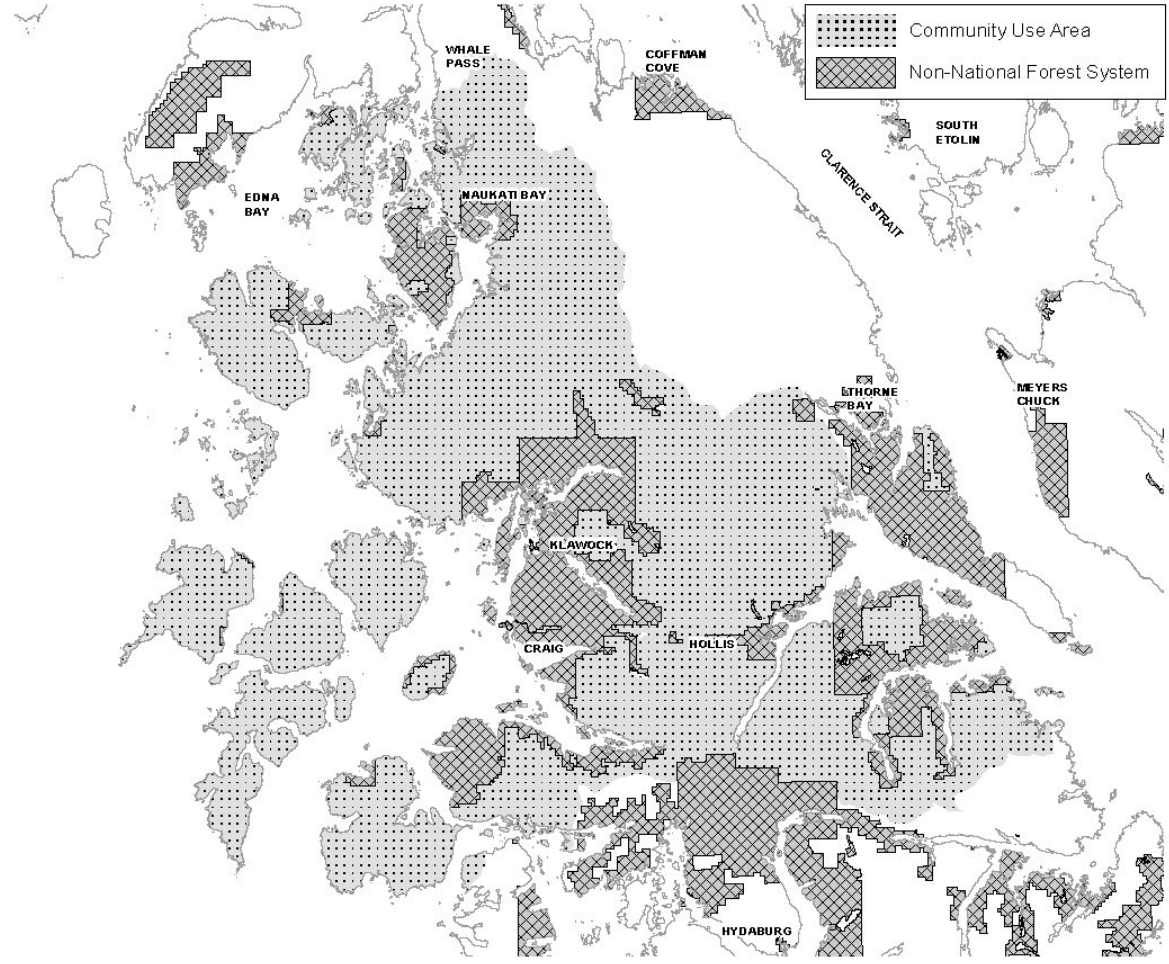

Table E-11
Roadless Areas, ARA Management Categories, and Development Opportunity in Craig's Community Use Area

Roadless Category (acres)	Alternative					
	1	2	3	4	5	6
Total Community Use Area	733,670	733,670	733,670	733,670	733,670	733,670
Total Roadless Area	418,413	396,858	239,678	330,167	240,160	0
Roadless Share	57%	54%	33%	45%	33%	0%
ARA Management Categories (acres)						
LUD II Priority	na	99,731	0	99,731	98,201	0
Watershed Priority	na	132,064	29,012	0	0	0
Roadless Priority	na	165,063	80,188	192,343	141,960	0
Community Priority	na	0	29,012	0	0	0
Timber Priority	na	0	0	38,093	0	0
Development Opportunity						
Development LUDs (acres	204,185	225,706	276,493	280,712	375,588	381,527
Timber Opportunity (Acres Suitable for Harvest)						
Old-Growth	40,738	46,824	60,255	64,177	65,495	65,495
Young-Growth	72,268	75,911	76,953	76,940	76,995	77,119
Estimated Harvest over 100 Years (acres)						
Old-Growth	9,263	9,435	9,613	8,691	8,712	7,043
Young-Growth	61,531	62,519	62,701	62,665	62,388	61,922

na = not applicable

Not all acres removed from roadless management would be available for development. The change in acres in development LUDs serves as a measure of development potential as it presently exists by alternative. Approximately 28 percent (204,200 acres) of the Craig CUA is presently managed in development LUDs. This total would increase under all action alternatives, with net gains ranging from about 21,500 acres (Alternative 2) to 177,350 acres (Alternative 6).

Suitable old-growth and young-growth acres available for harvest would increase under all action alternatives. Estimated net gains in suitable old growth range from about 6,100 acres (Alternative 2) to 24,800 acres (Alternatives 5 and 6). Increases in suitable young-growth acres range from about 3,650 acres (Alternative 2) to 4,850 acres (Alternative 6).

Total acres harvested are assumed to remain constant across all alternatives. Estimated old-growth harvest over 100 years ranges from about 7,050 acres (Alternative 6) to 9,600 acres (Alternative 3). Estimated young-growth harvest ranges from about 61,500 acres (Alternative 1) to 62,700 acres (Alternatives 3 and 4), with an increase in potential young-growth harvest relative to Alternative 1 in all cases (Table E-11).

Subsistence

No significant effect on salmon, other finfish, or invertebrate habitat capability is expected from implementation of any alternative. These resources account for 70 percent of the total edible pounds of subsistence resources harvested by Craig households (Kruse and Frazier 1988). Marine resources (fish and marine invertebrates) accounted for 67 percent of per capita subsistence harvest in Craig in 1997 (ADF&G 2018).

The 1988 TRUCS study found that deer accounted for 22 percent of the total edible pounds of subsistence resources harvested by Craig households (Kruse and Frazier 1988). Deer accounted for 19 percent of per capita subsistence harvest by Craig residents in 1997 (ADF&G 2018).

Deer harvest by Craig residents is spread over many WAAs, but a majority (55 percent) are harvested from six WAAs in central and northern Prince of Wales Island (the top six WAAs in Table E-12). The Craig portion of the harvest in these six WAAs represents about one-third of the total harvest and about one-half of the rural hunter harvest (Table E-12). About 32 percent of the combined harvest in these WAAs is by non-rural hunters, indicating that there is a harvest buffer that could be restricted, if necessary, before restrictions are placed on rural harvests.

The majority of the WAAs used heavily by Craig residents are in areas with substantial past timber harvest, and deer habitat capabilities are currently estimated to be below 1954 levels (Table E-12). The 2016 Forest Plan Amendment EIS analysis found that additional harvest under the current Forest Plan could further reduce estimated habitat capabilities by 1 to 7 percent after 100 years, except for two WAAs where there would be no effect (0902 and 1107) (Table E-12).

Table E-12
Deer Harvest and Deer Habitat Capability on NFS Lands for the WAAs where Craig Residents Obtain Approximately 75 Percent of their Average Annual Deer Harvest[1]

	Average Deer Harvest from 2004 to 2013			Deer Habitat Capability[3]		
WAA	Craig Residents	All Rural Hunters[2]	All Hunters	2014	After 100 Years of Implementation	Change
1422	106	247	383	57%	50%	-7%
1318	70	159	198	90%	84%	-6%
1214	60	120	235	77%	71%	-6%
1332	56	67	76	88%	87%	-1%
0902	55	65	82	100%	100%	0%
1317	51	93	133	58%	56%	-2%
0901	43	56	66	95%	93%	-2%
1319	40	169	226	74%	69%	-5%
1107	30	99	130	99%	99%	0%
1315	29	201	317	56%	50%	-6%

[1] Calculated based on harvest where location is known.
[2] The category "All Rural Hunters" includes residents of Southeast Alaska communities, excluding the cities of Juneau and Ketchikan.
[3] Deer habitat capability in 2014 and after 100 Years of full implementation is expressed as a percent of the 1954 habitat capability. Data presented for 100 Years of Implementation are estimates developed for the current Forest Plan in the 2016 Forest Plan Amendment EIS (USDA Forest Service 2016).

The 2016 Forest Plan Amendment EIS analysis found that use of most subsistence resources by Craig residents (fish and marine invertebrates) was not expected to be affected by any of the alternatives. Based on the Deer Availability and Anticipated Demand analysis completed for the 1997 Forest Plan Revision EIS, the 2016 analysis found that subsistence use of deer may be affected to the point that some restriction in hunting might be necessary over the long term, especially for non-rural hunters. The risk of hunting restrictions would be reduced somewhat, through more intensive management (e.g., thinning) of the existing and future closed-canopy, young-growth forests in this area. Indirect effects associated with increased competition for deer within Craig's subsistence use areas could also occur if hunters from other communities were displaced due to timber harvest activity.

Suitable old-growth acres would increase relative to Alternative 1 under most of the action alternatives, with larger increases under Alternatives 5 and 6 (Table E-13). In five of the WAAs, projected old-growth harvest is mostly expected to decrease relative to Alternative 1 under all five action alternatives, with projected harvest mostly expected to increase in the other five WAAs (Table E-14). These relative changes in projected harvest are small in absolute terms (i.e., number of acres), and none of the alternatives are expected to affect the findings of the 2016 Forest Plan Amendment.

Table E-13
Suitable Old-Growth by WAA and Alternative for the WAAs where Craig Residents Obtain Approximately 75 Percent of their Average Annual Deer Harvest

			Change from Alternative 1 (Acres)				
WAA	Total Acres	Alt 1	Alt 2	Alt 3	Alt 4	Alt 5	Alt 6
1422	120,282	10,120	350	3,770	3,900	3,900	3,900
1318	53,715	1,300	140	1,310	1,410	1,410	1,410
1214	61,675	3,440	1,910	3,190	3,190	3,190	3,190
1332	58,173	1,230	140	550	540	550	550
0902	105,924	-	-	-	-	10	10
1317	57,222	2,460	730	2,190	2,510	3,380	3,380
0901	36,528	490	(10)	(10)	1,270	1,270	1,270
1319	103,213	3,250	170	570	600	600	600
1107	124,051	360	10	80	80	90	90
1315	55,043	3,820	230	1,240	1,240	1,240	1,240

Table E-14
Projected Old-Growth Timber Harvest over 100 Years by WAA and Alternative for the WAAs where Craig Residents Obtain Approximately 75 Percent of their Average Annual Deer Harvest

			Change from Alternative 1 (Acres)				
WAA	Total Acres	Alt 1	Alt 2	Alt 3	Alt 4	Alt 5	Alt 6
1422	120,282	3,020	(180)	20	(360)	(410)	(410)
1318	53,715	390	-	180	120	110	110
1214	61,675	1,030	420	420	230	200	200
1332	58,173	370	-	20	(30)	(40)	(40)
0902	105,924	-	-	-	-	-	-
1317	57,222	730	130	290	210	360	360
0901	36,528	140	(10)	(30)	190	190	190
1319	103,213	970	(40)	(130)	(240)	(250)	(250)
1107	124,051	110	(10)	(10)	(30)	(30)	(30)
1315	55,043	1,140	(40)	(30)	(180)	(200)	(200)

Edna Bay

Community Use Area

Edna Bay's CUA encompasses a total of 633,338 acres (Figure E-4). Slightly more than half of this area (55 percent) is presently managed as roadless (Table E-15). This share would drop to 28 percent under Alternative 3 and 37 percent under Alternative 5, with no acres managed as roadless under Alternative 6. The removal of LUD II acres under Alternative 3 accounts for approximately 84 percent of the decrease in roadless acres under this alternative. These areas would retain their congressional protections and continue to be managed in a roadless state. Alternative 4 includes ARA acres that would be managed as Timber Priority and allow timber harvest and road building. Timber Priority acres account for 14 percent of the ARA in the Edna Bay CUA. Areas allocated to Roadless Priority would explicitly allow the cutting, utilization, customary trade, and removal of trees for the purposes of Alaska Native customary and traditional uses, as well as road construction deemed necessary by a federally recognized Tribe for access to Alaska Native cultural sites. This type of use would also be allowed in Timber Priority areas, which allow all timber harvest and road construction.

Figure E-4
Edna Bay's Community Use Area

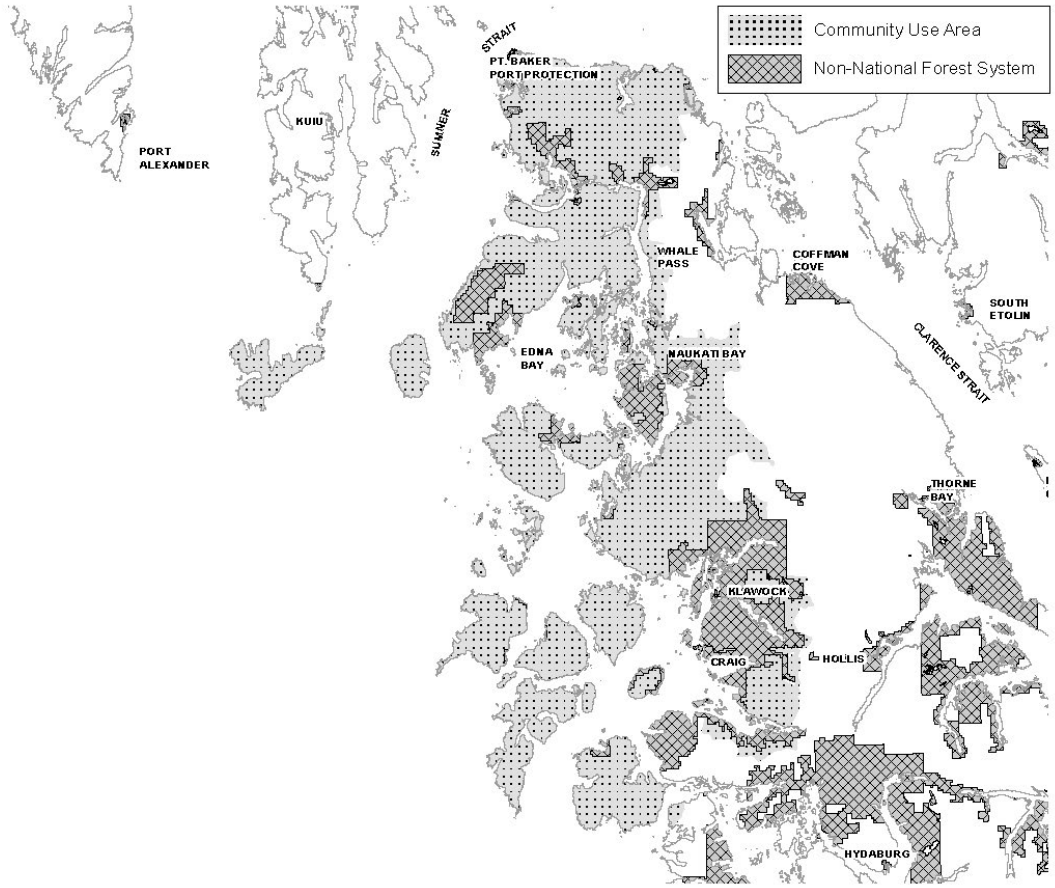

Table E-15
Roadless Areas, ARA Management Categories, and Development Opportunity in Edna Bay's Community Use Area

	Alternative					
Roadless Category (acres)	**1**	**2**	**3**	**4**	**5**	**6**
Total Community Use Area	633,338	633,338	633,338	633,338	633,338	633,338
Total Roadless Area	351,471	354,821	175,658	316,399	231,780	0
Roadless Share	55%	56%	28%	50%	37%	0%
ARA Management Categories (acres)						
LUD II Priority	na	149,651	0	149,651	147,822	0
Watershed Priority	na	91,728	6,833	0	0	0
Roadless Priority	na	113,442	78,370	122,925	83,958	0
Community Priority	na	0	6,833	0	0	0
Timber Priority	na	0	0	43,822	0	0
Development Opportunity						
Development LUDs (acres)	164,774	166,460	191,098	195,318	282,749	282,750
Timber Opportunity (Acres Suitable for Harvest)						
Old-Growth	32,189	34,109	41,876	49,942	50,555	50,555
Young-Growth	63,907	64,461	64,480	64,536	64,544	64,550
Estimated Harvest over 100 Years (acres)						
Old-Growth	7,675	7,223	6,695	6,771	6,754	6,754
Young-Growth	54,412	53,089	52,538	52,562	52,300	51,910

na = not applicable

Not all acres removed from roadless management would be available for development. The change in acres in development LUDs serves as a measure of development potential as it presently exists by alternative. Approximately 26 percent (164,800 acres) of the Edna Bay CUA is presently managed in development LUDs. This total would increase under all action alternatives with net gains ranging from about 1,700 acres (Alternative 2) to 118,000 acres (Alternatives 5 and 6).

Suitable old-growth and young-growth acres available for harvest would increase under all action alternatives. Estimated net gains in suitable old growth range from about 1,900 acres (Alternative 2) to 18,400 acres (Alternatives 5 and 6). Increases in suitable young-growth acres would be about 1 percent of the existing total under all action alternatives.

Total acres harvested are assumed to remain constant across all alternatives. Estimated old-growth harvest in the Edna Bay CUA over 100 years ranges from about 6,800 acres (Alternatives 4 to 6) to 7,700 acres (Alternative 1). Estimated young-growth harvest ranges from about 51,900 acres (Alternative 6) to 54,400 acres (Alternative 1), with a decrease in potential young-growth harvest relative to Alternative 1 in all cases (Table E-15).

Subsistence

No significant effect on salmon, other finfish, or invertebrate habitat capability is expected from implementation of any alternative. These resources accounted for 59 percent of the total edible pounds of subsistence resources harvested by Edna Bay households based on the 1988 TRUCS study (Kruse and Frazier 1988). Marine resources (fish and marine invertebrates) accounted for 67 percent of per capita subsistence harvest in Edna Bay in 1998 (ADF&G 2018).

The 1988 TRUCS study found that deer accounted for 21 percent of the total edible pounds of subsistence resources harvested by Edna Bay households (Kruse and Frazier 1988). Deer accounted for 23 percent of per capita subsistence harvest by Edna Bay residents in 1998 (ADF&G 2018).

Four WAAs have been identified as most important to Edna Bay residents for deer harvest, with about 68 percent of Edna Bay's harvest derived from WAA 1525 (Table E-16). Residents of Edna Bay are responsible for all of the deer harvested on Kosciusko Island (WAA 1525), but only a small portion of the deer harvested on Heceta Island (WAA 1003) and the other two WAAs identified as important. The Edna Bay share represents about 8 percent of the total harvested in these four WAAs and about 11 percent of the rural hunter harvest. About 23 percent of the combined harvest in these WAAs is by non-rural hunters, suggesting that there is a harvest buffer that could be restricted, if necessary, before restrictions are placed on rural harvests.

Table E-16
Deer Harvest and Deer Habitat Capability on NFS Lands for the WAAs where Edna Bay Residents Obtain Approximately 75 Percent of their Average Annual Deer Harvest[1]

	Average Deer Harvest from 2004 to 2013			Deer Habitat Capability[3]		
WAA	Edna Bay Residents	All Rural Hunters[2]	All Hunters	2014	After 100 Years of Implementation	Change
1525	18	18	18	59%	58%	-1%
1003	3	28	44	59%	55%	-4%
1318	1	159	198	90%	84%	-6%
1526	1	9	18	91%	91%	0%

[1] Calculated based on harvest where location is known.
[2] The category "All Rural Hunters" includes residents of Southeast Alaska communities, excluding the cities of Juneau and Ketchikan.
[3] Deer habitat capability in 2014 and after 100 Years of full implementation is expressed as a percent of the 1954 habitat capability. Data presented for 100 Years of Implementation are estimates developed for the current Forest Plan in the 2016 Forest Plan Amendment EIS (USDA Forest Service 2016).

The WAA used most heavily by Edna Bay residents (WAA 1525) is in an area with substantial past timber harvest and deer habitat capabilities are currently estimated to be considerably below 1954 levels (Table E-16). This is also the case with WAA 1003; the next two important WAAs have been less affected by past harvest, though are still under 1954 levels. The 2016 Forest Plan Amendment EIS analysis found

that additional harvest that could occur under the current Forest Plan would reduce estimated habitat capability by 1 percent to 6 percent in three of the WAAs (Table E-16).

The 2016 Forest Plan Amendment EIS analysis found that use of most subsistence resources by Edna Bay residents (fish and marine invertebrates) was not expected to be affected by any of the alternatives. Based on the Deer Availability and Anticipated Demand analysis completed for the 1997 Forest Plan EIS, the 2016 analysis found that there should be sufficient habitat capability over the long term for deer hunted by Edna Bay residents, all rural hunters, and all hunters, within the WAAs where Edna Bay hunters derive most of their deer harvest. Future young-growth management (e.g., thinning) was expected to further reduce the potential for effects on local hunters. It is possible, however, that additional timber harvest throughout Prince of Wales and adjacent islands would create increased competition for deer within Edna Bay's subsistence use areas if hunters from other communities were displaced due to timber harvest activity. However, these impacts were estimated to be relatively minor based on the limited accessibility of these island areas to non-local hunters.

The number of suitable old-growth acres would increase relative to Alternative 1 under most of the current action alternatives in all three of the four important WAAs used by Edna Bay residents, with relatively large increases in WAA 1318, which received the most use, almost entirely from hunters from outside Edna Bay (Table E-17). Projected old-growth timber harvest would, however, decrease relative to Alternative 1 in three of the four WAAs, with modest increases projected for WAA 1318 (Table E-18). As a result, none of the alternatives are expected to affect the findings of the 2016 Forest Plan Amendment.

Table E-17
Suitable Old-Growth by WAA and Alternative for the WAAs where Edna Bay Residents Obtain Approximately 75 Percent of their Average Annual Deer Harvest

			Change from Alternative 1 (Acres)				
WAA	**Total Acres**	**Alt 1**	**Alt 2**	**Alt 3**	**Alt 4**	**Alt 5**	**Alt 6**
1525	29,330	1,430	-	550	550	550	550
1003	40,620	4,100	140	140	260	260	260
1318	53,710	1,300	140	1,310	1,410	1,410	1,410
1526	67,360	70	-	-	-	-	-

Table E-18
Projected Old-Growth Harvest by WAA and Alternative for the WAAs where Edna Bay Residents Obtain Approximately 75 Percent of their Average Annual Deer Harvest

			Change from Alternative 1 (Acres)				
WAA	**Total Acres**	**Alt 1**	**Alt 2**	**Alt 3**	**Alt 4**	**Alt 5**	**Alt 6**
1525	29,330	430	(40)	-	(60)	(60)	(60)
1003	40,620	1,220	(70)	(290)	(390)	(410)	(410)
1318	53,710	390	-	180	120	110	110
1526	67,360	20	-	-	(10)	(10)	(10)

Elfin Cove

Community Use Area

Elfin Cove's CUA encompasses a total of 358,012 acres (Figure E-5). About half of this area (54 percent) is presently managed as roadless (Table E-19). This share would drop to 12 percent under Alternative 3, with no acres managed as roadless under Alternative 6. The removal of LUD II acres under Alternative 3 accounts for the entire decrease in roadless acres under this alternative. These areas would retain their congressional protections and continue to be managed in a roadless state. Areas allocated to Roadless Priority would explicitly allow the cutting, utilization, customary trade, and removal of trees for the purposes of Alaska Native customary and traditional uses, as well as road construction deemed necessary by a federally recognized Tribe for access to Alaska Native cultural sites. This type of use would also be allowed in Timber Priority areas, which allow all timber harvest and road construction.

Figure E-5
Elfin Cove's Community Use Area

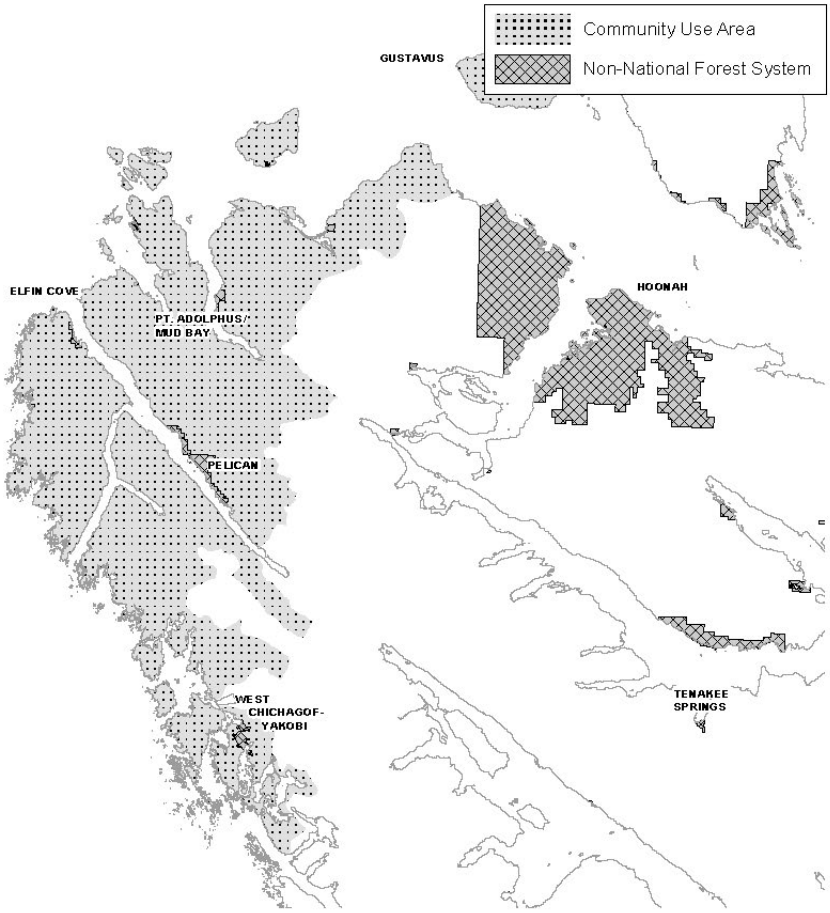

Table E-19
Roadless Areas, ARA Management Categories, and Development Opportunity in Elfin Cove's Community Use Area

	Alternative					
Roadless Category (acres)	**1**	**2**	**3**	**4**	**5**	**6**
Total Community Use Area	358,012	358,012	358,012	358,012	358,012	358,012
Total Roadless Area	194,411	194,769	44,410	194,497	189,595	0
Roadless Share	54%	54%	12%	54%	53%	0%
ARA Management Categories (acres)						
LUD II Priority	na	150,359	0	150,359	150,183	0
Watershed Priority	na	5,207	0	0	0	0
Roadless Priority	na	39,202	39,202	44,135	39,412	0
Community Priority	na	0	0	0	0	0
Timber Priority	na	0	0	0	0	0
Development Opportunity						
Development LUDs (acres)	2	2	2	2	5	5
Timber Opportunity (Acres Suitable for Harvest)						
Old-Growth	0	0	0	0	0	0
Young-Growth	0	0	0	0	0	0
Estimated Harvest over 100 Years (acres)						
Old-Growth	0	0	0	0	0	0
Young-Growth	0	0	0	0	0	0

na = not applicable

There would be no acres available for development or suitable for old-growth or young-growth harvest in the Elfin Cove CUA under any of the alternatives.

Subsistence

No significant effect on salmon, other finfish, or invertebrate habitat capability is expected from implementation of any alternative. These resources accounted for 63 percent of the total edible pounds of subsistence resources harvested by Elfin Cove households based on the 1988 TRUCS study (Kruse and Frazier 1988).

The 1988 TRUCS study found that deer accounted for 27 percent of the total edible pounds of subsistence resources harvested by Elfin Cove households (Kruse and Frazier 1988).

Elfin Cove residents take the majority (82 percent) of their deer from two WAAs (3421 and 3420). The 2016 Forest Plan Amendment EIS analysis found that neither of these WAAs would be affected by the current Forest Plan because no timber harvest is proposed in these areas (Table E-20). The 2016 analysis also concluded that Elfin Cove residents were unlikely to be affected by increased competition because of the limited access and the lack of activities under the alternatives in this area. There are no suitable old-growth acres in either of these WAAs under any of the alternatives and no projected old-growth harvest (Tables E-21 and E-22). As a result, none of the alternatives are expected to affect the findings of the 2016 Forest Plan Amendment EIS.

Table E-20
Deer Harvest and Deer Habitat Capability on NFS Lands for the WAAs where Elfin Cove Residents Obtain Approximately 75 Percent of their Average Annual Deer Harvest[1]

	Average Deer Harvest from 2004 to 2013			Deer Habitat Capability[3]		
WAA	Elfin Cove Residents	All Rural Hunters[2]	All Hunters	2014	After 100 Years of Implementation	Change
3421	13	42	66	100%	100%	0%
3420	2	19	52	100%	100%	0%

[1] Calculated based on harvest where location is known.
[2] The category "All Rural Hunters" includes residents of Southeast Alaska communities, excluding the cities of Juneau and Ketchikan.
[3] Deer habitat capability in 2014 and after 100 Years of full implementation is expressed as a percent of the 1954 habitat capability. Data presented for 100 Years of Implementation are estimates developed for the current Forest Plan in the 2016 Forest Plan Amendment EIS (USDA Forest Service 2016).

Table E-21
Suitable Old-Growth by WAA and Alternative for the WAAs where Elfin Cove Residents Obtain Approximately 75 Percent of their Average Annual Deer Harvest

			Change from Alternative 1 (Acres)				
WAA	Total Acres	Alt 1	Alt 2	Alt 3	Alt 4	Alt 5	Alt 6
3421	43,290	-	-	-	-	-	-
3420	53,230	-	-	-	-	-	-

Table E-22
Projected Old-Growth Harvest by WAA and Alternative for the WAAs where Elfin Cove Residents Obtain Approximately 75 Percent of their Average Annual Deer Harvest

			Change from Alternative 1 (Acres)				
WAA	Total Acres	Alt 1	Alt 2	Alt 3	Alt 4	Alt 5	Alt 6
3421	43,290	-	-	-	-	-	-
3420	53,230	-	-	-	-	-	-

Gustavus

Community Use Area

The Gustavus CUA encompasses a total of 481,696 acres (Figure E-6). Most of this area (81 percent) is presently managed as roadless (Table E-23). This share would drop to 56 and 59 percent under Alternatives 3 and 5, respectively, with no acres managed as roadless under Alternative 6. The removal of LUD II acres under Alternative 3 accounts for approximately 97 percent of the decrease in roadless acres under this alternative. These areas would retain their congressional protections and continue to be managed in a roadless state. Alternative 4 includes ARA acres that would be managed as Timber Priority and allow timber harvest and road building. Timber Priority acres account for 18 percent of the ARA in the Gustavus CUA. Areas allocated to Roadless Priority would explicitly allow the cutting, utilization, customary trade, and removal of trees for the purposes of Alaska Native customary and traditional uses, as well as road construction deemed necessary by a federally recognized Tribe for access to Alaska Native cultural sites. This type of use would also be allowed in Timber Priority areas, which allow all timber harvest and road construction.

Figure E-6
Gustavus Community Use Area

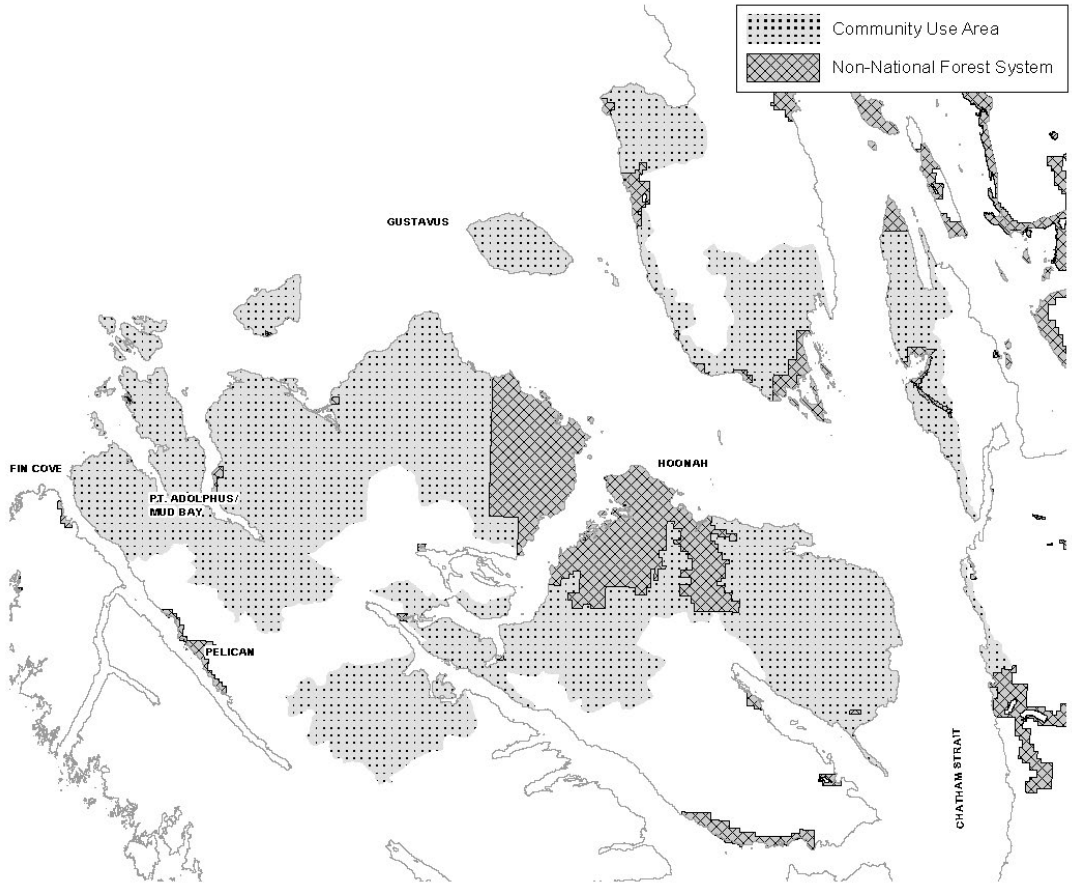

Table E-23
Roadless Areas, ARA Management Categories, and Development Opportunity in Gustavus' Community Use Area

	Alternative					
Roadless Category (acres)	**1**	**2**	**3**	**4**	**5**	**6**
Total Community Use Area	481,696	481,696	481,696	481,696	481,696	481,696
Total Roadless Area	388,838	389,799	269,082	382,303	282,713	0
Roadless Share	81%	81%	56%	79%	59%	0%
ARA Management Categories (acres)						
LUD II Priority	na	116,308	0	116,308	16,132	0
Watershed Priority	na	77,406	0	0	0	0
Roadless Priority	na	196,085	191,676	196,709	166,581	0
Community Priority	na	0	0	0	0	0
Timber Priority	na	0	0	69,285	0	0
Development Opportunity						
Development LUDs (acres)	43,019	42,544	46,258	48,435	144,642	144,643
Timber Opportunity (Acres Suitable for Harvest)						
Old-Growth	13,607	14,128	15,753	26,653	27,623	27,623
Young-Growth	11,322	11,491	11,516	11,650	11,774	12,530
Estimated Harvest over 100 Years (acres)						
Old-Growth	882	882	864	944	930	930
Young-Growth	9,640	9,464	9,384	9,488	9,540	10,061

na = not applicable

Not all acres removed from roadless management would be available for development. The change in acres in development LUDs serves as a measure of development potential as it presently exists by alternative. Approximately 9 percent (43,000 acres) of the Gustavus CUA is presently managed in development LUDs. This total would increase under Alternatives 3 to 6, with net gains ranging from about 3,200 acres (Alternative 2) to about 101,600 acres (Alternatives 5 and 6); the total would drop by about 500 acres under Alternative 2.

Suitable old-growth and young-growth acres available for harvest would increase under all action alternatives. Estimated net gains in suitable old-growth range from about 500 acres (Alternative 2) to 14,000 acres (Alternatives 5 and 6). Increases in suitable young-growth acres range from about 170 acres (Alternative 2) to 1,200 acres (Alternative 6).

Total acres harvested are assumed to remain constant across all alternatives. Estimated old-growth harvest over 100 years in the Gustavus CUA would be similar across all alternatives, about 900 acres. Estimated young-growth harvest ranges from about 9,400 acres (Alternative 3) to 10,100 acres (Alternative 6) (Table E-23).

Subsistence

No significant effect on salmon, other finfish, or invertebrate habitat capability is expected from implementation of any alternative. Marine resources (fish and marine invertebrates) accounted for 69 percent of per capita subsistence harvest in Gustavus in 1987 (Kruse and Frazier 1988).

The 1988 TRUCS study found that deer accounted for 70 percent of the total edible pounds of subsistence resources harvested by Gustavus households (Kruse and Frazier 1988).

Gustavus residents take the majority (73 percent) of their deer from two WAAs on northern Chichagof Island and Pleasant, Lemesurier, and Inian Islands (WAAs 4256 and 4222). The 2016 Forest Plan Amendment EIS analysis found that WAA 4256, which provides over half of Gustavus' harvest, would not be affected under the current Forest Plan because it is in wilderness. WAA 4222 was expected to be affected by timber harvest that could occur under the current Forest Plan, with habitat capability estimated to be reduced by 1 percent (Table E-24).

Table E-24
Deer Harvest and Deer Habitat Capability on NFS Lands for the WAAs where Gustavus Residents Obtain Approximately 75 Percent of their Average Annual Deer Harvest[1]

	Average Deer Harvest from 2004 to 2013			Deer Habitat Capability3		
WAA	Gustavus Residents	All Rural Hunters2	All Hunters	2014	After 100 Years of Implementation	Change
4256	47	52	68	100%	100%	0%
4222	10	32	44	97%	96%	-1%

[1] Calculated based on harvest where location is known.
[2] The category "All Rural Hunters" includes residents of Southeast Alaska communities, excluding the cities of Juneau and Ketchikan.
[3] Deer habitat capability in 2014 and after 100 Years of full implementation is expressed as a percent of the 1954 habitat capability. Data presented for 100 Years of Implementation are estimates developed for the current Forest Plan in the 2016 Forest Plan Amendment EIS (USDA Forest Service 2016).

The 2016 Forest Plan Amendment EIS analysis found that the use of most subsistence resources by Gustavus residents (fish and marine resources) was not expected to be affected by the current Forest Plan. The 2016 analysis also found that it was unlikely that Gustavus residents would be affected by increased competition because of the limited access and the lack of activities under the alternatives in this area. There are no suitable old-growth acres in either of these WAAs under any of the alternatives and no projected old-growth harvest (Tables E-25 and E-26). As a result, none of the alternatives are expected to affect the findings of the 2016 Forest Plan Amendment EIS.

Table E-25
Suitable Old-Growth by WAA and Alternative for the WAAs where Gustavus Residents Obtain Approximately 75 Percent of their Average Annual Deer Harvest

			Change from Alternative 1 (Acres)				
WAA	Total Acres	Alt 1	Alt 2	Alt 3	Alt 4	Alt 5	Alt 6
4256	18,940	-	-	-	-	-	-
4222	89,910	-	-	-	-	-	-

Table E-26
Projected Old-Growth Harvest by WAA and Alternative for the WAAs where Gustavus Residents Obtain Approximately 75 Percent of their Average Annual Deer Harvest

			Change from Alternative 1 (Acres)				
WAA	Total Acres	Alt 1	Alt 2	Alt 3	Alt 4	Alt 5	Alt 6
4256	18,940	-	-	-	-	-	-
4222	89,910	-	-	-	-	-	-

Haines

Community Use Area

Haines' CUA encompasses a total of 236,468 acres (Figure E-7). Nearly all of this area (98 percent) is presently managed as roadless (Table E-27). This share would lower to 84 percent under Alternative 5, with no acres managed as roadless under Alternative 6. Alternative 4 includes ARA acres that would be managed as Timber Priority and allow timber harvest and road building. Timber Priority acres account for 8 percent of the ARA in the Haines CUA. Areas allocated to Roadless Priority would explicitly allow the cutting, utilization, customary trade, and removal of trees for the purposes of Alaska Native customary and traditional uses, as well as road construction deemed necessary by a federally recognized Tribe for access to Alaska Native cultural sites. This type of use would also be allowed in Timber Priority areas, which allow all timber harvest and road construction.

Figure E-7
Haines Community Use Area

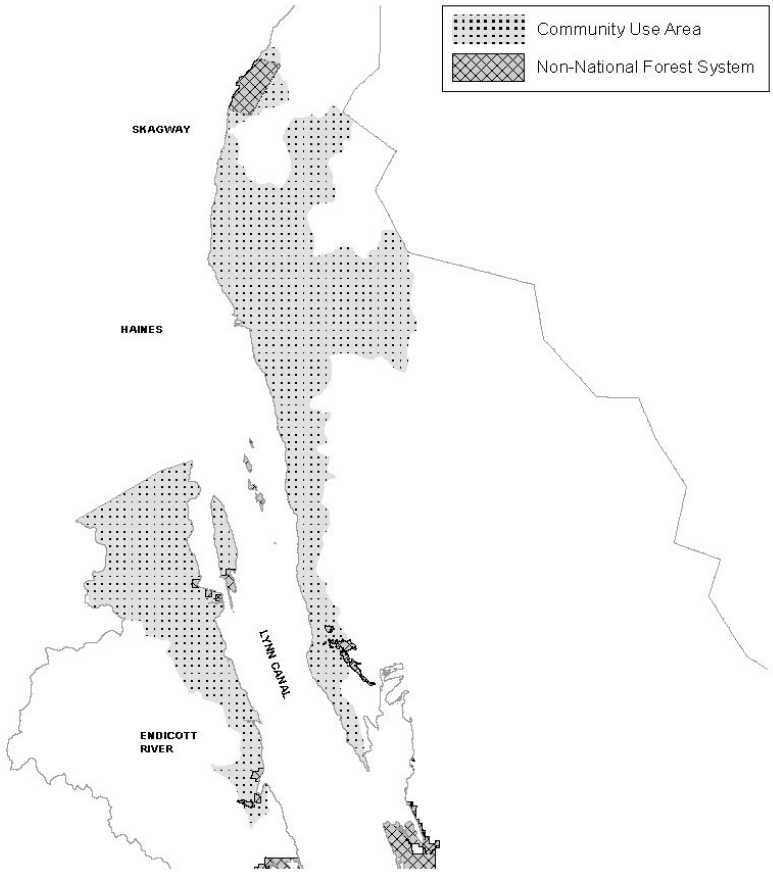

Table E-27
Roadless Areas, ARA Management Categories, and Development Opportunity in Haines' Community Use Area

	Alternative					
Roadless Category (acres)	**1**	**2**	**3**	**4**	**5**	**6**
Total Community Use Area	236,468	236,468	236,468	236,468	236,468	236,468
Total Roadless Area	232,027	230,323	230,323	230,109	198,410	0
Roadless Share	98%	97%	97%	97%	84%	0%
ARA Management Categories (acres)						
LUD II Priority	na	0	0	0	0	0
Watershed Priority	na	90,333	0	0	0	0
Roadless Priority	na	139,990	139,990	211,779	98,410	0
Community Priority	na	0	0	0	0	0
Timber Priority	na	0	0	18,330	0	0
Development Opportunity						
Development LUDs (acres)	2,517	4,379	4,379	4,379	32,581	32,581
Timber Opportunity (Acres Suitable for Harvest)						
Old-Growth	36	51	51	72	72	72
Young-Growth	1,428	2,089	2,089	2,135	2,336	2,406
Estimated Harvest over 100 Years (acres)						
Old-Growth	0	0	0	0	0	0
Young-Growth	1,216	1,721	1,702	1,739	1,893	1,932

na = not applicable

Not all acres removed from roadless management would be available for development. The change in acres in development LUDs serves as a measure of development potential as it presently exists by alternative. Approximately 1 percent (2,500 acres) of the Haines CUA is presently managed in development LUDs. This total would increase under all action alternatives, with net gains ranging from about 1,900 acres (Alternatives 2 to 4) to 30,100 acres (Alternatives 5 and 6).

Suitable old-growth and young-growth acres available for harvest would stay the same or increase under all action alternatives. Estimated net gains in suitable old-growth are negligible (less than 50 acres) under all alternatives. Increases in suitable young-growth acres range from about 700 acres (Alternatives 2 to 4) to 1,000 acres (Alternative 6).

Total acres harvested are assumed to remain constant across all alternatives. No old-growth acres are estimated to be harvested in the Haines CUA under any of the alternatives. Estimated young-growth harvest would increase slightly relative to Alternative 1 under all action alternatives, with increases from about 500 acres (Alternatives 2 to 4) to about 700 acres (Alternatives 5 and 6) (Table E-27).

Subsistence

No significant effect on salmon, other finfish, or invertebrate habitat capability is expected from implementation of any alternative. These resources account for 68 percent of the total edible pounds of subsistence resources harvested by Haines households (Kruse and Frazier 1988). Marine resources (fish and marine invertebrates) accounted for 72 percent of per capita subsistence harvest in Haines in 2012 (ADF&G 2018).

The 1988 TRUCS study found that deer accounted for 15 percent of the total edible pounds of subsistence resources harvested by Haines households (Kruse and Frazier 1988). Deer accounted for 5 percent of per capita subsistence harvest by Haines residents in 2012, with moose more important at 11 percent per capita (ADF&G 2018). Moose availability would not be significantly affected under any of the alternatives.

Twenty-three WAAs account for about 75 percent of deer harvest by Haines residents. The three most heavily used WAAs (3421, 2202, and 3836) accounted for about 28 percent of total deer harvest by Haines residents (Table E-28). As these numbers suggest, deer harvest by Haines residents is spread over a fairly wide area and, as a result, Haines residents tend to comprise a relatively small share of total harvest by WAA, with one main exception – WAA 2202 on Sullivan Island, which has a low level of deer harvest but nearly all by Haines residents.

The 2016 Forest Plan Amendment EIS analysis found that there would be no effect to deer habitat capability in 18 of the 23 WAAs under the current Forest Plan. Reductions in habitat capability in the other five WAAs were estimated to range from 1 to 6 percent (Table E-28). About 41 percent of the combined harvest in the 23 WAAs used by Haines residents is by non-rural hunters, suggesting that there is a harvest buffer that could be restricted, if necessary, before restrictions are placed on rural harvests.

Table E-28
Deer Harvest and Deer Habitat Capability on NFS Lands for the WAAs where Haines Residents Obtain Approximately 75 Percent of their Average Annual Deer Harvest[1]

	Average Deer Harvest from 2004 to 2013			Deer Habitat Capability[3]		
WAA	Haines Residents	All Rural Hunters[2]	All Hunters	2014	After 100 Years of Implementation	Change
3421	20	42	66	68%	63%	-5%
2202	18	18	18	91%	91%	0%
3836	10	16	210	100%	100%	0%
4252	9	51	72	92%	92%	0%
3420	9	19	52	100%	100%	0%
3938	7	41	75	100%	100%	0%
1106	7	17	33	100%	100%	0%
3416	6	78	88	100%	100%	0%

Table E-28 (continued)
Deer Harvest and Deer Habitat Capability on NFS Lands for the WAAs where Haines Residents Obtain Approximately 75 Percent of their Average Annual Deer Harvest[1]

	Average Deer Harvest from 2004 to 2013			Deer Habitat Capability[3]		
WAA	Haines Residents	All Rural Hunters[2]	All Hunters	2014	After 100 Years of Implementation	Change
4222	5	32	44	97%	96%	-1%
3524	5	51	82	99%	98%	-1%
3418	4	18	26	100%	100%	0%
4253	3	48	66	84%	84%	0%
3417	3	60	115	100%	100%	0%
3525	3	56	118	75%	70%	-5%
4256	3	52	68	100%	100%	0%
3002	3	272	299	69%	69%	0%
3001	2	338	361	82%	82%	0%
4041	2	16	19	91%	91%	0%
2722	2	6	302	100%	100%	0%
3309	2	72	81	100%	100%	0%
3551	2	48	67	83%	77%	-6%
4146	2	4	28	100%	100%	0%
3419	2	23	40	100%	100%	0%

[1] Calculated based on harvest where location is known.
[2] The category "All Rural Hunters" includes residents of Southeast Alaska communities, excluding the cities of Juneau and Ketchikan.
[3] Deer habitat capability in 2014 and after 100 Years of full implementation is expressed as a percent of the 1954 habitat capability. Data presented for 100 Years of Implementation are estimates developed for the current Forest Plan in the 2016 Forest Plan Amendment EIS (USDA Forest Service 2016).

The 2016 Forest Plan Amendment EIS analysis found that use of most subsistence resources by Haines residents (fish and marine invertebrates) was not expected to be affected by any of the alternatives. Based on the Deer Availability and Anticipated Demand analysis completed for the 1997 Forest Plan EIS, the 2016 analysis found that subsistence use of deer in some of the WAAs hunted by Haines residents may be affected to the point that some restriction in hunting might be necessary over the long term, especially for non-rural hunters. The risk of hunting restrictions would be reduced somewhat, through more intensive management (e.g., thinning) of the existing and future closed-canopy, young-growth forests in this area. Indirect effects associated with increased competition for deer within Haines' subsistence use areas could also occur if hunters from other communities were displaced due to timber harvest activity.

There are no suitable old-growth acres and no projected old-growth harvest in 20 of the 23 important WAAs used by Haines residents (Tables E-29 and E-30). Suitable old-growth acres in the other three WAAs (3524, 3525, and 3551) would increase relative to Alternative 1 under most of the action alternatives, with larger increases under Alternatives 4 to 6. Projected old-growth harvest is mostly expected to decrease relative to Alternative 1 for two of the WAAs, with modest increases projected for the other WAA (Table 30). These relative changes in projected harvest are small in absolute terms (i.e., number of acres) and none of the alternatives are expected to affect the findings of the 2016 Forest Plan Amendment.

Table E-29
Suitable Old-Growth by WAA and Alternative for the WAAs where Haines Residents Obtain Approximately 75 Percent of their Average Annual Deer Harvest

			Change from Alternative 1 (Acres)				
WAA	Total Acres	Alt 1	Alt 2	Alt 3	Alt 4	Alt 5	Alt 6
3421	43,290	-	-	-	-	-	-
2202	49,630	-	-	-	-	-	-
3836	53,460	-	-	-	-	-	-
4252	19,540	-	-	-	-	-	-
3420	53,230	-	-	-	-	-	-
3938	76,970	-	-	-	-	-	-
1106	7,420	-	-	-	-	-	-
3416	65,170	-	-	-	-	-	-
4222	89,910	-	-	-	-	-	-
3524	13,760	30	-	-	2,740	2,740	2,740
3418	53,510	-	-	-	-	-	-
4253	45,890	-	-	-	-	-	-
3417	134,230	-	-	-	-	-	-
3525	73,120	2,350	40	380	600	610	610
4256	18,940	-	-	-	-	-	-
3002	77,040	-	-	-	-	-	-
3001	79,250	-	-	-	-	-	-
4041	55,260	-	-	-	-	-	-
2722	25,150	-	-	-	-	-	-
3309	43,820	-	-	-	-	-	-
3551	58,490	5,120	80	1,370	3,170	3,170	3,170
4146	65,430	-	-	-	-	-	-
3419	84,930	-	-	-	-	-	-

Table E-30
Projected Old-Growth Harvest by WAA and Alternative for the WAAs where Haines Residents Obtain Approximately 75 Percent of their Average Annual Deer Harvest

			Change from Alternative 1 (Acres)				
WAA	Total Acres	Alt 1	Alt 2	Alt 3	Alt 4	Alt 5	Alt 6
3421	43,290	-	-	-	-	-	-
2202	49,630	-	-	-	-	-	-
3836	53,460	-	-	-	-	-	-
4252	19,540	-	-	-	-	-	-
3420	53,230	-	-	-	-	-	-
3938	76,970	-	-	-	-	-	-
1106	7,420	-	-	-	-	-	-
3416	65,170	-	-	-	-	-	-
4222	89,910	-	-	-	-	-	-
3524	13,760	-	-	-	180	180	180
3418	53,510	-	-	-	-	-	-
4253	45,890	-	-	-	-	-	-
3417	134,230	-	-	-	-	-	-
3525	73,120	260	-	(10)	(60)	(70)	(70)
4256	18,940	-	-	-	-	-	-
3002	77,040	-	-	-	-	-	-
3001	79,250	-	-	-	-	-	-
4041	55,260	-	-	-	-	-	-
2722	25,150	-	-	-	-	-	-
3309	43,820	-	-	-	-	-	-
3551	58,490	560	-	30	(10)	(30)	(30)
4146	65,430	-	-	-	-	-	-
3419	84,930	-	-	-	-	-	-

Appendix E

Hollis

Community Use Area

The Hollis CUA encompasses a total of 274,440 acres (Figure E-8). More than two-thirds of this area (68 percent) is presently managed as roadless (Table E-31). This share would drop to 32 percent under Alternative 5, with no acres managed as roadless under Alternative 6. Alternative 4 includes ARA acres that would be managed as Timber Priority and allow timber harvest and road building. Timber Priority acres account for 11 percent of the ARA in the Hollis CUA. Areas allocated to Roadless Priority would explicitly allow the cutting, utilization, customary trade, and removal of trees for the purposes of Alaska Native customary and traditional uses, as well as road construction deemed necessary by a federally recognized Tribe for access to Alaska Native cultural sites. This type of use would also be allowed in Timber Priority areas, which allow all timber harvest and road construction.

Not all acres removed from roadless management would be available for development. The change in acres in development LUDs serves as a measure of development potential as it presently exists by alternative. Approximately 16 percent (45,000 acres) of the Hollis CUA is presently managed in development LUDs. This total would increase under all action alternatives, with net gains ranging from about 18,200 acres (Alternative 2) to 97,400 acres (Alternative 6).

Suitable old-growth and young-growth acres available for harvest would increase under all action alternatives. Estimated net gains in suitable old-growth range from about 4,050 acres (Alternative 2) to 9,750 acres (Alternatives 5 and 6). Increases in suitable young-growth acres range from about 2,700 acres (Alternative 2) to 3,950 acres (Alternative 6), representing an increase of 21 to 31 percent.

Total acres harvested are assumed to remain constant across all alternatives. Estimated old-growth harvest totals over 100 years in the Hollis CUA would be similar across all alternatives, ranging from about 2,300 acres (Alternative 1) to 3,100 acres (Alternative 4). Estimated young-growth harvest ranges from about 11,000 acres (Alternative 1) to about 13,500 acres (Alternatives 3 to 6) (Table E-31).

Figure E-8
Hollis' Community Use Area

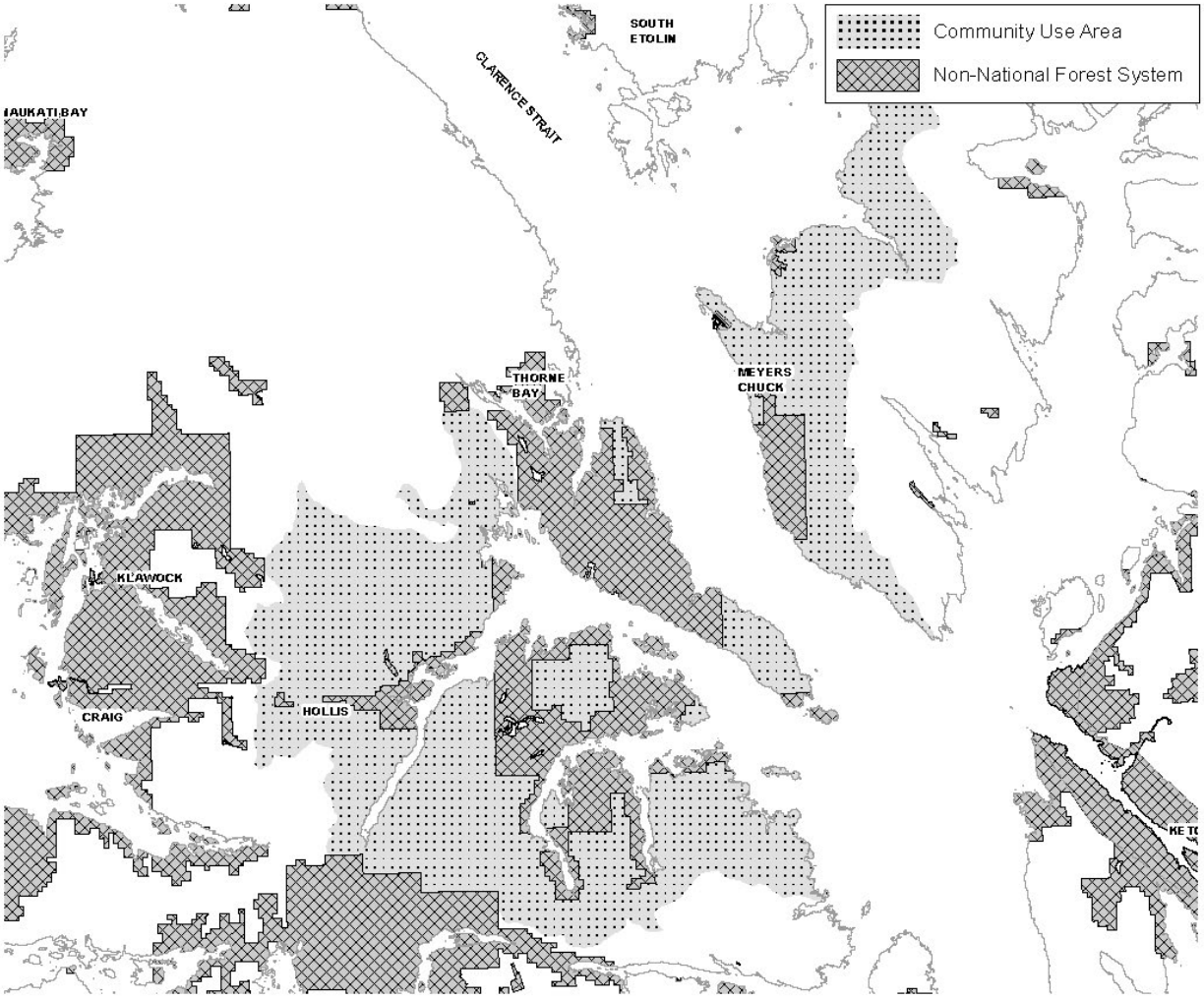

Table E-31
Roadless Areas, ARA Management Categories, and Development Opportunity in Hollis' Community Use Area

	Alternative					
Roadless Category (acres)	**1**	**2**	**3**	**4**	**5**	**6**
Total Community Use Area	274,440	274,440	274,440	274,440	274,440	274,440
Total Roadless Area	186,848	164,768	142,056	141,408	87,519	0
Roadless Share	68%	60%	52%	52%	32%	0%
ARA Management Categories (acres)						
LUD II Priority	na	0	0	0	0	0
Watershed Priority	na	87,257	17,343	0	0	0
Roadless Priority	na	77,511	37,456	126,467	87,519	0
Community Priority	na	0	17,343	0	0	0
Timber Priority	na	0	0	14,941	0	0
Development Opportunity						
Development LUDs (acres)	44,883	63,106	84,113	84,113	136,370	142,309
Timber Opportunity (Acres Suitable for Harvest)						
Old-Growth	8,848	12,884	17,194	17,640	18,590	18,590
Young-Growth	12,886	15,597	16,637	16,610	16,641	16,841
Estimated Harvest over 100 Years (acres)						
Old-Growth	2,270	2,832	3,091	2,733	2,845	2,845
Young-Growth	10,972	12,846	13,556	13,528	13,484	13,522

na = not applicable

Subsistence

No significant effect on salmon, other finfish, or invertebrate habitat capability is expected from implementation of any alternative. These resources account for 65 percent of the total edible pounds of subsistence resources harvested by Hollis households (Kruse and Frazier 1988). Marine resources (fish and marine invertebrates) accounted for 73 percent of per capita subsistence harvest in Hollis in 1998 (ADF&G 2018).

The 1988 TRUCS study found that deer account for 23 percent of the total edible pounds of subsistence resources harvested by Hollis households (Kruse and Frazier 1988). Deer accounted for 18 percent of the per capita subsistence harvest by Hollis residents in 1998 (ADF&G 2018).

The three WAAs most used by Hollis residents are areas where substantial past timber harvest has occurred and, therefore, deer habitat capabilities are currently estimated to be well below 1954 levels. The 2016 Forest Plan Amendment EIS analysis found that additional harvest that could occur under the current Forest Plan would further reduce estimated habitat capabilities after 100 years by 2 percent to 7 percent (Table E-32).

Table E-32
Deer Harvest and Deer Habitat Capability on NFS Lands for the WAAs where Hollis Residents Obtain Approximately 75 Percent of their Average Annual Deer Harvest[1]

	Average Deer Harvest from 2004 to 2013			Deer Habitat Capability[3]		
WAA	**Hollis Residents**	**All Rural Hunters[2]**	**All Hunters**	**2014**	**After 100 Years of Implementation**	**Change**
1214	11	121	235	77%	71%	-6%
1317	10	95	133	58%	56%	-2%
1422	3	247	383	57%	50%	-7%

[1] Calculated based on harvest where location is known.
[2] The category "All Rural Hunters" includes residents of Southeast Alaska communities, excluding the cities of Juneau and Ketchikan.
[3] Deer habitat capability in 2014 and after 100 Years of full implementation is expressed as a percent of the 1954 habitat capability. Data presented for 100 Years of Implementation are estimates developed for the current Forest Plan in the 2016 Forest Plan Amendment EIS (USDA Forest Service 2016).

The 2016 Forest Plan Amendment EIS analysis found that use of most subsistence resources by Hollis residents (fish and marine invertebrates) was not expected to be affected by any of the alternatives. Based on the Deer Availability and Anticipated Demand analysis completed for the 1997 Forest Plan EIS, the 2016 analysis found that subsistence use of deer may be affected to the point that some restriction in hunting might be necessary over the long term, especially for non-rural hunters. The risk of hunting restrictions would be reduced somewhat through more intensive management (e.g., thinning) of the existing and future closed-canopy, young-growth forests in this area. Indirect effects associated with increased competition could also occur if hunters from other communities were displaced due to timber harvest activity.

Suitable old-growth acres in all three WAAs important to Hollis residents would increase relative to Alternative 1 under all of the action alternatives, with larger increases under Alternatives 4 to 6 (Table E-33). Projected old-growth harvest is also expected to increase relative to Alternative 1 in two of the WAAs, with decreases anticipated under four of the five alternatives for the other WAA (Table E-34). These relative changes in projected harvest are small in absolute terms (i.e., number of acres) and none of the alternatives are expected to affect the findings of the 2016 Forest Plan Amendment.

Table E-33
Suitable Old-Growth by WAA and Alternative for the WAAs where Hollis Residents Obtain Approximately 75 Percent of their Average Annual Deer Harvest

			Change from Alternative 1 (Acres)				
WAA	**Total Acres**	**Alt 1**	**Alt 2**	**Alt 3**	**Alt 4**	**Alt 5**	**Alt 6**
1214	61,680	3,440	1,910	3,190	3,190	3,190	3,190
1317	57,220	2,460	730	2,190	2,510	3,380	3,380
1422	120,280	10,120	350	3,770	3,900	3,900	3,900

Table E-34
Projected Old-Growth Harvest by WAA and Alternative for the WAAs where Hollis Residents Obtain Approximately 75 Percent of their Average Annual Deer Harvest

			Change from Alternative 1 (Acres)				
WAA	**Total Acres**	**Alt 1**	**Alt 2**	**Alt 3**	**Alt 4**	**Alt 5**	**Alt 6**
1214	61,680	1,030	420	420	230	200	200
1317	57,220	730	130	290	210	360	360
1422	120,280	3,020	(180)	20	(360)	(410)	(410)

Hoonah (Xunaa)

Community Use Area

Hoonah's CUA encompasses a total of 585,102 acres (Figure E-9). About three-quarters of this area (76 percent) is presently managed as roadless (Table E-35). This share would drop to 57 and 50 percent under Alternatives 3 and 5, respectively, with no acres managed as roadless under Alternative 6. The removal of LUD II acres under Alternative 3 accounts for approximately 92 percent of the decrease in roadless acres under this alternative. These areas would retain their congressional protections and continue to be managed in a roadless state. Alternative 4 includes ARA acres that would be managed as Timber Priority and allow timber harvest and road building. Timber Priority acres account for 20 percent of the ARA in the Hoonah CUA. Areas allocated to Roadless Priority would explicitly allow the cutting, utilization, customary trade, and removal of trees for the purposes of Alaska Native customary and traditional uses, as well as road construction deemed necessary by a federally recognized Tribe for access to Alaska Native cultural sites. This type of use would also be allowed in Timber Priority areas, which allow all timber harvest and road construction.

Figure E-9
Hoonah's Community Use Area

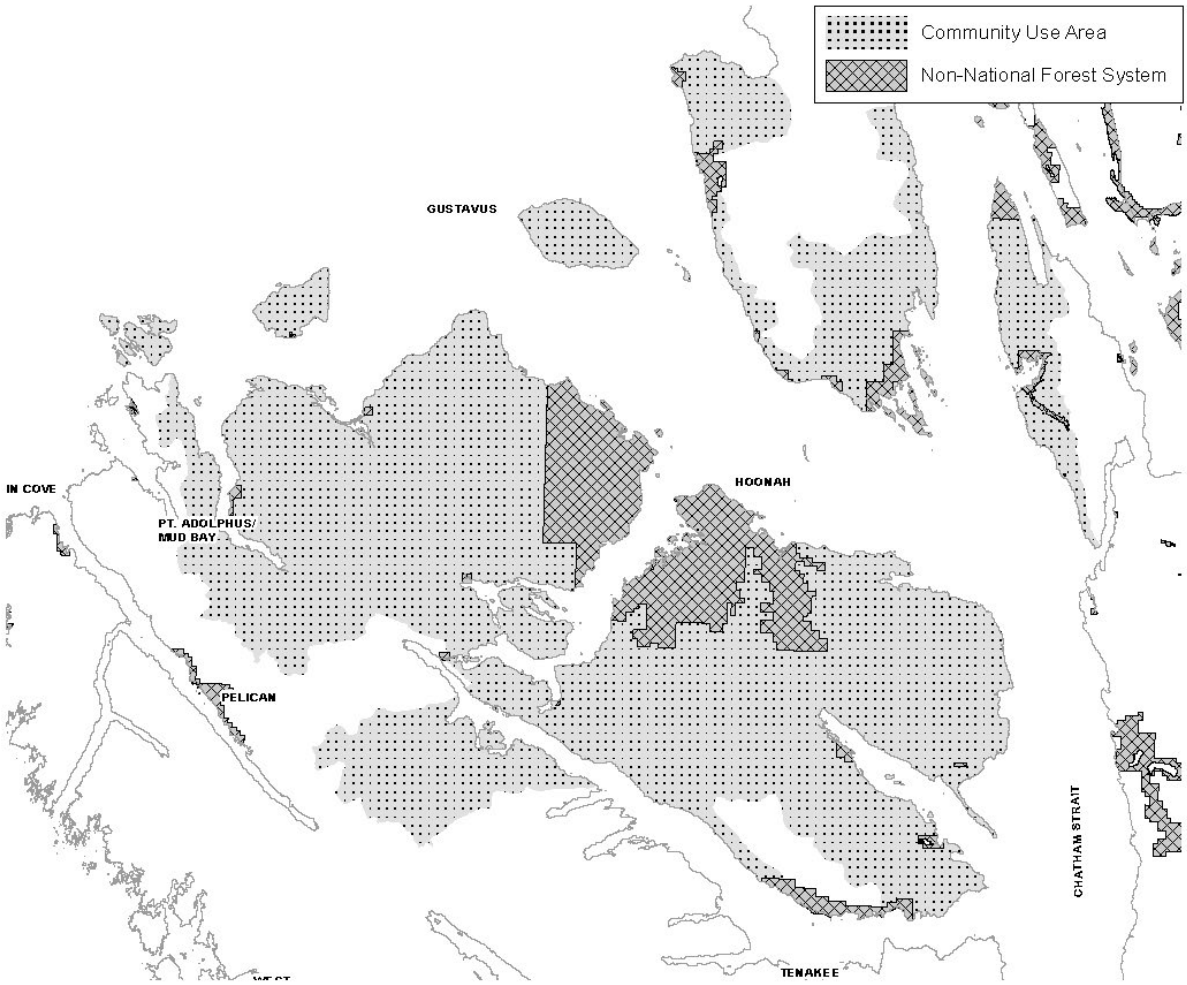

Table E-35
Roadless Areas, ARA Management Categories, and Development Opportunity in Hoonah's Community Use Area

Roadless Category (acres)	Alternative					
	1	2	3	4	5	6
Total Community Use Area	585,102	585,102	585,102	585,102	585,102	585,102
Total Roadless Area	446,273	447,147	336,145	433,045	290,934	0
Roadless Share	76%	76%	57%	74%	50%	0%
ARA Management Categories (acres)						
LUD II Priority	na	101,150	0	101,150	100,979	0
Watershed Priority	na	120,847	0	0	0	0
Roadless Priority	na	225,150	215,299	243,698	189,955	0
Community Priority	na	0	0	0	0	0
Timber Priority	na	0	0	88,197	0	0
Development Opportunity						
Development LUDs (acres)	80,078	79,693	88,849	92,016	230,746	230,748
Timber Opportunity (Acres Suitable for Harvest)						
Old-Growth	23,950	25,133	28,303	43,517	44,552	44,552
Young-Growth	20,079	20,340	20,365	20,498	20,625	20,621
Estimated Harvest over 100 Years (acres)						
Old-Growth	1,140	1,139	1,112	1,140	1,119	1,119
Young-Growth	17,095	16,751	16,593	16,695	16,712	17,360

na = not applicable

Not all acres removed from roadless management would be available for development. The change in acres in development LUDs serves as a measure of development potential as it presently exists by alternative. Approximately 14 percent (80,100 acres) of the Hoonah CUA is presently managed in development LUDs. This total would increase under Alternatives 3 to 6, with net gains ranging from about 8,800 acres (Alternative 3) to 150,700 acres (Alternatives 5 and 6); the total would drop by about 400 acres under Alternative 2.

Suitable old-growth and young-growth acres available for harvest would increase under all action alternatives. Estimated net gains in suitable old-growth range from about 1,200 acres (Alternative 2) to 20,600 acres (Alternatives 5 and 6). Increases in suitable young-growth acres range from about 250 acres (Alternative 2) to 1,550 acres (Alternative 6).

Total acres harvested are assumed to remain constant across all alternatives. Estimated old-growth harvest over 100 years in the Hoonah CUA is similar across all alternatives, with estimated totals of about 1,100 acres. Estimated young-growth harvest would also be similar across all alternatives, ranging from about 16,600 acres (Alternative 3) to approximately 17,400 acres (Alternative 6) (Table E-35).

Subsistence

No significant effect on salmon, other finfish, or invertebrate habitat capability is expected from implementation of any alternative. These resources account for 59 percent of the total edible pounds of subsistence resources harvested by Hoonah households (Kruse and Frazier 1988). Marine resources (fish and marine invertebrates) accounted for 68 percent of per capita subsistence harvest in Hoonah in 2012 (ADF&G 2018).

The 1988 TRUCS study found that deer accounted for 23 percent of the total edible pounds of subsistence resources harvested by Hoonah households (Kruse and Frazier 1988). Deer accounted for 15 percent of per capita subsistence harvest by Hoonah residents (ADF&G 2018).

Hoonah residents mainly harvest deer on Chichagof Island. Six WAAs account for the majority (73 percent) of deer harvest by Hoonah residents (Table E-36). The Hoonah portion represents about 89 percent of the combined average rural hunter harvest and 57 percent of the total harvest in these WAAs.

About 36 percent of the combined harvest in these WAAs is by non-rural hunters, suggesting that there is a harvest buffer that could be restricted, if necessary, before restrictions are placed on rural harvests.

All of the WAAs identified in Table E-36 are in areas with at least some past timber harvest and deer habitat capabilities are currently estimated to be below 1954 levels. The 2016 Forest Plan Amendment EIS analysis found that additional harvest under the current Forest Plan would further reduce estimated habitat capabilities after 100 years in four of the WAAs by 1 to 6 percent.

Table E-36
Deer Harvest and Deer Habitat Capability on NFS Lands for the WAAs where Hoonah Residents Obtain Approximately 75 Percent of their Average Annual Deer Harvest[1]

	Average Deer Harvest from 2004 to 2013			Deer Habitat Capability[3]		
WAA	Hoonah Residents	All Rural Hunters[2]	All Hunters	2014	After 100 Years of Implementation	Change
3523	60	62	88	79%	75%	-4%
3524	45	51	82	99%	98%	-1%
3551	45	48	67	83%	77%	-6%
3525	44	56	118	75%	70%	-5%
4253	43	48	66	84%	84%	0%
4252	42	51	72	92%	92%	0%

[1] Calculated based on harvest where location is known.
[2] The category "All Rural Hunters" includes residents of Southeast Alaska communities, excluding the cities of Juneau and Ketchikan.
[3] Deer habitat capability in 2014 and after 100 Years of full implementation is expressed as a percent of the 1954 habitat capability. Data presented for 100 Years of Implementation are estimates developed for the current Forest Plan in the 2016 Forest Plan Amendment EIS (USDA Forest Service 2016).

The 2016 Forest Plan Amendment EIS analysis found that the use of most subsistence resources by Hoonah residents (fish and marine invertebrates) was not expected to be affected under the current Forest Plan. Based on the Deer Availability and Anticipated Demand analysis completed for the 1997 Forest Plan EIS, the 2016 analysis found that subsistence use of deer may be affected to the point that some restriction in hunting might be necessary over the long term, especially for non-rural hunters. The risk of hunting restrictions would be reduced somewhat, through more intensive management (e.g., thinning) of the existing and future closed-canopy, young-growth forests in this area. Indirect effects associated with increased competition for deer within Hoonah's subsistence use areas could also occur if hunters from other communities were displaced due to timber harvest activity.

Suitable old-growth acres in three of the six WAAs important to Hoonah residents would increase relative to Alternative 1 under most of the action alternatives, with larger increases under Alternatives 4 to 6 (Table E-37). Projected old-growth harvest is also expected to increase relative to Alternative 1 in one of these WAAs, with relative decreases anticipated for the other WAAs (Table E-38). These relative changes in projected harvest are small in absolute terms (i.e., number of acres) and none of the alternatives are expected to affect the findings of the 2016 Forest Plan Amendment.

Table E-37
Suitable Old-Growth by WAA and Alternative for the WAAs where Hoonah Residents Obtain Approximately 75 Percent of their Average Annual Deer Harvest

			Change from Alternative 1 (Acres)				
WAA	Total Acres	Alt 1	Alt 2	Alt 3	Alt 4	Alt 5	Alt 6
3523	45,310	-	-	-	-	-	-
3524	13,760	30	-	-	2,740	2,740	2,740
3551	58,490	5,120	80	1,370	3,170	3,170	3,170
3525	73,120	2,350	40	380	600	610	610
4253	45,890	-	-	-	-	-	-
4252	19,540	-	-	-	-	-	-

Table E-38
Projected Old-Growth Harvest by WAA and Alternative for the WAAs where Hoonah Residents Obtain Approximately 75 Percent of their Average Annual Deer Harvest

			Change from Alternative 1 (Acres)				
WAA	**Total Acres**	**Alt 1**	**Alt 2**	**Alt 3**	**Alt 4**	**Alt 5**	**Alt 6**
3523	45,310	-	-	-	-	-	-
3524	13,760	-	-	-	180	180	180
3551	58,490	560	-	30	(10)	(30)	(30)
3525	73,120	260	-	(10)	(60)	(70)	(70)
4253	45,890	-	-	-	-	-	-
4252	19,540	-	-	-	-	-	-

Hydaburg

Community Use Area

Hydaburg's CUA encompasses a total of 729,892 acres (Figure E-10). Approximately three-quarters of this area (75 percent) is presently managed as roadless (Table E-39). This share would drop to 41 percent under Alternative 5, with no acres managed as roadless under Alternative 6. The removal of LUD II acres under Alternative 3 accounts for approximately 61 percent of the decrease in roadless acres under this alternative. These areas would retain their congressional protections and continue to be managed in a roadless state. Alternative 4 includes ARA acres that would be managed as Timber Priority and allow timber harvest and road building. Timber Priority acres account for 14 percent of the ARA in the Hydaburg CUA. Areas allocated to Roadless Priority would explicitly allow the cutting, utilization, customary trade, and removal of trees for the purposes of Alaska Native customary and traditional uses, as well as road construction deemed necessary by a federally recognized Tribe for access to Alaska Native cultural sites. This type of use would also be allowed in Timber Priority areas, which allow all timber harvest and road construction.

Figure E-10
Hydaburg's Community Use Area

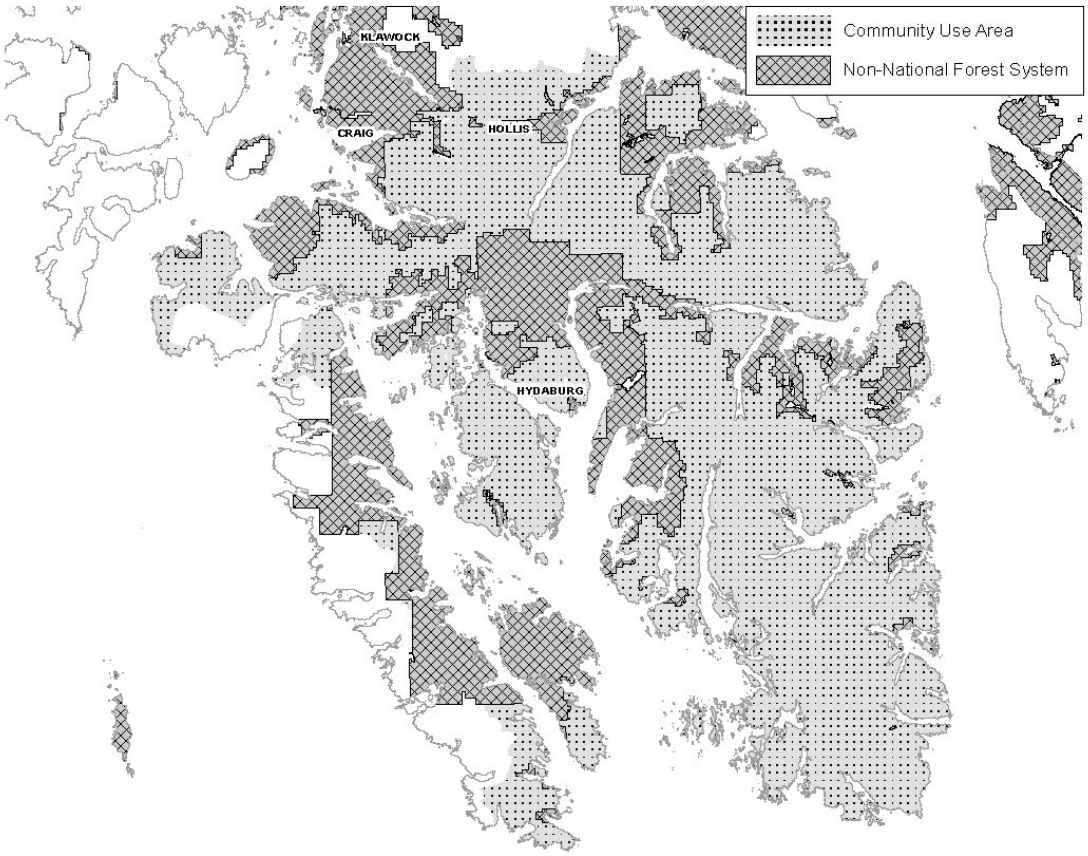

Table E-39
Roadless Areas, ARA Management Categories, and Development Opportunity in Hydaburg's Community Use Area

	Alternative					
Roadless Category (acres)	**1**	**2**	**3**	**4**	**5**	**6**
Total Community Use Area	729,892	729,892	729,892	729,892	729,892	729,892
Total Roadless Area	545,979	539,082	461,005	504,796	301,522	0
Roadless Share	75%	74%	63%	69%	41%	0%
ARA Management Categories (acres)						
LUD II Priority	na	55,975	0	55,975	51,781	0
Watershed Priority	na	264,103	31,369	0	0	0
Roadless Priority	na	219,003	166,232	376,563	249,741	0
Community Priority	na	0	31,369	0	0	0
Timber Priority	na	0	0	72,257	0	0
Development Opportunity						
Development LUDs (acres)	69,172	85,495	106,250	110,463	290,165	308,076
Timber Opportunity (Acres Suitable for Harvest)						
Old-Growth	12,573	16,882	22,489	24,768	25,742	25,746
Young-Growth	16,758	19,674	20,687	20,694	20,840	20,962
Estimated Harvest over 100 Years (acres)						
Old-Growth	3,092	3,592	3,842	3,568	3,669	3,669
Young-Growth	14,268	16,203	16,856	16,854	16,887	16,831

na = not applicable

Not all acres removed from roadless management would be available for development. The change in acres in development LUDs serves as a measure of development potential as it presently exists by alternative. Approximately 9 percent (69,200 acres) of the Hydaburg CUA is presently managed in development LUDs. This total would increase under all action alternatives, with net gains ranging from about 16,300 acres (Alternative 2) to 238,900 acres (Alternative 6).

Suitable old-growth and young-growth acres available for harvest would increase under all action alternatives. Estimated net gains in suitable old-growth range from about 4,300 acres (Alternative 2) to 13,200 acres (Alternatives 5 and 6). Increases in suitable young-growth acres range from about 2,900 acres (Alternative 2) to 4,200 acres (Alternative 6).

Total acres harvested are assumed to remain constant across all alternatives. Estimated old-growth harvest totals over 100 years in the Hydaburg CUA would be similar under all alternatives, ranging from about 3,100 acres (Alternative 1) to 3,850 acres (Alternative 3). Estimated young-growth harvest ranges from about 14,300 acres (Alternative 1) to 16,900 acres (Alternatives 3 to 5) (Table E-39).

Subsistence

No significant effect on salmon, other finfish, or invertebrate habitat capability is expected from implementation of any alternative. These resources account for 80 percent of the total edible pounds of subsistence resources harvested by Hydaburg households (Kruse and Frazier 1988). Marine resources (fish and marine invertebrates) accounted for the majority (81 percent) of per capita subsistence harvest in Hydaburg in 2012 (ADF&G 2018).

The 1988 TRUCS study found that deer accounted for 13 percent of the total edible pounds of subsistence resources harvested by Hydaburg households (Kruse and Frazier 1988). Deer accounted for 13 percent of per capita subsistence harvest by Hydaburg residents in 2012 (ADF&G 2018).

Hydaburg residents primarily harvest deer on south Prince of Wales Island. Residents of Hydaburg harvest the majority (73 percent) of their deer from three WAAs (Table E-40). The Hydaburg portion represents about 19 percent of the combined average rural hunter harvest and 11 percent of all harvest in these WAAs. About 41 percent of the combined harvest in these WAAs is by non-rural hunters, suggesting that there is a harvest buffer that could be restricted, if necessary, before restrictions are placed on rural harvests.

The 2016 Forest Plan Amendment EIS analysis found that only one of the three WAAs would be affected under the current Forest Plan (Table E-40). In WAA 1214, where past timber harvest has already reduced deer habitat capability well below 1954 levels, additional harvest that could occur under the current Forest Plan was estimated to reduce habitat capabilities by a further 6 percent (Table E-40).

Table E-40
Deer Harvest and Deer Habitat Capability on NFS Lands for the WAAs where Hydaburg Residents Obtain Approximately 75 Percent of their Average Annual Deer Harvest[1]

	Average Deer Harvest from 2004 to 2013			Deer Habitat Capability[3]		
WAA	Hydaburg Residents	All Rural Hunters[2]	All Hunters	2014	After 100 Years of Implementation	Change
1107	34	99	130	99%	99%	0%
1214	6	120	235	77%	71%	-6%
1106	4	17	33	100%	100%	0%

[1] Calculated based on harvest where location is known.
[2] The category "All Rural Hunters" includes residents of Southeast Alaska communities, excluding the cities of Juneau and Ketchikan.
[3] Deer habitat capability in 2014 and after 100 Years of full implementation is expressed as a percent of the 1954 habitat capability. Data presented for 100 Years of Implementation are estimates developed for the current Forest Plan in the 2016 Forest Plan Amendment EIS (USDA Forest Service 2016).

The 2016 Forest Plan Amendment EIS analysis found that the use of most subsistence resources by Hydaburg residents (fish and marine invertebrates) was not expected to be affected under the current Forest Plan. Based on the Deer Availability and Anticipated Demand analysis completed for the 1997

Forest Plan EIS, the 2016 analysis also found that subsistence use of deer was not likely to be directly affected at a level that would require hunting restrictions. Indirect effects associated with increased competition for deer within Hydaburg's subsistence use areas could occur if hunters from other communities were displaced due to timber harvest activity.

Suitable old-growth acres in two of the WAAs important to Hydaburg residents would increase relative to Alternative 1 under the action alternatives (Table E-41). Projected old-growth harvest is also expected to increase relative to Alternative 1 in one of these WAAs, with decreases anticipated for the other WAA (Table E-42). These relative changes in projected harvest are small in absolute terms (i.e., number of acres) and none of the alternatives are expected to affect the findings of the 2016 Forest Plan Amendment.

Table E-41
Suitable Old-Growth by WAA and Alternative for the WAAs where Hydaburg Residents Obtain Approximately 75 Percent of their Average Annual Deer Harvest

			Change from Alternative 1 (Acres)				
WAA	**Total Acres**	**Alt 1**	**Alt 2**	**Alt 3**	**Alt 4**	**Alt 5**	**Alt 6**
1107	124,050	360	10	80	80	90	90
1214	61,680	3,440	1,910	3,190	3,190	3,190	3,190
1106	7,420	-	-	-	-	-	-

Table E-42
Projected Old-Growth Harvest by WAA and Alternative for the WAAs where Hydaburg Residents Obtain Approximately 75 Percent of their Average Annual Deer Harvest

			Change from Alternative 1 (Acres)				
WAA	**Total Acres**	**Alt 1**	**Alt 2**	**Alt 3**	**Alt 4**	**Alt 5**	**Alt 6**
1107	124,050	110	(10)	(10)	(30)	(30)	(30)
1214	61,680	1,030	420	420	230	200	200
1106	7,420	-	-	-	-	-	-

Hyder

Community Use Area

Hyder's CUA encompasses a total of 108,628 acres (Figure E-11). Most of this area (94 percent) is presently managed as roadless (Table E-43). This share would drop to 58 percent under Alternative 5, with no acres managed as roadless under Alternative 6. No ARA acres in the Hyder CUA under any alternative would be managed as Timber Priority, which allow timber harvest and road building. Areas allocated to Roadless Priority would explicitly allow the cutting, utilization, customary trade, and removal of trees for the purposes of Alaska Native customary and traditional uses, as well as road construction deemed necessary by a federally recognized Tribe for access to Alaska Native cultural sites.

Figure E-11
Hyder's Community Use Area

Table E-43
Roadless Areas, ARA Management Categories, and Development Opportunity in Hyder's Community Use Area

Roadless Category (acres)	Alternative					
	1	2	3	4	5	6
Total Community Use Area	108,628	108,628	108,628	108,628	108,628	108,628
Total Roadless Area	102,029	101,897	101,897	101,897	62,788	0
Roadless Share	94%	94%	94%	94%	58%	0%
ARA Management Categories (acres)						
LUD II Priority	na	0	0	0	0	0
Watershed Priority	na	0	0	0	0	0
Roadless Priority	na	101,897	101,897	101,897	62,788	0
Community Priority	na	0	0	0	0	0
Timber Priority	na	0	0	0	0	0
Development Opportunity						
Development LUDs (acres)	3,051	3,057	3,057	3,057	10,343	10,485
Timber Opportunity (Acres Suitable for Harvest)						
Old-Growth	3	3	3	3	24	24
Young-Growth	174	174	174	174	204	235
Estimated Harvest over 100 Years (acres)						
Old-Growth	0	0	0	0	0	0
Young-Growth	149	144	142	142	165	189

na = not applicable

Not all acres removed from roadless management would be available for development. The change in acres in development LUDs serves as a measure of development potential as it presently exists by alternative. Approximately 3 percent (3,050 acres) of the Hyder CUA is presently managed in

development LUDs. This total would increase under Alternatives 5 and 6 by 7,300 acres to 7,450 acres, respectively (Table E-13). Very few of the acres included in development LUDs are suitable for harvest and timber harvest is not expected to take place in the Hyder CUA under any of the alternatives.

Subsistence

No significant effect on salmon, other finfish, or invertebrate habitat capability is expected from implementation of any alternative. These resources account for 80 percent of the total edible pounds of subsistence resources harvested by Hyder households (Kruse and Frazier 1988). Marine resources (fish and marine invertebrates) accounted for the majority (85 percent) of per capita subsistence in Hyder in 1987 (ADF&G 2018).

The 1988 TRUCS study found that deer accounted for only a fraction of the total edible pounds of subsistence resources harvested by Hyder households (Kruse and Frazier 1988). Bear, moose, and goat made up most of the land mammal subsistence harvest (ADF&G 2018).

The 2016 Forest Plan Amendment EIS analysis found that bear, moose, and goat availability would not be significantly affected under the current Forest Plan. Data were not provided for Hyder in the ADF&G deer harvest reports for 2004 to 2013, but the majority of deer harvest by Hyder residents likely takes place in GMU 1A. As of 2013, deer numbers were at very low levels throughout most of GMU 1A and were no longer meeting local hunter demands or established deer harvest objectives (ADF&G 2015). Though not closed, starting in 2011 the deer hunting season was shortened to August 1 through November 30 instead of continuing through December. Hunters are known to be shifting efforts to other more productive areas, such as nearby GMU 2, leading to less hunter effort and fewer deer harvested in GMU 1A (ADF&G 2015).

The 2016 Forest Plan Amendment EIS analysis found that use of most subsistence resources by Hyder residents (fish and marine invertebrates) was not expected to be affected by the current Forest Plan. Based on the Deer Availability and Anticipated Demand analysis completed for the 1997 Forest Plan EIS, the 2016 analysis found that subsistence use of deer was unlikely to be affected by the current Forest Plan; however, further hunting restrictions are possible due to existing conditions. The 2016 analysis also found that it was unlikely that Hyder residents would be affected by increased competition in WAA 826, which surrounds their community, because of the limited access to this area and current low deer numbers. None of the alternatives are expected to affect the findings of the 2016 Forest Plan Amendment.

Juneau (Dzántik'I Héeni)

Community Use Area

Juneau's CUA encompasses a total of 2,029,329 acres (Figure E-12). Most of this area (81 percent) is presently managed as roadless (Table E-44). This share would decrease to 71 percent under Alternative 5, with no acres managed as roadless under Alternative 6. The removal of LUD II acres under Alternative 3 accounts for all of the decrease in roadless acres under this alternative. These areas would retain their congressional protections and continue to be managed in a roadless state. Alternative 4 includes ARA acres that would be managed as Timber Priority and allow timber harvest and road building. Timber Priority acres account for 1 percent of the ARA in the Juneau CUA. Areas allocated to Roadless Priority and Community Priority would explicitly allow the cutting, utilization, customary trade, and removal of trees for the purposes of Alaska Native customary and traditional uses, as well as road construction deemed necessary by a federally recognized Tribe for access to Alaska Native cultural sites. This type of use would also be allowed in Timber Priority areas, which allow all timber harvest and road construction.

Figure E-12
Juneau's Community Use Area

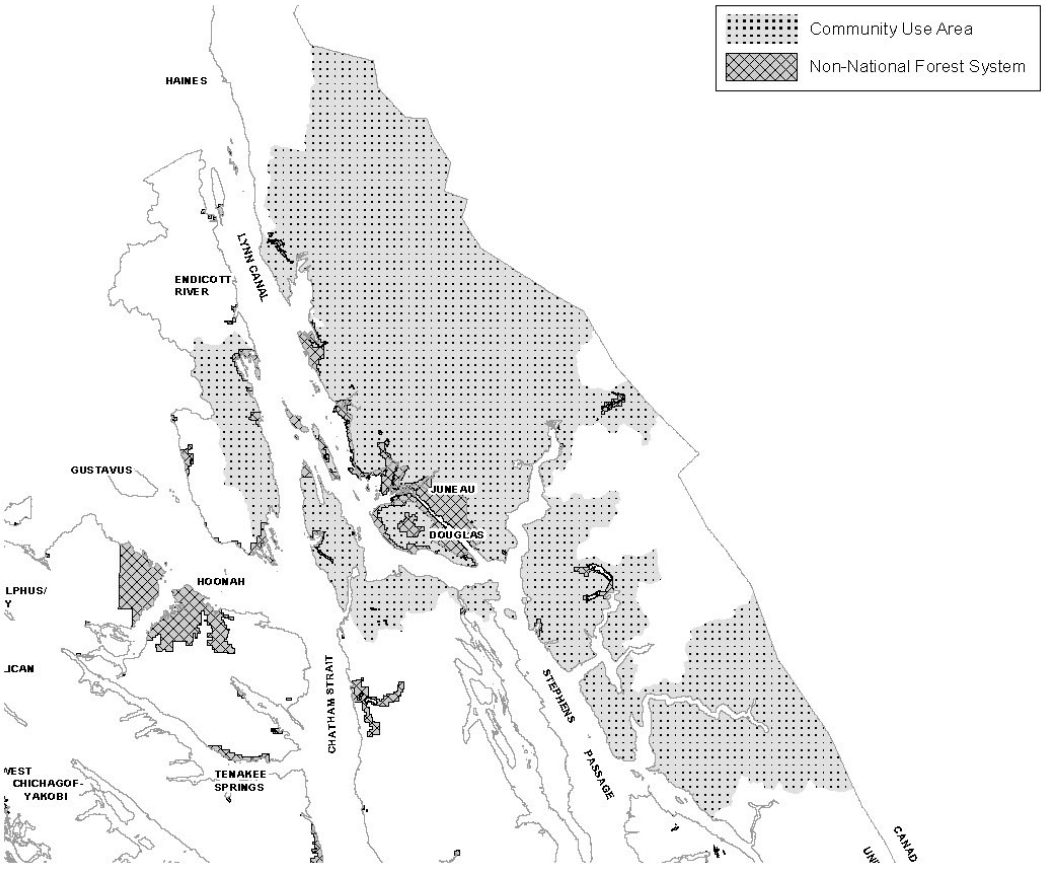

Table E-44
Roadless Areas, ARA Management Categories, and Development Opportunity in Juneau's Community Use Area

	Alternative					
Roadless Category (acres)	**1**	**2**	**3**	**4**	**5**	**6**
Total Community Use Area	2,029,329	2,029,329	2,029,329	2,029,329	2,029,329	2,029,329
Total Roadless Area	1,634,246	1,634,489	1,589,799	1,631,245	1,446,811	0
Roadless Share	81%	81%	78%	80%	71%	0%
ARA Management Categories (acres)						
LUD II Priority	na	44,690	0	44,690	44,594	0
Watershed Priority	na	489,310	77,991	0	0	0
Roadless Priority	na	1,100,489	1,022,498	1,572,538	1,402,217	0
Community Priority	na	0	77,991	0	0	0
Timber Priority	na	0	0	14,016	0	0
Development Opportunity						
Development LUDs (acres)	6,028	6,916	6,916	6,916	135,364	150,281
Timber Opportunity (Acres Suitable for Harvest)						
Old-Growth	34	53	53	74	132	132
Young-Growth	719	727	727	733	967	1,128
Estimated Harvest over 100 Years (acres)						
Old-Growth	0	0	0	0	0	0
Young-Growth	612	599	593	597	784	906

na = not applicable

Not all acres removed from roadless management would be available for development. The change in acres in development LUDs serves as a measure of development potential as it presently exists by alternative. Less than 1 percent (6,000 acres) of the Juneau CUA is presently managed in development LUDs. This total would increase substantially under Alternatives 5 and 6 with respective increases of about 129,300 acres and 144,250 acres. There are, however, very limited suitable old-growth and young-growth acres available for harvest in the Juneau CUA, with very little variation across alternatives. No old-growth and very limited young-growth harvest is estimated under any of the alternatives (Table E-44).

Subsistence

Juneau is not classified as a subsistence community; however, many residents use the surrounding Tongass National Forest for sport hunting and fishing. The City and Borough of Juneau had a total estimated population of 31,986 in 2019, accounting for approximately 44 percent of the population in Southeast Alaska (Alaska DOL 2019). Given the non-subsistence status of the community and its large size, no attempt is made here to summarize the WAAs that community residents use to hunt deer. However, the majority of deer harvest by Juneau residents likely takes place within the community's identified use area (Figure E-12), which is mainly located within GMU 1C.

The 2016 Forest Plan Amendment EIS analysis found use of most subsistence resources by Juneau residents (fish and marine invertebrates) was not expected to be affected by the current Forest Plan. Based on the Deer Availability and Anticipated Demand analysis completed for the 1997 Forest Plan EIS, the 2016 analysis found that there should be sufficient habitat capability for deer hunted by all rural hunters in the short and long terms. However, with the addition of Juneau residents and other non-rural hunters, demand would likely exceed the capability of the habitat to produce deer populations sufficient to avoid effects on hunter success in both the short and long terms. The Final EIS analysis concluded that at some point a restriction in hunting might be necessary and would target urban residents before any restrictions were considered for rural hunters. None of the alternatives evaluated in this EIS are expected to affect the findings of the 2016 Forest Plan Amendment.

Kake (Kéex')

Community Use Area

Kake's CUA encompasses a total of 450,413 acres (Figure E-13). About half of this area (54 percent) is presently managed as roadless (Table E-45). This proportion of roadless area decreases to 33 percent under Alternative 5, with no acres managed as roadless under Alternative 6. Alternative 4 includes ARA acres that would be managed as Timber Priority and allow timber harvest and road building. Timber Priority acres account for 21 percent of the ARA in the Kake CUA. Areas allocated to Roadless Priority would explicitly allow the cutting, utilization, customary trade, and removal of trees for the purposes of Alaska Native customary and traditional uses, as well as road construction deemed necessary by a federally recognized tribe for access to Alaska Native cultural sites. This type of use would also be allowed in Timber Priority areas, which allow all timber harvest and road construction.

Figure E-13
Kake's Community Use Area

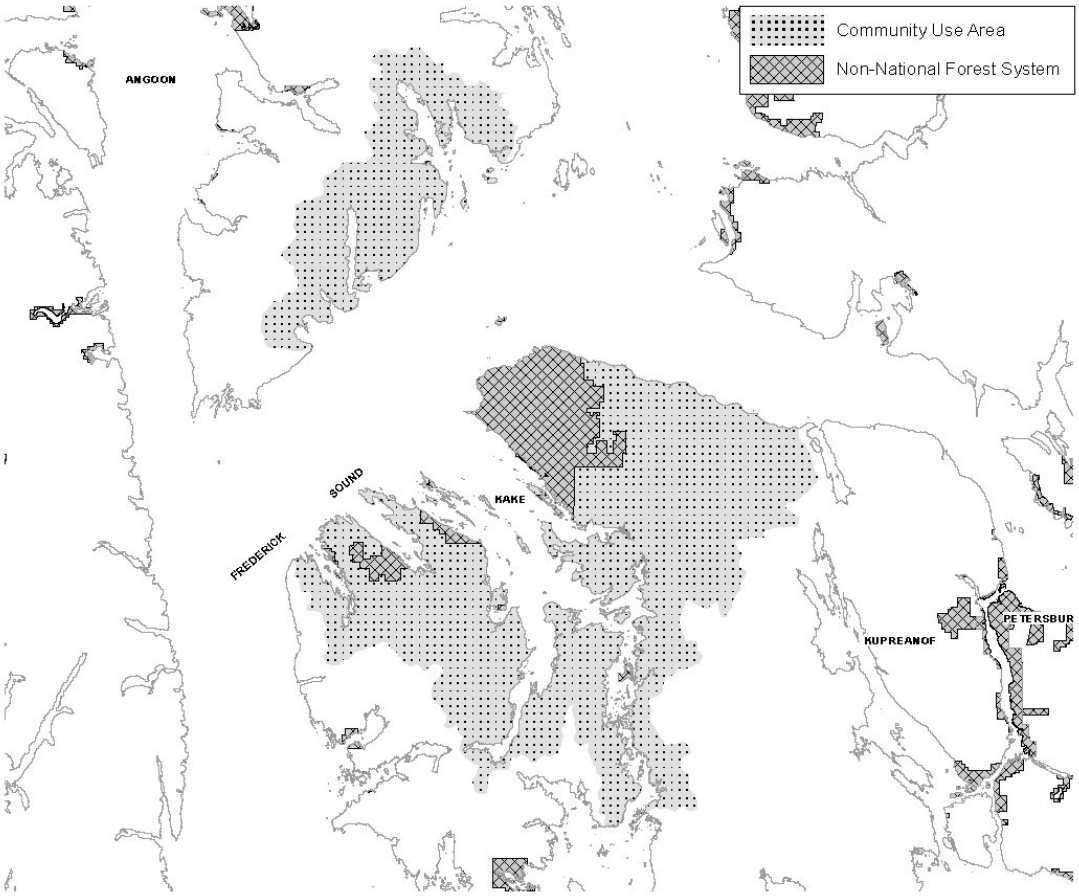

Table E-45
Roadless Areas, ARA Management Categories, and Development Opportunity in Kake's Community Use Area

Roadless Category (acres)	Alternative					
	1	2	3	4	5	6
Total Community Use Area	450,413	450,413	450,413	450,413	450,413	450,413
Total Roadless Area	241,879	238,794	229,926	224,259	149,318	0
Roadless Share	54%	53%	51%	50%	33%	0%
ARA Management Categories (acres)						
LUD II Priority	na	1	0	1	1	0
Watershed Priority	na	119,628	90,952	0	0	0
Roadless Priority	na	119,165	19,345	176,468	149,317	0
Community Priority	na	0	90,952	0	0	0
Timber Priority	na	0	0	47,790	0	0
Development Opportunity						
Development LUDs (acres)	82,811	87,007	91,905	95,428	174,154	174,164
Timber Opportunity (Acres Suitable for Harvest)						
Old-Growth	13,190	14,171	22,014	23,963	23,964	23,964
Young-Growth	21,524	22,229	22,324	22,298	22,234	22,377
Estimated Harvest over 100 Years (acres)						
Old-Growth	2,879	2,679	2,980	2,937	2,883	2,883
Young-Growth	18,326	18,308	18,190	18,161	18,089	17,967

na = not applicable

Not all acres removed from roadless management would be available for development. The change in acres in development LUDs serves as a measure of development potential as it presently exists by alternative. Approximately 18 percent (82,800 acres) of the Kake CUA is presently managed in development LUDs. This total would increase under all action alternatives, with net gains ranging from about 4,200 acres (Alternative 2) to 91,350 acres (Alternatives 5 and 6).

Suitable old-growth and young-growth acres available for harvest would increase under all action alternatives. Estimated net gains in suitable old-growth range from about 1,000 acres (Alternative 2) to 10,800 acres (Alternatives 4 to 6). Increases in suitable young-growth acres range from about 700 acres (Alternative 2) to 850 acres (Alternative 6).

Total acres harvested are assumed to remain constant across all alternatives. Estimated old-growth harvest totals over 100 years in the Kake CUA are less than 3,000 acres under all alternatives, with very little variation by alternative. Estimated young-growth harvest is also very similar across all alternatives, ranging from about 18,000 acres (Alternative 6) to 18,300 acres (Alternatives 1 and 2) (Table E-45).

Subsistence

No significant effect on salmon, other finfish, or invertebrate habitat capability is expected from implementation of any alternative. These resources account for 52 percent of the total edible pounds of subsistence resources harvested by Kake households (Kruse and Frazier 1988). Marine resources (fish and marine invertebrates) accounted for 60 percent of per capita subsistence harvest in Kake in 1996 (ADF&G 2018).

The 1988 TRUCS study found that deer accounted for 24 percent of the total edible pounds of subsistence resources harvested by Kake households (Kruse and Frazier 1988). Deer accounted for 28 percent of per capita subsistence harvest by Kake residents in 1996 (ADF&G 2018).

Five WAAs account for the majority (76 percent) of deer harvest by Kake residents (Table E-46). The Kake share ranges from about 11 percent (WAA 1420) to 60 percent (WAA 5132) of the total harvest and from 19 percent to 68 percent of the rural hunter harvest in these WAAs. About 35 percent of the combined harvest in these WAAs is by non-rural hunters, suggesting that there is a harvest buffer that could be restricted, if necessary, before restrictions are placed on rural harvests.

The 2016 Forest Plan Amendment EIS analysis found that four out of the five WAAs heavily used by Kake residents would not be affected under the current Forest Plan. For the other WAA (WAA 1420), the 2016 analysis estimated that deer habitat capability, which is currently at less than half of 1954 levels, would be further reduced by an estimated 5 percent (Table E-46).

Table E-46
Deer Harvest and Deer Habitat Capability on NFS Lands for the WAAs where Kake Residents Obtain Approximately 75 Percent of their Average Annual Deer Harvest[1]

	Average Deer Harvest from 2004 to 2013			Deer Habitat Capability[3]		
WAA	Kake Residents	All Rural Hunters[2]	All Hunters	2014	After 100 Years of Implementation	Change
1420	30	158	276	49%	44%	-5%
3940	26	61	75	93%	93%	0%
3939	19	71	105	100%	100%	0%
4041	5	16	19	91%	91%	0%
5132	5	7	8	70%	70%	0%

[1] Calculated based on harvest where location is known.
[2] The category "All Rural Hunters" includes residents of Southeast Alaska communities, excluding the cities of Juneau and Ketchikan.
[3] Deer habitat capability in 2014 and after 100 Years of full implementation is expressed as a percent of the 1954 habitat capability. Data presented for 100 Years of Implementation are estimates developed for the current Forest Plan in the 2016 Forest Plan Amendment EIS (USDA Forest Service 2016).

The 2016 Forest Plan Amendment EIS analysis found that use of most subsistence resources by Kake residents (fish and marine invertebrates) was not expected to be affected under the current Forest Plan.

Based on the Deer Availability and Anticipated Demand analysis completed for the 1997 Forest Plan EIS, the 2016 analysis found that subsistence use of deer in one of the WAAs hunted by Kake residents may be affected to the point that some restriction in hunting might be necessary over the long term, particularly for non-rural hunters. The risk of hunting restrictions would be reduced somewhat, through more intensive management (e.g., thinning) of the existing and future closed-canopy, young-growth forests in this area. Indirect effects associated with increased competition for deer within Kake's subsistence use areas could also occur if hunters from other communities were displaced due to timber harvest activity. Such impacts would be relatively low based on the limited accessibility of these areas to non-local hunters.

There are no suitable old-growth acres in three of the five WAAs heavily used by Kake residents under any of the alternatives. Suitable old-growth acres in the other two WAAs would increase relative to Alternative 1 under the action alternatives (Table E-47). Projected old-growth harvest is also expected to increase relative to Alternative 1 in one of these WAAs (5132), with decreases generally anticipated for the other one (WAA 1420) (Table E-48). These relative changes in projected harvest are small in absolute terms (i.e., number of acres) and none of the alternatives are expected to affect the findings of the 2016 Forest Plan Amendment.

Table E-47
Suitable Old-Growth by WAA and Alternative for the WAAs where Kake Residents Obtain Approximately 75 Percent of their Average Annual Deer Harvest

			Change from Alternative 1 (Acres)				
WAA	**Total Acres**	**Alt 1**	**Alt 2**	**Alt 3**	**Alt 4**	**Alt 5**	**Alt 6**
1420	42,410	3,210	230	390	500	500	500
3940	68,160	-	-	-	-	-	-
3939	66,460	-	-	-	-	-	-
4041	55,260	-	-	-	-	-	-
5132	37,010	1,150	10	1,010	1,010	1,010	1,010

Table E-48
Projected Old-Growth Harvest by WAA and Alternative for the WAAs where Kake Residents Obtain Approximately 75 Percent of their Average Annual Deer Harvest

			Change from Alternative 1 (Acres)				
WAA	**Total Acres**	**Alt 1**	**Alt 2**	**Alt 3**	**Alt 4**	**Alt 5**	**Alt 6**
1420	42,410	960	(30)	(170)	(260)	(270)	(270)
3940	68,160	-	-	-	-	-	-
3939	66,460	-	-	-	-	-	-
4041	55,260	-	-	-	-	-	-
5132	37,010	340	(30)	130	70	60	60

Kasaan

Community Use Area

Kasaan's CUA encompasses a total of 523,709 acres (Figure E-14). More than three-quarters of this area (79 percent) is presently managed as roadless (Table E-49). This share would decrease under all action alternatives, dropping to 39 percent under Alternative 5, with no acres managed as roadless under Alternative 6. Alternative 4 includes ARA acres that would be managed as Timber Priority and allow timber harvest and road building. Timber Priority acres account for 16 percent of the ARA in the Kasaan CUA. Areas allocated to Roadless Priority would explicitly allow the cutting, utilization, customary trade, and removal of trees for the purposes of Alaska Native customary and traditional uses, as well as road construction deemed necessary by a federally recognized Tribe for access to Alaska Native cultural sites. This type of use would also be allowed in Timber Priority areas, which allow all timber harvest and road construction.

Appendix E

Figure E-14
Kasaan's Community Use Area

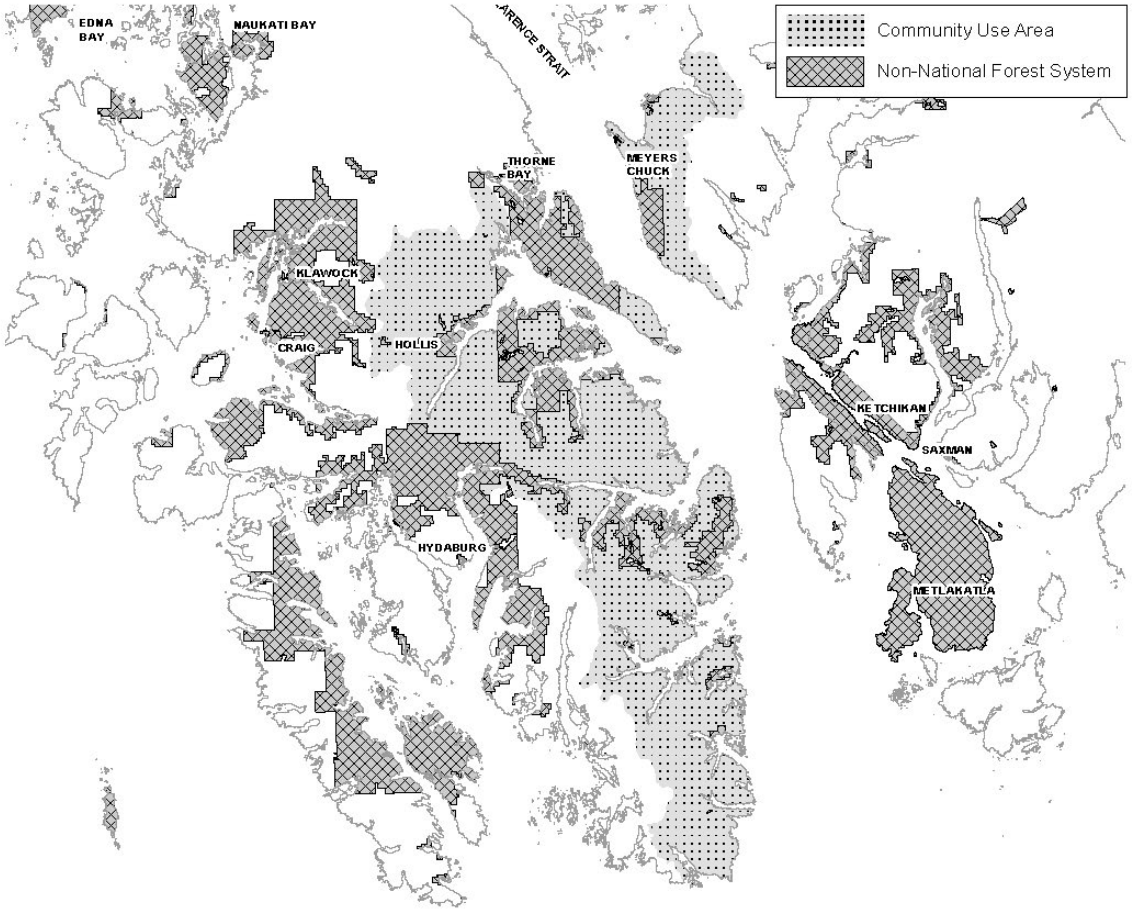

Table E-49
Roadless Areas, ARA Management Categories, and Development Opportunity in Kasaan's Community Use Area

	Alternative					
Roadless Category (acres)	**1**	**2**	**3**	**4**	**5**	**6**
Total Community Use Area	523,709	523,709	523,709	523,709	523,709	523,709
Total Roadless Area	413,187	391,608	367,105	364,378	202,290	0
Roadless Share	79%	75%	70%	70%	39%	0%
ARA Management Categories (acres)						
LUD II Priority	na	19	0	19	19	0
Watershed Priority	na	210,088	17,343	0	0	0
Roadless Priority	na	181,501	140,373	305,061	202,271	0
Community Priority	na	0	17,343	0	0	0
Timber Priority	na	0	0	59,298	0	0
Development Opportunity						
Development LUDs (acres)	56,154	75,529	98,307	98,316	238,375	244,314
Timber Opportunity (Acres Suitable for Harvest)						
Old-Growth	11,957	16,034	20,664	22,819	23,771	23,771
Young-Growth	15,072	18,004	19,044	19,050	19,123	19,346
Estimated Harvest over 100 Years (acres)						
Old-Growth	3,008	3,509	3,651	3,403	3,503	3,503
Young-Growth	12,833	14,828	15,517	15,515	15,495	15,534

na = not applicable

Not all acres removed from roadless management would be available for development. The change in acres in development LUDs serves as a measure of development potential as it presently exists by alternative. Approximately 11 percent (56,150 acres) of the Kasaan CUA is presently managed in development LUDs. This total would increase under all action alternatives, with net gains ranging from about 19,400 acres (Alternative 2) to 188,200 acres (Alternative 6).

Suitable old-growth and young-growth acres available for harvest would increase under all action alternatives. Estimated net gains in suitable old-growth range from about 4,100 acres (Alternative 2) to 11,800 acres (Alternatives 5 and 6). Increases in suitable young-growth acres range from about 2,900 acres (Alternative 2) to 4,300 acres (Alternative 6), representing a 19 to 28 percent increase relative to Alternative 1.

Total acres harvested are assumed to remain constant across all alternatives. Estimated old-growth harvest totals over 100 years in the Kasaan CUA would be similar under all alternatives, ranging from 3,000 acres (Alternative 1) to 3,500 acres (Alternatives 5 and 6). Young-growth harvest estimates range from about 12,800 acres (Alternative 1) to 15,500 acres (Alternatives 3 to 6) (Table E-49).

Subsistence

No significant effect on salmon, other finfish, or invertebrate habitat capability is expected from implementation of any alternative. These resources account for 74 percent of the total edible pounds of subsistence resources harvested by Kasaan households (Kruse and Frazier 1988) and 75 percent of per capita harvest in 1998 (ADF&G 2018).

The 1988 TRUCS survey found that deer account for 22 percent of the total edible pounds of subsistence resources harvested by Kasaan households (Kruse and Frazier 1988). Deer accounted for 15 percent of per capita subsistence harvest by Kasaan residents in 1998 (ADF&G 2018).

The majority of deer harvest by Kasaan residents takes place near the community on north Prince of Wales Island. Residents of Kasaan harvest the majority (87 percent) of their deer from two WAAs (Table E-50). The Kasaan portion makes up 2 percent of the total combined harvest and 4 percent of the rural hunter harvest in these WAAs. About 42 percent of the combined harvest in these WAA is by non-rural hunters, suggesting that there is a harvest buffer that could be restricted, if necessary, before restrictions are placed on rural harvests.

Table E-50
Deer Harvest and Deer Habitat Capability on NFS Lands for the WAAs where Kasaan Residents Obtain Approximately 75 Percent of their Average Annual Deer Harvest[1]

	Average Deer Harvest from 2004 to 2013			Deer Habitat Capability[3]		
WAA	Kasaan Residents	All Rural Hunters[2]	All Hunters	2014	After 100 Years of Implementation	Change
1315	9	201	317	56%	50%	-6%
1214	4	120	235	77%	71%	-6%

[1] Calculated based on harvest where location is known.
[2] The category "All Rural Hunters" includes residents of Southeast Alaska communities, excluding the cities of Juneau and Ketchikan.
[3] Deer habitat capability in 2014 and after 100 Years of full implementation is expressed as a percent of the 1954 habitat capability. Data presented for 100 Years of Implementation are estimates developed for the current Forest Plan in the 2016 Forest Plan Amendment EIS (USDA Forest Service 2016).

Both WAAs are in areas with substantial past timber harvest and, therefore, deer habitat capabilities are currently estimated to be considerably below 1954 levels. The 2016 Forest Plan Amendment EIS analysis found that additional harvest that could occur under the current Forest Plan would further reduce estimated habitat capabilities after 100 years by 6 percent in both areas (Table E-50).

The 2016 Forest Plan Amendment EIS analysis found that use of most subsistence resources by Kasaan residents (fish and marine invertebrates) was not expected to be affected by any of the alternatives. Based on the Deer Availability and Anticipated Demand analysis completed for the 1997 Forest Plan EIS, the 2016 analysis found that subsistence use of deer may be affected to the point that some restriction in

hunting might be necessary over the long term, especially for non-rural hunters. Kasaan is currently competing with other communities in their subsistence use areas and this is likely to continue to be the case. The risk of hunting restrictions would be reduced somewhat, through more intensive management (e.g., thinning) of the existing and future closed-canopy, young-growth forests in this area. Indirect effects associated with increased competition for deer within Kasaan's subsistence use areas could also occur if hunters from other communities were displaced due to timber harvest activity.

Suitable old-growth acres would increase relative to Alternative 1 in both WAAs under all of the action alternatives (Table E-51). Projected old-growth harvest is also expected to increase relative to Alternative 1 in one of these WAAs (1214), with relative decreases anticipated for the other WAA (1315) (Table E-52). These relative changes in projected harvest are small in absolute terms (i.e., number of acres) and none of the alternatives are expected to affect the findings of the 2016 Forest Plan Amendment.

Table E-51
Suitable Old-Growth by WAA and Alternative for the WAAs where Kasaan Residents Obtain Approximately 75 Percent of their Average Annual Deer Harvest

			Change from Alternative 1 (Acres)				
WAA	**Total Acres**	**Alt 1**	**Alt 2**	**Alt 3**	**Alt 4**	**Alt 5**	**Alt 6**
1315	55,040	3,820	230	1,240	1,240	1,240	1,240
1214	61,680	3,440	1,910	3,190	3,190	3,190	3,190

Table E-52
Projected Old-Growth Harvest by WAA and Alternative for the WAAs where Kasaan Residents Obtain Approximately 75 Percent of their Average Annual Deer Harvest

			Change from Alternative 1 (Acres)				
WAA	**Total Acres**	**Alt 1**	**Alt 2**	**Alt 3**	**Alt 4**	**Alt 5**	**Alt 6**
1315	55,040	1,140	(40)	(30)	(180)	(200)	(200)
1214	61,680	1,030	420	420	230	200	200

Ketchikan (Kicháan)

Community Use Area

Ketchikan's CUA encompasses a total of 1,968,512 acres (Figure E-15). Almost half of this area (48 percent) is presently managed as roadless (Table E-53). This share would decrease to 32 percent under Alternative 5, with no acres managed as roadless under Alternative 6. The removal of LUD II acres under Alternative 3 accounts for approximately 39 percent of the decrease in roadless acres under this alternative. These areas would retain their congressional protections and continue to be managed in a roadless state. Alternative 4 includes ARA acres that would be managed as Timber Priority and allow timber harvest and road building. Timber Priority acres account for 13 percent of the ARA in the Ketchikan CUA. Areas allocated to Roadless Priority and Community Priority would explicitly allow the cutting, utilization, customary trade, and removal of trees for the purposes of Alaska Native customary and traditional uses, as well as road construction deemed necessary by a federally recognized Tribe for access to Alaska Native cultural sites. This type of use would also be allowed in Timber Priority areas, which allow all timber harvest and road construction.

Figure E-15
Ketchikan's Community Use Area

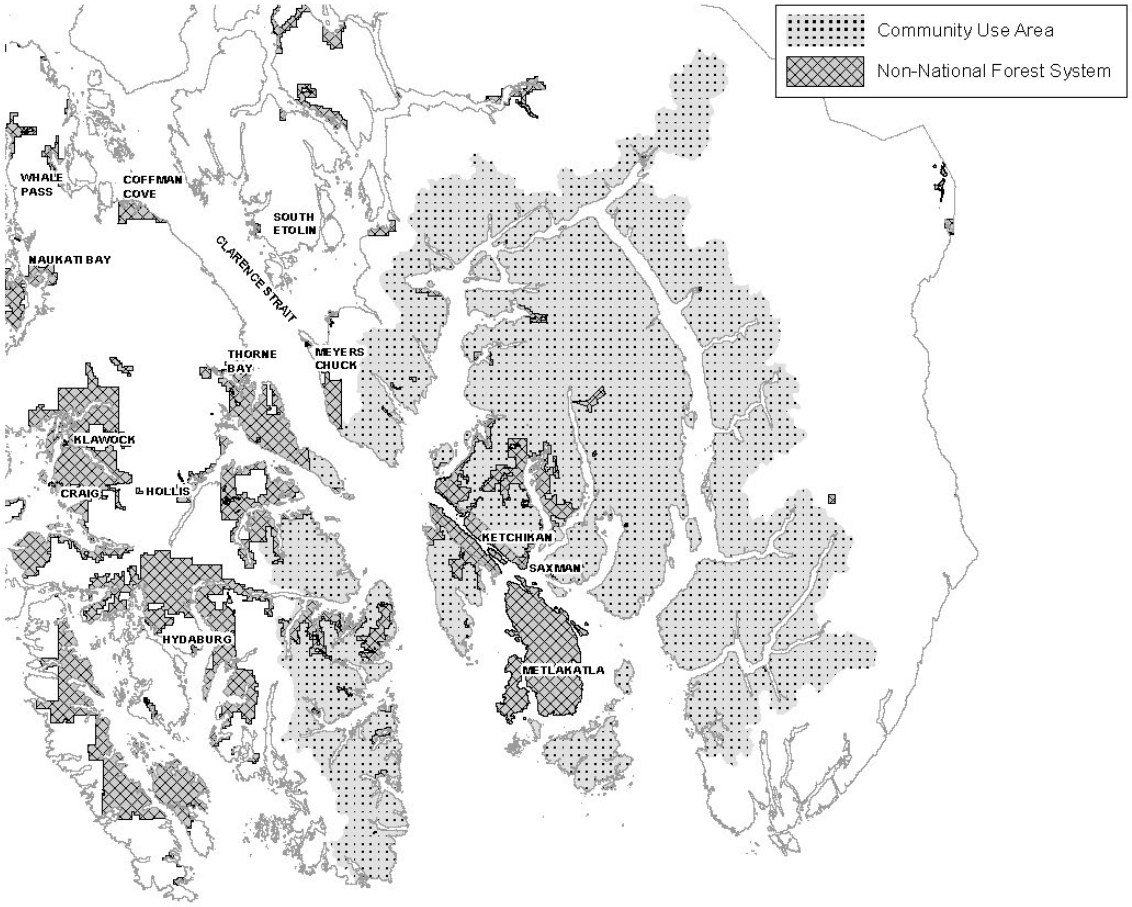

Table E-53
Roadless Areas, ARA Management Categories, and Development Opportunity in Ketchikan's Community Use Area

Roadless Category (acres)	Alternative					
	1	2	3	4	5	6
Total Community Use Area	1,968,512	1,968,512	1,968,512	1,968,512	1,968,512	1,968,512
Total Roadless Area	951,613	938,575	870,794	897,258	629,605	0
Roadless Share	48%	48%	44%	46%	32%	0%
ARA Management Categories (acres)						
LUD II Priority	na	31,386	0	31,386	31,384	0
Watershed Priority	na	494,679	58,585	0	0	0
Roadless Priority	na	412,511	317,685	753,390	598,221	0
Community Priority	na	0	58,585	0	0	0
Timber Priority	na	0	0	112,482	0	0
Development Opportunity						
Development LUDs (acres)	115,243	127,745	160,833	160,844	413,413	413,416
Timber Opportunity (Acres Suitable for Harvest)						
Old-Growth	29,744	33,535	45,566	55,120	56,219	56,220
Young-Growth	32,823	34,341	34,760	34,649	35,101	35,454
Estimated Harvest over 100 Years (acres)						
Old-Growth	7,080	7,335	7,510	7,959	7,957	7,957
Young-Growth	27,946	28,283	28,322	28,220	28,442	28,467

na = not applicable

Not all acres removed from roadless management would be available for development. The change in acres in development LUDs serves as a measure of development potential as it presently exists by alternative. Approximately 6 percent (115,250 acres) of the Ketchikan CUA is presently managed in development LUDs. This total would increase under all action alternatives, with net gains ranging from about 12,500 acres (Alternative 2) to 298,200 acres (Alternatives 5 and 6).

Suitable old-growth and young-growth acres available for harvest would increase under all action alternatives. Estimated net gains in suitable old-growth range from about 3,800 acres (Alternative 2) to 26,500 acres (Alternatives 5 and 6). Increases in suitable young-growth acres range from about 1,500 acres (Alternative 2) to 2,600 acres (Alternative 6).

Total acres harvested are assumed to remain constant across all alternatives. Estimated old-growth harvest totals over 100 years in the Ketchikan CUA range from about 7,100 acres (Alternative 1) to 7,950 acres (Alternatives 4 to 6). Estimated young-growth totals range from about 27,950 acres (Alternative 1) to about 28,450 acres (Alternatives 5 and 6) (Table E-53).

Subsistence

Ketchikan is not classified as a subsistence community; however, many residents use the surrounding Tongass National Forest for hunting and fishing. Given the non-subsistence status of the community and its large size, no attempt is made here to summarize the WAAs that community residents use to hunt deer. However, the majority of deer harvest by Ketchikan residents likely takes place within the community's identified use area (Figure E-15), which is mainly located within GMU 1A and GMU 2.

The 2016 Forest Plan Amendment EIS analysis found use of most subsistence resources by Ketchikan residents (fish and marine invertebrates) was not expected to be affected by the current Forest Plan. Based on the Deer Availability and Anticipated Demand analysis completed for the 1997 Forest Plan EIS, the 2016 analysis found that there should be sufficient habitat capability for deer hunted by all hunters in the short term. However, projected deer harvest in the long term by Ketchikan residents, all rural hunters, and all hunters exceeded the level that is both sustainable and provides a reasonably high level of hunter success for their effort. The Final EIS analysis concluded that if a restriction were necessary, sport hunting by Ketchikan residents would be restricted before subsistence hunting by rural hunters is restricted. None of the alternatives are expected to affect the findings of the 2016 Forest Plan Amendment.

Klawock (Lawáak)

Community Use Area

Klawock's CUA encompasses a total of 733,670 acres (Figure E-16). More than half of this area (57 percent) is presently managed as roadless (Table E-54). This share would drop to 33 percent under Alternatives 3 and 5, with no acres managed as roadless under Alternative 6. The removal of LUD II acres under Alternative 3 accounts for approximately 55 percent of the decrease in roadless acres under this alternative. These areas would retain their congressional protections and continue to be managed in a roadless state. Alternative 4 includes ARA acres that would be managed as Timber Priority and allow timber harvest and road building. Timber Priority acres account for 12 percent of the ARA in the Klawock CUA. Areas allocated to Roadless Priority would explicitly allow the cutting, utilization, customary trade, and removal of trees for the purposes of Alaska Native customary and traditional uses, as well as road construction deemed necessary by a federally recognized Tribe for access to Alaska Native cultural sites. This type of use would also be allowed in Timber Priority areas, which allow all timber harvest and road construction.

Figure E-16
Klawock's Community Use Area

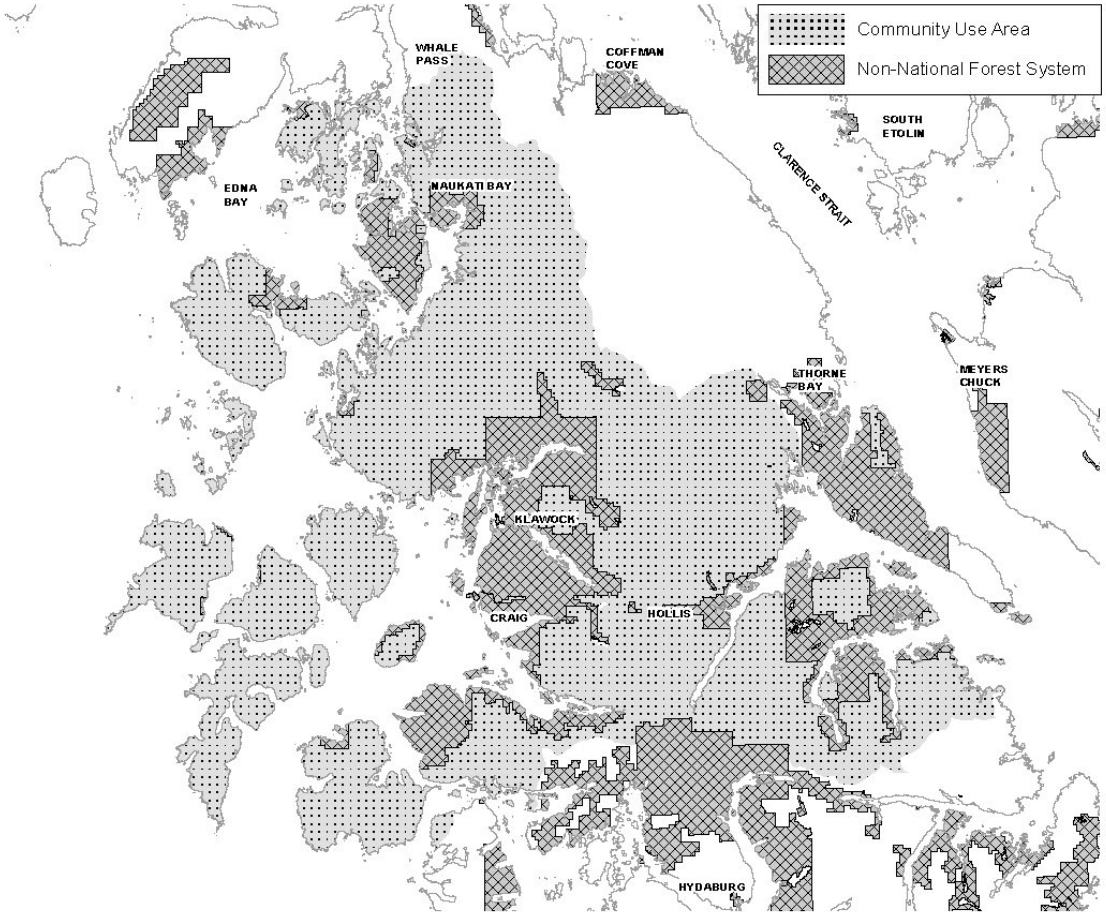

Table E-54
Roadless Areas, ARA Management Categories, and Development Opportunity in Klawock's Community Use Area

	Alternative					
Roadless Category (acre	**1**	**2**	**3**	**4**	**5**	**6**
Total Community Use Area	733,670	733,670	733,670	733,670	733,670	733,670
Total Roadless Area	418,413	396,858	239,678	330,167	240,160	0
Roadless Share	57%	54%	33%	45%	33%	0
ARA Management Categories (acres)						
LUD II Priority	na	99,731	0	99,731	98,201	0
Watershed Priority	na	132,064	29,012	0	0	0
Roadless Priority	na	165,063	80,188	192,343	141,960	0
Community Priority	na	0	29,012	0	0	0
Timber Priority	na	0	0	38,093	0	0
Development Opportunity						
Development LUDs (acres)	204,185	225,706	276,493	280,712	375,588	381,527
Timber Opportunity (Acres Suitable for Harvest)						
Old-Growth	40,738	46,824	60,255	64,177	65,495	65,495
Young-Growth	72,268	75,911	76,953	76,940	76,995	77,119
Estimated Harvest over 100 Years (acres)						
Old-Growth	9,263	9,435	9,613	8,691	8,712	8,712
Young-Growth	61,531	62,519	62,701	62,665	62,388	61,922

na = not applicable

Not all acres removed from roadless management would be available for development. The change in acres in development LUDs serves as a measure of development potential as it presently exists by alternative. Approximately 28 percent (204,200 acres) of the Klawock CUA is presently managed in development LUDs. This total would increase under all action alternatives, with net gains ranging from about 21,500 acres (Alternative 2) to 177,350 acres (Alternative 6).

Suitable old-growth and young-growth acres available for harvest would increase under all action alternatives. Estimated net gains in suitable old-growth range from about 6,100 acres (Alternative 2) to 24,800 acres (Alternatives 5 and 6). Increases in suitable young-growth acres range from about 3,600 acres (Alternative 2) to 4,850 acres (Alternative 6).

Total acres harvested are assumed to remain constant across all alternatives. Estimated old-growth harvest totals over 100 years in the Klawock CUA would be similar under all alternatives, ranging from about 8,700 acres (Alternatives 4 to 6) to 9,600 acres (Alternative 3). This would also be the case with young-growth acres, which are estimated to range from about 61,500 acres (Alternative 1) to 62,700 acres (Alternatives 3 and 4) (Table E-54).

Subsistence

No significant effect on salmon, other finfish, or invertebrate habitat capability is expected from implementation of any alternative. These resources account for 75 percent of the total edible pounds of subsistence resources harvested by Klawock households (Kruse and Frazier 1988). Marine resources (fish and marine invertebrates) accounted for 71 percent of per capita subsistence harvest in Klawock in 1997 (ADF&G 2018).

The 1988 TRUCS study found that deer accounted for 19 percent of the total edible pounds of subsistence resources harvested by Klawock households (Kruse and Frazier 1988). Deer accounted for 15 percent of per capita subsistence harvest by Klawock residents in 1997 (ADF&G 2018).

Klawock residents mainly harvest deer on north Prince of Wales Island, with the majority (74 percent) of their deer obtained from eight WAAs (Table E-55). The Klawock portion represents from about 5 percent (WAA 1420) to 34 percent (WAA 1318) of the total harvest and about 9 percent to 42 percent of the rural hunter harvest in these WAAs. About 34 percent of the combined harvest in these WAAs is by non-rural hunters, suggesting that there is a limited harvest buffer that could be restricted, if necessary, before restrictions are placed on rural harvests.

Table E-55
Deer Harvest and Deer Habitat Capability on NFS Lands for the WAAs where Klawock Residents Obtain Approximately 75 Percent of their Average Annual Deer Harvest[1]

	Average Deer Harvest from 2004 to 2013			Deer Habitat Capability[3]		
WAA	Klawock Residents	All Rural Hunters[2]	All Hunters	2014	After 100 Years of Implementation	Change
1318	67	159	198	90%	84%	-6%
1422	65	247	383	57%	50%	-7%
1319	28	169	226	74%	69%	-5%
1214	26	120	235	77%	71%	-6%
1107	22	99	130	99%	99%	0%
1315	21	201	317	56%	50%	-6%
1317	19	93	133	58%	56%	-2%
1420	15	158	276	49%	44%	-5%

[1] Calculated based on harvest where location is known.
[2] The category "All Rural Hunters" includes residents of Southeast Alaska communities, excluding the cities of Juneau and Ketchikan.
[3] Deer habitat capability in 2014 and after 100 Years of full implementation is expressed as a percent of the 1954 habitat capability. Data presented for 100 Years of Implementation are estimates developed for the current Forest Plan in the 2016 Forest Plan Amendment EIS (USDA Forest Service 2016).

Most of the WAAs identified in Table E-55 occur in areas with substantial past harvest and, therefore, deer habitat capabilities are currently estimated to be below 1954 levels. The 2016 Forest Plan

Amendment EIS analysis found that additional harvest that could occur under the current Forest Plan would further reduce estimated habitat capabilities after 100 years in all of the WAAs except for one (WAA 1107) by 2 to 7 percent (Table E-55).

The 2016 Forest Plan Amendment EIS analysis found that use of most subsistence resources by Klawock residents (fish and marine invertebrates) was not expected to be affected by the current Forest Plan. Based on the Deer Availability and Anticipated Demand analysis completed for the 1997 Forest Plan EIS, the 2016 analysis found that subsistence use of deer may be affected to the point that some restriction in hunting might be necessary, especially for non-rural hunters. The risk of hunting restrictions would be reduced somewhat, through more intensive management (e.g., thinning) of the existing and future closed-canopy, young-growth forests in this area. Indirect effects associated with increased competition for deer within the Klawock subsistence use areas could also occur if hunters from other communities were displaced due to timber harvest activity.

Suitable old-growth acres would increase relative to Alternative 1 in all eight WAAs under all of the action alternatives, with increases tending to be larger under Alternatives 4 to 6 (Table E-56). Projected old-growth harvest would increase in three of the WAAs under most alternatives and decrease in the other five (Table E-57). These relative changes in projected harvest are small in absolute terms (i.e., number of acres) and none of the alternatives are expected to affect the findings of the 2016 Forest Plan Amendment.

Table E-56
Suitable Old-Growth by WAA and Alternative for the WAAs where Klawock Residents Obtain Approximately 75 Percent of their Average Annual Deer Harvest

			Change from Alternative 1 (Acres)				
WAA	**Total Acres**	**Alt 1**	**Alt 2**	**Alt 3**	**Alt 4**	**Alt 5**	**Alt 6**
1318	53,710	1,300	140	1,310	1,410	1,410	1,410
1422	120,280	10,120	350	3,770	3,900	3,900	3,900
1319	103,210	3,250	170	570	600	600	600
1214	61,680	3,440	1,910	3,190	3,190	3,190	3,190
1107	124,050	360	10	80	80	90	90
1315	55,040	3,820	230	1,240	1,240	1,240	1,240
1317	57,220	2,460	730	2,190	2,510	3,380	3,380
1420	42,410	3,210	230	390	500	500	500

Table E-57
Projected Old-Growth Harvest by WAA and Alternative for the WAAs where Klawock Residents Obtain Approximately 75 Percent of their Average Annual Deer Harvest

			Change from Alternative 1 (Acres)				
WAA	**Total Acres**	**Alt 1**	**Alt 2**	**Alt 3**	**Alt 4**	**Alt 5**	**Alt 6**
1318	53,710	390	-	180	120	110	110
1422	120,280	3,020	(180)	20	(360)	(410)	(410)
1319	103,210	970	(40)	(130)	(240)	(250)	(250)
1214	61,680	1,030	420	420	230	200	200
1107	124,050	110	(10)	(10)	(30)	(30)	(30)
1315	55,040	1,140	(40)	(30)	(180)	(200)	(200)
1317	57,220	730	130	290	210	360	360
1420	42,410	960	(30)	(170)	(260)	(270)	(270)

Appendix E

Metlakatla

Community Use Area

Metlakatla's CUA encompasses a total of 1,968,512 acres (Figure E-17). Almost half of this area (48 percent) is presently managed as roadless (Table E-58). This share would drop to 32 percent under Alternative 5, with no acres managed as roadless under Alternative 6. The removal of LUD II acres under Alternative 3 accounts for approximately 39 percent of the decrease in roadless acres under this alternative. These areas would retain their congressional protections and continue to be managed in a roadless state. Alternative 4 includes ARA acres that would be managed as Timber Priority and allow timber harvest and road building. Timber Priority acres account for 13 percent of the ARA in the Metlakatla CUA. Areas allocated to Roadless Priority and Community Priority would explicitly allow the cutting, utilization, customary trade, and removal of trees for the purposes of Alaska Native customary and traditional uses, as well as road construction deemed necessary by a federally recognized Tribe for access to Alaska Native cultural sites. This type of use would also be allowed in Timber Priority areas, which allow all timber harvest and road construction.

Figure E-17
Metlakatla's Community Use Area

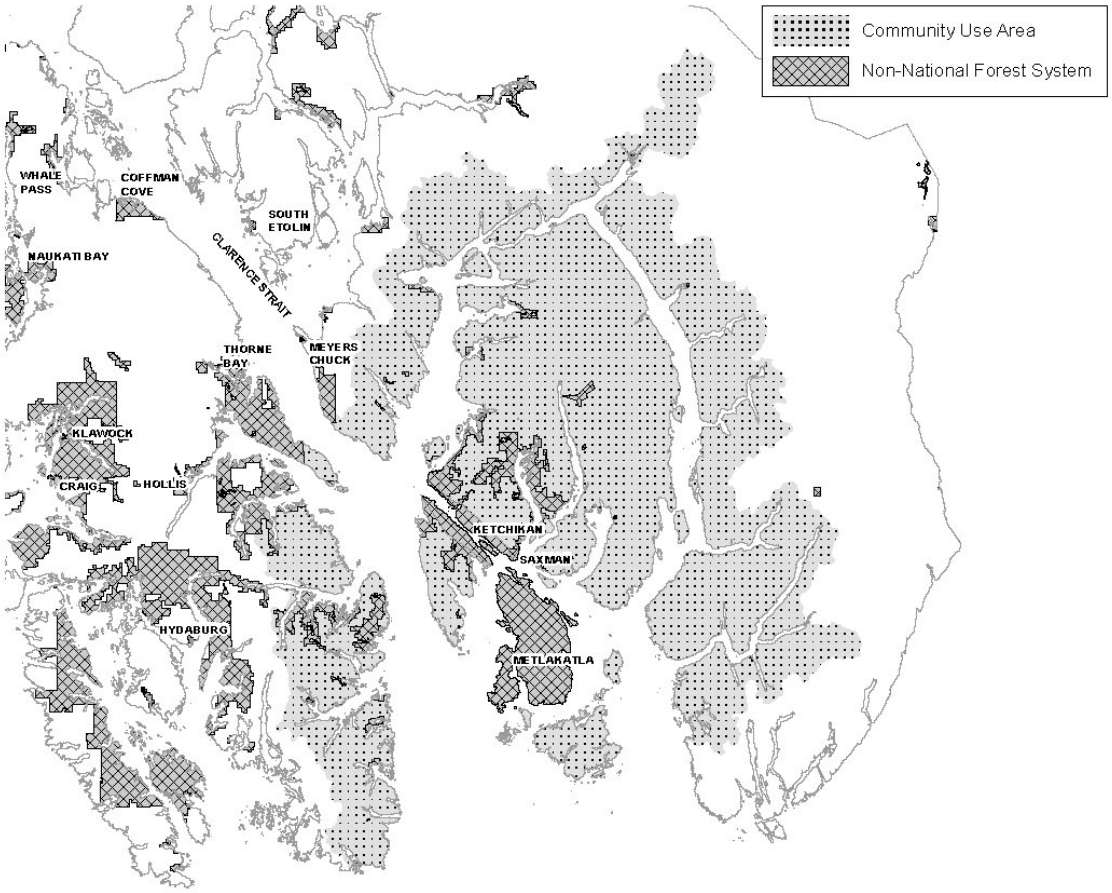

Table E-58
Roadless Areas, ARA Management Categories, and Development Opportunity in Metlakatla's Community Use Area

Roadless Category (acres)	Alternative					
	1	2	3	4	5	6
Total Community Use Area	1,968,512	1,968,512	1,968,512	1,968,512	1,968,512	1,968,512
Total Roadless Area	951,613	938,575	870,794	897,258	629,605	0
Roadless Share	48%	48%	44%	46%	32%	0%
ARA Management Categories (acres)						
LUD II Priority	na	31,386	0	31,386	31,384	0
Watershed Priority	na	494,679	58,585	0	0	0
Roadless Priority	na	412,511	317,685	753,390	598,221	0
Community Priority	na	0	58,585	0	0	0
Timber Priority	na	0	0	112,482	0	0
Development Opportunity						
Development LUDs (acres)	115,243	127,745	160,833	160,844	413,413	413,416
Timber Opportunity (Acres Suitable for Harvest)						
Old-Growth	29,744	33,535	45,566	55,120	56,219	56,220
Young-Growth	32,823	34,341	34,760	34,649	35,101	35,454
Estimated Harvest over 100 Years (acres)						
Old-Growth	7,080	7,335	7,510	7,959	7,957	7,957
Young-Growth	27,946	28,283	28,322	28,220	28,442	28,467

na = not applicable

Not all acres removed from roadless management would be available for development. The change in acres in development LUDs serves as a measure of development potential as it presently exists by alternative. Approximately 6 percent (115,250 acres) of the Metlakatla CUA is presently managed in development LUDs. This total would increase under all action alternatives, with net gains ranging from about 12,500 acres (Alternative 2) to 298,200 acres (Alternatives 5 and 6).

Suitable old-growth and young-growth acres available for harvest would increase under all action alternatives. Estimated net gains in suitable old-growth range from about 3,800 acres (Alternative 2) to 26,500 acres (Alternatives 5 and 6). Increases in suitable young-growth acres range from about 1,500 acres (Alternative 2) to 2,600 acres (Alternative 6).

Total acres harvested are assumed to remain constant across all alternatives. Estimated old-growth harvest totals over 100 years in the Metlakatla CUA range from about 7,100 acres (Alternative 2) to 7,950 acres (Alternatives 4 to 6). Estimated young-growth acres range from about 27,950 acres (Alternative 1) to 28,450 acres (Alternatives 5 and 6) (Table E-58).

Subsistence

No significant effect on salmon, other finfish, or invertebrate habitat capability is expected from implementation of any alternative. These resources account for 75 percent of the total edible pounds of subsistence resources harvested by Metlakatla households (Kruse and Frazier 1988).

The 1988 TRUCS study found that deer account for 15 percent of the total edible pounds of subsistence resources harvested by Metlakatla households (Kruse and Frazier 1988).

The majority (72 percent) of deer harvest by Metlakatla residents takes place in ten WAAs (Table E-59). Metlakatla residents account for 1 percent (WAA 1315) to 100 percent (WAAs 0405 and 0406) of the rural harvest in these WAAs, and 1 percent (WAAs 1214 and 1315) to 15 percent (WAA 0405) of all harvest. About 39 percent of the combined harvest in these WAAs is by non-rural hunters, suggesting that there is a harvest buffer that could be restricted, if necessary, before restrictions are placed on rural harvests.

Table E-59
Deer Harvest and Deer Habitat Capability on NFS Lands for the WAAs where Metlakatla Residents Obtain Approximately 75 Percent of their Average Annual Deer Harvest[1]

	Average Deer Harvest from 2004 to 2013			Deer Habitat Capability[3]		
WAA	Metlakatla Residents	All Rural Hunters[2]	All Hunters	2014	After 100 Years of Implementation	Change
1107	8	99	130	99%	99%	0%
1318	7	159	198	90%	84%	-6%
1422	6	247	383	57%	50%	-7%
405	4	4	25	89%	86%	-3%
1214	3	120	235	77%	71%	-6%
1421	3	76	102	68%	64%	-4%
1315	3	201	317	56%	50%	-6%
1210	2	4	31	100%	100%	0%
406	2	2	55	76%	71%	-5%
509	2	2	19	95%	93%	-2%

[1] Calculated based on harvest where location is known.
[2] The category "All Rural Hunters" includes residents of Southeast Alaska communities, excluding the cities of Juneau and Ketchikan.
[3] Deer habitat capability in 2014 and after 100 Years of full implementation is expressed as a percent of the 1954 habitat capability. Data presented for 100 Years of Implementation are estimates developed for the current Forest Plan in the 2016 Forest Plan Amendment EIS (USDA Forest Service 2016).

The WAAs used by Metlakatla residents occur in areas that have been affected to variable degrees by past timber harvest and, therefore, deer habitat capabilities are currently estimated at 56 to 100 percent of 1954 levels (Table E-59). The 2016 Forest Plan Amendment EIS analysis found that two of the 10 WAAs (1107 and 1210) used most by Metlakatla residents would not be affected under the current Forest Plan (Table E-59). In the remaining eight WAAs, additional harvest that could occur under the current Forest Plan was estimated to further reduce habitat capabilities after 100 years by 2 to 7 percent (Table E-59).

The 2016 Forest Plan Amendment EIS analysis found it likely that the current Forest Plan would provide sufficient habitat capability for deer hunted by Metlakatla residents, all rural hunters, and all hunters in this area over the course of Forest Plan implementation. Suitable old-growth acres are expected to increase relative to Alternative 1 under the action alternatives in nine of the 10 WAAs (Table E-60). Projected old-growth harvest would increase in four of the WAAs under most alternatives and decrease in the other five (Table E-61). These relative changes in projected harvest are small in absolute terms (i.e., number of acres) and none of the alternatives are expected to affect the findings of the 2016 Forest Plan Amendment.

Table E-60
Suitable Old-Growth by WAA and Alternative for the WAAs where Metlakatla Residents Obtain Approximately 75 Percent of their Average Annual Deer Harvest

			Change from Alternative 1 (Acres)				
WAA	Total Acres	Alt 1	Alt 2	Alt 3	Alt 4	Alt 5	Alt 6
1107	124,050	360	10	80	80	90	90
1318	53,710	1,300	140	1,310	1,410	1,410	1,410
1422	120,280	10,120	350	3,770	3,900	3,900	3,900
405	53,400	1,790	170	690	690	690	690
1214	61,680	3,440	1,910	3,190	3,190	3,190	3,190
1421	90,040	2,510	-	-	40	110	110
1315	55,040	3,820	230	1,240	1,240	1,240	1,240
1210	86,080	-	-	-	-	-	-
406	124,730	6,940	2,670	4,830	7,150	7,150	7,150
509	64,970	690	30	280	480	610	610

Table E-61
Projected Old-Growth Harvest by WAA and Alternative for the WAAs where Metlakatla Residents Obtain Approximately 75 Percent of their Average Annual Deer Harvest

			Change from Alternative 1 (Acres)				
WAA	**Total Acres**	**Alt 1**	**Alt 2**	**Alt 3**	**Alt 4**	**Alt 5**	**Alt 6**
1107	124,050	110	(10)	(10)	(30)	(30)	(30)
1318	53,710	390	-	180	120	110	110
1422	120,280	3,020	(180)	20	(360)	(410)	(410)
405	53,400	530	-	10	(60)	(70)	(70)
1214	61,680	1,030	420	420	230	200	200
1421	90,040	750	(70)	(200)	(270)	(260)	(260)
1315	55,040	1,140	(40)	(30)	(180)	(200)	(200)
1210	86,080	-	-	-	-	-	-
406	124,730	2,070	530	510	600	550	550
509	64,970	210	(20)	-	10	30	30

Naukati Bay

Community Use Area

Naukati Bay's CUA encompasses a total of 1,076,081 acres (Figure E-18). Half of this area (50 percent) is presently managed as roadless (Table E-62). This share would drop to 25 and 34 percent under Alternatives 3 and 5, respectively, with no acres managed as roadless under Alternative 6. The removal of LUD II acres under Alternative 3 accounts for approximately 71 percent of the decrease in roadless acres under this alternative. These areas would retain their congressional protections and continue to be managed in a roadless state. Alternative 4 includes ARA acres that would be managed as Timber Priority and allow timber harvest and road building. Timber Priority acres account for 8 percent of the ARA in the Naukati Bay CUA. Areas allocated to Roadless Priority would explicitly allow the cutting, utilization, customary trade, and removal of trees for the purposes of Alaska Native customary and traditional uses, as well as road construction deemed necessary by a federally recognized Tribe for access to Alaska Native cultural sites. This type of use would also be allowed in Timber Priority areas, which allow all timber harvest and road construction.

Figure E-18
Naukati Bay's Community Use Area

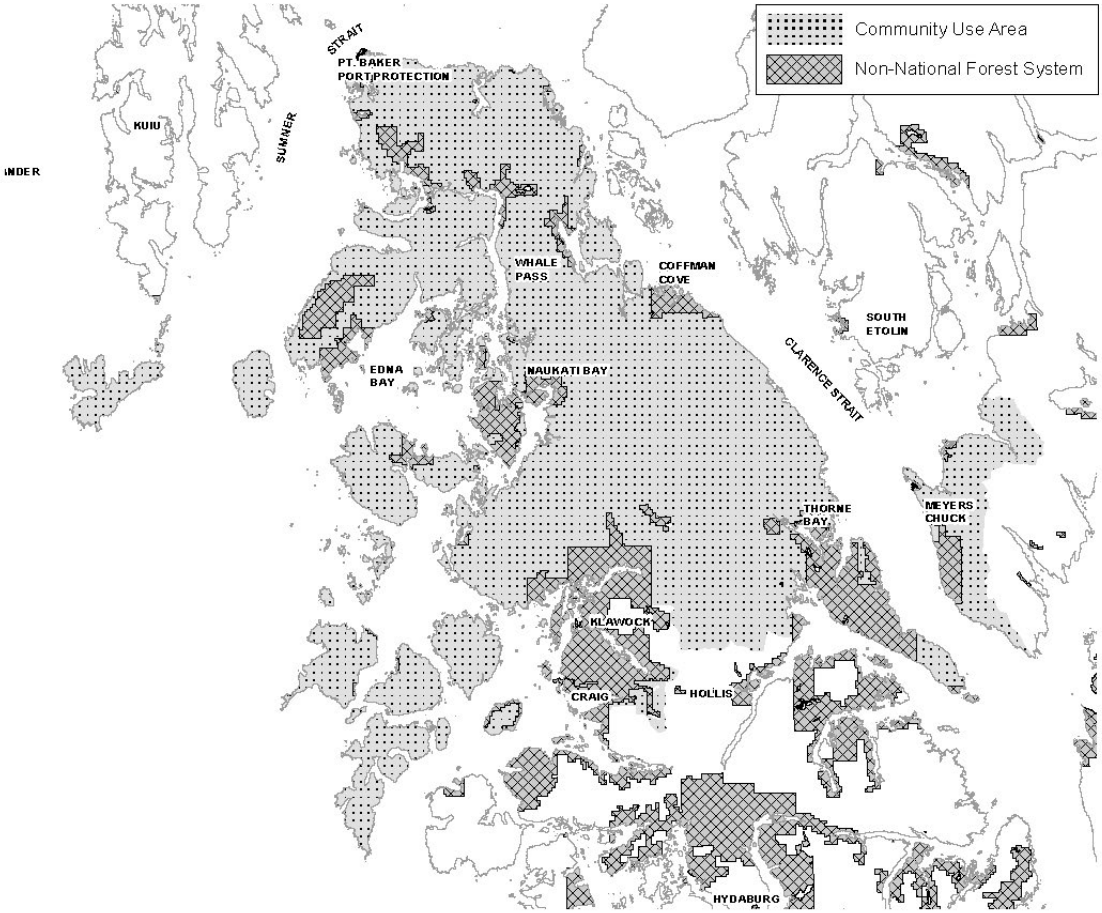

Table E-62
Roadless Areas, ARA Management Categories, and Development Opportunity in Naukati Bay's Community Use Area

	Alternative					
Roadless Category (acres)	**1**	**2**	**3**	**4**	**5**	**6**
Total Community Use Area	1,076,081	1,076,081	1,076,081	1,076,081	1,076,081	1,076,081
Total Roadless Area	536,424	523,599	268,357	456,204	369,090	0
Roadless Share	50%	49%	25%	42%	34%	0%
ARA Management Categories (acres)						
LUD II Priority	na	193,281	0	193,281	191,422	0
Watershed Priority	na	169,537	6,833	0	0	0
Roadless Priority	na	160,781	94,236	225,814	177,668	0
Community Priority	na	0	6,833	0	0	0
Timber Priority	na	0	0	37,109	0	0
Development Opportunity						
Development LUDs (acres)	327,102	340,027	388,390	388,717	484,222	484,229
Timber Opportunity (Acres Suitable for Harvest)						
Old-Growth	62,595	65,978	78,593	84,592	85,555	85,555
Young-Growth	127,013	128,256	128,312	128,367	128,398	128,654
Estimated Harvest over 100 Years (acres)						
Old-Growth	13,480	12,748	11,837	11,038	10,957	10,957
Young-Growth	108,142	105,630	104,548	104,550	104,040	103,301

na = not applicable

Not all acres removed from roadless management would be available for development. The change in acres in development LUDs serves as a measure of development potential as it presently exists by alternative. Approximately 30 percent (327,100 acres) of the Naukati Bay CUA is presently managed in development LUDs. This total would increase under all action alternatives, with net gains ranging from about 12,900 acres (Alternative 2) to 157,100 acres (Alternatives 5 and 6).

Suitable old-growth and young-growth acres available for harvest would increase under all action alternatives. Estimated net gains in suitable old-growth range from about 3,400 acres (Alternative 2) to 23,000 acres (Alternatives 5 and 6). Suitable young-growth acres would increase by about 1 percent under all of the action alternatives.

Total acres harvested are assumed to remain constant across all alternatives. Estimated old-growth harvest totals in the Naukati Bay CUA over 100 years are expected to drop under all of the action alternatives, with decreases ranging from about 750 acres (Alternative 2) to about 2,500 acres (Alternatives 5 and 6). This would also be the case with estimated young-growth harvest, with decreases estimated to range from about 2,500 acres (Alternative 2) to 4,850 acres (Alternative 6) (Table E-62).

Subsistence

No significant effect on salmon, other finfish, or invertebrate habitat capability is expected from implementation of any alternative. Marine resources (fish and marine invertebrates) accounted for 73 percent of per capita subsistence harvest in Naukati Bay in 1998, with deer making up 19 percent of the per capita total (ADF&G 2018).

Residents of Naukati Bay harvest the majority (73 percent) of their deer from three WAAs on north Prince of Wales Island (1422, 1531, and 1529). As shown in Table E-63, the Naukati Bay share ranges from 2 percent to 21 percent of the total harvest and from 4 percent to 37 percent of the rural hunter harvest in these WAAs. About 40 percent of the combined harvest in these WAAs is by non-rural hunters, suggesting that there is a harvest buffer that could be restricted, if necessary, before restrictions are placed on rural harvests.

Table E-63
Deer Harvest and Deer Habitat Capability on NFS Lands for the WAAs where Naukati Bay Residents Obtain Approximately 75 Percent of their Average Annual Deer Harvest[1]

	Average Deer Harvest from 2004 to 2013			Deer Habitat Capability[3]		
WAA	Naukati Bay Residents	All Rural Hunters[2]	All Hunters	2014	After 100 Years of Implementation	Change
1422	30	247	383	57%	50%	-7%
1531	8	22	39	64%	63%	-1%
1529	3	77	154	68%	66%	-2%

[1] Calculated based on harvest where location is known.
[2] The category "All Rural Hunters" includes residents of Southeast Alaska communities, excluding the cities of Juneau and Ketchikan.
[3] Deer habitat capability in 2014 and after 100 Years of full implementation is expressed as a percent of the 1954 habitat capability. Data presented for 100 Years of Implementation are estimates developed for the current Forest Plan in the 2016 Forest Plan Amendment EIS (USDA Forest Service 2016).

The three WAAs heavily used by Naukati Bay residents occur in an area with substantial past harvest and, therefore, deer habitat capabilities are currently estimated to be considerably below 1954 levels (Table E-63). The 2016 Forest Plan Amendment EIS analysis found that additional harvest that could occur under the current Forest Plan would reduce estimated habitat capabilities after 100 years by a further 1 to 7 percent (Table E-63).

The 2016 Forest Plan Amendment EIS analysis found that use of most subsistence resources by Naukati Bay residents (fish and marine invertebrates) was not expected to be affected by the current Forest Plan. Based on the Deer Availability and Anticipated Demand analysis completed for the 1997 Forest Plan EIS, the 2016 analysis found that subsistence use of deer may be affected to the point that some restriction in hunting might be necessary over the long term, especially for non-rural hunters. The risk of hunting restrictions would be reduced somewhat, through more intensive management (e.g., thinning) of the

existing and future closed-canopy, young-growth forests in this area. Indirect effects associated with increased competition for deer within Naukati Bay's subsistence use areas could also occur if hunters from other communities were displaced due to timber harvest activity.

Suitable old-growth acres would increase relative to Alternative 1 in two of the three WAAs under all of the action alternatives (Table E-64). Projected old-growth harvest would, however, decrease in all three of the WAAs under most alternatives (Table E-65). These relative changes in projected harvest are small in absolute terms (i.e., number of acres) and none of the alternatives are expected to affect the findings of the 2016 Forest Plan Amendment EIS.

Table E-64
Suitable Old-Growth by WAA and Alternative for the WAAs where Naukati Bay Residents Obtain Approximately 75 Percent of their Average Annual Deer Harvest

			Change from Alternative 1 (Acres)				
WAA	**Total Acres**	**Alt 1**	**Alt 2**	**Alt 3**	**Alt 4**	**Alt 5**	**Alt 6**
1422	120,280	10,120	350	3,770	3,900	3,900	3,900
1531	20,540	1,390	-	-	-	-	-
1529	67,930	7,610	110	210	3,680	4,250	4,250

Table E-65
Projected Old-Growth Harvest by WAA and Alternative for the WAAs where Naukati Bay Residents Obtain Approximately 75 Percent of their Average Annual Deer Harvest

			Change from Alternative 1 (Acres)				
WAA	**Total Acres**	**Alt 1**	**Alt 2**	**Alt 3**	**Alt 4**	**Alt 5**	**Alt 6**
1422	120,280	3,020	(180)	20	(360)	(410)	(410)
1531	20,540	420	(40)	(120)	(160)	(160)	(160)
1529	67,930	2,270	(180)	(560)	(130)	(70)	(70)

Pelican

Community Use Area

Pelican's CUA encompasses a total of 489,587 acres (Figure E-19). Almost half of this area (49 percent) is presently managed as roadless (Table E-66). This share would drop to 13 percent under Alternative 3, with no acres managed as roadless under Alternative 6. The removal of LUD II acres under Alternative 3 accounts for the entire decrease in roadless acres under this alternative. These areas would retain their congressional protections and continue to be managed in a roadless state. Alternative 4 includes ARA acres that would be managed as Timber Priority and allow timber harvest and road building. Timber Priority acres account for 1 percent of the ARA in the Pelican CUA. Areas allocated to Roadless Priority would explicitly allow the cutting, utilization, customary trade, and removal of trees for the purposes of Alaska Native customary and traditional uses, as well as road construction deemed necessary by a federally recognized Tribe for access to Alaska Native cultural sites. This type of use would also be allowed in Timber Priority areas, which allow all timber harvest and road construction.

Not all acres removed from roadless management would be available for development. The change in acres in development LUDs serves as a measure of development potential as it presently exists by alternative. None of the Pelican CUA is presently managed in a development LUD. There would be no change under Alternatives 2 to 4. Under Alternatives 5 and 6, approximately 2,900 acres would be managed as development LUDs (Table E-66).

There would be no suitable old-growth acres for harvest under any alternative, and no young-growth suitable acres for harvest under all alternatives except for Alternative 6, which would have less than 50 acres considered suitable under the current 2016 Forest Plan. No timber harvest is expected to occur in the Pelican CUA (Table E-66).

Figure E-19
Pelican's Community Use Area

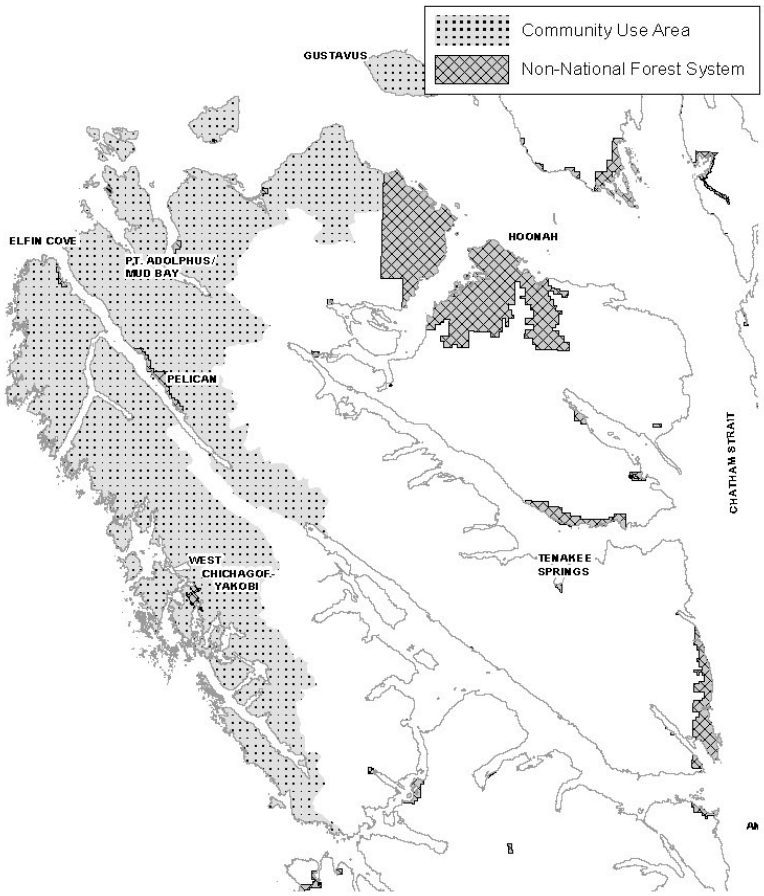

Table E-66
Roadless Areas, ARA Management Categories, and Development Opportunity in Pelican's Community Use Area

Roadless Category (acres)	Alternative					
	1	2	3	4	5	6
Total Community Use Area	489,587	489,587	489,587	489,587	489,587	489,587
Total Roadless Area	242,256	242,624	63,545	242,350	234,588	0
Roadless Share	49%	50%	13%	50%	48%	0%
ARA Management Categories (acres)						
LUD II Priority	na	179,078	0	179,078	178,891	0
Watershed Priority	na	20,908	0	0	0	0
Roadless Priority	na	42,637	42,637	60,424	55,697	0
Community Priority	na	0	0	0	0	0
Timber Priority	na	0	0	2,848	0	0
Development Opportunity						
Development LUDs (acres)	0	0	0	0	2,855	2,855
Timber Opportunity (Acres Suitable for Harvest)						
Old-Growth	0	0	0	0	0	0
Young-Growth	0	0	0	0	0	34
Estimated Harvest over 100 Years (acres)						
Old-Growth	0	0	0	0	0	0
Young-Growth	0	0	0	0	0	27

na = not applicable

Subsistence

No significant effect on salmon, other finfish, or invertebrate habitat capability is expected from implementation of any alternative. These resources account for 63 percent of the total edible pounds of subsistence resources harvested by Pelican households (Kruse and Frazier 1988).

The 1988 TRUCS study found that deer account for 30 percent of the total edible pounds of subsistence resources harvested by Pelican households (Kruse and Frazier 1988).

Pelican residents take the majority (94 percent) of their deer from three WAAs on northwestern Chichagof Island where deer habitat capability is estimated to be the same as in 1954 (Table E-67). The 2016 Forest Plan Amendment EIS analysis found that none of these WAAs would be affected under the current Forest Plan and there would be no effects to subsistence deer harvest in these areas. This would also be the case under all of the alternatives, with no suitable old-growth acres or projected harvest anticipated in these WAAs (Tables E-68 and E-69).

Table E-67
Deer Harvest and Deer Habitat Capability on NFS Lands for the WAAs where Pelican Residents Obtain Approximately 75 Percent of their Average Annual Deer Harvest[1]

	Average Deer Harvest from 2004 to 2013			Deer Habitat Capability[3]		
WAA	Pelican Residents	All Rural Hunters[2]	All Hunters	2014	After 100 Years of Implementation	Change
3419	20	23	40	100%	100%	0%
3418	13	18	26	100%	100%	0%
3417	6	60	115	100%	100%	0%

[1] Calculated based on harvest where location is known.
[2] The category "All Rural Hunters" includes residents of Southeast Alaska communities, excluding the cities of Juneau and Ketchikan.
[3] Deer habitat capability in 2014 and after 100 Years of full implementation is expressed as a percent of the 1954 habitat capability. Data presented for 100 Years of Implementation are estimates developed for the current Forest Plan in the 2016 Forest Plan Amendment EIS (USDA Forest Service 2016).

Table E-68
Suitable Old-Growth by WAA and Alternative for the WAAs where Pelican Residents Obtain Approximately 75 Percent of their Average Annual Deer Harvest

			Change from Alternative 1 (Acres)				
WAA	Total Acres	Alt 1	Alt 2	Alt 3	Alt 4	Alt 5	Alt 6
3419	84,930	-	-	-	-	-	-
3418	53,510	-	-	-	-	-	-
3417	134,230	-	-	-	-	-	-

Table E-69
Projected Old-Growth Harvest by WAA and Alternative for the WAAs where Pelican Residents Obtain Approximately 75 Percent of their Average Annual Deer Harvest

			Change from Alternative 1 (Acres)				
WAA	Total Acres	Alt 1	Alt 2	Alt 3	Alt 4	Alt 5	Alt 6
3419	84,930	-	-	-	-	-	-
3418	53,510	-	-	-	-	-	-
3417	134,230	-	-	-	-	-	-

Petersburg (Gánti Yaaks Séedi) and Kupreanof

Community Use Area

Petersburg's CUA encompasses a total of 744,245 acres (Figure E-20). About half of this area (51 percent) is presently managed as roadless (Table E-70). This share would drop to 27 percent under Alternative 5, with no acres managed as roadless under Alternative 6. Alternative 4 includes ARA acres that would be managed as Timber Priority and allow timber harvest and road building. Timber Priority acres account for 22 percent of the ARA in the Petersburg CUA. Areas allocated to Roadless Priority would explicitly allow the cutting, utilization, customary trade, and removal of trees for the purposes of Alaska Native customary and traditional uses, as well as road construction deemed necessary by a federally recognized Tribe for access to Alaska Native cultural sites. This type of use would also be allowed in Timber Priority areas, which allow all timber harvest and road construction.

Figure E-20
Petersburg's Community Use Area

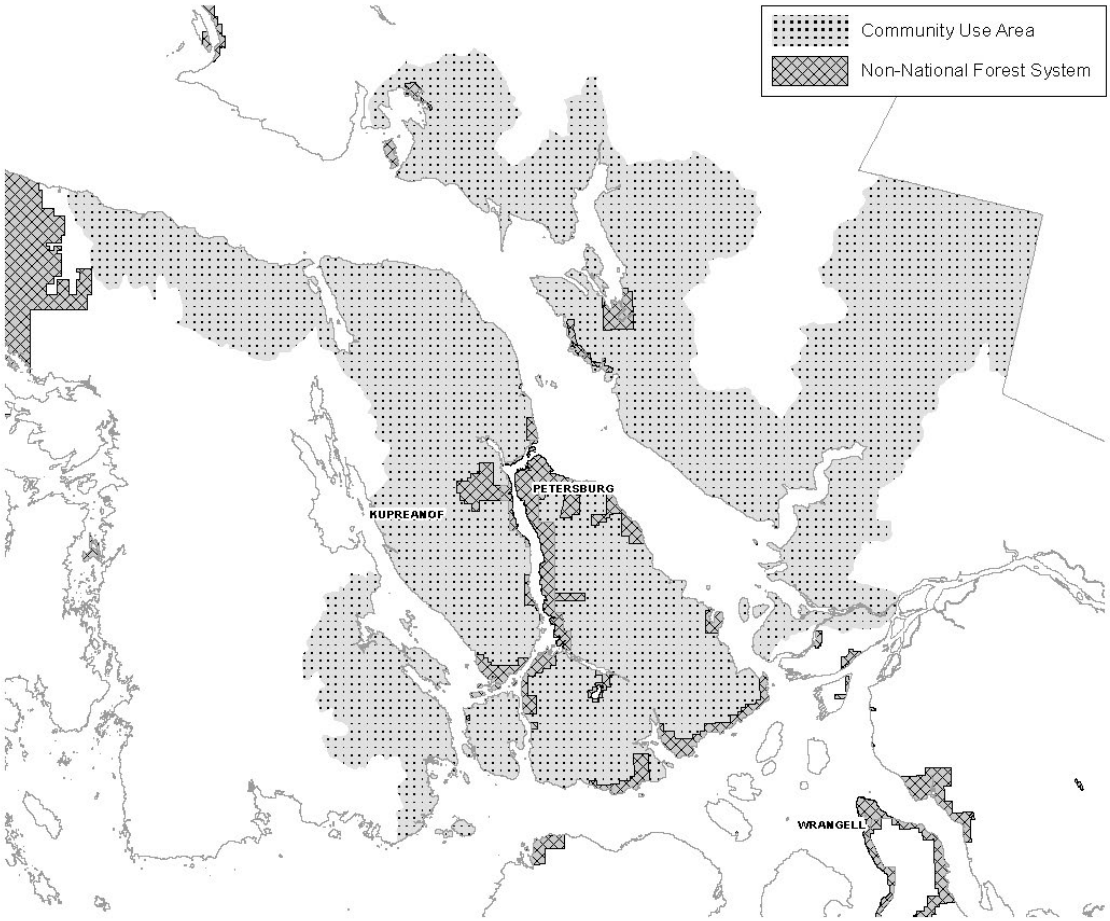

Table E-70
Roadless Areas, ARA Management Categories, and Development Opportunity in Petersburg's Community Use Area

	Alternative					
Roadless Category (acres)	**1**	**2**	**3**	**4**	**5**	**6**
Total Community Use Area	744,245	744,245	744,245	744,245	744,245	744,245
Total Roadless Area	376,088	358,646	314,109	311,947	198,234	0
Roadless Share	51%	48%	42%	42%	27%	0%
ARA Management Categories (acres)						
LUD II Priority	na	0	0	0	0	0
Watershed Priority	na	102,707	33,081	0	0	0
Roadless Priority	na	255,939	178,320	243,875	198,234	0
Community Priority	na	0	33,081	0	0	0
Timber Priority	na	0	0	68,072	0	0
Development Opportunity						
Development LUDs (acres)	109,829	127,063	163,835	164,230	285,390	285,394
Timber Opportunity (Acres Suitable for Harvest)						
Old-Growth	26,982	33,049	44,562	53,757	54,423	54,424
Young-Growth	23,143	24,899	24,941	24,936	25,026	25,103
Estimated Harvest over 100 Years (acres)						
Old-Growth	6,406	7,164	7,715	8,038	8,004	8,004
Young-Growth	19,705	20,506	20,322	20,310	20,279	20,156

na = not applicable

Not all acres removed from roadless management would be available for development. The change in acres in development LUDs serves as a measure of development potential as it presently exists by alternative. Approximately 15 percent (109,800 acres) of the Petersburg CUA is presently managed in development LUDs. This total would increase under all action alternatives, with net gains ranging from about 17,200 acres (Alternative 2) to 175,600 acres (Alternatives 5 and 6).

Suitable old-growth and young-growth acres available for harvest would increase under all action alternatives. Estimated net gains in suitable old-growth range from about 6,100 acres (Alternative 2) to 27,450 acres (Alternatives 5 and 6). Increases in suitable young-growth acres would be approximately 8 percent of the existing total under all action alternatives.

Total acres harvested are assumed to remain constant across all alternatives. Estimated old-growth harvest totals in the Petersburg CUA over 100 years range from about 6,400 acres (Alternative 1) to about 8,000 acres (Alternatives 4 to 6). Young-growth harvest is estimated to range from about 19,700 acres (Alternative 1) to 20,500 acres (Alternative 2) (Table E-70).

Subsistence

No significant effect on salmon, other finfish, or invertebrate habitat capability is expected from implementation of any alternative. These resources account for 52 percent of the total edible pounds of subsistence resources harvested by Petersburg households (Kruse and Frazier 1988). Marine resources (fish and marine invertebrates) accounted for 86 percent of per capita subsistence harvest in Petersburg in 2000 (ADF&G 2018).

The 1988 TRUCS study found that deer accounted for 21 percent of the total edible pounds of subsistence resources harvested by Petersburg households (Kruse and Frazier 1988). Deer accounted for 11 percent of per capita subsistence harvest by Petersburg residents in 1987 (ADF&G 2018).

Seventeen WAAs account for the majority (74 percent) of deer harvest by Petersburg residents. As shown in Table E-71, the Petersburg portion ranges from 2 to 100 percent of all hunters and 4 to 100 percent of all rural hunters in these WAAs and represents the majority or all of rural hunter deer harvest in 12 of the 17 WAAs. About 30 percent of the combined harvest in these WAAs is by non-rural hunters, suggesting that there is a limited harvest buffer that could be restricted, if necessary, before restrictions are placed on rural harvests.

Table E-71
Deer Harvest and Deer Habitat Capability on NFS Lands for the WAAs where Petersburg and Kupreanof Residents Obtain Approximately 75 Percent of their Average Annual Deer Harvest[1]

	Average Deer Harvest from 2004 to 2013			Deer Habitat Capability[3]		
WAA	Petersburg Residents	All Rural Hunters[2]	All Hunters	2014	After 100 Years of Implementation	Change
5138	56	56	61	80%	72%	-8%
2007	43	44	46	75%	71%	-4%
3939	42	71	105	100%	100%	0%
3938	30	41	75	100%	100%	0%
3940	30	61	75	93%	93%	0%
1605	24	24	27	77%	74%	-3%
1603	18	21	25	94%	94%	0%
1528	18	30	36	78%	78%	0%
1905	16	190	204	73%	67%	-6%
1706	14	14	15	100%	100%	0%
1530	12	57	124	61%	57%	-4%
1529	10	77	154	68%	66%	-2%
5134	9	10	13	89%	89%	0%
5136	9	9	9	84%	77%	-7%
1420	7	158	276	49%	44%	-5%
5137	7	7	7	100%	100%	0%
5133	6	6	6	98%	98%	0%

[1] Calculated based on harvest where location is known.
[2] The category "All Rural Hunters" includes residents of Southeast Alaska communities, excluding the cities of Juneau and Ketchikan.
[3] Deer habitat capability in 2014 and after 100 Years of full implementation is expressed as a percent of the 1954 habitat capability. Data presented for 100 Years of Implementation are estimates developed for the current Forest Plan in the 2016 Forest Plan Amendment EIS (USDA Forest Service 2016).

The 2016 Forest Plan Amendment EIS analysis found that there would be no effect to deer habitat capability in nine of the 17 WAAs under the current Forest Plan. In the remaining eight WAAs, all of which currently have deer habitat capability below 1954 levels due to prior timber harvest, the 2016 analysis estimated that deer habitat capability could be further reduced by 1 to 8 percent (Table E-71).

The 2016 Forest Plan Amendment EIS analysis found that use of most subsistence resources by Petersburg residents (fish and marine invertebrates) was not expected to be affected by any of the alternatives. Based on the Deer Availability and Anticipated Demand analysis completed for the 1997 Forest Plan EIS, the 2016 analysis found that subsistence use of deer in some of the WAAs hunted by Petersburg residents may be affected to the point that some restriction in hunting might be necessary over the long term, especially for non-rural hunters. The risk of hunting restrictions would be reduced somewhat, through more intensive management (e.g., thinning) of the existing and future closed-canopy, young-growth forests in this area. Indirect effects associated with increased competition for deer within Petersburg's subsistence use areas could also occur if hunters from other communities were displaced due to timber harvest activity.

Suitable old-growth acres would increase relative to Alternative 1 under all of the action alternatives in the eight WAAs that were identified as potentially affected in the 2016 Forest Plan Amendment EIS, with minor increases also estimated for two other WAAs (Table E-72). Projected old-growth harvest was estimated to decrease relative to Alternative 1 in five WAAs under most alternatives, with relative increases projected in three others (Table E-73). These relative changes in projected harvest are small in absolute terms (i.e., number of acres) and none of the alternatives are expected to affect the findings of the 2016 Forest Plan Amendment EIS.

Table E-72
Suitable Old-Growth by WAA and Alternative for the WAAs where Petersburg and Kupreanof Residents Obtain Approximately 75 Percent of their Average Annual Deer Harvest

			Change from Alternative 1 (Acres)				
WAA	Total Acres	Alt 1	Alt 2	Alt 3	Alt 4	Alt 5	Alt 6
5138	61,680	3,130	2,150	4,240	6,040	6,390	6,390
2007	109,300	12,020	10	1,150	2,460	2,620	2,620
3939	66,460	-	-	-	-	-	-
3938	76,970	-	-	-	-	-	-
3940	68,160	-	-	-	-	-	-
1605	149,230	2,070	110	2,370	5,440	5,440	5,440
1603	78,380	-	-	-	-	-	-
1528	24,750	10	-	10	10	10	10
1905	116,400	8,960	910	1,060	3,570	3,660	3,660
1706	98,870	-	-	-	-	-	-
1530	59,420	4,250	170	330	330	330	330
1529	67,930	7,610	110	210	3,680	4,250	4,250
5134	102,060	-	-	-	-	-	-
5136	59,910	4,230	1,080	3,160	4,200	4,290	4,290
1420	42,410	3,210	230	390	500	500	500
5137	50,820	-	10	20	30	30	30
5133	108,180	-	-	-	-	-	-

Table E-73
Projected Old-Growth Harvest by WAA and Alternative for the WAAs where Petersburg and Kupreanof Residents Obtain Approximately 75 Percent of their Average Annual Deer Harvest

			Change from Alternative 1 (Acres)				
WAA	Total Acres	Alt 1	Alt 2	Alt 3	Alt 4	Alt 5	Alt 6
5138	61,680	930	500	690	810	840	840
2007	109,300	3,590	(330)	(710)	(850)	(870)	(870)
3939	66,460	-	-	-	-	-	-
3938	76,970	-	-	-	-	-	-
3940	68,160	-	-	-	-	-	-
1605	149,230	620	(30)	350	800	780	780
1603	78,380	-	-	-	-	-	-
1528	24,750	-	-	-	-	-	-
1905	116,400	2,670	-	(480)	(300)	(320)	(320)
1706	98,870	-	-	-	-	-	-
1530	59,420	1,270	(70)	(270)	(400)	(420)	(420)
1529	67,930	2,270	(180)	(560)	(130)	(70)	(70)
5134	102,060	-	-	-	-	-	-
5136	59,910	1,260	180	360	340	320	320
1420	42,410	960	(30)	(170)	(260)	(270)	(270)
5137	50,820	-	-	10	-	10	10
5133	108,180	-	-	-	-	-	-

Point Baker

Community Use Area

Point Baker's CUA encompasses a total of 805,913 acres (Figure E-21). About half of this area (51 percent) is presently managed as roadless (Table E-74). This share would drop to 25 and 39 percent under Alternatives 3 and 5, respectively, with no acres managed as roadless under Alternative 6. The

removal of LUD II acres under Alternative 3 accounts for approximately 83 percent of the decrease in roadless acres under this alternative. These areas would retain their congressional protections and continue to be managed in a roadless state. Alternative 4 includes ARA acres that would be managed as Timber Priority and allow timber harvest and road building. Timber Priority acres account for 7 percent of the ARA in the Point Baker CUA. Areas allocated to Roadless Priority would explicitly allow the cutting, utilization, customary trade, and removal of trees for the purposes of Alaska Native customary and traditional uses, as well as road construction deemed necessary by a federally recognized Tribe for access to Alaska Native cultural sites. This type of use would also be allowed in Timber Priority areas, which allow all timber harvest and road construction.

Figure E-21
Point Baker's Community Use Area

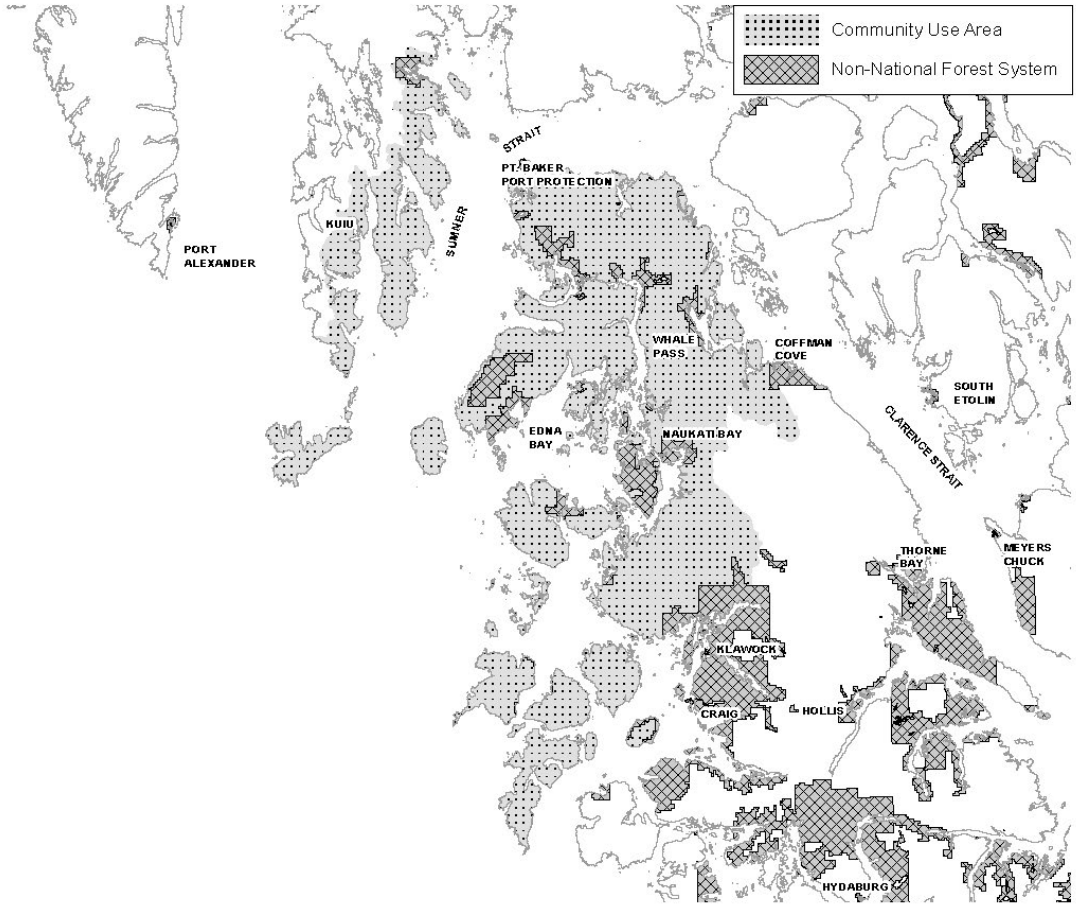

Table E-74
Roadless Areas, ARA Management Categories, and Development Opportunity in Point Baker's Community Use Area

	Alternative					
Roadless Category (acres)	**1**	**2**	**3**	**4**	**5**	**6**
Total Community Use Area	805,913	805,913	805,913	805,913	805,913	805,913
Total Roadless Area	414,878	420,428	205,310	368,674	313,422	0
Roadless Share	51%	52%	25%	46%	39%	0%
ARA Management Categories (acres)						
LUD II Priority	na	176,847	0	176,847	174,800	0
Watershed Priority	na	90,101	0	0	0	0
Roadless Priority	na	153,480	117,306	166,021	138,622	0
Community Priority	na	0	0	0	0	0
Timber Priority	na	0	0	25,806	0	0
Development Opportunity						
Development LUDs (acres)	212,385	213,558	244,918	252,485	312,447	312,448
Timber Opportunity (Acres Suitable for Harvest)						
Old-Growth	38,867	40,834	48,775	54,162	54,774	54,774
Young-Growth	82,427	83,070	83,097	83,217	83,223	83,332
Estimated Harvest over 100 Years (acres)						
Old-Growth	9,274	8,723	7,979	7,651	7,618	7,618
Young-Growth	70,180	68,416	67,706	67,777	67,435	66,911

na = not applicable

Not all acres removed from roadless management would be available for development. The change in acres in development LUDs serves as a measure of development potential as it presently exists by alternative. Approximately 26 percent (212,400 acres) of the Point Baker CUA is presently managed in development LUDs. This total would increase under all action alternatives, with net gains ranging from about 1,200 acres (Alternative 2) to 100,100 acres (Alternatives 5 and 6).

Suitable old-growth and young-growth acres available for harvest would increase under all action alternatives. Estimated net gains in suitable old-growth range from about 2,000 acres (Alternative 2) to 15,900 acres (Alternatives 5 and 6). Increases in suitable young-growth acres would be about 1 percent of the existing total under all action alternatives.

Total acres harvested are assumed to remain constant across all alternatives. Estimated old-growth harvest totals over 100 years in the Point Baker CUA range from about 7,600 acres (Alternatives 5 and 6) to 9,300 acres (Alternative 1). Estimated young-growth harvest ranges from about 66,900 acres (Alternative 6) to 70,200 acres (Alternative 1) (Table E-74).

Subsistence

No significant effect on salmon, other finfish, or invertebrate habitat capability is expected from implementation of any alternative. These resources account for 59 percent of the total edible pounds of subsistence resources harvested by Point Baker households (Kruse and Frazier 1988). Marine resources (fish and marine invertebrates) accounted for 79 percent of per capita subsistence harvest in Point Baker in 1996 (ADF&G 2018).

The 1988 TRUCS study found that deer account for 27 percent of the total edible pounds of subsistence resources harvested by Point Baker households (Kruse and Frazier 1988). Deer accounted for 16 percent of per capita subsistence harvest by Point Baker residents in 1996 (ADF&G 2018).

Residents of Point Baker harvest the majority (69 percent) of their deer from two WAAs, 1529 and 1527. As shown in Table E-75, the Point Baker portion is about 6 percent of the total combined harvest and 12 percent of the rural hunter harvest in these WAAs. About 48 percent of the combined harvest in these WAAs is by non-rural hunters, suggesting that there is a harvest buffer that could be restricted, if necessary, before restrictions are placed on rural harvests.

Table E-75
Deer Harvest and Deer Habitat Capability on NFS Lands for the WAAs where Point Baker Residents Obtain Approximately 75 Percent of their Average Annual Deer Harvest[1]

	Average Deer Harvest from 2004 to 2013[2]			Deer Habitat Capability[4]		
WAA	Point Baker Residents	All Rural Hunters[3]	All Hunters	2014	After 100 Years of Implementation	Change
1529	10	77	154	68%	66%	-2%
1527	1	17	27	72%	70%	-2%

[1] Calculated based on harvest where location is known.
[2] Data was not available for Point Baker residents for the 2011 to 2013 hunting seasons.
[3]The category "All Rural Hunters" includes residents of Southeast Alaska communities, excluding the cities of Juneau and Ketchikan.
[4] Deer habitat capability in 2014 and after 100 Years of full implementation is expressed as a percent of the 1954 habitat capability. Data presented for 100 Years of Implementation are estimates developed for the current Forest Plan in the 2016 Forest Plan Amendment EIS (USDA Forest Service 2016).

Both WAAs used most by Point Baker residents occur in an area with substantial past timber harvest and, therefore, deer habitat capabilities are currently estimated to be below 1954 levels. The 2016 Forest Plan Amendment EIS analysis found that additional harvest that could occur under the current Forest Plan would reduce estimated habitat capabilities after 100 years by a further 1 to 4 percent (Table E-75).

The 2016 Forest Plan Amendment EIS analysis found that use of most subsistence resources by Point Baker residents (fish and marine invertebrates) was not expected to be affected under the current Forest Pan. Based on the Deer Availability and Anticipated Demand analysis completed for the 1997 Forest Plan EIS, the 2016 analysis found that subsistence use of deer on Prince of Wales Island may be affected to the point that some restriction in hunting might be necessary over the long term, especially for non-rural hunters. The risk of hunting restrictions would be reduced somewhat, through more intensive management (e.g., thinning) of the existing and future closed-canopy, young-growth forests in this area. Indirect effects associated with increased competition for deer within Point Baker's subsistence use areas on Prince of Wales Island could also occur if hunters from other communities were displaced due to timber harvest activity.

Suitable old-growth acres would increase relative to Alternative 1 in both WAAs under all of the action alternatives, with larger increases in WAA 1529 expected under Alternatives 4 to 6 (Table E-76). Projected old-growth harvest would, however, decrease in both of these WAAs under most alternatives (Table E-77). These relative changes in projected harvest are small in absolute terms (i.e., number of acres) and none of the alternatives are expected to affect the findings of the 2016 Forest Plan Amendment EIS.

Table E-76
Suitable Old-Growth by WAA and Alternative for the WAAs where Point Baker Residents Obtain Approximately 75 Percent of their Average Annual Deer Harvest

			Change from Alternative 1 (Acres)				
WAA	Total Acres	Alt 1	Alt 2	Alt 3	Alt 4	Alt 5	Alt 6
1529	67,930	7,610	110	210	3,680	4,250	4,250
1527	33,730	2,100	350	350	590	590	590

Table E-77
Projected Old-Growth Harvest by WAA and Alternative for the WAAs where Point Baker Residents Obtain Approximately 75 Percent of their Average Annual Deer Harvest

			Change from Alternative 1 (Acres)				
WAA	Total Acres	Alt 1	Alt 2	Alt 3	Alt 4	Alt 5	Alt 6
1529	67,930	2,270	(180)	(560)	(130)	(70)	(70)
1527	33,730	630	30	(90)	(120)	(130)	(130)

Appendix E

Port Alexander

Community Use Area

Port Alexander's CUA encompasses a total of 86,850 acres (Figure E-22). More than three-quarters of this area (79 percent) is presently managed as roadless (Table E-78). This share would stay the same under each alternative except for Alternative 6, where no acres would be managed as roadless. No ARA acres in the Port Alexander CUA would be managed under any alternative as Timber Priority, which allow timber harvest and road building. Areas allocated to Roadless Priority would explicitly allow the cutting, utilization, customary trade, and removal of trees for the purposes of Alaska Native customary and traditional uses, as well as road construction deemed necessary by a federally recognized Tribe for access to Alaska Native cultural sites.

There are no acres in development LUDs in the Port Alexander CUA under any of the alternatives and no acres suitable for harvest, with no estimated harvest over the next 100 years.

Figure E-22
Port Alexander's Community Use Area

Table E-78
Roadless Areas, ARA Management Categories, and Development Opportunity in Port Alexander's Community Use Area

	Alternative					
Roadless Category (acres)	**1**	**2**	**3**	**4**	**5**	**6**
Total Community Use Area	86,850	86,850	86,850	86,850	86,850	86,850
Total Roadless Area	68,884	68,905	68,905	68,884	68,884	0
Roadless Share	79%	79%	79%	79%	79%	0%
ARA Management Categories (acres)						
LUD II Priority	na	0	0	0	0	0
Watershed Priority	na	0	0	0	0	0
Roadless Priority	na	68,905	68,905	68,884	68,884	0
Community Priority	na	0	0	0	0	0
Timber Priority	na	0	0	0	0	0
Development Opportunity						
Development LUDs (acres)	0	0	0	0	0	0
Timber Opportunity (Acres Suitable for Harvest)						
Old-Growth	0	0	0	0	0	0
Young-Growth	0	0	0	0	0	0
Estimated Harvest over 100 Years (acres)						
Old-Growth	0	0	0	0	0	0
Young-Growth	0	0	0	0	0	0

na = not applicable

Subsistence

No significant effect on salmon, other finfish, or invertebrate habitat capability is expected from implementation of any alternative. These resources account for 55 percent of the total edible pounds of subsistence resources harvested by Port Alexander households (Kruse and Frazier 1988). Deer account for 36 percent of the total edible pounds of subsistence resources harvested by Port Alexander households (Kruse and Frazier 1988).

Port Alexander residents take the majority (71 percent) of their deer from one WAA (3734) on the south end of Baranof Island where deer habitat capability is estimated to be the same as in 1954 (Table E-79). The 2016 Forest Plan Amendment EIS analysis found that this WAA would not be affected under the current Forest Plan and there would be no effects to subsistence deer harvest in this area. This would also be the case under all of the alternatives, with no suitable old-growth acres or projected harvest anticipated in WAA 3734 (Tables E-80 and E-81).

Table E-79
Deer Harvest and Deer Habitat Capability on NFS Lands for the WAAs where Port Alexander Residents Obtain Approximately 75 Percent of their Average Annual Deer Harvest[1]

	Average Deer Harvest from 2004 to 2013			Deer Habitat Capability[3]		
WAA	**Port Alexander Residents**	**All Rural Hunters[2]**	**All Hunters**	**2014**	**After 100 Years of Implementation**	**Change**
3734	26	59	66	100%	100%	0%

[1] Calculated based on harvest where location is known.
[2] The category "All Rural Hunters" includes residents of Southeast Alaska communities, excluding the cities of Juneau and Ketchikan.
[3] Deer habitat capability in 2014 and after 100 Years of full implementation is expressed as a percent of the 1954 habitat capability. Data presented for 100 Years of Implementation are estimates developed for the current Forest Plan in the 2016 Forest Plan Amendment EIS (USDA Forest Service 2016).

Table E-80
Suitable Old-Growth by WAA and Alternative for the WAAs where Port Alexander Residents Obtain Approximately 75 Percent of their Average Annual Deer Harvest

			Change from Alternative 1 (Acres)				
WAA	Total Acres	Alt 1	Alt 2	Alt 3	Alt 4	Alt 5	Alt 6
3734		-	-	-	-	-	-

Table E-81
Projected Old-Growth Harvest by WAA and Alternative for the WAAs where Port Alexander Residents Obtain Approximately 75 Percent of their Average Annual Deer Harvest

			Change from Alternative 1 (Acres)				
WAA	Total Acres	Alt 1	Alt 2	Alt 3	Alt 4	Alt 5	Alt 6
3734	126,070	-	-	-	-	-	-

Port Protection

Community Use Area

Port Protection's CUA encompasses a total of 673,746 acres (Figure E-23). About half of this area (54 percent) is presently managed as roadless (Table E-82). This share would drop to 23 and 39 percent under Alternatives 3 and 5, respectively, with no acres managed as roadless under Alternative 6. The removal of LUD II acres under Alternative 3 accounts for approximately 81 percent of the decrease in roadless acres under this alternative. These areas would retain their congressional protections and continue to be managed in a roadless state. Alternative 4 includes ARA acres that would be managed as Timber Priority and allow timber harvest and road building. Timber Priority acres account for 13 percent of the ARA in the Port Protection CUA. Areas allocated to Roadless Priority would explicitly allow the cutting, utilization, customary trade, and removal of trees for the purposes of Alaska Native customary and traditional uses, as well as road construction deemed necessary by a federally recognized Tribe for access to Alaska Native cultural sites. This type of use would also be allowed in Timber Priority areas, which allow all timber harvest and road construction.

Figure E-23
Port Protection's Community Use Area

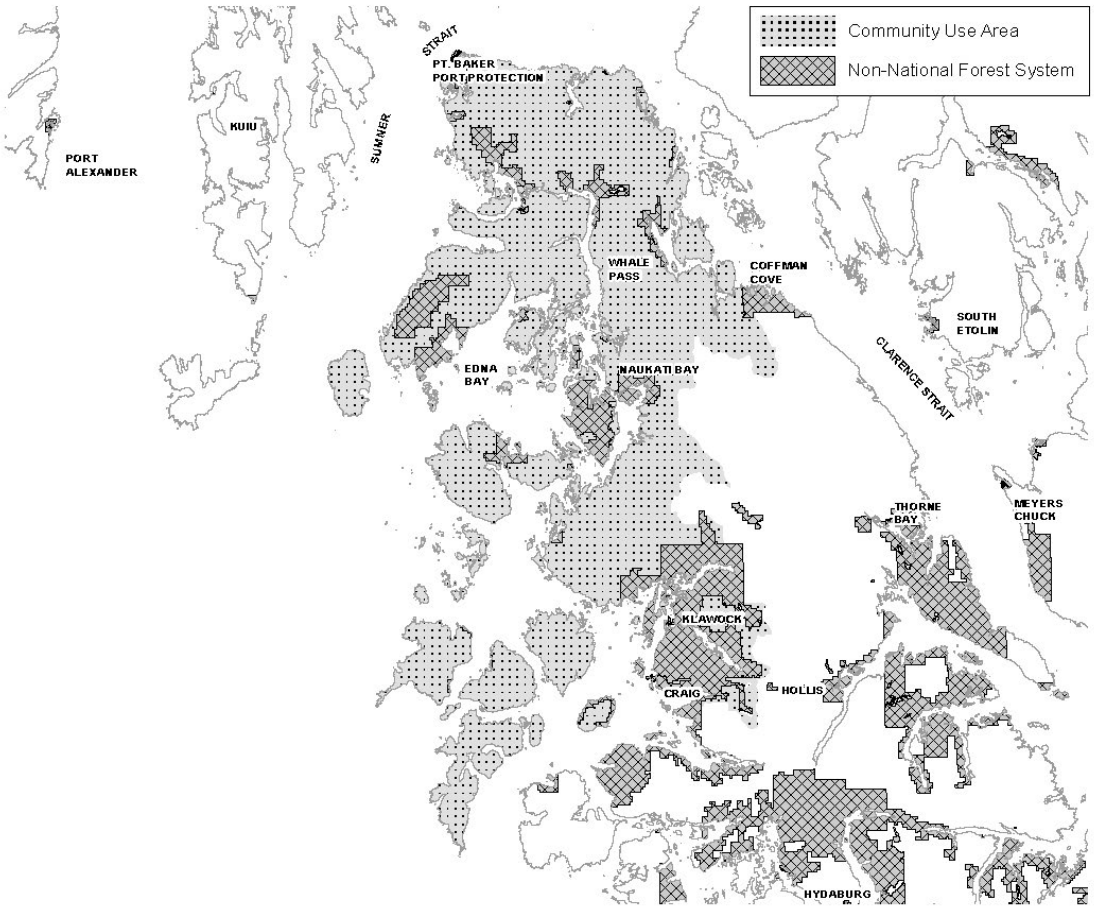

Table E-82
Roadless Areas, ARA Management Categories, and Development Opportunity in Port Protection's Community Use Area

	Alternative					
Roadless Category (acres)	**1**	**2**	**3**	**4**	**5**	**6**
Total Community Use Area	673,746	673,746	673,746	673,746	673,746	673,746
Total Roadless Area	363,488	359,761	151,704	320,832	260,826	0
Roadless Share	54%	53%	23%	48%	39%	0%
ARA Management Categories (acres)						
LUD II Priority	na	173,561	0	173,561	171,702	0
Watershed Priority	na	68,235	6,833	0	0	0
Roadless Priority	na	117,965	78,733	107,100	89,124	0
Community Priority	na	0	6,833	0	0	0
Timber Priority	na	0	0	40,171	0	0
Development Opportunity						
Development LUDs (acres)	197,454	206,237	234,009	234,011	298,739	298,739
Timber Opportunity (Acres Suitable for Harvest)						
Old-Growth	37,367	39,515	47,553	54,129	54,740	54,740
Young-Growth	78,762	79,416	79,444	79,499	79,500	79,610
Estimated Harvest over 100 Years (acres)						
Old-Growth	8,799	8,292	7,592	7,307	7,280	7,280
Young-Growth	67,060	65,406	64,730	64,749	64,419	63,922

na = not applicable

Not all acres removed from roadless management would be available for development. The change in acres in development LUDs serves as a measure of development potential as it presently exists by alternative. Approximately 29 percent (197,450 acres) of the Port Protection CUA is presently managed in development LUDs. This total would increase under all action alternatives, with net gains ranging from about 8,800 acres (Alternative 2) to 101,300 acres (Alternatives 5 and 6).

Suitable old-growth and young-growth acres available for harvest would increase under all action alternatives. Estimated net gains in suitable old-growth range from about 2,150 acres (Alternative 2) to 17,400 acres (Alternatives 5 and 6). Increases in suitable young-growth acres would be about 1 percent of the existing total under all action alternatives.

Total acres harvested are assumed to remain constant across all alternatives. Estimated old-growth harvest totals in the Port Protection CUA over 100 years range from about 7,300 acres (Alternatives 4 to 6) to 8,800 acres (Alternative 1). Estimated young-growth harvest ranges from about 63,900 acres (Alternative 6) to 67,100 acres (Alternative 1) (Table E-82).

Subsistence

No significant effect on salmon, other finfish, or invertebrate habitat capability is expected from implementation of any alternative. Marine resources (fish and marine invertebrates) accounted for 69 percent of per capita subsistence harvest in Port Protection in 1996, with deer accounting for an estimated 21 percent (ADF&G 2018).

Port Protection residents take the majority (64 percent) of their deer from two WAAs (Table E-83). As shown in Table E-83, the Port Protection portion of harvest represents about 3 percent of the total combined harvest and about 6 percent of the rural hunter harvest in these WAAs. About 41 percent of the harvest in these WAAs is by non-rural hunters, suggesting that there is a harvest buffer that could be restricted, if necessary, before restrictions are placed on rural harvests.

Both WAAs occur in an area with substantial past harvest and, therefore, deer habitat capabilities are currently estimated to be considerably below 1954 levels. The 2016 Forest Plan Amendment EIS analysis found that additional harvest that could occur under the current Forest Plan could further reduce estimated habitat capabilities after 100 years by 2 percent (Table E-83).

Table E-83
Deer Harvest and Deer Habitat Capability on NFS Lands for the WAAs where Port Protection Residents Obtain Approximately 75 Percent of their Average Annual Deer Harvest[1]

	Average Deer Harvest from 2004 to 2013			Deer Habitat Capability[3]		
WAA	Port Protection Residents	All Rural Hunters[2]	All Hunters	2014	After 100 Years of Implementation	Change
1529	9	77	154	68%	66%	-2%
1317	1	93	133	58%	56%	-2%

[1] Calculated based on harvest where location is known.
[2] The category "All Rural Hunters" includes residents of Southeast Alaska communities, excluding the cities of Juneau and Ketchikan.
[3] Deer habitat capability in 2014 and after 100 Years of full implementation is expressed as a percent of the 1954 habitat capability. Data presented for 100 Years of Implementation are estimates developed for the current Forest Plan in the 2016 Forest Plan Amendment EIS (USDA Forest Service 2016).

The 2016 Forest Plan Amendment EIS analysis found that use of most subsistence resources by Port Protection residents (fish and marine invertebrates) was not expected to be affected by the current Forest Plan. Based on the Deer Availability and Anticipated Demand analysis completed for the 1997 Forest Plan EIS, the 2016 analysis found that subsistence use of deer may be affected to the point that some restriction in hunting might be necessary over the long term, especially for non-rural hunters. The risk of hunting restrictions would be reduced somewhat, through more intensive management (e.g., thinning) of the existing and future closed-canopy, young-growth forests in this area. Indirect effects associated with

increased competition for deer within Port Protection's subsistence use areas could also occur if hunters from other communities were displaced due to timber harvest activity.

Suitable old-growth acres would increase relative to Alternative 1 in both WAAs under all of the action alternatives (Table E-84). Projected old-growth harvest would decrease relative to Alternative 1 under all of the action alternatives in one of the WAAs and increase in the other (Table E-85). These relative changes in projected harvest are small in absolute terms (i.e., number of acres) and none of the alternatives are expected to affect the findings of the 2016 Forest Plan Amendment EIS.

Table E-84
Suitable Old-Growth by WAA and Alternative for the WAAs where Port Protection Residents Obtain Approximately 75 Percent of their Average Annual Deer Harvest

			Change from Alternative 1 (Acres)				
WAA	**Total Acres**	**Alt 1**	**Alt 2**	**Alt 3**	**Alt 4**	**Alt 5**	**Alt 6**
1529	67,930	7,610	110	210	3,680	4,250	4,250
1317	57,220	2,460	730	2,190	2,510	3,380	3,380

Table E-85
Projected Old-Growth Harvest by WAA and Alternative for the WAAs where Port Protection Residents Obtain Approximately 75 Percent of their Average Annual Deer Harvest

			Change from Alternative 1 (Acres)				
WAA	**Total Acres**	**Alt 1**	**Alt 2**	**Alt 3**	**Alt 4**	**Alt 5**	**Alt 6**
1529	67,930	2,270	(180)	(560)	(130)	(70)	(70)
1317	57,220	730	130	290	210	360	360

Saxman

Community Use Area

Saxman's CUA encompasses a total of 1,968,512 acres (Figure E-24). Almost half of this area (48 percent) is presently managed as roadless (Table E-86). This share would drop to 32 percent under Alternative 5, with no acres managed as roadless under Alternative 6. The removal of LUD II acres under Alternative 3 accounts for approximately 39 percent of the decrease in roadless acres under this alternative. These areas would retain their congressional protections and continue to be managed in a roadless state. Alternative 4 includes ARA acres that would be managed as Timber Priority and allow timber harvest and road building. Timber Priority acres account for 13 percent of the ARA in the Saxman CUA. Areas allocated to Roadless Priority and Community Priority would explicitly allow the cutting, utilization, customary trade, and removal of trees for the purposes of Alaska Native customary and traditional uses, as well as road construction deemed necessary by a federally recognized Tribe for access to Alaska Native cultural sites. This type of use would also be allowed in Timber Priority areas, which allow all timber harvest and road construction.

Figure E-24
Saxman's Community Use Area

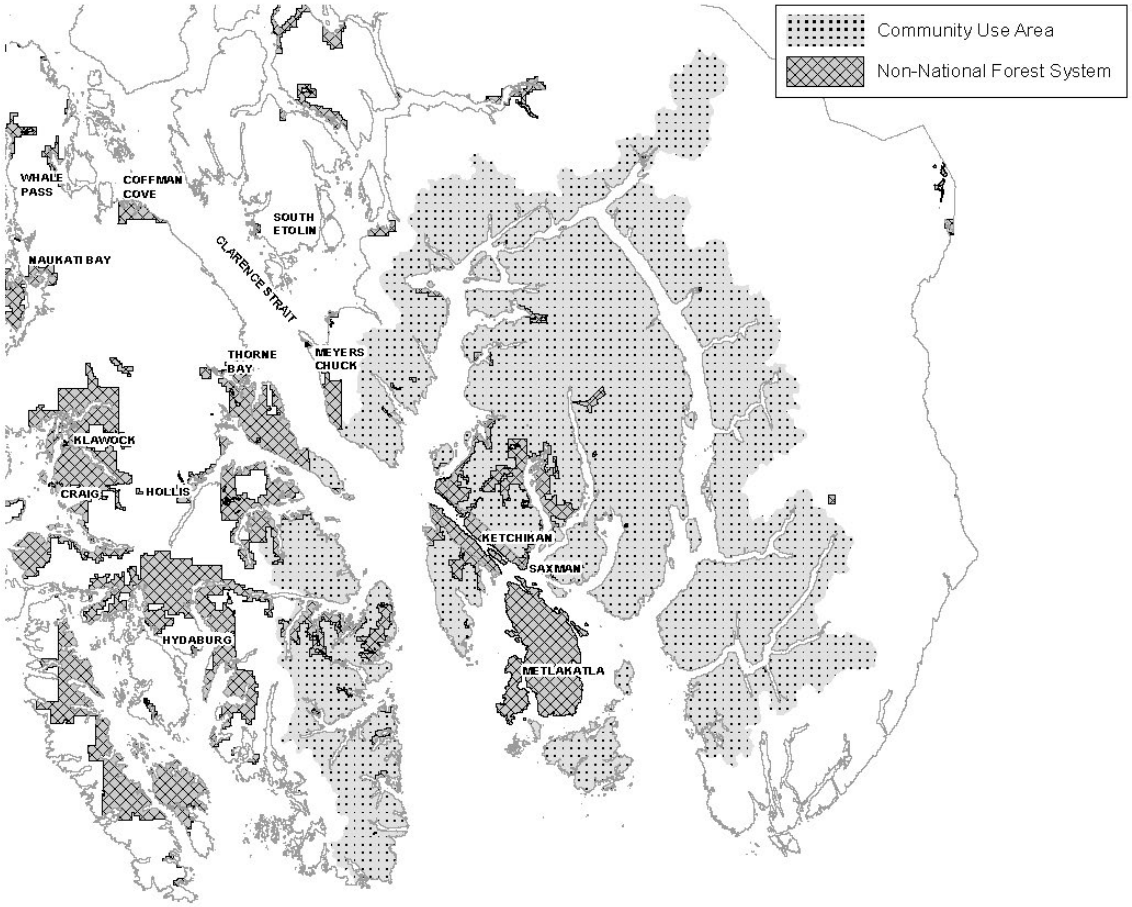

Table E-86
Roadless Areas, ARA Management Categories, and Development Opportunity in Saxman's Community Use Area

	Alternative					
Roadless Category (acres)	**1**	**2**	**3**	**4**	**5**	**6**
Total Community Use Area	1,968,512	1,968,512	1,968,512	1,968,512	1,968,512	1,968,512
Total Roadless Area	951,613	938,575	870,794	897,258	629,605	0
Roadless Share	48%	48%	44%	46%	32%	0%
ARA Management Categories (acres)						
LUD II Priority	na	31,386	0	31,386	31,384	0
Watershed Priority	na	494,679	58,585	0	0	0
Roadless Priority	na	412,511	317,685	753,390	598,221	0
Community Priority	na	0	58,585	0	0	0
Timber Priority	na	0	0	112,482	0	0
Development Opportunity						
Development LUDs (acres)	115,243	127,745	160,833	160,844	413,413	413,416
Timber Opportunity (Acres Suitable for Harvest)						
Old-Growth	29,744	33,535	45,566	55,120	56,219	56,220
Young-Growth	32,823	34,341	34,760	34,649	35,101	35,454
Estimated Harvest over 100 Years (acres)						
Old-Growth	7,080	7,335	7,510	7,959	7,957	7,957
Young-Growth	27,946	28,283	28,322	28,220	28,442	28,467

na = not applicable

Not all acres removed from roadless management would be available for development. The change in acres in development LUDs serves as a measure of development potential as it presently exists by alternative. Approximately 6 percent (115,250 acres) of the Saxman CUA is presently managed in development LUDs. This total would increase under all action alternatives, with net gains ranging from about 12,500 acres (Alternative 2) to 298,200 acres (Alternatives 5 and 6).

Suitable old-growth and young-growth acres available for harvest would increase under all action alternatives. Estimated net gains in suitable old-growth range from about 3,800 acres (Alternative 2) to 26,500 acres (Alternatives 5 and 6). Increases in suitable young-growth acres range from an estimated 1,500 acres (Alternative 2) to about 2,600 acres (Alternative 6).

Total acres harvested are assumed to remain constant across all alternatives. Estimated harvest totals in the Saxman CUA over 100 years range from about 7,100 acres (Alternative 2) to 7,950 acres (Alternatives 4 to 6). Young-growth harvest estimates range from about 27,950 acres (Alternative 1) to 7,950 acres (Alternatives 5 and 6) (Table E-86).

Subsistence

No significant decline in salmon, other finfish, or invertebrate habitat capability is expected from implementation of any alternative. These resources account for 68 percent of the total edible pounds of subsistence resources harvested by Saxman households (Kruse and Frazier 1988). Marine resources (fish and marine invertebrates) accounted for 70 percent of per capita subsistence harvest in Saxman in 1999 (ADF&G 2018).

The 1988 TRUCS study found that deer accounted for 19 percent of the total edible pounds of subsistence resources harvested by Saxman households (Kruse and Frazier 1988). Deer accounted for 13 percent of per capita subsistence harvest by Saxman residents in 1999 (ADF&G 2018). Data were not provided separately for Saxman in the ADF&G deer harvest reports for 2004 to 2013. The majority of deer harvest by Saxman residents likely takes place in GMU 1A.

The 2016 Forest Plan Amendment EIS analysis found that use of most subsistence resources by Saxman residents (fish and marine invertebrates) was not expected to be affected by the current Forest Plan. Based on the Deer Availability and Anticipated Demand analysis completed for the 1997 Forest Plan EIS, the 2016 analysis indicated that subsistence use of deer may be affected to the point that some restriction in hunting might be necessary over the long term, especially for non-rural hunters. None of the alternatives are expected to affect these findings.

Sitka (Sheet'ká)

Community Use Area

Sitka's CUA encompasses a total of 420,004 acres (Figure E-25). Most of this area (83 percent) is presently managed as roadless (Table E-87). This share would decrease to 67 percent under Alternative 5, with no acres managed as roadless under Alternative 6. Alternative 4 includes ARA acres that would be managed as Timber Priority and allow timber harvest and road building. Timber Priority acres account for 9 percent of the ARA in the Sitka CUA. Areas allocated to Roadless Priority and Community Priority would explicitly allow the cutting, utilization, customary trade, and removal of trees for the purposes of Alaska Native customary and traditional uses, as well as road construction deemed necessary by a federally recognized Tribe for access to Alaska Native cultural sites. This type of use would also be allowed in Timber Priority areas, which allow all timber harvest and road construction.

Figure E-25
Sitka's Community Use Area

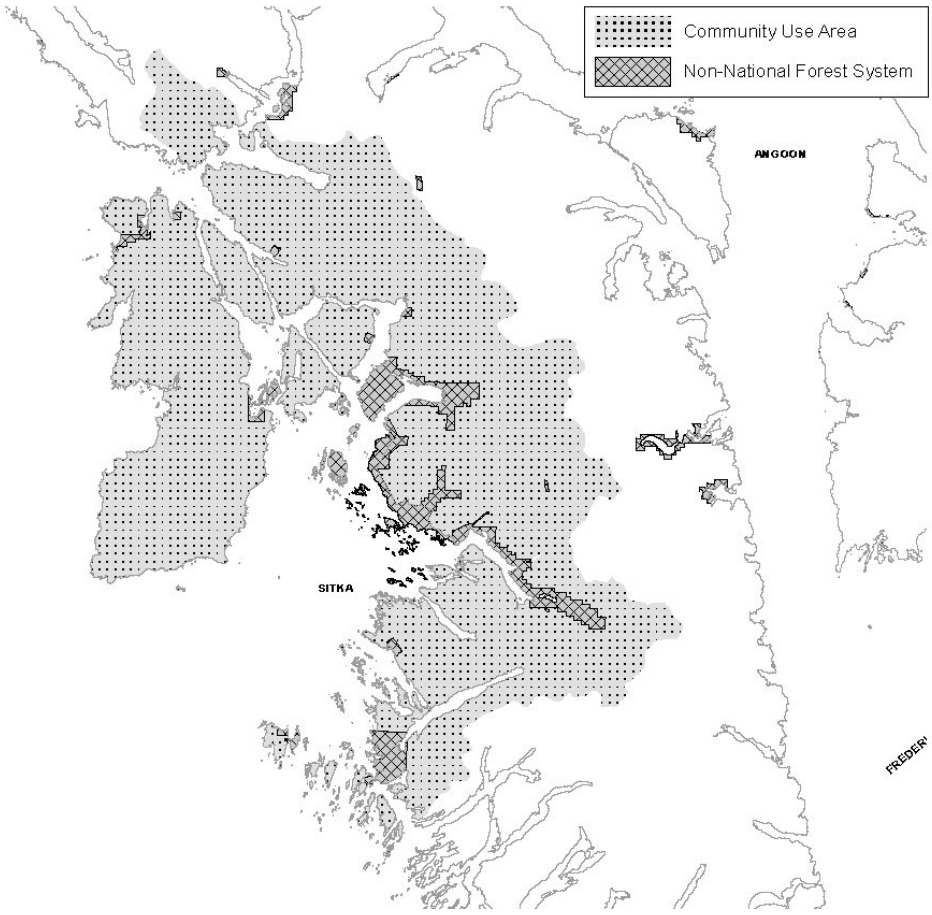

Table E-87
Roadless Areas, ARA Management Categories, and Development Opportunity in Sitka's Community Use Area

	Alternative					
Roadless Category (acres)	**1**	**2**	**3**	**4**	**5**	**6**
Total Community Use Area	420,004	420,004	420,004	420,004	420,004	420,004
Total Roadless Area	348,194	350,192	350,192	346,216	281,941	0
Roadless Share	83%	83%	83%	82%	67%	0%
ARA Management Categories (acres)						
LUD II Priority	na	0	0	0	0	0
Watershed Priority	na	206,073	57,134	0	0	0
Roadless Priority	na	144,119	86,985	315,687	281,941	0
Community Priority	na	0	57,134	0	0	0
Timber Priority	na	0	0	30,528	0	0
Development Opportunity						
Development LUDs (acres)	26,073	26,839	26,839	26,840	91,035	91,039
Timber Opportunity (Acres Suitable for Harvest)						
Old-Growth	2,329	2,357	2,357	4,870	4,870	4,870
Young-Growth	10,550	10,592	10,601	10,601	10,601	10,648
Estimated Harvest over 100 Years (acres)						
Old-Growth	0	0	0	6	5	5
Young-Growth	8,983	8,724	8,638	8,634	8,590	8,549

na = not applicable

Not all acres removed from roadless management would be available for development. The change in acres in development LUDs serves as a measure of development potential as it presently exists by alternative. Approximately 6 percent (26,100 acres) of the Sitka CUA is presently managed in development LUDs. This total would increase under all action alternatives, with net gains ranging from about 800 acres (Alternatives 2 to 4) to 65,000 acres (Alternatives 5 and 6).

Suitable old-growth available for harvest would increase by about 2,550 acres under Alternatives 4 to 6, with negligible increases (less than 30 acres) estimated for Alternatives 2 and 3. Increases in suitable young-growth acres would be negligible (less than 100 acres) under all action alternatives. No old-growth harvest is expected to occur in the Sitka CUA over 100 years under any of the alternatives. Estimated young-growth harvest ranges from about 8,550 acres (Alternative 6) to 9,000 acres (Alternative 1) (Table E-87).

Subsistence

No significant effect on salmon, other finfish, or invertebrate habitat capability is expected from implementation of any alternative. These resources account for 69 percent of the total edible pounds of subsistence resources harvested by Sitka households (Kruse and Frazier 1988). Marine resources (fish and marine invertebrates) accounted for 68 percent of per capita subsistence harvest in Sitka in 1996 (ADF&G 2018).

The 1988 TRUCS study found that deer accounted for 27 percent of the total edible pounds of subsistence resources harvested by Sitka households (Kruse and Frazier 1988). Deer accounted for 22 percent of per capita subsistence harvest by Sitka residents in 1996 (ADF&G 2018).

Sitka residents mainly harvest deer on Baranof Island. Sixteen WAAs account for the majority (75 percent) of deer harvested by Sitka residents. As shown in Table E-88, the Sitka portion represents about 97 percent of the rural hunter harvest and 87 percent of the total harvest in these WAAs. About 11 percent of the combined harvest in these WAAs is by non-rural hunters, suggesting that there is little harvest buffer that could be restricted, if necessary, before restrictions are placed on rural harvests.

The 2016 Forest Plan Amendment EIS analysis found that of the 16 WAAs used most heavily by Sitka residents, only one (WAA 3308) would be affected under the current Forest Plan, with harvest that could occur estimated to further reduce deer habitat capability by 1 percent after 100 years of Forest Plan implementation (Table E-88).

Table E-88
Deer Harvest and Deer Habitat Capability on NFS Lands for the WAAs where Sitka Residents Obtain Approximately 75 Percent of their Average Annual Deer Harvest[1]

	Average Deer Harvest from 2004 to 2013			Deer Habitat Capability[3]		
WAA	Sitka Residents	All Rural Hunters[2]	All Hunters	2014	After 100 Years of Implementation	Change
3001	334	338	361	82%	82%	0%
3002	268	272	299	69%	69%	0%
3003	144	144	152	86%	86%	0%
3314	122	123	136	90%	90%	0%
3311	112	113	127	97%	97%	0%
3313	106	107	125	97%	97%	0%
3310	88	92	100	92%	92%	0%
3207	86	88	94	100%	100%	0%
3104	73	75	84	74%	74%	0%
3416	71	78	88	100%	100%	0%
3309	70	72	81	100%	100%	0%
3733	69	77	81	100%	100%	0%
3312	68	69	76	95%	95%	0%
3206	61	63	68	100%	100%	0%
3105	56	58	68	99%	99%	0%
3308	52	61	107	66%	65%	-1%

[1] Calculated based on harvest where location is known.
[2] The category "All Rural Hunters" includes residents of Southeast Alaska communities, excluding the cities of Juneau and Ketchikan.
[3] Deer habitat capability in 2014 and after 100 Years of full implementation is expressed as a percent of the 1954 habitat capability. Data presented for 100 Years of Implementation are estimates developed for the current Forest Plan in the 2016 Forest Plan Amendment EIS (USDA Forest Service 2016).

The 2016 Forest Plan Amendment EIS analysis found that use of most subsistence resources by Sitka residents (fish and marine invertebrates) was not expected to be affected by any of the alternatives. Based on the Deer Availability and Anticipated Demand analysis completed for the 1997 Forest Plan EIS, the 2016 analysis found that due to existing circumstances, subsistence use of deer may reach a point that some restriction in hunting by Sitka residents, all rural hunters, and all hunters might be necessary over the long term. The risk of hunting restrictions would be reduced somewhat, through more intensive management (e.g., thinning) of the existing and future closed-canopy, young-growth forests in this area. Indirect effects associated with increased competition for deer within Sitka's subsistence, use areas could also occur if hunters from other communities were displaced due to timber production activity.

Suitable old-growth acres would increase relative to Alternative 1 under all of the action alternatives in WAA 3308, with minor increases also estimated for one other WAA (3003) (Table E-89). Projected old-growth harvest was, however, estimated to decrease in WAA 3308 under most of the action alternatives (Table E-90). These relative changes in projected harvest are small and none of the alternatives are expected to affect the findings of the 2016 Forest Plan Amendment EIS, which anticipated potential impacts based on existing circumstances.

Table E-89
Suitable Old-Growth by WAA and Alternative for the WAAs where Sitka Residents Obtain Approximately 75 Percent of their Average Annual Deer Harvest

			Change from Alternative 1 (Acres)				
WAA	Total Acres	Alt 1	Alt 2	Alt 3	Alt 4	Alt 5	Alt 6
3001	79,250	-	-	-	-	-	-
3002	77,040	-	-	-	-	-	-
3003	59,150	-	-	-	80	80	80
3314	41,600	-	-	-	-	-	-
3311	56,050	-	-	-	-	-	-
3313	73,870	-	-	-	-	-	-
3310	58,300	-	-	-	-	-	-
3207	99,830	-	-	-	-	-	-
3104	53,710	-	-	-	-	-	-
3416	65,170	-	-	-	-	-	-
3309	43,820	-	-	-	-	-	-
3733	215,330	-	-	-	-	-	-
3312	19,590	-	-	-	-	-	-
3206	40,340	-	-	-	-	-	-
3105	52,840	-	-	-	-	-	-
3308	100,810	6,500	100	980	2,560	3,510	3,510

Table E-90
Projected Old-Growth Harvest by WAA and Alternative for the WAAs where Sitka Residents Obtain Approximately 75 Percent of their Average Annual Deer Harvest

			Change from Alternative 1 (Acres)				
WAA	Total Acres	Alt 1	Alt 2	Alt 3	Alt 4	Alt 5	Alt 6
3001	79,250	-	-	-	-	-	-
3002	77,040	-	-	-	-	-	-
3003	59,150	-	-	-	10	10	10
3314	41,600	-	-	-	-	-	-
3311	56,050	-	-	-	-	-	-
3313	73,870	-	-	-	-	-	-
3310	58,300	-	-	-	-	-	-
3207	99,830	-	-	-	-	-	-
3104	53,710	-	-	-	-	-	-
3416	65,170	-	-	-	-	-	-
3309	43,820	-	-	-	-	-	-
3733	215,330	-	-	-	-	-	-
3312	19,590	-	-	-	-	-	-
3206	40,340	-	-	-	-	-	-
3105	52,840	-	-	-	-	-	-
3308	100,810	710	-	(30)	(110)	(70)	(70)

Skagway

Community Use Area

Skagway's CUA encompasses a total of 203,461 acres (Figure E-26). Nearly all of this area (99 percent) is presently managed as roadless (Table E-91). This share would decrease somewhat under Alternative 5 to 95 percent, and drop to no acres managed as roadless under Alternative 6. Alternative 4 includes ARA acres that would be managed as Timber Priority and allow timber harvest and road building. Timber Priority acres account for 4 percent of the ARA in the Skagway CUA. Areas allocated to Roadless Priority would explicitly allow the cutting, utilization, customary trade, and removal of trees for the purposes of Alaska Native customary and traditional uses, as well as road construction deemed necessary by a

federally recognized Tribe for access to Alaska Native cultural sites. This type of use would also be allowed in Timber Priority areas, which allow all timber harvest and road construction.

Not all acres removed from roadless management would be available for development. The change in acres in development LUDs serves as a measure of development potential as it presently exists by alternative. None of the lands in Skagway CUA are presently managed in a development LUD. This would change under Alternatives 5 and 6, both of which would allocate about 7,200 acres to development LUDs.

There are no suitable old-growth acres for harvest under any of the alternatives, and very limited suitable young-growth acres (less than 100 acres in all cases). Correspondingly, no old-growth or young-growth harvest is estimated over the next 100 years in the Skagway CUA (Table E-91).

Figure E-26
Skagway's Community Use Area

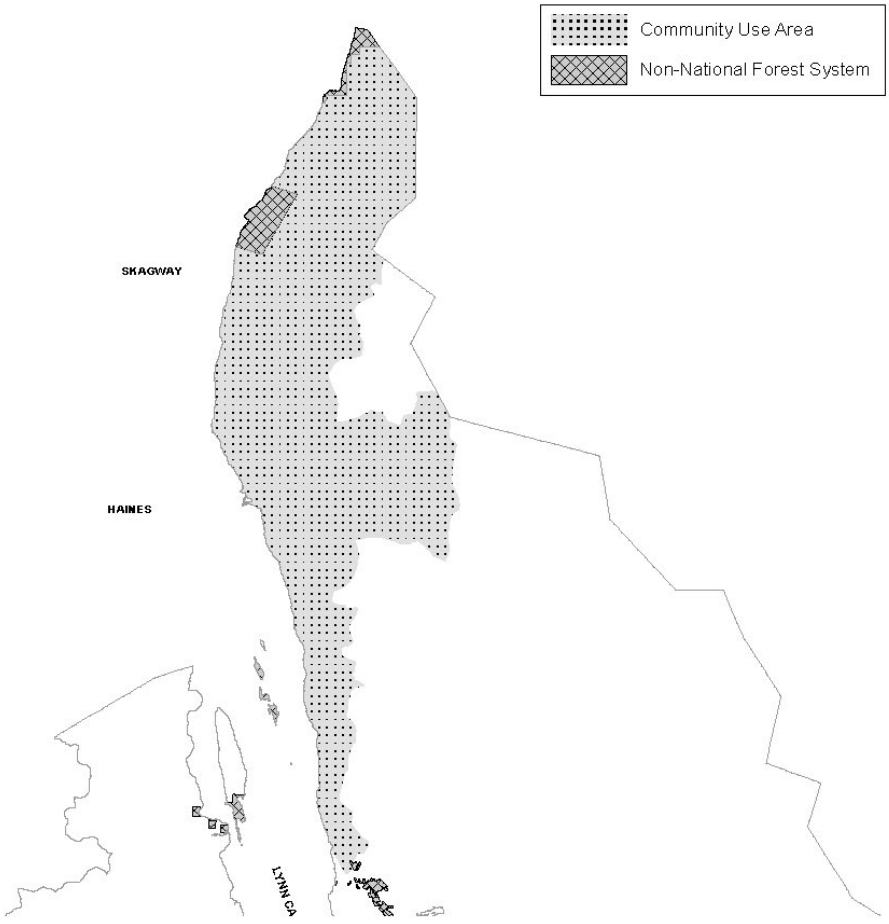

Table E-91
Roadless Areas, ARA Management Categories, and Development Opportunity in Skagway's Community Use Area

Roadless Category (acres)	Alternative					
	1	2	3	4	5	6
Total Community Use Area	203,461	203,461	203,461	203,461	203,461	203,461
Total Roadless Area	200,585	203,461	203,461	200,585	192,490	0
Roadless Share	99%	100%	100%	99%	95%	0%
ARA Management Categories (acres)						
LUD II Priority	na	0	0	0	0	0
Watershed Priority	na	67,481	0	0	0	0
Roadless Priority	na	135,979	135,979	193,370	192,490	0
Community Priority	na	0	0	0	0	0
Timber Priority	na	0	0	7,215	0	0
Development Opportunity						
Development LUDs (acres)	0	0	0	0	7,215	7,215
Timber Opportunity (Acres Suitable for Harvest)						
Old-Growth	0	0	0	0	0	0
Young-Growth	0	0	0	46	70	70
Estimated Harvest over 100 Years (acres)						
Old-Growth	0	0	0	0	0	0
Young-Growth	0	0	0	0	0	0

na = not applicable

Subsistence

No significant effect on salmon, other finfish, or invertebrate habitat capability is expected from implementation of any alternative. These resources account for 88 percent of the total edible pounds of subsistence resources harvested by Skagway households (Kruse and Frazier 1988).

The 1988 TRUCS study found that deer account for only a small fraction of the total edible pounds of subsistence resources harvested by Skagway households (Kruse and Frazier 1988).

Skagway residents primarily harvest deer in four WAAs (Table E-92). Skagway residents harvested very few deer from 2004 to 2013, with annual average harvests per WAA ranging from two to four deer over this period. The 2016 Forest Plan Amendment EIS analysis found that none of these WAAs would be affected by the current Forest Plan as no timber harvest is proposed in these areas. Indirect effects could occur if hunters from other communities were displaced due to timber harvest activity.

There are no suitable old-growth acres and no projected old-growth harvest in these WAAs under any of the alternatives (Tables E-93 and E-94) and, therefore, no change to the findings of the 2016 Forest Plan Amendment EIS.

Table E-92
Deer Harvest and Deer Habitat Capability on NFS Lands for the WAAs where Skagway Residents Obtain Approximately 75 Percent of their Average Annual Deer Harvest[1]

WAA	Average Deer Harvest from 2004 to 2013			Deer Habitat Capability[3]		
	Skagway Residents	All Rural Hunters[2]	All Hunters	2014	After 100 Years of Implementation	Change
3836	4	16	210	100%	100%	0%
2515	2	1	12	100%	100%	0%
2722	2	6	302	100%	100%	0%
4044	2	6	57	88%	88%	0%

[1] Calculated based on harvest where location is known.
[2] The category "All Rural Hunters" includes residents of Southeast Alaska communities, excluding the cities of Juneau and Ketchikan.
[3] Deer habitat capability in 2014 and after 100 Years of full implementation is expressed as a percent of the 1954 habitat capability. Data presented for 100 Years of Implementation are estimates developed for the current Forest Plan in the 2016 Forest Plan Amendment EIS (USDA Forest Service 2016).

Table E-93
Suitable Old-Growth by WAA and Alternative for the WAAs where Skagway Residents Obtain Approximately 75 Percent of their Average Annual Deer Harvest

			Change from Alternative 1 (Acres)				
WAA	Total Acres	Alt 1	Alt 2	Alt 3	Alt 4	Alt 5	Alt 6
3836	53,460	-	-	-	-	-	-
2515	99,410	-	-	-	-	-	-
2722	25,150	-	-	-	-	-	-
4044	79,650	-	-	-	-	-	-

Table E-94
Projected Old-Growth Harvest by WAA and Alternative for the WAAs where Skagway Residents Obtain Approximately 75 Percent of their Average Annual Deer Harvest

			Change from Alternative 1 (Acres)				
WAA	Total Acres	Alt 1	Alt 2	Alt 3	Alt 4	Alt 5	Alt 6
3836	53,460	-	-	-	-	-	-
2515	99,410	-	-	-	-	-	-
2722	25,150	-	-	-	-	-	-
4044	79,650	-	-	-	-	-	-

Tenakee Springs

Community Use Area

The Tenakee Springs CUA encompasses a total of 195,975 acres (Figure E-27). Over three-quarters of this area (78 percent) is presently managed as roadless (Table E-95). This share would drop to 60 and 42 percent under Alternatives 3 and 5, respectively, with no acres managed as roadless under Alternative 6. The removal of LUD II acres under Alternative 3 accounts for all of the decrease in roadless acres under this alternative. These areas would retain their congressional protections and continue to be managed in a roadless state. Alternative 4 includes ARA acres that would be managed as Timber Priority and allow timber harvest and road building. Timber Priority acres account for 21 percent of the ARA in the Tenakee Springs CUA. Areas allocated to Roadless Priority would explicitly allow the cutting, utilization, customary trade, and removal of trees for the purposes of Alaska Native customary and traditional uses, as well as road construction deemed necessary by a federally recognized Tribe for access to Alaska Native cultural sites. This type of use would also be allowed in Timber Priority areas, which allow all timber harvest and road construction.

Figure E-27
Tenakee Springs' Community Use Area

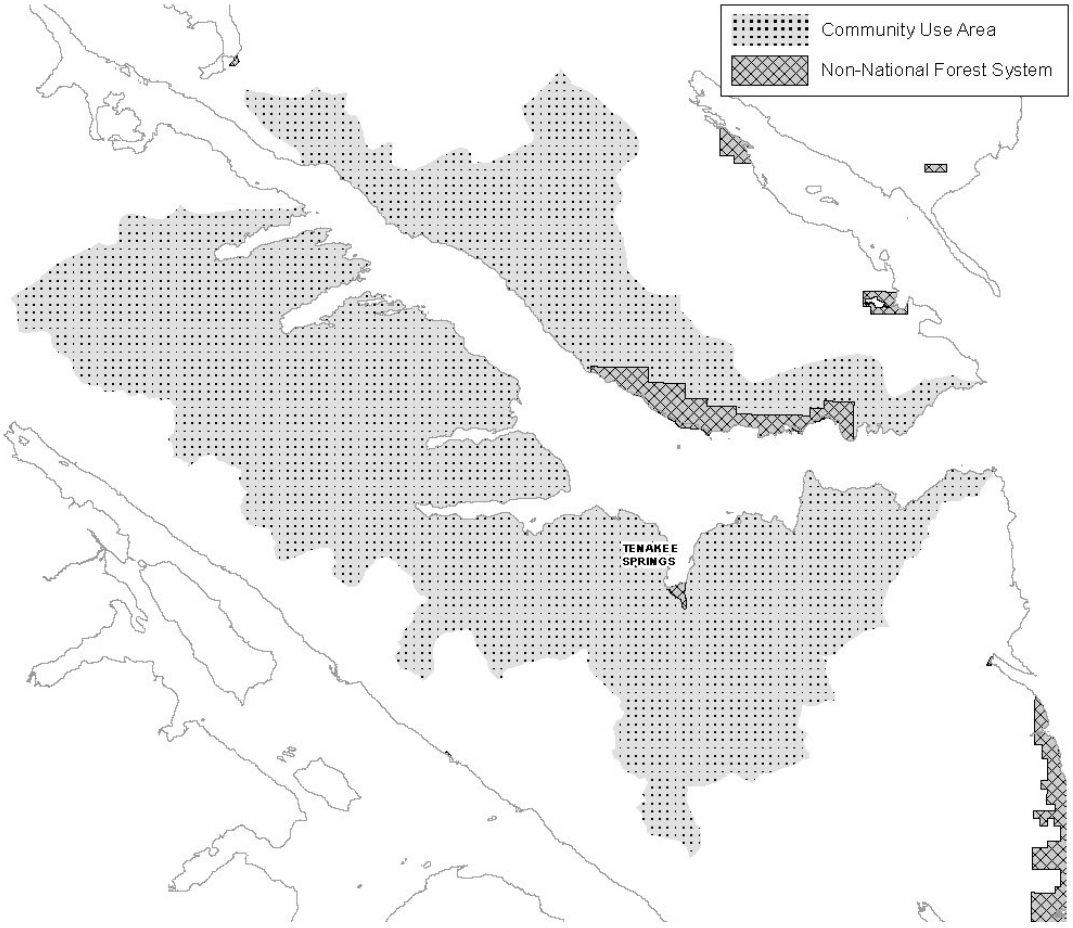

Table E-95
Roadless Areas, ARA Management Categories, and Development Opportunity in Tenakee Springs' Community Use Area

	Alternative					
Roadless Category (acres)	**1**	**2**	**3**	**4**	**5**	**6**
Total Community Use Area	195,975	195,975	195,975	195,975	195,975	195,975
Total Roadless Area	153,343	161,076	118,192	147,140	82,936	0
Roadless Share	78%	82%	60%	75%	42%	0%
ARA Management Categories (acres)						
LUD II Priority	na	37,972	0	37,972	37,969	0
Watershed Priority	na	71,580	0	0	0	0
Roadless Priority	na	51,524	46,611	78,533	44,967	0
Community Priority	na	0	0	0	0	0
Timber Priority	na	0	0	30,635	0	0
Development Opportunity						
Development LUDs (acres)	30,954	23,526	26,221	34,719	101,136	101,137
Timber Opportunity (Acres Suitable for Harvest)						
Old-Growth	8,492	7,077	8,442	18,807	18,807	18,808
Young-Growth	6,462	6,556	6,556	6,557	6,566	6,599
Estimated Harvest over 100 Years (acres)						
Old-Growth	160	160	234	170	163	163
Young-Growth	5,502	5,400	5,342	5,340	5,320	5,299

na = not applicable

Not all acres removed from roadless management would be available for development. The change in acres in development LUDs serves as a measure of development potential as it presently exists by alternative. Approximately 16 percent (30,950 acres) of the Tenakee Springs CUA is presently managed in development LUDs. This total would decrease under Alternatives 2 and 3, and increase under Alternatives 4 to 6, with net gains ranging from about 3,800 acres (Alternative 4) to 70,200 acres (Alternatives 5 and 6).

Suitable old-growth acres available for harvest would decrease under Alternatives 2 and 3, with net gains of about 10,300 acres under the other three action alternatives (Alternatives 4 to 6). Estimated increases in suitable young-growth acres range from about 100 to 150 acres under all action alternatives.

Total acres harvested are assumed to remain constant across all alternatives. Less than 200 acres of old-growth harvest is estimated to occur in the Tenakee Springs CUA over 100 years under all of the alternatives. Young-growth harvest estimates are similar across alternatives, ranging from about 5,300 acres (Alternatives 3 to 6) to 5,500 acres (Alternative 1) (Table E-95).

Subsistence

No significant effect on salmon, other finfish, or invertebrate habitat capability is expected from implementation of any alternative. These resources account for 55 percent of the total edible pounds of subsistence resources harvested by Tenakee Springs households, with deer accounting for an estimated 39 percent (Kruse and Frazier 1988).

Tenakee Springs residents take the majority (71 percent) of their deer from six WAAs (Table E-96). As shown in Table E-96, the Tenakee Springs portion ranges from about 4 to 31 percent of total harvest and 8 to 90 percent of all rural deer harvest in these WAAs. About 58 percent of the combined harvest in these WAAs is by non-rural hunters, suggesting that there is a harvest buffer that could be restricted, if necessary, before restrictions are placed on rural harvests.

All of the WAAs identified in Table E-96 are in areas with some past timber harvest and, therefore, deer habitat capabilities are currently estimated to be below 1954 levels. The 2016 Forest Plan Amendment EIS found that additional harvest that could occur under the current Forest Plan would reduce estimated habitat capabilities in three of the six WAAs by a further 2 to 4 percent (Table E-96).

Table E-96
Deer Harvest and Deer Habitat Capability on NFS Lands for the WAAs where Tenakee Springs Residents Obtain Approximately 75 Percent of their Average Annual Deer Harvest[1]

	Average Deer Harvest from 2004 to 2013			Deer Habitat Capability[3]		
WAA	Tenakee Springs Residents	All Rural Hunters[2]	All Hunters	2014	After 100 Years of Implementation	Change
3627	20	25	63	76%	72%	-4%
3526	15	28	63	80%	78%	-2%
3629	14	23	66	91%	91%	0%
3525	5	56	118	75%	72%	-3%
3630	4	6	18	99%	99%	0%
3628	2	2	8	98%	98%	0%

[1] Calculated based on harvest where location is known.
[2] The category "All Rural Hunters" includes residents of Southeast Alaska communities, excluding the cities of Juneau and Ketchikan.
[3] Deer habitat capability in 2014 and after 100 Years of full implementation is expressed as a percent of the 1954 habitat capability. Data presented for 100 Years of Implementation are estimates developed for the current Forest Plan in the 2016 Forest Plan Amendment EIS (USDA Forest Service 2016).

The 2016 Forest Plan Amendment EIS analysis found that use of most subsistence resources by Tenakee Springs residents (fish and marine invertebrates) was not expected to be affected by the current Forest Plan. Based on the Deer Availability and Anticipated Demand analysis completed for the 1997 Forest Plan EIS, the 2016 analysis found that subsistence use of deer may be affected to the point that

some restriction in hunting might be necessary over the long term, especially for non-rural hunters. The risk of hunting restrictions would be reduced somewhat, through more intensive management (e.g., thinning) of the existing and future closed-canopy, young-growth forests in this area.

Suitable old-growth acres would increase relative to Alternative 1 in two of the six WAAs under all of the action alternatives (Table E-97). However, projected old-growth harvest would decrease relative to Alternative 1 in these WAAs under most alternatives, with no suitable acres or projected harvest identified for the other four WAAs (Tables E-97 and E-98). These relative changes in projected harvest are small and none of the alternatives are expected to affect the findings of the 2016 Forest Plan Amendment EIS.

Table E-97
Suitable Old-Growth by WAA and Alternative for the WAAs where Tenakee Springs Residents Obtain Approximately 75 Percent of their Average Annual Deer Harvest

			Change from Alternative 1 (Acres)				
WAA	**Total Acres**	**Alt 1**	**Alt 2**	**Alt 3**	**Alt 4**	**Alt 5**	**Alt 6**
3627	27,320	1,420	30	1,100	1,100	1,100	1,100
3526	40,790	230	-	-	-	-	-
3629	96,880	-	-	-	-	-	-
3525	73,120	2,350	40	380	600	610	610
3630	70,770	-	-	-	-	-	-
3628	34,080	-	-	-	-	-	-

Table E-98
Projected Old-Growth Harvest by WAA and Alternative for the WAAs where Tenakee Springs Residents Obtain Approximately 75 Percent of their Average Annual Deer Harvest

			Change from Alternative 1 (Acres)				
WAA	**Total Acres**	**Alt 1**	**Alt 2**	**Alt 3**	**Alt 4**	**Alt 5**	**Alt 6**
3627	27,320	160	-	70	10	-	-
3526	40,790	30	-	(10)	(10)	(20)	(20)
3629	96,880	-	-	-	-	-	-
3525	73,120	260	-	(10)	(60)	(70)	(70)
3630	70,770	-	-	-	-	-	-
3628	34,080	-	-	-	-	-	-

Thorne Bay

Community Use Area

Thorne Bay's CUA encompasses a total of 966,427 acres (Figure E-28). Almost half of this area (47 percent) is presently managed as roadless (Table E-99). This share would drop to 27 and 29 percent under Alternatives 3 and 5, respectively, with no acres managed as roadless under Alternative 6. The removal of LUD II acres under Alternative 3 accounts for approximately 60 percent of the decrease in roadless acres under this alternative. These areas would retain their congressional protections and continue to be managed in a roadless state. Alternative 4 includes ARA acres that would be managed as Timber Priority and allow timber harvest and road building. Timber Priority acres account for 13 percent of the ARA in the Thorne Bay CUA. Areas allocated to Roadless Priority would explicitly allow the cutting, utilization, customary trade, and removal of trees for the purposes of Alaska Native customary and traditional uses, as well as road construction deemed necessary by a federally recognized Tribe for access to Alaska Native cultural sites. This type of use would also be allowed in Timber Priority areas, which allow all timber harvest and road construction.

Figure E-28
Thorne Bay's Community Use Area

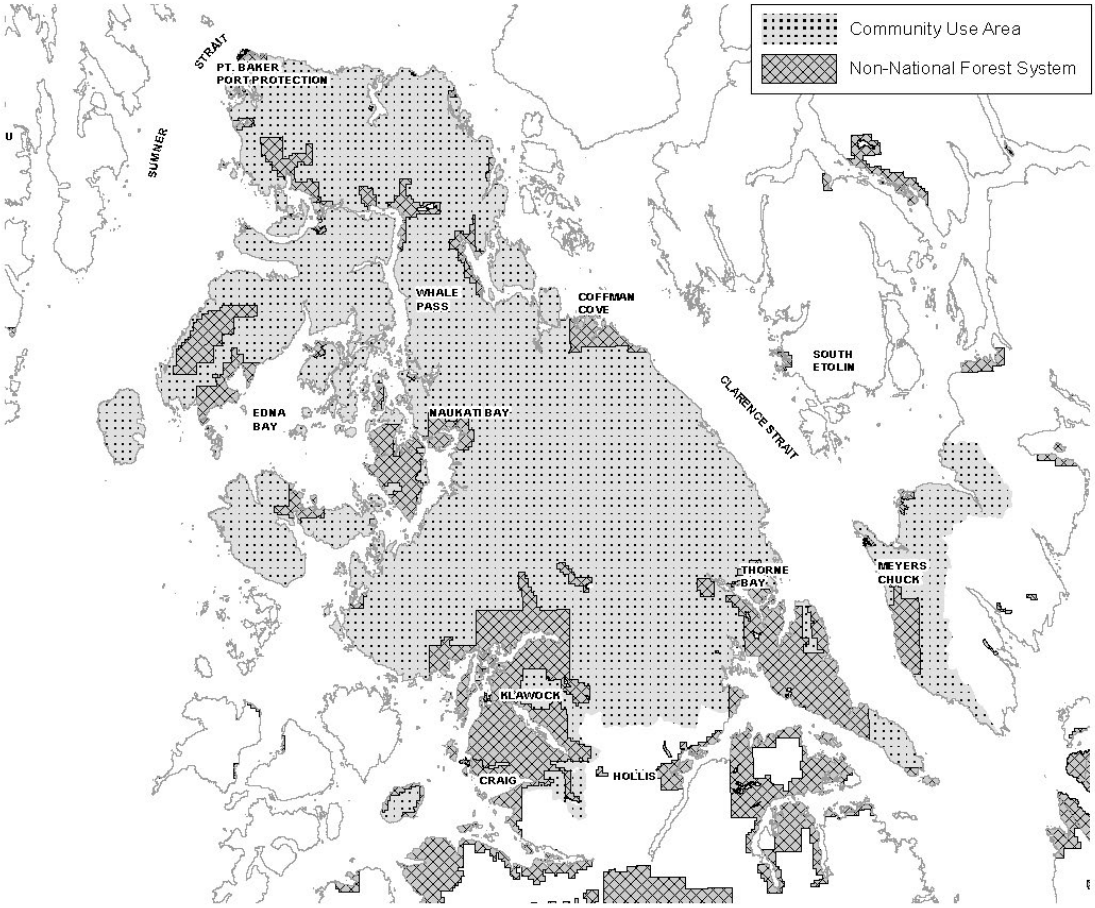

Table E-99
Roadless Areas, ARA Management Categories, and Development Opportunity in Thorne Bay's Community Use Area

	Alternative					
Roadless Category (acres)	**1**	**2**	**3**	**4**	**5**	**6**
Total Community Use Area	966,427	966,427	966,427	966,427	966,427	966,427
Total Roadless Area	452,295	437,535	257,783	370,574	275,582	0
Roadless Share	47%	45%	27%	38%	29%	0%
ARA Management Categories (acres)						
LUD II Priority	na	117,791	0	117,791	117,432	0
Watershed Priority	na	159,375	6,833	0	0	0
Roadless Priority	na	160,369	93,824	206,295	158,149	0
Community Priority	na	0	6,833	0	0	0
Timber Priority	na	0	0	46,488	0	0
Development Opportunity						
Development LUDs (acres)	327,188	340,112	388,475	388,803	493,687	493,694
Timber Opportunity (Acres Suitable for Harvest)						
Old-Growth	62,595	65,978	78,593	85,763	86,735	86,735
Young-Growth	127,013	128,256	128,312	128,368	128,398	128,655
Estimated Harvest over 100 Years (acres)						
Old-Growth	13,480	12,748	11,837	11,038	10,957	10,957
Young-Growth	108,142	105,630	104,548	104,550	104,040	103,302

na = not applicable

Not all acres removed from roadless management would be available for development. The change in acres in development LUDs serves as a measure of development potential as it presently exists by alternative. Approximately 34 percent (327,200 acres) of the Thorne Bay CUA is presently managed in development LUDs. This total would increase under all action alternatives, with net gains ranging from about 12,900 acres (Alternative 2) to 166,500 acres (Alternatives 5 and 6).

Suitable old-growth and young-growth acres available for harvest would increase under all action alternatives. Estimated net gains in suitable old-growth range from about 3,400 acres (Alternative 2) to 24,150 acres (Alternatives 5 and 6). Increases in suitable young-growth acres range from about 1,250 acres (Alternative 2) to 1,650 acres (Alternative 6), about 1 percent of the existing total in all cases.

Total acres harvested are assumed to remain constant across all alternatives. Estimated old-growth harvest totals in the Thorne Bay CUA over 100 years range from about 11,000 acres (Alternatives 4 to 6) to 13,500 acres (Alternative 1). Young-growth harvest estimates range from about 103,300 acres (Alternative 6) to 108,150 acres (Alternative 1) (Table E-99).

Subsistence

No significant effect on salmon, other finfish, or invertebrate habitat capability is expected from implementation of any alternative. These resources account for 75 percent of the total edible pounds of subsistence resources harvested by Thorne Bay households (Kruse and Frazier 1988). Marine resources (fish and marine invertebrates) accounted for 54 percent of per capita subsistence harvest in Thorne Bay in 1998 (ADF&G 2018).

The 1988 TRUCS study found that deer accounted for 20 percent of the total edible pounds of subsistence resources harvested by Thorne Bay (Kruse and Frazier 1988). Deer accounted for 27 percent of per capita subsistence harvest by Throne Bay residents in 1998 (ADF&G 2018).

Residents of Thorne Bay harvest the majority (70 percent) of their deer from two WAAs in north-central Prince of Wales Island (1319 and 1315). As shown in Table E-100, the Thorne Bay portion represents about 38 percent and 40 percent of the total harvest and about 59 percent and 53 percent of the rural hunter harvest in these WAAs, respectively. About 32 percent of the combined harvest in these WAAs is by non-rural hunters, suggesting that there is a limited harvest buffer that could be restricted, if necessary, before restrictions are placed on rural harvests.

WAAs 1319 and 1315 occur in an area with substantial past harvest and, therefore, deer habitat capabilities are currently estimated to be below 1954 levels. The 2016 Forest Plan Amendment EIS analysis found that additional harvest that could occur under the current Forest Plan would further reduce estimated habitat capabilities by 5 to 6 percent (Table E-100).

Table E-100
Deer Harvest and Deer Habitat Capability on NFS Lands for the WAAs where Thorne Bay Residents Obtain Approximately 75 Percent of their Average Annual Deer Harvest[1]

	Average Deer Harvest from 2004 to 2013			Deer Habitat Capability[3]		
WAA	Thorne Bay Residents	All Rural Hunters[2]	All Hunters	2014	After 100 Years of Implementation	Change
1319	119	201	317	74%	69%	-5%
1315	90	169	226	56%	50%	-6%

[1] Calculated based on harvest where location is known.
[2] The category "All Rural Hunters" includes residents of Southeast Alaska communities, excluding the cities of Juneau and Ketchikan.
[3] Deer habitat capability in 2014 and after 100 Years of full implementation is expressed as a percent of the 1954 habitat capability. Data presented for 100 Years of Implementation are estimates developed for the current Forest Plan in the 2016 Forest Plan Amendment EIS (USDA Forest Service 2016).

The 2016 Forest Plan Amendment EIS analysis found that use of most subsistence resources by Thorne Bay residents (fish and marine invertebrates) was not expected to be affected by any of the alternatives.

Based on the Deer Availability and Anticipated Demand analysis completed for the 1997 Forest Plan EIS, the 2016 analysis also found that subsistence use of deer may be affected to the point that some restriction in hunting might be necessary over the long term, especially for non-rural hunters. The risk of hunting restrictions was found to be reduced somewhat, through more intensive management (e.g., thinning) of the existing and future closed-canopy, young-growth forests in this area. Indirect effects associated with increased competition for deer within Thorne Bay's subsistence use areas could also occur if hunters from other communities were displaced due to timber harvest activity.

Suitable old-growth acres would increase relative to Alternative 1 in both of the WAAs under all of the action alternatives (Table E-101). However, projected old-growth harvest would decrease relative to Alternative 1 in these WAAs under all of the action alternatives (Table E-102). These relative changes in projected harvest are small and not expected to affect the findings of the 2016 Forest Plan Amendment EIS.

Table E-101
Suitable Old-Growth by WAA and Alternative for the WAAs where Thorne Bay Residents Obtain Approximately 75 Percent of their Average Annual Deer Harvest

			Change from Alternative 1 (Acres)				
WAA	**Total Acres**	**Alt 1**	**Alt 2**	**Alt 3**	**Alt 4**	**Alt 5**	**Alt 6**
1319	103,210	3,250	170	570	600	600	600
1315	55,040	3,820	230	1,240	1,240	1,240	1,240
1319	103,210	3,250	170	570	600	600	600

Table E-102
Projected Old-Growth Harvest by WAA and Alternative for the WAAs where Thorne Bay Residents Obtain Approximately 75 Percent of their Average Annual Deer Harvest

			Change from Alternative 1 (Acres)				
WAA	**Total Acres**	**Alt 1**	**Alt 2**	**Alt 3**	**Alt 4**	**Alt 5**	**Alt 6**
1319	103,210	970	(40)	(130)	(240)	(250)	(250)
1315	55,040	1,140	(40)	(30)	(180)	(200)	(200)
1319	103,210	970	(40)	(130)	(240)	(250)	(250)

Whale Pass

Community Use Area

The Whale Pass CUA encompasses a total of 966,427 acres (Figure E-29). Almost half of this area (47 percent) is presently managed as roadless (Table E-103). This share would drop to 27 and 29 percent under Alternatives 3 and 5, respectively, with no acres managed as roadless under Alternative 6. The removal of LUD II acres under Alternative 3 accounts for approximately 60 percent of the decrease in roadless acres under this alternative. These areas would retain their congressional protections and continue to be managed in a roadless state. Alternative 4 includes ARA acres that would be managed as Timber Priority and allow timber harvest and road building. Timber Priority acres account for 13 percent of the ARA in the Whale Pass CUA. Areas allocated to Roadless Priority would explicitly allow the cutting, utilization, customary trade, and removal of trees for the purposes of Alaska Native customary and traditional uses, as well as road construction deemed necessary by a federally recognized Tribe for access to Alaska Native cultural sites. This type of use would also be allowed in Timber Priority areas, which allow all timber harvest and road construction.

Figure E-29
Whale Pass' Community Use Area

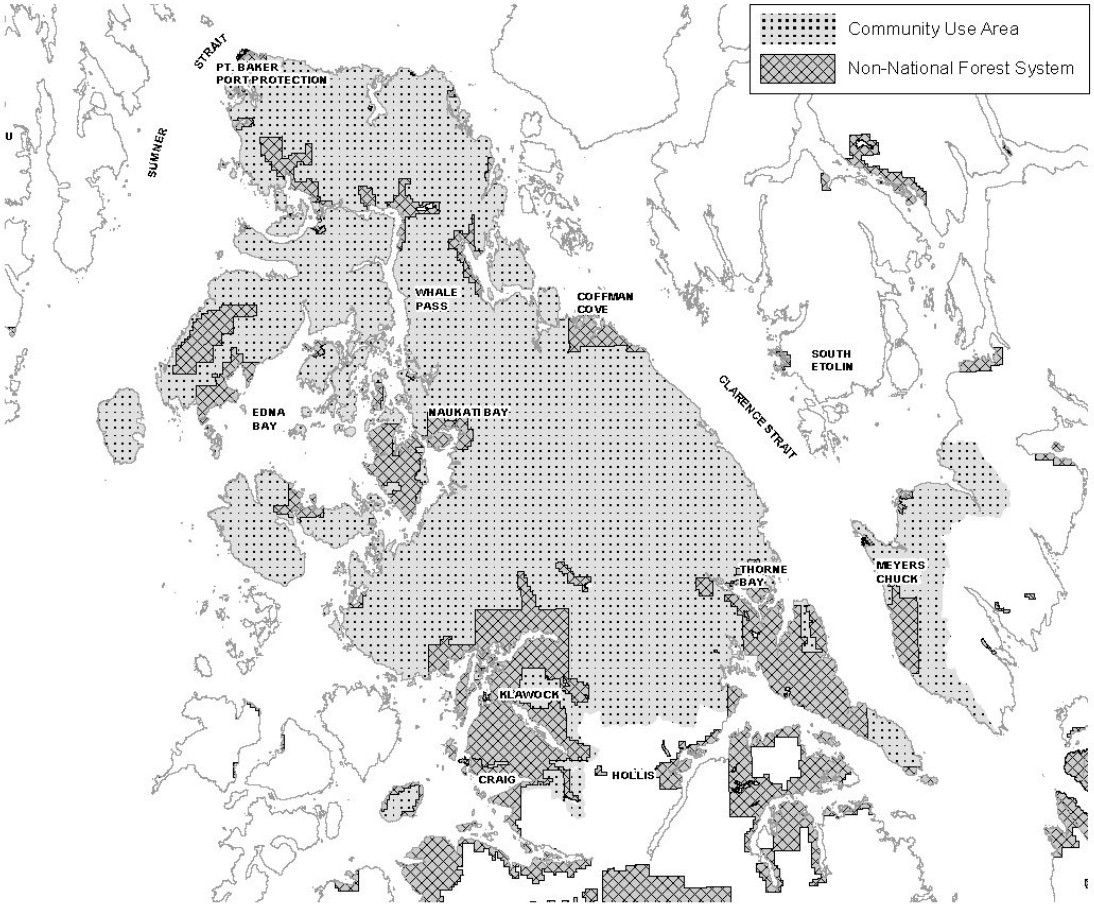

Table E-103
Roadless Areas, ARA Management Categories, and Development Opportunity in Whale Pass' Community Use Area

Roadless Category (acres)	Alternative					
	1	2	3	4	5	6
Total Community Use Area	966,427	966,427	966,427	966,427	966,427	966,427
Total Roadless Area	452,295	437,535	257,783	370,574	275,582	0
Roadless Share	47%	45%	27%	38%	29%	0%
ARA Management Categories (acres)						
LUD II Priority	na	117,791	0	117,791	117,432	0
Watershed Priority	na	159,375	6,833	0	0	0
Roadless Priority	na	160,369	93,824	206,295	158,149	0
Community Priority	na	0	6,833	0	0	0
Timber Priority	na	0	0	46,488	0	0
Development Opportunity						
Development LUDs (acres)	327,188	340,112	388,475	388,803	493,687	493,694
Timber Opportunity (Acres Suitable for Harvest)						
Old-Growth	62,595	65,978	78,593	85,772	86,735	86,735
Young-Growth	127,013	128,256	128,312	128,368	128,398	128,655
Estimated Harvest over 100 Years (acres)						
Old-Growth	13,480	12,748	11,837	11,038	10,957	10,957
Young-Growth	108,142	105,630	104,548	104,550	104,040	103,302

na = not applicable

Not all acres removed from roadless management would be available for development. The change in acres in development LUDs serves as a measure of development potential as it presently exists by alternative. Approximately 34 percent (327,200 acres) of the Whale Pass CUA is presently managed in development LUDs. This total would increase under all action alternatives, with net gains ranging from about 12,900 acres (Alternative 2) to 166,500 acres (Alternatives 5 and 6).

Suitable old-growth and young-growth acres available for harvest would increase under all action alternatives. Estimated net gains in suitable old-growth range from about 3,400 acres (Alternative 2) to 24,150 acres (Alternatives 5 and 6). Increases in suitable young-growth acres range from about 1,250 acres (Alternative 2) to 1,650 acres (Alternative 6), about 1 percent of the existing total in all cases.

Total acres harvested are assumed to remain constant across all alternatives. Estimated old-growth harvest totals in the Whale Pass CUA over 100 years range from about 11,000 acres (Alternatives 4 to 6) to 13,500 acres (Alternative 1). Young-growth harvest estimates range from about 103,300 acres (Alternative 6) to 108,150 acres (Alternative 1) (Table E-103).

Subsistence

No significant effect on salmon, other finfish, or invertebrate habitat capability is expected from implementation of any alternative. These resources account for 60 percent of the total edible pounds of subsistence resources harvested by Whale Pass households (Kruse and Frazier 1988). Marine resources (fish and marine invertebrates) accounted for 61 percent of per capita subsistence harvest in Whale Pass in 2012 (ADF&G 2018).

The 1988 TRUCS study found that deer account for 27 percent of the total edible pounds of subsistence resources harvested by Whale Pass households (Kruse and Frazier 1988). Deer accounted for 29 percent of per capita subsistence harvest by Whale Pass residents in 2012 (ADF&G 2018).

Residents of Whale Pass harvest the majority (72 percent) of their deer from two WAAs in north Prince of Wales Island (1530 and 1527). As shown in Table E-104, the Whale Pass portion represents about 15 percent and 11 percent of the total harvest and about 32 percent and 18 percent of the rural hunter harvest in these WAAs, respectively. About 51 percent of the combined harvest in these WAAs is by non-rural hunters, suggesting that there is a harvest buffer that could be restricted, if necessary, before restrictions are placed on rural harvests.

WAAs 1530 and 1527 occur in an area with substantial past timber harvest and, therefore, deer habitat capabilities are currently estimated to be below 1954 levels. The 2016 Forest Plan Amendment EIS analysis found that additional harvest that could occur under the current Forest Plan would reduce estimated habitat capabilities after 100 years by a further 2 to 4 percent (Table E-104).

Table E-104
Deer Harvest and Deer Habitat Capability on NFS Lands for the WAAs where Whale Pass Residents Obtain Approximately 75 Percent of their Average Annual Deer Harvest[1]

	Average Deer Harvest from 2004 to 2013			Deer Habitat Capability[3]		
WAA	Whale Pass Residents	All Rural Hunters[2]	All Hunters	2014	After 100 Years of Implementation	Change
1530	18	57	124	61%	57%	-4%
1527	3	17	27	72%	70%	-2%

[1] Calculated based on harvest where location is known.
[2] The category "All Rural Hunters" includes residents of Southeast Alaska communities, excluding the cities of Juneau and Ketchikan.
[3] Deer habitat capability in 2014 and after 100 Years of full implementation is expressed as a percent of the 1954 habitat capability. Data presented for 100 Years of Implementation are estimates developed for the current Forest Plan in the 2016 Forest Plan Amendment EIS (USDA Forest Service 2016).

The 2016 Forest Plan Amendment EIS analysis found that use of most subsistence resources by Whale Pass residents (fish and marine invertebrates) was not expected to be affected by any of the alternatives.

Based on the Deer Availability and Anticipated Demand analysis completed for the 1997 Forest Plan EIS, the 2016 analysis found that subsistence use of deer may be affected to the point that some restriction in hunting might be necessary over the long term, especially for non-rural hunters. The risk of hunting restrictions would be reduced somewhat, through more intensive management (e.g., thinning) of the existing and future closed-canopy, young-growth forests in this area. Indirect effects associated with increased competition for deer within the Whale Pass subsistence use areas could also occur if hunters from other communities were displaced due to timber harvest activity.

Suitable old-growth acres would increase relative to Alternative 1 in both of the WAAs under all of the action alternatives (Table E-105). However, projected old-growth harvest would decrease relative to Alternative 1 in these WAAs under all of the action alternatives (Table E-106). Overall projected harvest and relative changes under the action alternatives are small and not expected to affect the findings of the 2016 Forest Plan Amendment EIS.

Table E-105
Suitable Old-Growth by WAA and Alternative for the WAAs where Whale Pass Residents Obtain Approximately 75 Percent of their Average Annual Deer Harvest

			Change from Alternative 1 (Acres)				
WAA	**Total Acres**	**Alt 1**	**Alt 2**	**Alt 3**	**Alt 4**	**Alt 5**	**Alt 6**
1530	59,420	4,250	170	330	330	330	330
1527	33,730	2,100	350	350	590	590	590

Table E-106
Projected Old-Growth Harvest by WAA and Alternative for the WAAs where Whale Pass Residents Obtain Approximately 75 Percent of their Average Annual Deer Harvest

			Change from Alternative 1 (Acres)				
WAA	**Total Acres**	**Alt 1**	**Alt 2**	**Alt 3**	**Alt 4**	**Alt 5**	**Alt 6**
1530	59,420	1,270	(70)	(270)	(400)	(420)	(420)
1527	33,730	630	30	(90)	(120)	(130)	(130)

Wrangell (Kaachxana.áak'w)

Community Use Area

Wrangell's CUA encompasses a total of 824,250 acres (Figure E-30). Approximately 40 percent is presently managed as roadless (Table E-107). This share would drop to 15 percent under Alternative 5, with no acres managed as roadless under Alternative 6. Alternative 4 includes ARA acres that would be managed as Timber Priority and allow timber harvest and road building. Timber Priority acres account for 21 percent of the ARA in the Wrangell CUA. Areas allocated to Roadless Priority and Community Priority would explicitly allow the cutting, utilization, customary trade, and removal of trees for the purposes of Alaska Native customary and traditional uses, as well as road construction deemed necessary by a federally recognized Tribe for access to Alaska Native cultural sites. This type of use would also be allowed in Timber Priority areas, which allow all timber harvest and road construction.

Figure E-30
Wrangell's Community Use Area

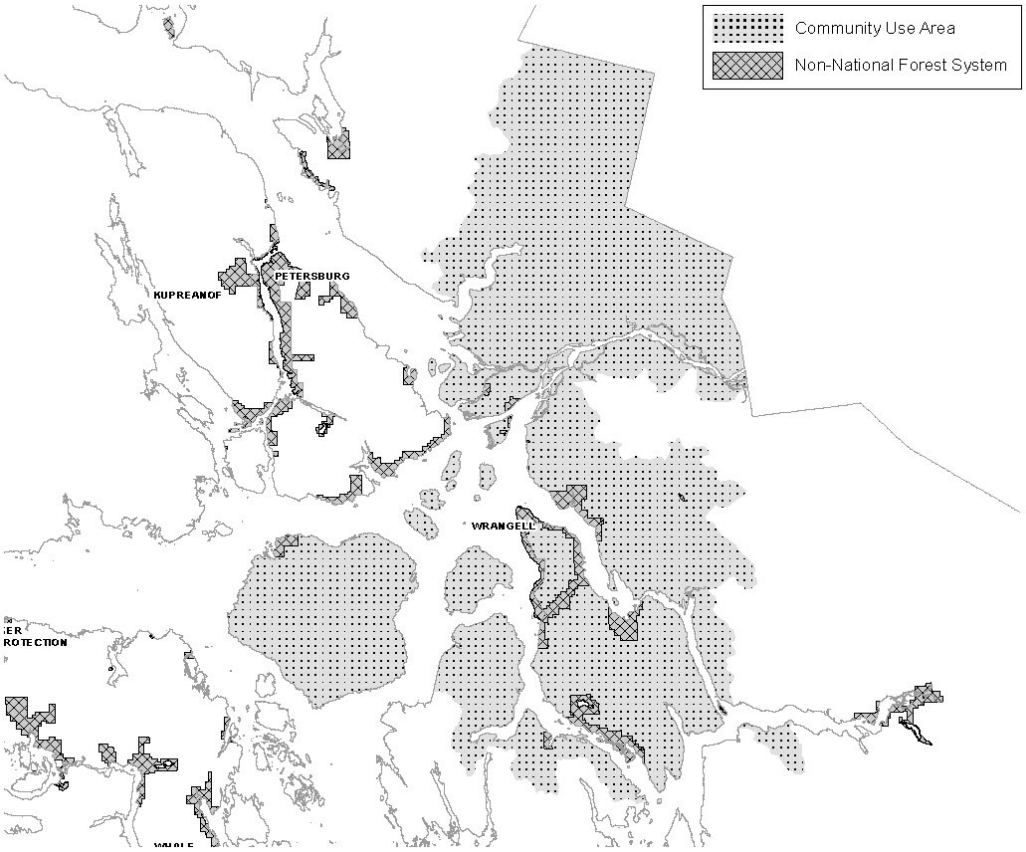

Table E-107
Roadless Areas, ARA Management Categories, and Development Opportunity in Wrangell's Community Use Area

Roadless Category (acres)	Alternative					
	1	2	3	4	5	6
Total Community Use Area	824,250	824,250	824,250	824,250	824,250	824,250
Total Roadless Area	327,483	307,283	273,535	273,064	124,798	0
Roadless Share	40%	37%	33%	33%	15%	0%
ARA Management Categories (acres)						
LUD II Priority	na	5	0	5	5	0
Watershed Priority	na	184,944	24,677	0	0	0
Roadless Priority	na	122,333	73,877	215,139	124,793	0
Community Priority	na	0	24,677	0	0	0
Timber Priority	na	0	0	57,919	0	0
Development Opportunity						
Development LUDs (acres)	102,384	119,916	146,985	146,987	294,305	294,327
Timber Opportunity (Acres Suitable for Harvest)						
Old-Growth	25,607	29,375	39,741	46,595	46,698	46,698
Young-Growth	26,134	27,921	28,094	28,151	28,308	28,736
Estimated Harvest over 100 Years (acres)						
Old-Growth	4,793	4,891	4,888	4,929	4,856	4,856
Young-Growth	22,251	22,995	22,891	22,928	22,938	23,073

na = not applicable

Not all acres removed from roadless management would be available for development. The change in acres in development LUDs serves as a measure of development potential as it presently exists by alternative. Approximately 12 percent (102,400 acres) of the Wrangell CUA is presently managed in development LUDs. This total would increase under all action alternatives, with net gains ranging from about 17,500 acres (Alternative 2) to 192,000 acres (Alternatives 5 and 6).

Suitable old-growth and young-growth acres available for harvest would increase under all action alternatives. Estimated net gains in suitable old-growth range from about 3,800 acres (Alternative 2) to 21,100 acres (Alternatives 5 and 6). Increases in suitable young-growth acres range from about 1,800 acres (Alternative 2) to 2,600 acres (Alternative 6).

Total acres harvested are assumed to remain constant across all alternatives. Estimated old-growth harvest totals in the Wrangell CUA over 100 years are similar for all alternatives, ranging from about 4,800 acres (Alternative 1) to 4,950 acres (Alternative 6). Young-growth harvest estimates range from about 22,250 acres (Alternative 1) to 23,100 acres (Alternative 6) (Table E-107).

Subsistence

No significant effect on salmon, other finfish, or invertebrate habitat capability is expected from implementation of any alternative. These resources account for 52 percent of the total edible pounds of subsistence resources harvested by Wrangell households (Kruse and Frazier 1988). Marine resources (fish and marine invertebrates) accounted for 71 percent of per capita subsistence harvest in Wrangell in 2000 (ADF&G 2018).

The 1988 TRUCS study found that deer account for 21 percent of the total edible pounds of subsistence resources harvested by Wrangell households (Kruse and Frazier 1988). Deer accounted for 17 percent of per capita subsistence harvest by Wrangell residents in 2000 (ADF&G 2018).

Deer harvest by Wrangell residents is spread over many WAAs, but the majority (76 percent) of their deer are from six WAAs located on Wrangell and surrounding islands. Zarembo Island (WAA 1905) alone accounted for 39 percent of the annual average deer harvest by Wrangell residents from 2004 to 2013. The Wrangell portion of the harvest in these six WAAs represents about 76 percent of the total harvest and about 85 percent of the rural hunter harvest (Table E-108).

The majority of the WAAs used heavily by Wrangell residents are in areas with substantial past harvest and deer habitat capabilities are currently estimated to be considerably below 1954 levels (Table E-108). The 2016 Forest Plan Amendment EIS found that additional harvest that could occur under the current Forest Plan would further reduce estimated habitat capabilities after 100 years in four of the WAAs by 1 to 6 percent (Table E-108).

Table E-108
Deer Harvest and Deer Habitat Capability on NFS Lands for the WAAs where Wrangell Residents Obtain Approximately 75 Percent of their Average Annual Deer Harvest[1]

	Average Deer Harvest from 2004 to 2013			Deer Habitat Capability[3]		
WAA	Wrangell Residents	All Rural Hunters[2]	All Hunters	2014	After 100 Years of Implementation	Change
1905	170	190	204	73%	68%	71%
1903	67	69	72	84%	80%	82%
1901	53	56	62	90%	89%	89%
1003	15	28	44	59%	55%	58%
1528	12	30	36	78%	76%	78%
1904	12	12	14	66%	67%	66%

[1] Calculated based on harvest where location is known.
[2] The category "All Rural Hunters" includes residents of Southeast Alaska communities, excluding the cities of Juneau and Ketchikan.
[3] Deer habitat capability in 2014 and after 100 Years of full implementation is expressed as a percent of the 1954 habitat capability. Data presented for 100 Years of Implementation are estimates developed for the current Forest Plan in the 2016 Forest Plan Amendment EIS (USDA Forest Service 2016).

The 2016 Forest Plan Amendment EIS analysis found that use of most subsistence resources by Wrangell residents (fish and marine invertebrates) was not expected to be affected by any of the alternatives. Based on the Deer Availability and Anticipated Demand analysis completed for the 1997 Forest Plan EIS, the 2016 analysis found that subsistence use of deer may be affected to the point that some restriction on hunting might be necessary over the long term, especially for non-rural hunters. The risk of hunting restrictions would be reduced somewhat, through more intensive management (e.g., thinning) of the existing and future closed-canopy, young-growth forests in this area.

Suitable old-growth acres would increase relative to Alternative 1 in four of the six WAAs under all of the action alternatives (Table E-109). Projected old-growth harvest would increase relative to Alternative 1 in two WAAs under most of the action alternatives, with relative decreases projected for three others (Table E-110). These relative changes in projected harvest are small and none of the alternatives are expected to affect the findings of the 2016 Forest Plan Amendment EIS.

Table E-109
Suitable Old-Growth by WAA and Alternative for the WAAs where Wrangell Residents Obtain Approximately 75 Percent of their Average Annual Deer Harvest

			Change from Alternative 1 (Acres)				
WAA	**Total Acres**	**Alt 1**	**Alt 2**	**Alt 3**	**Alt 4**	**Alt 5**	**Alt 6**
1905	116,400	8,960	910	1,060	3,570	3,660	3,660
1903	113,540	4,550	1,060	4,010	4,010	4,010	4,010
1901	132,790	2,560	30	1,190	2,520	3,450	3,450
1003	40,620	4,100	140	140	260	260	260
1528	24,750	10	-	10	10	10	10
1904	22,930	440	-	-	-	-	-

Table E-110
Projected Old-Growth Harvest by WAA and Alternative for the WAAs where Wrangell Residents Obtain Approximately 75 Percent of their Average Annual Deer Harvest

			Change from Alternative 1 (Acres)				
WAA	**Total Acres**	**Alt 1**	**Alt 2**	**Alt 3**	**Alt 4**	**Alt 5**	**Alt 6**
1905	116,400	2,670	-	(480)	(300)	(320)	(320)
1903	113,540	1,360	160	510	260	230	230
1901	132,790	760	(60)	60	200	360	360
1003	40,620	1,220	(70)	(290)	(390)	(410)	(410)
1528	24,750	-	-	-	-	-	-
1904	22,930	130	(10)	(30)	(50)	(50)	(50)

Yakutat (Yaakwdáat)

Community Use Area

Yakutat's CUA encompasses a total of 249,048 acres (Figure E-31). About half of this area (53 percent) is presently managed as roadless (Table E-111). This share would drop to 43 percent under Alternatives 3 to 5, with no acres managed as roadless under Alternative 6. Alternative 4 includes ARA acres that would be managed as Timber Priority and allow timber harvest and road building. Timber Priority acres account for 17 percent of the ARA in the Yakutat CUA. Areas allocated to Roadless Priority and Community Priority would explicitly allow the cutting, utilization, customary trade, and removal of trees for the purposes of Alaska Native customary and traditional uses, as well as road construction deemed necessary by a federally recognized Tribe for access to Alaska Native cultural sites. This type of use would also be allowed in Timber Priority areas, which allow all timber harvest and road construction.

Figure E-31
Yakutat's Community Use Area

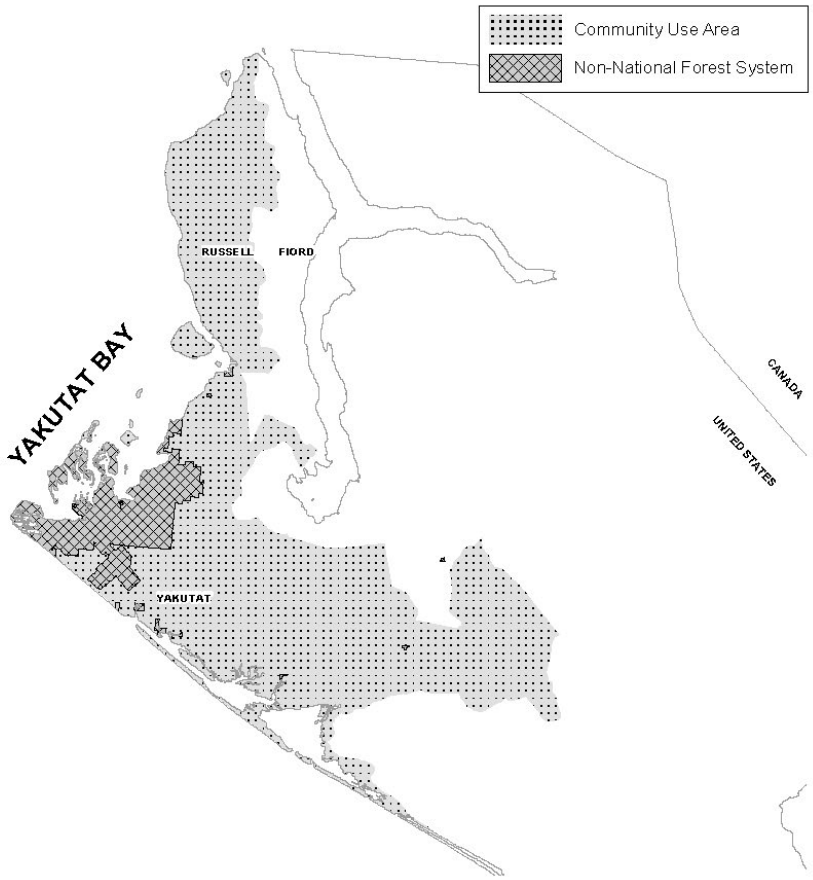

Table E-111
Roadless Areas, ARA Management Categories, and Development Opportunity in Yakutat's Community Use Area

	Alternative					
Roadless Category (acres)	**1**	**2**	**3**	**4**	**5**	**6**
Total Community Use Area	249,048	249,048	249,048	249,048	249,048	249,048
Total Roadless Area	132,814	125,945	107,997	107,201	106,669	0
Roadless Share	53%	51%	43%	43%	43%	0%
ARA Management Categories (acres)						
LUD II Priority	na	35	0	35	35	0
Watershed Priority	na	88,239	28,951	0	0	0
Roadless Priority	na	37,671	565	88,948	106,634	0
Community Priority	na	0	28,951	0	0	0
Timber Priority	na	0	0	18,218	0	0
Development Opportunity						
Development LUDs (acres)	16,107	18,721	18,721	18,721	37,166	37,166
Timber Opportunity (Acres Suitable for Harvest)						
Old-Growth	62	63	63	63	63	63
Young-Growth	3,882	3,905	5,812	5,544	5,383	5,822
Estimated Harvest over 100 Years (acres)						
Old-Growth	7	7	6	4	4	4
Young-Growth	3,305	3,216	4,736	4,515	4,362	4,675

na = not applicable

Not all acres removed from roadless management would be available for development. The change in acres in development LUDs serves as a measure of development potential as it presently exists by alternative. Approximately 6 percent (16,100 acres) of the Yakutat CUA is presently managed in development LUDs. This total would increase under all action alternatives, with net gains ranging from about 2,600 acres (Alternatives 2 through 4) to 21,100 acres (Alternatives 5 and 6).

Suitable old-growth acres available for harvest would remain at current negligible levels (less than 100 acres) under all alternatives. Estimated increases in suitable young-growth acres range up to about 1,950 acres (Alternatives 3 and 6).

Total acres harvested are assumed to remain constant across all alternatives. No old-growth harvest is estimated to occur in the Yakutat CUA over 100 years. Young-growth harvest estimates range from about 3,200 acres (Alternative 2) to 4,700 acres (Alternatives 3 and 6) (Table E-111).

Subsistence

No significant effect on salmon, other finfish, or invertebrate habitat capability is expected from implementation of any alternative. These resources account for 82 percent of the total edible pounds of subsistence resources harvested by Yakutat households (Kruse and Frazier 1988). Marine resources (fish and marine invertebrates) accounted for 74 percent of per capita subsistence harvest in Yakutat in 2000 (ADF&G 2018).

Moose are more important than deer as a subsistence meat source for Yakutat residents. Moose availability would not be significantly affected under any of the alternatives.

The 1988 TRUCS study found that deer account for only a small fraction of the total edible pounds of subsistence resources harvested by Yakutat households (Kruse and Frazier 1988). Deer accounted for 1 percent of per capita subsistence harvest by Yakutat residents in 2000 (ADF&G 2018).

Yakutat residents harvested an annual average of 36 deer from 2004 to 2013, with four WAAs accounting for 76 percent of this annual average (Table E-112). The 2016 Forest Plan Amendment EIS analysis found that the estimated habitat capabilities in these WAAs would not be affected by the current Forest Plan.

Table E-112
Deer Harvest and Deer Habitat Capability on NFS Lands for the WAAs where Yakutat Residents Obtain Approximately 75 Percent of their Average Annual Deer Harvest[1]

	Average Deer Harvest from 2004 to 2013			Deer Habitat Capability[3]		
WAA	Yakutat Residents	All Rural Hunters[2]	All Hunters	2014	After 100 Years of Implementation	Change
4504	15	15	17	100%	100%	0%
4508	7	7	7	94%	94%	0%
3315	3	38	46	84%	84%	0%
3835	3	5	141	100%	100%	0%

[1] Calculated based on harvest where location is known.
[2] The category "All Rural Hunters" includes residents of Southeast Alaska communities, excluding the cities of Juneau and Ketchikan.
[3] Deer habitat capability in 2014 and after 100 Years of full implementation is expressed as a percent of the 1954 habitat capability. Data presented for 100 Years of Implementation are estimates developed for the current Forest Plan in the 2016 Forest Plan Amendment EIS (USDA Forest Service 2016).

The 2016 Forest Plan Amendment EIS analysis found that use of most subsistence resources by Wrangell residents (fish and marine invertebrates) was not expected to be affected by any of the alternatives. Based on the Deer Availability and Anticipated Demand analysis completed for the 1997 Forest Plan EIS, the 2016 analysis found that subsistence use of deer may be affected to the point that some restriction in hunting might be necessary over the long term, especially for non-rural hunters. The risk of hunting restrictions would be reduced somewhat, through more intensive management (e.g., thinning) of the existing and future closed-canopy, young-growth forests in this area.

Suitable old-growth acres would increase relative to Alternative 1 in one of the four WAAs under all of the action alternatives (Table E-113). Projected old-growth harvest would be negligible under all of the alternatives and none of the alternatives are expected to affect the findings of the 2016 Forest Plan Amendment EIS (Table E-114).

Table E-113
Suitable Old-Growth by WAA and Alternative for the WAAs where Yakutat Residents Obtain Approximately 75 Percent of their Average Annual Deer Harvest

			Change from Alternative 1 (Acres)				
WAA	**Total Acres**	**Alt 1**	**Alt 2**	**Alt 3**	**Alt 4**	**Alt 5**	**Alt 6**
4504	840	-	-	-	-	-	-
4508	281,260	60	-	-	-	-	-
3315	43,580	990	30	30	2,080	2,080	2,080
3835	31,260	-	-	-	-	-	-

Table E-114
Projected Old-Growth Harvest by WAA and Alternative for the WAAs where Yakutat Residents Obtain Approximately 75 Percent of their Average Annual Deer Harvest

			Change from Alternative 1 (Acres)				
WAA	**Total Acres**	**Alt 1**	**Alt 2**	**Alt 3**	**Alt 4**	**Alt 5**	**Alt 6**
4504	840	-	-	-	-	-	-
4508	281,260	10	-	-	(10)	(10)	(10)
3315	43,580	110	-	(20)	90	80	80
3835	31,260	-	-	-	-	-	-

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APPENDIX F
TRADITIONAL TERRITORIES

Appendix F
Traditional Territories

Abstract

Completed during 1946 and released during 1947, Goldschmidt and Haas' federal government landmark report titled *Possessory Rights of the Natives of Southeastern Alaska* was an early and comprehensive ethnographic study of Southeast Alaska's Tlingit and Haida peoples. The report was crafted during a period of time in Alaska's history when commercial interests were working to secure additional lands and there was a need to collect evidence of Alaska Native land rights. Responding to the need to understand Alaska Native land use and possession, Goldschmidt and Haas carried out ethnographic research, qualitative interviews, and onsite observations to determine Southeast Alaska lands possessed by Tlingit and Haida peoples as evidenced by actual use and occupancy. In the decades that followed, the Goldschmidt and Haas report and associated maps served as the authority on the geographic areas used and occupied by Southeast Alaska's Haida and Tlingit villages – and remains relevant today.

In addition to geographic analysis, Goldschmidt and Haas also made significant anthropological contributions regarding Tlingit and Haida culture, society, and patterns of behavior. They concluded Tlingit and Haida Indians had continuously used and occupied Southeast from south of the Copper River to the southern tip of the Alexander Archipelago. Tlingit and Haida societies were some of the most developed and complex indigenous societies in the United States and Canada, rich in ceremony and art and complex in social, legal, and political systems. Furthermore, Tlingit and Haida societies had a well-defined system of property ownership with land held by the clan or house group, with joint use extended to family. Land title was obtained by inheritance or as legal settlement for damages – not bought and sold. Land title was recorded with elaborate ceremonies, which served the purpose of publicly-acknowledging land ownership. Land title and associated rights were also sometimes recorded as carvings on totem poles. During 1946, Goldschmidt and Haas compelled Southeast Alaska lands still used and occupied by Alaska Natives should be safeguarded without further delay.

Goldschmidt and Haas' landmark ethnographic study remains relevant today as a comprehensive and historical study of land use, occupancy, and possession by Tlingit and Haida peoples across Southeast Alaska. Of noteworthy importance, the Sealaska Heritage Foundation reprinted the original report and associated maps during 1998 under the *title Haa Aani: Tlingit and Haida Land Rights and Use* with additional introductory statements, original Alaska Native witness statements, and final reflections by Goldschmidt.

Citation

Goldschmidt, Water R. and Hass, Theodore H. 1946. *Possessory Rights of Natives of Southeastern Alaska*. A Report to the Commissioner of Indian Affairs. Washington, DC. 176 pages, 13 charts and maps, 6 photographs, and 2 appendices.

Goldschmidt, Walter R. and Haas, Theodore H. 1998. *Haa Aani, Our Land: Tlingit and Haida Land Rights and Use*. Seattle, WA: University of Washington Press/Sealaska Heritage Foundation.

Appendix F

Figure F-1
Goldschmidt and Haas associated map depicting the geographic areas used and occupied by Southeast Alaska's Haida and Tlingit villages (1946).

APPENDIX G
ROADLESS RULE REGULATORY LANGUAGE BY ALTERNATIVE

Appendix G
Roadless Rule Regulatory Language by Alternative

Introduction

The following provides representational rule language for Alternatives 2 through 6. Final rule language could vary from what is presented in this Appendix based on comments received and other considerations. The 2001 Roadless Rule would remain in effect nation-wide except for Alaska, Colorado, and Idaho if one of the action alternatives were selected.

Alternative 1 – No Action

Subpart B—Protection of Inventoried Roadless Areas as published in the Federal Register on January 12, 2001 (66 FR 3244) as reinstated by Order of the US District Court for the District of Alaska.

§ 294.10 Purpose.

The purpose of this subpart is to provide, within the context of multiple use management, lasting protection for inventoried roadless areas within the National Forest System.

§ 294.11 Definitions.

The following terms and definitions apply to this subpart:

Inventoried roadless areas. Areas identified in a set of inventoried roadless area maps, contained in Forest Service Roadless Area Conservation, Final Environmental Impact Statement, Volume 2, dated November 2000, which are held at the National headquarters office of the Forest Service, or any subsequent update or revision of those maps.

Responsible official. The Forest Service line officer with the authority and responsibility to make decisions regarding protection and management of inventoried roadless areas pursuant to this subpart.

Road. A motor vehicle travelway over 50 inches wide, unless designated and managed as a trail. A road may be classified, unclassified, or temporary.

> (1) Classified road. A road wholly or partially within or adjacent to National Forest System lands that is determined to be needed for long-term motor vehicle access, including State roads, county roads, privately owned roads, National Forest System roads, and other roads authorized by the Forest Service.
>
> (2) Unclassified road. A road on National Forest System lands that is not managed as part of the forest transportation system, such as unplanned roads, abandoned travelways, and off-road vehicle tracks that have not been designated and managed as a trail; and those roads that were once under permit or other authorization and were not decommissioned upon the termination of the authorization.
>
> (3) Temporary road. A road authorized by contract, permit, lease, other written authorization, or emergency operation, not intended to be part of the forest transportation system and not necessary for long-term resource management.

Road construction. Activity that results in the addition of forest classified or temporary road miles.

Road maintenance. The ongoing upkeep of a road necessary to retain or restore the road to the approved road management objective.

Road reconstruction. Activity that results in improvement or realignment of an existing classified road defined as follows:

(1) Road improvement. Activity that results in an increase of an existing road's traffic service level, expansion of its capacity, or a change in its original design function.

(2) Road realignment. Activity that results in a new location of an existing road or portions of an existing road, and treatment of the old roadway.

Roadless area characteristics. Resources or features that are often present in and characterize inventoried roadless areas, including:

(1) High quality or undisturbed soil, water, and air;

(2) Sources of public drinking water;

(3) Diversity of plant and animal communities;

(4) Habitat for threatened, endangered, proposed, candidate, and sensitive species and for those species dependent on large, undisturbed areas of land;

(5) Primitive, semi-primitive nonmotorized and semi-primitive motorized classes of dispersed recreation;

(6) Reference landscapes;

(7) Natural appearing landscapes with high scenic quality;

(8) Traditional cultural properties and sacred sites; and

(9) Other locally identified unique characteristics.

§ 294.12 Prohibition on road construction and road reconstruction in inventoried roadless areas.

(a) A road may not be constructed or reconstructed in inventoried roadless areas of the National Forest System, except as provided in paragraph (b) of this section.

(b) Notwithstanding the prohibition in paragraph (a) of this section, a road may be constructed or reconstructed in an inventoried roadless area if the Responsible Official determines that one of the following circumstances exists:

(1) A road is needed to protect public health and safety in cases of an imminent threat of flood, fire, or other catastrophic event that, without intervention, would cause the loss of life or property;

(2) A road is needed to conduct a response action under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) or to conduct a natural resource restoration action under CERCLA, Section 311 of the Clean Water Act, or the Oil Pollution Act;

(3) A road is needed pursuant to reserved or outstanding rights, or as provided for by statute or treaty;

(4) Road realignment is needed to prevent irreparable resource damage that arises from the design, location, use, or deterioration of a classified road and that cannot be mitigated by road maintenance. Road realignment may occur under this paragraph only if the road is deemed essential for public or private access, natural resource management, or public health and safety;

(5) Road reconstruction is needed to implement a road safety improvement project on a classified road determined to be hazardous on the basis of accident experience or accident potential on that road;

(6) The Secretary of Agriculture determines that a Federal Aid Highway project, authorized pursuant to Title 23 of the United States Code, is in the public interest or is consistent with the purposes for which the land was reserved or acquired and no other reasonable and prudent alternative exists; or

(7) A road is needed in conjunction with the continuation, extension, or renewal of a mineral lease on lands that are under lease by the Secretary of the Interior as of January 12, 2001 or for a new lease issued immediately upon expiration of an existing lease. Such road construction or reconstruction must be conducted in a manner that minimizes effects on surface resources, prevents unnecessary or unreasonable surface disturbance, and complies with all applicable lease requirements, land and resource management plan direction, regulations, and laws. Roads constructed or reconstructed pursuant to this paragraph must be obliterated when no longer needed for the purposes of the lease or upon termination or expiration of the lease, whichever is sooner.

(c) Maintenance of classified roads is permissible in inventoried roadless areas.

§ 294.13 Prohibition on timber cutting, sale, or removal in inventoried roadless areas.

(a) Timber may not be cut, sold, or removed in inventoried roadless areas of the National Forest System, except as provided in paragraph (b) of this section.

(b) Notwithstanding the prohibition in paragraph (a) of this section, timber may be cut, sold, or removed in inventoried roadless areas if the Responsible Official determines that one of the following circumstances exists. The cutting, sale, or removal of timber in these areas is expected to be infrequent.

(1) The cutting, sale, or removal of generally small diameter timber is needed for one of the following purposes and will maintain or improve one or more of the roadless area characteristics as defined in § 294.11.

(i) To improve threatened, endangered, proposed, or sensitive species habitat; or

(ii) To maintain or restore the characteristics of ecosystem composition and structure, such as to reduce the risk of uncharacteristic wildfire effects, within the range of variability that would be expected to occur under natural disturbance regimes of the current climatic period;

(2) The cutting, sale, or removal of timber is incidental to the implementation of a management activity not otherwise prohibited by this subpart;

(3) The cutting, sale, or removal of timber is needed and appropriate for personal or administrative use, as provided for in 36 CFR part 223; or

(4) Roadless characteristics have been substantially altered in a portion of an inventoried roadless area due to the construction of a classified road and subsequent timber harvest. Both the road construction and subsequent timber harvest must have occurred after the area was designated an inventoried roadless area and prior to January 12, 2001. Timber may be cut, sold, or removed only in the substantially altered portion of the inventoried roadless area.

§ 294.14 Scope and applicability.

(a) This subpart does not revoke, suspend, or modify any permit, contract, or other legal instrument authorizing the occupancy and use of National Forest System land issued prior to January 12, 2001.

(b) This subpart does not compel the amendment or revision of any land and resource management plan.

(c) This subpart does not revoke, suspend, or modify any project or activity decision made prior to January 12, 2001.

(d) This subpart does not apply to road construction, reconstruction, or the cutting, sale, or removal of timber in inventoried roadless areas on the Tongass National Forest if a notice of availability of a draft

environmental impact statement for such activities has been published in the Federal Register prior to January 12, 2001.

(e) The prohibitions and restrictions established in this subpart are not subject to reconsideration, revision, or rescission in subsequent project decisions or land and resource management plan amendments or revisions undertaken pursuant to 36 CFR part 219.

(f) If any provision of the rules in this subpart or its application to any person or to certain circumstances is held invalid, the remainder of the regulations in this subpart and their application remain in force.

Table G-1
2001 Inventoried Roadless Area name and approximate acres contained within that are subject to the prohibitions and exemptions of Alternative 1 (No Action).

2001 Inventoried Roadless Area Name	Acres
Aaron	78,700
Anan	36,700
Bay of Pillars	27,500
Behm Islands	4,800
Brabazon Addition	498,700
Bradfield	199,000
Calder	9,900
Camden	36,800
Carroll	11,400
Castle	49,300
Central Wrangell	13,400
Chichagof	555,800
Chilkat-West Lynn Canal	199,700
Christoval	9,100
Cleveland	189,400
Cone	128,400
Crystal	19,000
Dall Island	105,800
Douglas Island	28,100
Duke	45,100
East Kuiu	27,600
East Mitkof	8,800
East Wrangell	7,600
East Zarembo	10,800
El Capitan	26,700
Eudora	195,000
Fake Pass	500
Fanshaw	48,200
Five Mile	19,500
Freshwater Bay	44,900
Frosty	39,900
Game Creek	54,500
Gravina	37,400
Green Rocks	11,100
Greens Creek	27,200
Harding	174,300
Hoonah Sound	79,800
Hydaburg	11,200
Hyder	121,700
Juneau Urban	101,600
Juneau-Skagway Icefield	1,187,100
Kadin	2,000
Karta	52,100
Kasaan	7,600

Table G-1
2001 Inventoried Roadless Area name and approximate acres contained within that are subject to the prohibitions and exemptions of Alternative 1 (No Action).

2001 Inventoried Roadless Area Name	Acres
Kasaan Bay	7,400
Kashevarof Islands	4,700
Keku	10,900
Kogish	65,200
Kosciusko	64,100
Lindenberg	25,800
Madan	68,500
Mansfield Peninsula	55,000
Manzanita	8,400
McKenzie	83,100
Middle Kruzof	14,700
Missionary	16,700
Mosman	53,500
Neka Bay	7,100
Neka Mountain	6,100
North Baranof	314,000
North Cleveland	105,300
North Etolin	41,000
North Kruzof	33,100
North Kuiu	6,400
North Kupreanof	114,600
North Revilla	215,400
North Wrangell	8,100
Nutkwa	53,700
Outer Islands	99,900
Pavlof-East Point	5,400
Point Augusta	15,500
Point Craven	10,900
Port Alexander	120,700
Quartz	143,000
Ratz	5,300
Redoubt	68,300
Revilla	29,300
Rhine	23,000
Rocky Pass	78,100
Salmon Bay	22,800
Sarkar	51,900
Security	31,400
Sitka Sound	13,500
Sitka Urban	112,000
Soda Bay	78,100
South Etolin	26,300
South Kruzof	55,200
South Kuiu	62,400
South Kupreanof	216,800
South Revilla	52,100
South Wrangell	14,200
South Zarembo	36,300
Southeast Wrangell	18,400
Spires	533,700
Suemez Island	19,900
Sukkwan	44,400
Sullivan	67,300
Taku-Snettisham	664,900
Tenakee Ridge	20,500
Thorne River	73,000

Table G-1
2001 Inventoried Roadless Area name and approximate acres contained within that are subject to the prohibitions and exemptions of Alternative 1 (No Action).

2001 Inventoried Roadless Area Name	Acres
Trap Bay	13,200
Twelvemile	37,900
Upper Situk	16,800
West Wrangell	10,300
West Zarembo	6,800
Whitestone	5,600
Windham-Port Houghton	161,900
Woewodski	10,100
Woronkofski	11,100
Yakutat Forelands	323,500

Alternative 2

Subpart E – Alaska Roadless Area Management

§294.50 Purpose.

The purpose of this subpart is to provide, in the context of multiple-use management for the conservation of roadless areas within the Tongass National Forest while providing for local concerns, including economic and community development. This subpart sets forth the procedures for management of Alaska Roadless Areas.

§294.51 Definitions.

The following terms and definitions apply to this subpart.

Alaska Native. Federally recognized tribes or individuals that are enrolled or eligible to enroll as a member of a federally recognized tribe.

Alaska Roadless Areas. Lands within the Tongass National Forest designated pursuant to this subpart and identified in a set of maps maintained by the national headquarters office of the Forest Service.

Commercial Old Growth Timber Harvest. Trees, portions of trees, and other forest products originating from old growth stands on National Forest System lands that may be sold for the purpose of achieving the policies set forth in the Multiple-Use Sustained-Yield Act of 1960, as amended, the Forest and Rangeland Renewable Resources Planning Act of 1974, as amended, and the program thereunder. (See 36 CFR 223.1).

Community utility system. A system that provides a community or communities with services for public use or consumption such as municipal water and wastewater systems, biomass heating and energy systems, transmission lines, and hydroelectric and other renewable energy projects and related infrastructure.

Responsible official. The Forest Service line officer with the authority to make and implement a decision on a proposed action.

Road. As defined at 36 CFR 212.1, the term means a motor vehicle route over 50 inches wide, unless identified and managed as a trail.

Road construction and reconstruction. As defined at 36 CFR 212.1, the terms mean supervising, inspecting, building, and incurrence of all costs incidental to the construction or reconstruction of a road.

Roadless Area Characteristics. Resources or features that are often present in and characterize Alaska Roadless Areas, including

(1) *Physical Environment*. Roadless areas provide high-quality or undisturbed soil, water, and air.

(2) *Water*. Roadless areas provide a variety of water resources including public drinking water sources, fish and aquatic resources, and hatchery aquatic resources.

(3) *Diversity*. Roadless areas support a diversity of plant and animal communities including stands of old-growth forests.

(4) *Habitat*. Roadless areas are expansive areas where high-quality intact habitat exists and ecosystems function with all their native species and components. Roadless areas may serve as habitat for threatened, endangered, proposed, candidate, and species of conservation concern, and for those species dependent on large, undisturbed areas of land.

(5) *Remoteness*. Roadless areas provide rich primitive, semi-primitive motorized, and semi-primitive non-motorized classes of dispersed recreation, which are a source of ecological, social, and economic benefits.

(6) *Landscape*. Roadless areas provide reference landscapes of relatively undisturbed areas that serve as a barometer to measure the effects of development on other parts of the landscape.

(7) *Scenery*. Roadless areas have natural-appearing landscapes with high-scenic qualities that people value.

(8) *Cultural*. Roadless areas often include traditional cultural properties and sacred sites. In Alaska, indigenous peoples have been on national forests for more than 10,000 years and the forests have cultural significance.

(9) *Locally-unique characteristics*. Roadless areas represent geographic areas with additional locally-unique characteristics specific to Alaska, including: (a) important source of subsistence resources including terrestrial wildlife, waterfowl, mammals, fish, and plant-based resources; (b) rich habitat that supports multiple species of fish for personal, subsistence, sport, recreation, and commercial harvest; and (c) supports diverse economic opportunity that is especially important for rural community well-being.

Timber harvest. The cutting, removal, or sale of trees.

§294.52 Alaska Roadless Areas

(a) *Designations*. All National Forest System lands listed in § 294.57 are hereby designated as Alaska Roadless Areas. Alaska Roadless Areas established by this subpart shall constitute the exclusive set of National Forest System lands within the Tongass National Forest to which the provisions of this subpart shall apply.

(b) *Roadless area management designations*. Alaska Roadless Areas are subdivided into three roadless area management designations: LUD II Priority, Watershed Priority, and Roadless Priority.

§294.53 Road construction and reconstruction in Alaska Roadless Areas.

(a) A road may not be constructed or reconstructed in Alaska Roadless Areas, except as provided in paragraphs (b), (c), (d), and (e) of this section.

(b) *Alaska Roadless Areas*. Notwithstanding the prohibition in paragraph (a) of this section, road construction or reconstruction in any Alaska Roadless Area regardless of the roadless area management designation is allowed for the following exceptions:

(1) A mandatory road authorization pursuant to reserved or outstanding rights, or as provided for by statute or treaty. Examples of mandatory statutory authorizations include but are not limited to roads pursuant to the Alaska National Interest Lands Conservation Act (P.L. 96-487), Section 4407 of the Safe, Accountable, Flexible, Efficient Transportation Equity Act (P.L. 109-59);and General Mining Law of 1872 (as amended);

(2) A road to conduct a response action under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) or to conduct a natural resource restoration action under CERCLA, Section 311 of the Clean Water Act, or the Oil Pollution Act;

(3) A Federal Aid Highway project, authorized pursuant to Title 23 of the United States Code;

(4) A road realignment to prevent irreparable resource damage that arises from the design, location, use, or deterioration of a road and cannot be mitigated by road maintenance;

(5) A road reconstruction safety improvement project on a classified road; or

(6) A road to protect public health and safety in cases of an imminent threat of flood, fire, or other catastrophic event that, without intervention, would cause the loss of life or property.

(c) *LUD II Priority*. Notwithstanding the prohibition in paragraph (a) of this section, road construction or reconstruction in an Alaska Roadless Area designated as LUD II Priority is allowed if consistent with the legislated management restrictions established in Section 201 of the Tongass Timber Reform Act.

(d) *Watershed Priority*. With the exception of the authorities provided in paragraph (b), a road may not be constructed or reconstructed in an Alaska Roadless Area designated as Watershed Priority.

(e) *Roadless Priority*. Notwithstanding the prohibition in paragraph (a) of this section, road construction or reconstruction in an Alaska Roadless Area designated as Roadless Priority is allowed for the following exceptions:

(1) A road for the construction, expansion, or maintenance of facilities such as airports, marine access points, and communication equipment;

(2) A road to provide access to Alaska Native cultural site(s) if requested by an affected federally-recognized tribe(s);

(3) A road for transportation needs identified by the State of Alaska's Southeast Alaska Transportation Plan for the connection of communities and development of the regional transportation system;

(4) A road within a designated experimental forest for research or administration or to provide administrative access to a designated experimental forest;

(5) A road for the construction, expansion, or maintenance of a community utility system; or

(6) A road in conjunction with the construction, expansion, or maintenance of an authorized fishway, hatchery, or aquaculture facility.

§294.54 Timber harvest in Alaska Roadless Areas.

(a) Timber harvest is prohibited in Alaska Roadless Areas except as provided in paragraph (b), (c), (d), and (e) of this section.

(b) *Alaska Roadless Areas*. Notwithstanding the prohibition in paragraph (a) of this section, timber harvest in any Alaska Roadless Area regardless of the roadless area management designation is allowed for the following exceptions:

(1) Timber harvest conducted pursuant to reserved or outstanding rights or as provided for by statute or treaty,

(2) Timber harvest to protect public health and safety in cases of an imminent threat of flood, fire, or other catastrophic event that, without intervention, would cause the loss of life or property, including removal of hazard trees;

(3) Timber harvest for personal or administrative use, as provided for in 36 CFR part 223; or

(4) Timber harvest incidental to the implementation of a management activity not otherwise prohibited by this subpart, including the construction or reconstruction of a road pursuant to §294.53 or the construction, expansion, or maintenance of authorized fishways, fish hatcheries, and aquaculture facilities.

(c) *LUD II Priority*. Notwithstanding the prohibition in paragraph (a) of this section, timber harvest in an Alaska Roadless Area designated as LUD II Priority is allowed if consistent with the legislated management restrictions established in Section 201 of the Tongass Timber Reform Act.

(d) *Watershed Priority*. Notwithstanding the prohibitions in paragraph (a) of this section, timber harvest in an Alaska Roadless Area designated as Watershed Priority is allowed for the following exceptions:

(1) The cutting, customary trade, and removal of trees for the purposes of Alaska Native customary and traditional uses that does not degrade water quality, fish habitat, fish production, fish passage, aquatic diversity, or soil productivity;

(2) Timber harvest for one of the following purposes that will maintain, restore, or improve one or more of the purposes:

(i) To maintain, restore or improve fish and wildlife habitat; or

(ii) To maintain, restore, or improve the characteristics of ecosystem composition, structure, and processes; or

(3) Timber harvest is incidental to trail or recreation development that does not degrade water quality, fish habitat, fish production, fish passage, aquatic biodiversity, or soil productivity.

(e) *Roadless Priority*. Notwithstanding the prohibition in paragraph (a) of this section, timber harvest in an Alaska Roadless Area designated as Roadless Priority is allowed for the following exceptions:

(1) Timber harvest for the cutting, customary trade, and removal of trees for the purposes of Alaska Native customary and traditional uses;

(2) Timber harvest for one of the following purposes that will maintain, restore or improve one or more of the following purposes:

(i) To maintain, restore, or improve fish and wildlife habitat; or

(ii) To maintain, restore, or improve the characteristics of ecosystem composition, structure, and processes;

(3) Timber harvest within a designated experimental forest for research or administration; or

(4) Timber harvest for the construction, expansion, utilization, or maintenance of community utility systems; or

(5) Timber harvest is incidental to trail or recreation development that does not degrade water quality, fish habitat, fish production, fish passage, aquatic biodiversity, or soil productivity.

§294.55 Corrections and modifications.

Administrative correction or modification of designations made pursuant to this subpart may be made as follows:

(a) *Administrative corrections to boundaries*. The Chief of the Forest Service may issue administrative corrections to the boundaries or classifications of an Alaska Roadless Area after a 30-day public notice and opportunity to comment period. Administrative corrections are limited to adjustments that remedy clerical errors, typographical errors, mapping errors, or improvements in mapping technology.

(b) *Administrative modifications to Classifications and Boundaries*. The Chief of the Forest Service may issue modifications to the boundaries or classifications of an Alaska Roadless Area after a 45-day public notice and opportunity to comment period.

Appendix G

§294.56 Scope and applicability.

(a) After [final rule effective date], the Roadless Area Conservation Rule (66 FR 3244) published on January 12, 2001, shall have no effect within the Tongass National Forest.

(b) This subpart does not revoke, suspend, or modify any permit, contract, or other legal instrument authorizing the occupancy and use of National Forest System land issued prior to the effective date of this subpart.

(c) This subpart does not revoke, suspend, or modify any project or activity decision made prior to the effective date of this subpart.

(d) The provisions set forth in this subpart shall take precedence over any inconsistent land management plan component of the Tongass Land and Resource Management Plan. Land management plan components that are not inconsistent with this subpart will continue to provide guidance for projects and activities within Alaska Roadless Areas. This subpart does not compel the amendment or revision of any land management plan, but the Tongass Forest Supervisor shall issue a ministerial Notice of Administrative Change pursuant to 36 CFR 219.13(c) identifying plan changes made in conformance with the regulatory determinations of this subpart, including rescission of the portion of the December 9, 2016, Record of Decision concerning suitable timber lands attributed exclusively to implementation of the January 12, 2001, Roadless Area Conservation Rule (66 FR 3244).

(e) The prohibitions and permissions set forth in this subpart are not subject to reconsideration, revision, or rescission in subsequent project decisions or land and resource management plan amendments or revisions undertaken pursuant to 36 CFR part 219.

(f) Nothing in this subpart waives any applicable requirements regarding site-specific environmental analysis, public involvement, consultation with Tribes and other agencies, or compliance with other applicable laws.

(g) If any provision of the rules in this subpart or its application to any person or to certain circumstances is held invalid, the remainder of the regulations in this subpart and their application remain in force.

§294.57 List of designated Alaska Roadless Areas Alternative 2.

Table G-2
Alaska Roadless Area name and approximate acres contained within that are subject to the prohibitions and exemptions of Alternative 2.

Alaska Roadless Area Name	LUD II (Acres)	Watershed Priority (Acres)	Roadless Priority (Acres)
Aaron	58,900	0	20,500
Alaska Roadless Area Islands	10,900	3,500	15,500
Anan	0	37,900	0
Bay of Pillars	5,800	20,300	1,300
Behm Islands	3,200	0	0
Brabazon Addition	0	0	499,900
Bradfield	20,000	0	178,000
Calder	200	8,500	0
Camden	30,100	0	5,800
Carroll	0	0	9,400
Castle	31,100	0	18,800
Central Wrangell	5,000	0	8,100
Chichagof	211,000	237,100	123,100
Chilkat-West Lynn Canal	98,900	0	95,700
Christoval	0	0	8,600
Cleveland	177,700	0	8,600
Cone	0	0	128,000
Crystal	9,800	0	8,700
Dall Island	64,100	0	43,900
Douglas Island	0	0	24,000

Table G-2
Alaska Roadless Area name and approximate acres contained within that are subject to the prohibitions and exemptions of Alternative 2.

Alaska Roadless Area Name	LUD II (Acres)	Watershed Priority (Acres)	Roadless Priority (Acres)
Duke	39,200	0	5,900
East Kuiu	32,800	3,100	4,600
East Mitkof	0	0	7,900
East Wrangell	6,100	0	1,200
East Zarembo	0	0	10,300
El Capitan	4,400	7,500	14,100
Eudora	105,500	0	90,700
Fake Pass	0	0	600
Fanshaw	31,700	0	16,700
Five Mile	11,100	0	9,300
Freshwater Bay	0	0	44,300
Frosty	17,000	0	16,800
Game Creek	3,300	0	44,300
Gravina	24,300	0	13,400
Green Rocks	2,600	0	7,100
Greens Creek	0	0	27,200
Harding	138,400	100	36,900
Hoonah Sound	43,000	51,300	0
Hydaburg	7,400	4,600	1,600
Hyder	0	0	122,000
Juneau Urban	66,700	6,200	28,000
Juneau-Skagway Icefield	138,400	39,300	1,028,200
Kadin	0	0	2,000
Karta	7,500	0	40,000
Kasaan	0	0	7,600
Kasaan Bay	0	0	2,700
Kashevarof Islands	0	0	4,700
Keku	0	0	9,000
Kogish	32,600	0	25,900
Kosciusko	3,600	47,600	12,100
Lindenberg	0	0	21,000
Madan	68,200	0	1,300
Mansfield Peninsula	0	0	53,000
Manzanita	0	0	8,300
McKenzie	43,200	0	30,000
Middle Kruzof	7,100	0	7,500
Missionary	0	0	14,500
Mosman	52,300	0	1,400
Neka Bay	4,700	0	2,300
Neka Mountain	3,800	0	4,600
North Baranof	176,000	0	145,500
North Cleveland	75,100	0	34,200
North Etolin	22,300	0	13,000
North Kruzof	20,300	0	11,300
North Kuiu	4,400	0	5,300
North Kupreanof	2,800	0	101,400
North Revilla	77,100	31,400	101,200
North Wrangell	0	0	6,800
Nutkwa	16,200	21,500	4,900
Outer Islands	10,100	74,000	14,900
Pavlof-East Point	0	0	4,800
Point Augusta	0	0	15,300
Point Craven	8,500	0	2,200
Port Alexander	0	0	125,000
Quartz	0	0	146,500
Ratz	4,100	0	1,900

Table G-2
Alaska Roadless Area name and approximate acres contained within that are subject to the prohibitions and exemptions of Alternative 2.

Alaska Roadless Area Name	LUD II (Acres)	Watershed Priority (Acres)	Roadless Priority (Acres)
Redoubt	52,500	0	16,100
Revilla	0	0	30,100
Rhine	12,800	0	10,000
Rocky Pass	71,600	100	5,200
Salmon Bay	0	10,200	13,100
Sarkar	16,300	23,900	10,700
Security	24,200	0	6,600
Sitka Sound	7,500	0	5,700
Sitka Urban	20,300	0	92,500
Soda Bay	46,100	0	16,100
South Etolin	7,000	0	19,600
South Kruzof	53,300	0	1,000
South Kuiu	12,900	0	49,400
South Kupreanof	157,500	33,200	14,500
South Revilla	22,300	0	29,700
South Wrangell	4,000	0	10,100
South Zarembo	0	0	28,500
Southeast Wrangell	8,500	0	9,900
Spires	37,700	0	500,700
Suemez Island	16,500	0	7,600
Sukkwan	18,800	28,800	0
Sullivan	16,100	0	49,600
Taku-Snettisham	395,600	0	303,600
Tenakee Ridge	0	0	20,600
Thomas			
Thorne River	29,000	19,700	23,100
Trap Bay	0	6,400	6,800
Twelvemile	0	0	27,300
Upper Situk	10,100	0	700
West Wrangell	3,500	0	1,200
West Zarembo	0	0	6,600
Whitestone	0	0	5,900
Windham-Port Houghton	101,500	0	58,600
Woewodski	10,300	0	0
Woronkofski	11,000	0	0
Yakutat Forelands	78,100	137,500	106,900

Alternative 3

Subpart E – Alaska Roadless Area Management

§294.50 Purpose.

The purpose of this subpart is to provide, in the context of multiple-use management for the conservation of roadless areas within the Tongass National Forest while providing for local concerns, including economic and community development. This subpart sets forth the procedures for management of Alaska Roadless Areas.

§294.51 Definitions.

The following terms and definitions apply to this subpart.

Alaska Native. Federally recognized tribes or individuals that are enrolled or eligible to enroll as a member of a federally recognized tribe.

Alaska Roadless Areas. Lands within the Tongass National Forest designated pursuant to this subpart and identified in a set of maps maintained by the national headquarters office of the Forest Service.

Commercial Old Growth Timber Harvest. Trees, portions of trees, and other forest products originating from old growth stands on National Forest System lands that may be sold for the purpose of achieving the policies set forth in the Multiple-Use Sustained-Yield Act of 1960 as amended, the Forest and Rangeland Renewable Resources Planning Act of 1974 as amended, and the program thereunder. (See 36 CFR 223.1).

Community utility system. A system that provides a community or communities with services for public use or consumption such as municipal water and wastewater systems, biomass heating and energy systems, transmission lines, and hydroelectric and other renewable energy projects and related infrastructure.

Responsible official. The Forest Service line officer with the authority to make and implement a decision on a proposed action.

Road. As defined at 36 CFR 212.1, the term means a motor vehicle route over 50 inches wide, unless identified and managed as a trail.

Road construction and reconstruction. As defined at 36 CFR 212.1, the terms mean supervising, inspecting, building, and incurrence of all costs incidental to the construction or reconstruction of a road.

Roadless Area Characteristics. Resources or features that are often present in and characterize Alaska Roadless Areas, including

(1) *Physical Environment*. Roadless areas provide high-quality or undisturbed soil, water, and air.

(2) *Water*. Roadless areas provide a variety of water resources including public drinking water sources, fish and aquatic resources, and hatchery aquatic resources.

(3) *Diversity*. Roadless areas support a diversity of plant and animal communities including stands of old-growth forests.

(4) *Habitat*. Roadless areas are expansive areas where high-quality intact habitat exists and ecosystems function with all their native species and components. Roadless areas may serve as habitat for threatened, endangered, proposed, candidate, and species of conservation concern, and for those species dependent on large, undisturbed areas of land.

(5) *Remoteness*. Roadless areas provide rich primitive, semi-primitive motorized, and semi-primitive non-motorized classes of dispersed recreation, which are a source of ecological, social, and economic benefits.

(6) *Landscape*. Roadless areas provide reference landscapes of relatively undisturbed areas that serve as a barometer to measure the effects of development on other parts of the landscape.

(7) *Scenery*. Roadless areas have natural-appearing landscapes with high-scenic qualities that people value.

(8) *Cultural*. Roadless areas often include traditional cultural properties and sacred sites. In Alaska, indigenous peoples have been on national forests for more than 10,000 years and the forests have cultural significance.

(9) *Locally-unique characteristics*. Roadless areas represent geographic areas with additional locally-unique characteristics specific to Alaska, including: (a) important source of subsistence resources including terrestrial wildlife, waterfowl, mammals, fish, and plant-based resources; (b) rich habitat that supports multiple species of fish for personal, subsistence, sport, recreation, and commercial harvest; and (c) supports diverse economic opportunity that is especially important for rural community well-being.

Timber harvest. The cutting, removal, or sale of trees.

§294.52 Alaska Roadless Areas

(a) *Designations*. All National Forest System lands listed in § 294.57 are hereby designated as Alaska Roadless Areas. Alaska Roadless Areas established by this subpart shall constitute the exclusive set of National Forest System lands within the Tongass National Forest to which the provisions of this subpart shall apply.

(b) *Roadless area management designations*. Alaska Roadless Areas are subdivided into three roadless area management designations: Watershed Priority, Roadless Priority, and Community Priority.

§294.53 Road construction and reconstruction in Alaska Roadless Areas.

(a) A road may not be constructed or reconstructed in Alaska Roadless Areas, except as provided in paragraphs (b), (c), (d), and (e) of this section.

(b) *Alaska Roadless Areas*. Notwithstanding the prohibition in paragraph (a) of this section, road construction or reconstruction in any Alaska Roadless Area regardless of the roadless area management designation is allowed for the following exceptions:

(1) A mandatory road authorization pursuant to reserved or outstanding rights, or as provided for by statute or treaty. Examples of mandatory statutory authorizations include but are not limited to roads pursuant to the Alaska National Interest Lands Conservation Act (P.L. 96-487), Section 4407 of the Safe, Accountable, Flexible, Efficient Transportation Equity Act (P.L. 109-59);and General Mining Law of 1872 (as amended);

(2) A road to conduct a response action under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) or to conduct a natural resource restoration action under CERCLA, Section 311 of the Clean Water Act, or the Oil Pollution Act;

(3) A Federal Aid Highway project, authorized pursuant to Title 23 of the United States Code;

(4) A road realignment to prevent irreparable resource damage that arises from the design, location, use, or deterioration of a road and cannot be mitigated by road maintenance

(5) A road reconstruction safety improvement project on a classified road; or

(6) A road to protect public health and safety in cases of an imminent threat of flood, fire, or other catastrophic event that, without intervention, would cause the loss of life or property.

(c) *Watershed Priority*. With the exception of the authorities provided in paragraph (b), a road may not be constructed or reconstructed in an Alaska Roadless Area designated as Watershed Priority.

(d) *Roadless Priority*. *Roadless Priority*. Notwithstanding the prohibition in paragraph (a) of this section, road construction or reconstruction in an Alaska Roadless Area designated as Roadless Priority is allowed for the following exceptions:

(1) A road for the construction, expansion, or maintenance of facilities such as airports, marine access points, and communication equipment;

(2) A road to provide access to Alaska Native cultural site(s) if requested by an affected federally-recognized tribe(s);

(3) A road for transportation needs identified by the State of Alaska's Southeast Alaska Transportation Plan for the connection of communities and development of the regional transportation system;

(4) A road within a designated experimental forest for research or administration or to provide administrative access to a designated experimental forest;

(5) A road for the construction, expansion, or maintenance of a community utility system; or

(6) A road in conjunction with the construction, expansion, or maintenance of an authorized fishway, fish hatchery, or aquaculture facility.

(d) *Community Priority*. Notwithstanding the prohibition in paragraph (a) of this section, road construction or reconstruction in an Alaska Roadless Area designated as Community Priority is allowed for the following exceptions:

(1) A road to provide access to Alaska Native cultural site(s) if requested by an affected federally-recognized tribe(s);

(2) A road for micro sales, salvage sales, and small commercial sales less than one million board feet of timber;

(3) A road for the construction, expansion, or maintenance of facilities such as airports, marine access points, and communication equipment;

(4) A road for the construction, expansion, or maintenance of a community utility system;

(5) A road in conjunction with the construction, expansion, or maintenance of an authorized fishway, fish hatchery, or aquaculture facility; or

(6) A road in conjunction with the construction, expansion, or maintenance of a developed recreation site.

§294.54 Timber harvest in Alaska Roadless Areas.

(a) Timber harvest is prohibited in Alaska Roadless Areas except as provided in paragraph (b), (c), (d), and (e) of this section. Additionally, except as provided in paragraph (d), commercial old-growth timber harvest is prohibited on National Forest System lands as depicted in a map maintained by Chief's Office that identifies high priority watersheds that largely coincide with Alaska Roadless Areas, but can extend beyond Alaska Roadless Area boundaries.

(b) *Alaska Roadless Areas*. Notwithstanding the prohibition in paragraph (a) of this section, timber harvest in any Alaska Roadless Area regardless of the roadless area management designation is allowed for the following exceptions:

(1) Timber harvest conducted pursuant to reserved or outstanding rights or as provided for by statute or treaty,

(2) Timber harvest to protect public health and safety in cases of an imminent threat of flood, fire, or other catastrophic event that, without intervention, would cause the loss of life or property, including removal of hazard trees;

(3) Timber harvest for personal or administrative use, as provided for in 36 CFR part 223; or

(4) Timber harvest incidental to the implementation of a management activity not otherwise prohibited by this subpart, including the construction or reconstruction of a road pursuant to §294.53 or the construction, expansion, or maintenance of authorized fishways, fish hatcheries, and aquaculture facilities.

(d) *Watershed Priority*. Notwithstanding the prohibitions in paragraph (a) of this section, timber harvest may occur in an Alaska Roadless Area designated as Watershed Priority is allowed for the following exceptions:

(1) The cutting, customary trade, and removal of trees for the purposes of Alaska Native customary and traditional uses that does not degrade water quality, fish habitat, fish production, fish passage, aquatic diversity, or soil productivity;

(2) Timber harvest for one of the following purposes that will maintain, restore, or improve one or more of the purposes:

(i) To maintain, restore or improve fish and wildlife habitat; or

(ii) To maintain, restore, or improve the characteristics of ecosystem composition, structure, and processes;

(3) Timber harvest is incidental to trail or recreation development that does not degrade water quality, fish habitat, fish production, fish passage, aquatic biodiversity, or soil productivity.

(e) *Roadless Priority*. Notwithstanding the prohibition in paragraph (a) of this section, timber harvest in an Alaska Roadless Area designated as Roadless Priority is allowed for the following exceptions:

(1) Timber harvest for the cutting, customary trade, and removal of trees for the purposes of Alaska Native customary and traditional uses;

(2) Timber harvest for one of the following purposes that will maintain, restore or improve one or more of the following purposes:

(i) To maintain, restore, or improve fish and wildlife habitat; or

(ii) To maintain, restore, or improve the characteristics of ecosystem composition, structure, and processes;

(3) Timber harvest within a designated experimental forest for research or administration;

(4) Timber harvest for the construction, expansion, utilization, or maintenance of community utility systems; or

(5) Timber harvest is incidental to trail or recreation development that does not degrade water quality, fish habitat, fish production, fish passage, aquatic biodiversity, or soil productivity.

(d) *Community Priority*. Notwithstanding the prohibition in paragraph (a) of this section, timber harvest in an Alaska Roadless Area designated as Community Priority is allowed for the following exceptions:

(1) The cutting, customary trade, and removal of trees is for the purpose of Alaska Native customary and traditional uses;

(2) Timber harvest for micro sales, salvage sales, or small commercial sales less than one million board feet of timber;

(3) Timber harvest for one of the following purposes that will maintain, restore or improve one or more of the following purposes:

(i) To maintain, restore, or improve fish and wildlife habitat; or

(ii) To maintain, restore, or improve the characteristics of ecosystem composition, structure, and processes; or

(4) Timber harvest for the construction, expansion, utilization, or maintenance of a community utility system.

§294.55 Corrections and modifications.

Administrative correction or modification of designations made pursuant to this subpart may be made as follows:

(a) *Administrative corrections to boundaries*. The Chief of the Forest Service may issue administrative corrections to the boundaries or classifications of an Alaska Roadless Area after a 30-day public notice and opportunity to comment period. Administrative corrections are limited to adjustments that remedy clerical errors, typographical errors, mapping errors, or improvements in mapping technology.

(b) *Administrative modifications to Classifications and Boundaries*. The Chief of the Forest Service may issue modifications to the boundaries or classifications of an Alaska Roadless Area after a 45-day public notice and opportunity to comment period.

§294.56 Scope and applicability.

(a) After [final rule effective date], the Roadless Area Conservation Rule (66 FR 3244) published on January 12, 2001, shall have no effect within the Tongass National Forest.

(b) This subpart does not revoke, suspend, or modify any permit, contract, or other legal instrument authorizing the occupancy and use of National Forest System land issued prior to the effective date of this subpart.

(c) This subpart does not revoke, suspend, or modify any project or activity decision made prior to the effective date of this subpart.

(d The provisions set forth in this subpart shall take precedence over any inconsistent land management plan component of the Tongass Land and Resource Management Plan. Land management plan components that are not inconsistent with this subpart will continue to provide guidance for projects and activities within Alaska Roadless Areas. This subpart does not compel the amendment or revision of any land management plan, but the Tongass Forest Supervisor shall issue a ministerial Notice of Administrative Change pursuant to 36 CFR 219.13(c) identifying plan changes made in conformance with the regulatory determinations of this subpart, including rescission of the portion of the December 9, 2016, Record of Decision concerning suitable timber lands attributed exclusively to implementation of the January 12, 2001, Roadless Area Conservation Rule (66 FR 3244).

(e) The prohibitions and permissions set forth in this subpart are not subject to reconsideration, revision, or rescission in subsequent project decisions or land and resource management plan amendments or revisions undertaken pursuant to 36 CFR part 219.

(f) Nothing in this subpart waives any applicable requirements regarding site-specific environmental analysis, public involvement, consultation with Tribes and other agencies, or compliance with other applicable laws.

(g) If any provision of the rules in this subpart or its application to any person or to certain circumstances is held invalid, the remainder of the regulations in this subpart and their application remain in force.

§294.57 List of designated Alaska Roadless Areas Alternative 3

Table G-3
Alaska Roadless Area name and approximate acres contained within that are subject to the prohibitions and exemptions of Alternative 3.

Alaska Roadless Area Name	Watershed Priority (acres)	Roadless Priority (acres)	Community Priority (acres)
Aaron	58,900	20,500	0
Alaska Roadless Area Islands	10,900	15,000	600
Anan	0	0	0
Bay of Pillars	5,800	1,300	0
Behm Islands	3,200	0	0
Brabazon Addition	0	499,900	0
Bradfield	20,000	178,000	0
Calder	100	0	0
Camden	30,100	200	100
Carroll	0	3,700	5,600
Castle	31,100	18,800	0
Central Wrangell	5,000	0	8,100
Chichagof	211,000	114,900	0
Chilkat-West Lynn Canal	98,900	95,700	0
Christoval	0	8,600	0
Cleveland	177,700	8,600	0

Table G-3
Alaska Roadless Area name and approximate acres contained within that are subject to the prohibitions and exemptions of Alternative 3.

Alaska Roadless Area Name	Watershed Priority (acres)	Roadless Priority (acres)	Community Priority (acres)
Cone	0	128,000	0
Crystal	9,800	7,400	0
Dall Island	64,100	43,900	0
Douglas Island	0	0	24,000
Duke	39,200	5,900	0
East Kuiu	32,800	4,600	0
East Mitkof	0	7,900	0
East Wrangell	6,100	0	0
East Zarembo	0	10,300	0
El Capitan	4,400	13,500	0
Eudora	105,500	90,200	0
Fake Pass	0	600	0
Fanshaw	31,700	16,700	0
Five Mile	11,100	5,200	0
Freshwater Bay	0	44,300	0
Frosty	15,100	14,900	0
Game Creek	3,300	42,800	0
Gravina	24,300	3,000	10,400
Green Rocks	2,600	6,700	0
Greens Creek	0	27,200	0
Harding	138,400	36,900	0
Hoonah Sound	43,000	0	0
Hydaburg	7,400	1,600	0
Hyder	0	122,000	0
Juneau Urban	66,700	5,500	22,500
Juneau-Skagway Icefield	138,400	1,004,500	23,700
Kadin	0	2,000	0
Karta	7,400	28,500	0
Kasaan	0	7,600	0
Kasaan Bay	0	0	0
Kashevarof Islands	0	4,700	0
Keku	0	2,000	7,000
Kogish	31,500	500	0
Kosciusko	3,600	7,600	0
Lindenberg	0	9,400	0
Madan	68,200	1,300	0
Mansfield Peninsula	0	53,000	0
Manzanita	0	5,700	0
McKenzie	42,500	23,100	900
Middle Kruzof	7,100	7,500	0
Missionary	0	9,100	0
Mosman	52,300	400	0
Neka Bay	4,700	2,300	0
Neka Mountain	3,800	4,600	0
North Baranof	176,000	145,200	300
North Cleveland	75,100	34,200	0
North Etolin	15,100	7,100	0
North Kruzof	20,300	11,300	0
North Kuiu	4,400	5,300	0
North Kupreanof	2,800	13,400	76,600
North Revilla	77,000	70,900	10,400
North Wrangell	0	0	0
Nutkwa	16,200	4,900	0
Outer Islands	10,100	14,900	0
Pavlof-East Point	0	4,500	0
Point Augusta	0	12,400	0

Table G-3
Alaska Roadless Area name and approximate acres contained within that are subject to the prohibitions and exemptions of Alternative 3.

Alaska Roadless Area Name	Watershed Priority (acres)	Roadless Priority (acres)	Community Priority (acres)
Point Craven	8,500	2,200	0
Port Alexander	0	125,000	0
Quartz	0	146,500	0
Ratz	4,100	1,900	0
Redoubt	52,500	11,700	4,400
Revilla	0	700	27,100
Rhine	12,800	3,100	6,800
Rocky Pass	71,600	400	4,800
Salmon Bay	0	8,300	0
Sarkar	15,500	9,100	0
Security	24,200	5,000	0
Sitka Sound	7,500	5,700	0
Sitka Urban	20,300	39,900	52,600
Soda Bay	46,100	1,800	12,600
South Etolin	7,000	19,000	0
South Kruzof	53,300	1,000	0
South Kuiu	12,900	49,400	0
South Kupreanof	157,500	12,000	2,400
South Revilla	22,300	11,200	5,000
South Wrangell	4,000	0	10,100
South Zarembo	0	24,900	0
Southeast Wrangell	8,500	0	6,400
Spires	37,700	493,000	0
Suemez Island	16,500	7,600	0
Sukkwan	18,800	0	0
Sullivan	16,100	49,600	0
Taku-Snettisham	395,600	302,600	900
Tenakee Ridge	0	15,500	0
Thomas			
Thorne River	29,000	9,200	0
Trap Bay	0	0	0
Twelvemile	0	1,600	17,900
Upper Situk	400	200	0
West Wrangell	700	0	0
West Zarembo	0	6,600	0
Whitestone	0	5,900	0
Windham-Port Houghton	101,500	58,600	0
Woewodski	10,300	0	0
Woronkofski	11,000	0	0
Yakutat Forelands	78,100	64,000	28,700

Alternative 4

Subpart E – Alaska Roadless Area Management

§294.50 Purpose.

The purpose of this subpart is to provide, in the context of multiple-use management for the conservation of roadless areas within the Tongass National Forest while providing for local concerns, including economic and community development. This subpart sets forth the procedures for management of Alaska Roadless Areas.

§294.51 Definitions.

The following terms and definitions apply to this subpart.

Alaska Native. Federally recognized tribes or individuals that are enrolled or eligible to enroll as a member of a federally recognized tribe.

Alaska Roadless Areas. Lands within the Tongass National Forest designated pursuant to this subpart and identified in a set of maps maintained by the national headquarters office of the Forest Service.

Commercial Old Growth Timber Harvest. Trees, portions of trees, and other forest products originating from old growth stands on National Forest System lands that may be sold for the purpose of achieving the policies set forth in the Multiple-Use Sustained-Yield Act of 1960, as amended, the Forest and Rangeland Renewable Resources Planning Act of 1974, as amended, and the program thereunder. (See 36 CFR 223.1).

Community utility system. A system that provides a community or communities with services for public use or consumption such as municipal water and wastewater systems, biomass heating and energy systems, transmission lines, and hydroelectric and other renewable energy projects and related infrastructure.

Responsible official. The Forest Service line officer with the authority to make and implement a decision on a proposed action.

Road. As defined at 36 CFR 212.1, the term means a motor vehicle route over 50 inches wide, unless identified and managed as a trail.

Road construction and reconstruction. As defined at 36 CFR 212.1, the terms mean supervising, inspecting, building, and incurrence of all costs incidental to the construction or reconstruction of a road.

Roadless Area Characteristics. Resources or features that are often present in and characterize Alaska Roadless Areas, including

(1) *Physical Environment*. Roadless areas provide high-quality or undisturbed soil, water, and air.

(2) *Water*. Roadless areas provide a variety of water resources including public drinking water sources, fish and aquatic resources, and hatchery aquatic resources.

(3) *Diversity*. Roadless areas support a diversity of plant and animal communities including stands of old-growth forests.

(4) *Habitat*. Roadless areas are expansive areas where high-quality intact habitat exists and ecosystems function with all their native species and components. Roadless areas may serve as habitat for threatened, endangered, proposed, candidate, and species of conservation concern, and for those species dependent on large, undisturbed areas of land.

(5) *Remoteness*. Roadless areas provide rich primitive, semi-primitive motorized, and semi-primitive non-motorized classes of dispersed recreation, which are a source of ecological, social, and economic benefits.

(6) *Landscape*. Roadless areas provide reference landscapes of relatively undisturbed areas that serve as a barometer to measure the effects of development on other parts of the landscape.

(7) *Scenery*. Roadless areas have natural-appearing landscapes with high-scenic qualities that people value.

(8) *Cultural*. Roadless areas often include traditional cultural properties and sacred sites. In Alaska, indigenous peoples have been on national forests for more than 10,000 years and the forests have cultural significance.

(9) *Locally-unique characteristics*. Roadless areas represent geographic areas with additional locally-unique characteristics specific to Alaska, including: (a) important source of subsistence resources including terrestrial wildlife, waterfowl, mammals, fish, and plant-based resources; (b) rich habitat that supports multiple species of fish for personal, subsistence, sport, recreation, and

commercial harvest; and (c) supports diverse economic opportunity that is especially important for rural community well-being.

Timber harvest. The cutting, removal, or sale of trees.

§294.52 Alaska Roadless Areas

(a) *Designations*. All National Forest System lands listed in § 294.57 are hereby designated as Alaska Roadless Areas. Alaska Roadless Areas established by this subpart shall constitute the exclusive set of National Forest System lands within the Tongass National Forest to which the provisions of this subpart shall apply.

(b) *Roadless area management designations*. Alaska Roadless Areas are subdivided into three roadless area management designations: LUD II Priority, Roadless Priority, and Timber Priority.

§294.53 Road construction and reconstruction in Alaska Roadless Areas.

(a) A road may not be constructed or reconstructed in Alaska Roadless Areas, except as provided in paragraphs (b), (c), (d), and (e) of this section.

(b) *Alaska Roadless Areas*. Notwithstanding the prohibition in paragraph (a) of this section, road construction or reconstruction in any Alaska Roadless Area regardless of the roadless area management designation is allowed for the following exceptions:

(1) A mandatory road authorization pursuant to reserved or outstanding rights, or as provided for by statute or treaty. Examples of mandatory statutory authorizations include but are not limited to roads pursuant to the Alaska National Interest Lands Conservation Act (P.L. 96-487), Section 4407 of the Safe, Accountable, Flexible, Efficient Transportation Equity Act (P.L. 109-59);and General Mining Law of 1872 (as amended);

(2) A road to conduct a response action under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) or to conduct a natural resource restoration action under CERCLA, Section 311 of the Clean Water Act, or the Oil Pollution Act;

(3) A Federal Aid Highway project, authorized pursuant to Title 23 of the United States Code;

(4) A road realignment to prevent irreparable resource damage that arises from the design, location, use, or deterioration of a road and cannot be mitigated by road maintenance;

(5) A road reconstruction safety improvement project on a classified road; or

(6) A road to protect public health and safety in cases of an imminent threat of flood, fire, or other catastrophic event that, without intervention, would cause the loss of life or property.

(c) *LUD II Priority*. Notwithstanding the prohibition in paragraph (a) of this section, road construction or reconstruction in an Alaska Roadless Area designated as LUD II Priority is allowed if consistent with the legislated management restrictions established in Section 201 of the Tongass Timber Reform Act.

(d) *Roadless Priority*. Notwithstanding the prohibition in paragraph (a) of this section, road construction or reconstruction in an Alaska Roadless Area designated as Roadless Priority is allowed for the following exceptions:

(1) A road for the construction, expansion, or maintenance of facilities such as airports, marine access points, and communication equipment;

(2) A road to provide access to Alaska Native cultural site(s) if requested by an affected federally-recognized tribe(s);

(3) A road for transportation needs identified by the State of Alaska's Southeast Alaska Transportation Plan for the connection of communities and development of the regional transportation system;

(4) A road within a designated experimental forest for research or administration or to provide administrative access to a designated experimental forest;

(5) A road for the construction, expansion, or maintenance of a community utility system; or

(6) A road in conjunction with the construction, expansion, or maintenance of an authorized fishway, fish hatchery, or aquaculture facility.

(e) *Timber Priority*. Notwithstanding the prohibition in paragraph (a) of this section, permanent or temporary road construction, reconstruction, or maintenance within an Alaska Roadless Area designated as Timber Priority is allowed.

§294.54 Timber harvest in Alaska Roadless Areas.

(a) Timber harvest is prohibited in Alaska Roadless Areas except as provided in paragraph (b), (c), (d), and (e) of this section.

(b) *Alaska Roadless Areas*. Notwithstanding the prohibition in paragraph (a) of this section, timber harvest in any Alaska Roadless Area regardless of the roadless area management designation is allowed for the following exceptions:

(1) Timber harvest conducted pursuant to reserved or outstanding rights or as provided for by statute or treaty;

(2) Timber harvest to protect public health and safety in cases of an imminent threat of flood, fire, or other catastrophic event that, without intervention, would cause the loss of life or property, including removal of hazard trees;

(3) Timber harvest for personal or administrative use, as provided for in 36 CFR part 223; or

(4) Timber harvest incidental to the implementation of a management activity not otherwise prohibited by this subpart, including the construction or reconstruction of a road pursuant to §294.53 or the construction, expansion, or maintenance of authorized fishways, fish hatcheries, and aquaculture facilities.

(c) *LUD II Priority*. Notwithstanding the prohibition in paragraph (a) of this section, timber harvest in an Alaska Roadless Area designated as LUD II Priority is allowed if consistent with the legislated management restrictions established in Section 201 of the Tongass Timber Reform Act.

(d) *Roadless Priority*. Notwithstanding the prohibition in paragraph (a) of this section, timber harvest in an Alaska Roadless Area designated as Roadless Priority is allowed for the following exceptions:

(1) Timber harvest for the cutting, customary trade, and removal of trees for the purposes of Alaska Native customary and traditional uses;

(2) Timber harvest for one of the following purposes that will maintain, restore or improve one or more of the following purposes:

(i) To maintain, restore, or improve fish and wildlife habitat; or

(ii) To maintain, restore, or improve the characteristics of ecosystem composition, structure, and processes;

(3) Timber harvest within a designated experimental forest for research or administration;

(4) Timber harvest for the construction, expansion, utilization, or maintenance of community utility systems; or

(5) Timber harvest is incidental to trail or recreation development that does not degrade water quality, fish habitat, fish production, fish passage, aquatic biodiversity, or soil productivity.

(e) *Timber Priority*. Notwithstanding the prohibition in paragraph (a) of this section, timber harvest in an Alaska Roadless Area designated as Timber Priority is allowed.

§294.55 Corrections and modifications.

Administrative correction or modification of designations made pursuant to this subpart may be made as follows:

(a) *Administrative corrections to boundaries*. The Chief of the Forest Service may issue administrative corrections to the boundaries or classifications of an Alaska Roadless Area after a 30-day public notice and opportunity to comment period. Administrative corrections are limited to adjustments that remedy clerical errors, typographical errors, mapping errors, or improvements in mapping technology.

(b) *Administrative modifications to Classifications and Boundaries*. The Chief of the Forest Service may issue modifications to the boundaries or classifications of an Alaska Roadless Area after a 45-day public notice and opportunity to comment period.

§294.56 Scope and applicability.

(a) After [final rule effective date], the Roadless Area Conservation Rule (66 FR 3244) published on January 12, 2001, shall have no effect within the Tongass National Forest.

(b) This subpart does not revoke, suspend, or modify any permit, contract, or other legal instrument authorizing the occupancy and use of National Forest System land issued prior to the effective date of this subpart.

(c) This subpart does not revoke, suspend, or modify any project or activity decision made prior to the effective date of this subpart.

(d) The provisions set forth in this subpart shall take precedence over any inconsistent land management plan component of the Tongass Land and Resource Management Plan. Land management plan components that are not inconsistent with this subpart will continue to provide guidance for projects and activities within Alaska Roadless Areas. This subpart does not compel the amendment or revision of any land management plan, but the Tongass Forest Supervisor shall issue a ministerial Notice of Administrative Change pursuant to 36 CFR 219.13(c) identifying plan changes made in conformance with the regulatory determinations of this subpart, including rescission of the portion of the December 9, 2016, Record of Decision concerning suitable timber lands attributed exclusively to implementation of the January 12, 2001, Roadless Area Conservation Rule (66 FR 3244).

(e) The prohibitions and permissions set forth in this subpart are not subject to reconsideration, revision, or rescission in subsequent project decisions or land and resource management plan amendments or revisions undertaken pursuant to 36 CFR part 219.

f) Nothing in this subpart waives any applicable requirements regarding site-specific environmental analysis, public involvement, consultation with Tribes and other agencies, or compliance with other applicable laws.

(g) If any provision of the rules in this subpart or its application to any person or to certain circumstances is held invalid, the remainder of the regulations in this subpart and their application remain in force.

§294.57 List of designated Alaska Roadless Areas Alternative 4

Table G-4
Alaska Roadless Area name and approximate acres contained within that are subject to the prohibitions and exemptions of Alternative 4.

Alaska Roadless Area Name	LUD II Priority (acres)	Roadless Priority (acres)	Timber Priority (acres)
Aaron	0	79,400	0
Alaska Roadless Area Islands	3,500	0	0
Anan	37,900	0	0

Table G-4
Alaska Roadless Area name and approximate acres contained within that are subject to the prohibitions and exemptions of Alternative 4.

Alaska Roadless Area Name	LUD II Priority (acres)	Roadless Priority (acres)	Timber Priority (acres)
Bay of Pillars	20,300	7,000	0
Behm Islands	0	3,200	0
Brabazon Addition	0	499,900	0
Bradfield	0	91,800	106,300
Calder	8,500	100	0
Camden	0	30,400	0
Carroll	0	0	9,400
Castle	0	40,300	9,600
Central Wrangell	0	6,400	6,700
Chichagof	237,100	259,200	50,600
Chilkat-West Lynn Canal	0	179,200	15,400
Christoval	0	7,600	1,000
Cleveland	0	186,300	0
Cone	0	128,000	0
Crystal	0	11,600	5,500
Dall Island	0	104,600	3,400
Douglas Island	0	24,000	0
Duke	0	45,100	0
East Kuiu	3,100	22,100	1,500
East Mitkof	0	4,000	3,900
East Wrangell	0	5,000	1,100
East Zarembo	0	2,200	8,100
El Capitan	7,500	7,600	10,300
Eudora	0	156,100	39,300
Fake Pass	0	600	0
Fanshaw	0	45,500	2,800
Five Mile	0	12,600	2,400
Freshwater Bay	0	25,700	18,100
Frosty	0	22,500	7,500
Game Creek	0	16,900	29,200
Gravina	0	34,700	3,000
Green Rocks	0	9,200	200
Greens Creek	0	27,200	0
Harding	100	155,800	19,500
Hoonah Sound	51,300	27,500	0
Hydaburg	4,600	6,500	0
Hyder	0	122,000	0
Juneau Urban	6,200	94,700	0
Juneau-Skagway Icefield	39,300	1,143,800	19,900
Kadin	0	2,000	0
Karta	0	17,900	18,000
Kasaan	0	7,600	0
Kasaan Bay	0	0	0
Kashevarof Islands	0	4,700	0
Keku	0	3,500	5,500
Kogish	0	31,800	200
Kosciusko	47,600	4,700	6,600
Lindenberg	0	1,100	7,900
Madan	0	69,600	0
Mansfield Peninsula	0	53,000	0
Manzanita	0	1,400	4,300
McKenzie	0	54,300	12,100
Middle Kruzof	0	8,300	6,300
Missionary	0	5,800	3,300
Mosman	0	52,700	0
Neka Bay	0	6,900	0

Table G-4
Alaska Roadless Area name and approximate acres contained within that are subject to the prohibitions and exemptions of Alternative 4.

Alaska Roadless Area Name	LUD II Priority (acres)	Roadless Priority (acres)	Timber Priority (acres)
Neka Mountain	0	5,100	1,000
North Baranof	0	296,600	16,900
North Cleveland	0	109,300	0
North Etolin	0	21,800	300
North Kruzof	0	28,100	3,500
North Kuiu	0	5,400	800
North Kupreanof	0	51,700	41,100
North Revilla	31,400	112,000	46,300
North Wrangell	0	0	0
Nutkwa	21,500	16,200	4,900
Outer Islands	74,000	25,100	0
Pavlof-East Point	0	4,500	0
Point Augusta	0	10,100	2,300
Point Craven	0	10,700	0
Port Alexander	0	125,000	0
Quartz	0	146,500	0
Ratz	0	3,900	1,200
Redoubt	0	62,400	5,200
Revilla	0	25,400	2,400
Rhine	0	22,700	0
Rocky Pass	100	75,900	900
Salmon Bay	10,200	1,800	6,500
Sarkar	23,900	24,200	300
Security	0	24,500	4,700
Sitka Sound	0	13,200	0
Sitka Urban	0	97,200	15,600
Soda Bay	0	54,100	6,400
South Etolin	0	12,000	14,100
South Kruzof	0	54,300	0
South Kuiu	0	62,300	0
South Kupreanof	33,200	159,400	12,500
South Revilla	0	37,100	1,400
South Wrangell	0	4,000	10,100
South Zarembo	0	13,500	11,300
Southeast Wrangell	0	14,800	0
Spires	0	507,900	22,800
Suemez Island	0	15,500	3,900
Sukkwan	28,800	18,800	0
Sullivan	0	62,000	3,600
Taku-Snettisham	0	696,100	0
Tenakee Ridge	0	6,400	9,100
Thomas			
Thorne River	19,700	36,900	1,200
Trap Bay	6,400	0	0
Twelvemile	0	16,700	2,900
Upper Situk	0	600	0
West Wrangell	0	700	0
West Zarembo	0	6,100	600
Whitestone	0	3,200	2,700
Windham-Port Houghton	0	115,900	44,100
Woewodski	0	10,300	0
Woronkofski	0	11,000	0
Yakutat Forelands	137,500	152,500	18,200

Appendix G

Alternative 5

Subpart E – Alaska Roadless Area Management

§294.50 Purpose.

The purpose of this subpart is to provide, in the context of multiple-use management for the conservation of roadless areas within the Tongass National Forest while providing for local concerns, including economic and community development. This subpart sets forth the procedures for management of Alaska Roadless Areas.

§294.51 Definitions.

The following terms and definitions apply to this subpart.

Alaska Native. Federally recognized tribes or individuals that are enrolled or eligible to enroll as a member of a federally recognized tribe.

Alaska Roadless Areas. Lands within the Tongass National Forest designated pursuant to this subpart and identified in a set of maps maintained by the national headquarters office of the Forest Service.

Commercial Old Growth Timber Harvest. Trees, portions of trees, and other forest products originating from old growth stands on National Forest System lands that may be sold for the purpose of achieving the policies set forth in the Multiple-Use Sustained-Yield Act of 1960, as amended, the Forest and Rangeland Renewable Resources Planning Act of 1974, as amended, and the program thereunder. (See 36 CFR 223.1).

Log transfer facility. The site and structures used for moving logs and timber products from land-based transportation forms to water-based transportation forms or vice-versa.

Community utility system. A system that provides a community or communities with services for public use or consumption such as municipal water and wastewater systems, biomass heating and energy systems, transmission lines, and hydroelectric and other renewable energy projects and related infrastructure.

Responsible official. The Forest Service line officer with the authority to make and implement a decision on a proposed action.

Road. As defined at 36 CFR 212.1, the term means a motor vehicle route over 50 inches wide, unless identified and managed as a trail.

Road construction and reconstruction. As defined at 36 CFR 212.1, the terms mean supervising, inspecting, actual building, and incurrence of all costs incidental to the construction or reconstruction of a road.

Roadless Area Characteristics. Resources or features that are often present in and characterize Alaska Roadless Areas, including

(1) *Physical Environment*. Roadless areas provide high-quality or undisturbed soil, water, and air.

(2) *Water*. Roadless areas provide a variety of water resources including public drinking water sources, fish and aquatic resources, and hatchery aquatic resources.

(3) *Diversity*. Roadless areas support a diversity of plant and animal communities including stands of old-growth forests.

(4) *Habitat*. Roadless areas are expansive areas where high-quality intact habitat exists and ecosystems function with all their native species and components. Roadless areas may serve as habitat for threatened, endangered, proposed, candidate, and species of conservation concern, and for those species dependent on large, undisturbed areas of land.

(5) *Remoteness*. Roadless areas provide rich primitive, semi-primitive motorized, and semi-primitive non-motorized classes of dispersed recreation, which are a source of ecological, social, and economic benefits..

(6) *Landscape*. Roadless areas provide reference landscapes of relatively undisturbed areas that serve as a barometer to measure the effects of development on other parts of the landscape.

(7) *Scenery*. Roadless areas have natural-appearing landscapes with high-scenic qualities that people value.

(8) *Cultural*. Roadless areas often include traditional cultural properties and sacred sites. In Alaska, indigenous peoples have been on national forests for more than 10,000 years and the forests have cultural significance.

(9) *Locally-unique characteristics*. Roadless areas represent geographic areas with additional locally-unique characteristics specific to Alaska, including: (a) important source of subsistence resources including terrestrial wildlife, waterfowl, mammals, fish, and plant-based resources; (b) rich habitat that supports multiple species of fish for personal, subsistence, sport, recreation, and commercial harvest; and (c) supports diverse economic opportunity that is especially important for rural community well-being.

Timber harvest. The cutting, removal, or sale of trees.

§294.52 Alaska Roadless Areas

(a) *Designations*. All National Forest System lands listed in § 294.57 are hereby designated as Alaska Roadless Areas. Alaska Roadless Areas established by this subpart shall constitute the exclusive set of National Forest System lands within the Tongass National Forest to which the provisions of this subpart shall apply.

(b) *Roadless area management designations*. Alaska Roadless Areas are subdivided into two roadless area management categories: LUD II Priority and Roadless Priority.

§294.53 Road construction and reconstruction in Alaska Roadless Areas.

(a) A road may not be constructed or reconstructed in Alaska Roadless Areas, except as provided in paragraphs (b), (c), (d), and (e) of this section.

(b) *Alaska Roadless Areas*. Notwithstanding the prohibition in paragraph (a) of this section, road construction or reconstruction in any Alaska Roadless Area regardless of the roadless area management designation is allowed for the following exceptions:

(1) A mandatory road authorization pursuant to reserved or outstanding rights, or as provided for by statute or treaty. Examples of mandatory statutory authorizations include but are not limited to roads pursuant to the Alaska National Interest Lands Conservation Act (P.L. 96-487), Section 4407 of the Safe, Accountable, Flexible, Efficient Transportation Equity Act (P.L. 109-59);and General Mining Law of 1872 (as amended);

(2) A road to conduct a response action under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) or to conduct a natural resource restoration action under CERCLA, Section 311 of the Clean Water Act, or the Oil Pollution Act;

(3) A Federal Aid Highway project, authorized pursuant to Title 23 of the United States Code;

(4) A road realignment to prevent irreparable resource damage that arises from the design, location, use, or deterioration of a road and cannot be mitigated by road maintenance;

(5) A road reconstruction safety improvement project on a classified road; or

(6) A road to protect public health and safety in cases of an imminent threat of flood, fire, or other catastrophic event that, without intervention, would cause the loss of life or property.

(c) *LUD II Priority*. Notwithstanding the prohibition in paragraph (a) of this section, road construction or reconstruction in an Alaska Roadless Area designated as LUD II Priority is allowed if consistent with the legislated management restrictions established in Section 201 of the Tongass Timber Reform Act.

(d) *Roadless Priority*. Notwithstanding the prohibition in paragraph (a) of this section, road construction and reconstruction in an Alaska Roadless Area designated as Roadless Priority is allowed for the following exceptions:

(1) A road for the construction, expansion, or maintenance of facilities such as airports, marine access points, and communication equipment;

(2) A road to provide access to Alaska Native cultural site(s) if requested by an affected federally-recognized tribe(s);

(3) A road for transportation needs identified by the State of Alaska's Southeast Alaska Transportation Plan for the connection of communities and development of the regional transportation system;

(4) A road within a designated experimental forest for research or administration or to provide administrative access to a designated experimental forest;

(5) A road for the construction, expansion, or maintenance of a community utility system; or

(6) A road in conjunction with the construction, expansion, or maintenance of an authorized fishway, fish hatchery, or aquaculture facility.

§294.54 Timber harvest in Alaska Roadless Areas.

(a) Timber harvest is prohibited in Alaska Roadless Areas except as provided in paragraphs (b), (c), and (d) of this section.

(b) *Alaska Roadless Areas*. Notwithstanding the prohibition in paragraph (a) of this section, timber harvest in any Alaska Roadless Area regardless of the roadless area management designation is allowed for the following exceptions:

(1) Timber harvest conducted pursuant to reserved or outstanding rights or as provided for by statute or treaty,

(2) Timber harvest to protect public health and safety in cases of an imminent threat of flood, fire, or other catastrophic event that, without intervention, would cause the loss of life or property, including removal of hazard trees;

(3) Timber harvest for personal or administrative use, as provided for in 36 CFR part 223; or

(4) Timber harvest incidental to the implementation of a management activity not otherwise prohibited by this subpart, including the construction or reconstruction of a road pursuant to §294.53 or the construction, expansion, or maintenance of authorized fishways, fish hatcheries, and aquaculture facilities.

(c) *LUD II Priority*. Notwithstanding the prohibition in paragraph (a) of this section, timber harvest in an Alaska Roadless Area designated as LUD II Priority is allowed if consistent with the legislated management restrictions established in Section 201 of the Tongass Timber Reform Act.

(d) *Roadless Priority*. Notwithstanding the prohibition in paragraph (a) of this section, timber harvest in an Alaska Roadless Area designated as Roadless Priority is allowed for the following exceptions:

(1) Timber harvest for the cutting, customary trade, and removal of trees for the purposes of Alaska Native customary and traditional uses;

(2) Timber harvest for one of the following purposes that will maintain, restore or improve one or more of the following purposes:

(i) To maintain, restore, or improve fish and wildlife habitat; or

(ii) To maintain, restore, or improve the characteristics of ecosystem composition, structure, and processes;

(3) Timber harvest within a designated experimental forest for research or administration;

(4) Timber harvest for the construction, expansion, utilization, or maintenance of community utility systems; or

(5) Timber harvest is incidental to trail or recreation development that does not degrade water quality, fish habitat, fish production, fish passage, aquatic biodiversity, or soil productivity.

§294.55 Corrections and modifications.

Administrative correction or modification of designations made pursuant to this subpart may be made as follows:

(a) *Administrative corrections to boundaries*. The Chief of the Forest Service may issue administrative corrections to the boundaries or classifications of an Alaska Roadless Area after a 30-day public notice and opportunity to comment period. Administrative corrections are limited to adjustments that remedy clerical errors, typographical errors, mapping errors, or improvements in mapping technology.

(b) *Administrative modifications to Classifications and Boundaries*. The Chief of the Forest Service may issue modifications to the boundaries or classifications of an Alaska Roadless Area after a 45-day public notice and opportunity to comment period.

§294.56 Scope and applicability.

(a) After [final rule effective date], the Roadless Area Conservation Rule (66 FR 3244) published on January 12, 2001, shall have no effect within the Tongass National Forest.

(b) This subpart does not revoke, suspend, or modify any permit, contract, or other legal instrument authorizing the occupancy and use of National Forest System land issued prior to the effective date of this subpart.

(c) This subpart does not revoke, suspend, or modify any project or activity decision made prior to the effective date of this subpart.

(d) The provisions set forth in this subpart shall take precedence over any inconsistent land management plan component of the Tongass Land and Resource Management Plan. Land management plan components that are not inconsistent with this subpart will continue to provide guidance for projects and activities within Alaska Roadless Areas. This subpart does not compel the amendment or revision of any land management plan, but the Tongass Forest Supervisor shall issue a ministerial Notice of Administrative Change pursuant to 36 CFR 219.13(c) identifying plan changes made in conformance with the regulatory determinations of this subpart, including rescission of the portion of the December 9, 2016, Record of Decision concerning suitable timber lands attributed exclusively to implementation of the January 12, 2001, Roadless Area Conservation Rule (66 FR 3244).

(e) The prohibitions and permissions set forth in this subpart are not subject to reconsideration, revision, or rescission in subsequent project decisions or land and resource management plan amendments or revisions undertaken pursuant to 36 CFR part 219.

(f) Nothing in this subpart waives any applicable requirements regarding site-specific environmental analysis, public involvement, consultation with Tribes and other agencies, or compliance with other applicable laws.

(g) If any provision of the rules in this subpart or its application to any person or to certain circumstances is held invalid, the remainder of the regulations in this subpart and their application remain in force.

§294.57 List of designated Alaska Roadless Areas Alternative 5.

Table G-5
Alaska Roadless Area name and approximate acres contained within that are subject to the prohibitions and exemptions of Alternative 5.

Alaska Roadless Area Name	LUD II Priority (acres)	Roadless Priority (acres)
Aaron	0	72,000
Alaska Roadless Area Islands	0	0
Anan	37,900	0
Bay of Pillars	20,300	7,000
Behm Islands	0	3,200
Brabazon Addition	0	499,900
Bradfield	0	74,400
Calder	8,500	100
Camden	0	6,500
Carroll	0	0
Castle	0	27,000
Central Wrangell	0	6,400
Chichagof	237,100	155,400
Chilkat-West Lynn Canal	0	151,700
Christoval	0	7,600
Cleveland	0	103,100
Cone	0	128,000
Crystal	0	7,200
Dall Island	0	95,800
Douglas Island	0	23,000
Duke	0	45,100
East Kuiu	3,100	11,200
East Mitkof	0	4,000
East Wrangell	0	0
East Zarembo	0	2,100
El Capitan	7,500	2,900
Eudora	0	106,000
Fake Pass	0	600
Fanshaw	0	16,200
Five Mile	0	3,500
Freshwater Bay	0	25,700
Frosty	0	9,100
Game Creek	0	16,900
Gravina	0	21,200
Green Rocks	0	9,300
Greens Creek	0	25,600
Harding	100	146,000
Hoonah Sound	51,200	6,500
Hydaburg	4,600	6,500
Hyder	0	82,800
Juneau Urban	6,200	49,500
Juneau-Skagway Icefield	39,300	1,134,900
Kadin	0	2,000
Karta	0	16,000
Kasaan	0	7,600
Kasaan Bay	0	0
Kashevarof Islands	0	4,700
Keku	0	3,500
Kogish	0	25,700
Kosciusko	47,600	2,700
Lindenberg	0	2,300
Madan	0	14,200
Mansfield Peninsula	0	41,500
Manzanita	0	1,400

Table G-5
Alaska Roadless Area name and approximate acres contained within that are subject to the prohibitions and exemptions of Alternative 5.

Alaska Roadless Area Name	LUD II Priority (acres)	Roadless Priority (acres)
McKenzie	0	27,200
Middle Kruzof	0	2,900
Missionary	0	5,200
Mosman	0	25,500
Neka Bay	0	6,900
Neka Mountain	0	4,300
North Baranof	0	241,300
North Cleveland	0	108,400
North Etolin	0	16,100
North Kruzof	0	21,700
North Kuiu	0	3,300
North Kupreanof	0	52,900
North Revilla	31,400	102,300
North Wrangell	0	1,700
Nutkwa	21,500	6,800
Outer Islands	74,000	22,000
Pavlof-East Point	0	4,100
Point Augusta	0	10,800
Point Craven	0	9,500
Port Alexander	0	125,000
Quartz	0	146,500
Ratz	0	1,300
Redoubt	0	56,100
Revilla	0	25,400
Rhine	0	3,900
Rocky Pass	100	70,900
Salmon Bay	10,200	3,300
Sarkar	23,900	21,300
Security	0	24,300
Sitka Sound	0	13,200
Sitka Urban	0	93,300
Soda Bay	0	30,300
South Etolin	0	5,500
South Kruzof	0	50,300
South Kuiu	0	62,300
South Kupreanof	33,200	38,400
South Revilla	0	28,400
South Wrangell	0	300
South Zarembo	0	13,700
Southeast Wrangell	0	7,900
Spires	0	494,600
Suemez Island	0	8,500
Sukkwan	25,700	12,500
Sullivan	0	52,100
Taku-Snettisham	0	630,400
Tenakee Ridge	0	6,400
Thomas		
Thorne River	19,700	33,100
Trap Bay	6,400	3,200
Twelvemile	0	17,500
Upper Situk	0	10,800
West Wrangell	0	1,900
West Zarembo	0	6,100
Whitestone	0	2,200
Windham-Port Houghton	0	41,800

Table G-5
Alaska Roadless Area name and approximate acres contained within that are subject to the prohibitions and exemptions of Alternative 5.

Alaska Roadless Area Name	LUD II Priority (acres)	Roadless Priority (acres)
Woewodski	0	0
Woronkofski	0	2,200
Yakutat Forelands	137,500	166,100

Alternative 6 – Preferred Alternative

Subpart E – Alaska Roadless Area Management

§294.50 Tongass National Forest.

(a) The 2001 Roadless Area Conservation Rule as published in the Federal Register on January 12, 2001 (66 FR 3244) shall not apply to the Tongass National Forest.

§294.51 Transition.

(a) The Tongass Forest Supervisor shall issue a ministerial Notice of Administrative Change pursuant to 36 CFR 219.13(c) identifying plan changes made in conformance with the regulatory determinations of this subpart; including rescission of the portion of the December 9, 2016, Record of Decision concerning suitable timber lands attributed exclusively to implementation of the January 12, 2001, Roadless Area Conservation Rule (66 FR 3244).

APPENDIX H
RESPONSE TO COMMENTS

Appendix H
Response to Comments

CONTENTS

Appendix H
Response to Comments

Tribal Engagement/Cooperating Agencies

Comment 001: There was concern that the consultation with Alaska Native tribes and corporations on the Alaska Roadless Rule was inadequate, and that this may lead to impaired agency performance of its responsibility to consult and coordinate with Tribes regarding any future plan or project for the Tongass.

> **Response 001:** In 2018, the Forest Service sent letters to the 32 federally recognized tribes and 27 Alaska Native corporations in Southeast and Southcentral Alaska to invite government-to-government and government-to-corporation consultation. The in-region consultation invitation was continuous throughout the rulemaking process.
>
> The Alaska Region and the Tongass National Forest have an ongoing government-to-government relationship with all federally recognized tribes in southeast Alaska. The agency will continue to meet its responsibility to consult with federally recognized tribes and Alaska Native corporations through government-to-government and government-to-corporation consultation on all topics. In addition to district rangers, Regional Office staff also met with tribes, tribal cooperators, and other interested parties to answer questions and provide information as requested when feasible. Forest and Regional Office staff provided briefings, information meetings, supported formal consultations, and formal public hearings in or within the vicinity of communities throughout southeast Alaska. Most tribal governments took advantage of these opportunities. To date, twelve government-to-government consultations have occurred in association with this rulemaking effort.

Comment 002: There was concern that government-to-government consultation was inadequate because tribal governments were not consulted prior to the Secretary of Agriculture acceptance of the State of Alaska's petition for rulemaking. Commenters said tribal concerns had been inadequately addressed and requests for government-to-government consultation were not responded to in a timely manner.

> **Response 002:** The decision when to initiate government-to-government consultation is subjective. The Department did not think it was most advantageous to initiate consultation before it had an opportunity to explore development of a new policy and gain an understanding of the issues surrounding the proposal.
>
> In July 2018, the Forest Service sent letters to the 32 federally recognized tribes and 27 Alaska Native corporations in Southeast and Southcentral Alaska to invite government-to-government and government-to-corporation consultation. This was less than four months after the Secretary accepted the petition and less than two months after the Secretary directed the Forest Service to begin the rulemaking process.
>
> All in-region government-to-government consultation requests occurred as well as one consultation with the Department in which the Secretary delegated consultation to the Undersecretary, due to multitude of responsibilities at the Departmental level. All requests for government-to-government consultation with the local line officers occurred within weeks of the request. However, requests for government-to-government consultation with the Secretary's office took longer to coordinate and occur.

Comment 003: Commenters said the DEIS should have included an alternative providing Tribal Nations with a more meaningful role in management decisions affecting land in the Tongass National Forest within their traditional territory.

Response 003: Co-management of the Tongass National Forest along with tribal partners was considered as an alternative but was eliminated from detailed study because it does not comport with existing legal authorities. Alternatives, including this one, that were considered and eliminated from detailed analysis were described in Chapter 2 of the DEIS, along with the rationale for their elimination.

Comment 004: Commenters were concerned that Alternative 6 was identified as the preferred alternative after all six tribal cooperating agencies indicated opposition for a full exemption from the 2001 Roadless Rule. Further, there was concern about the Forest Service relationship with cooperating agencies because suggestions for how to improve the analysis did not seem to be taken into consideration and community use area maps were not adjusted.

Response 004: The Department has heard from a wide variety of individuals and groups and understands that opinions and preferences vary regarding how roadless areas with the Tongass National Forest should be managed and conserved. The Forest Service has been working with its cooperating agencies, as part of the Memorandums of Understanding to which all parties agreed. USDA and the Forest Service will continue to listen to all views and perspectives in reaching a final decision. The cooperating agencies, public input, and other considerations will inform that decision.

The agency considered in the development of the DEIS the use of the Alaska Native Tribe's traditional use area for the community use analysis boundaries, as suggested by the tribal cooperating agencies. The agency did not utilize the traditional use areas for the impact analysis because they are considerably larger than the community use areas. The use of larger analysis areas diffuses the impacts and the agency wanted impacts to be focused by community. The agency added an appendix displaying the traditional use areas to recognize the importance of the traditional use areas to the Alaska Native Tribes.

The agency revisited the analysis boundary issue between draft and final. The agency solicited from the State of Alaska subsistence use data by community. Alaska Department of Fish and Game provided updated survey information from six communities regarding areas of subsistence gathering. Data indicates Southeast Alaskans are traveling farther for subsistence gathering, meaning the community use areas are larger. For example, latest data indicate some people from the city of Yakutat are utilizing Prince of Wales Island for subsistence gathering. Again, the larger area would diffuse the impacts if the Yakutat community use area were to be considered Prince of Wales Island and north, which would be three-quarters of Southeast Alaska. The agency determined this would not be an improvement to the impact analysis and would make it more difficult to the reader to determine the impacts to people living in the city of Yakutat.

Comment 005: Commenters expressed concern that the process had not respected the sovereignty of tribal governments and its citizens and that tribal governments were not included as full cooperating agency partners in the decision-making process but rather were brought in after decisions were already made.

Response 005: Government-to-government consultation and cooperating agency participation provide avenues for input into analysis and to inform the decision-maker, but does not provide for decision-making. The sole decision-maker in the Alaska rulemaking process is the Secretary of Agriculture.

Comment 006: Commenters were concerned that exemption from the rule may impair tribal dependent resources and sought to have the rule kept intact for the protection and preservation of these and other reserved rights and to safeguard the health, livelihood and well-being of tribal citizens.

Response 006: It is the policy of the USDA to provide for the continuation of the opportunity for subsistence uses by rural Alaskan residents, both Native and non-Native. The policy also includes maintaining reasonable access to subsistence resources as required by ANILCA. Potential effects on subsistence and other resources are described in Chapter 3 of this FEIS. The

FEIS includes alternatives that provide varying levels of long-term protection to traditional use areas on the Tongass.

Comment 007: There was concern that exempting the Tongass National Forest may be a human rights issue and racially motivated. Commenters saw exemption from the rule as a violation of indigenous rights that would contribute to the ongoing genocide of Indigenous Peoples whose identities, cultures, and livelihoods are integral to the forest.

Response 007: A civil rights impact analysis (CRIA) was prepared for the preferred alternative for the Alaska Roadless Rule, corresponding to Alternative 6 in the DEIS. The analysis considers the proposed rule and demographic data of Tongass National Forest users and beneficiaries in the affected region of Alaska. The CRIA analysis evaluates whether there are potential adverse or disproportionate impacts from the Alaska Roadless Rule on those specific populations identified in USDA Departmental Regulation (DR) 4300-4 and 5600-002. This analysis was undertaken to evaluate how the American public could be affected by the Alaska Roadless Rule, particularly whether populations including (but not limited to) ethnic and racial minorities, people with disabilities, and women could receive potential adverse or disproportionate impacts from the proposed rule. The proposed rule is not projected to exclude, limit, or otherwise disadvantage any group or class of persons from using or benefiting from resources on the Tongass National Forest.

The proposed rule issues no requirements related to eligibility, benefits of, and services to, protected classes, nor is there a purpose or effect of treating any class of people differently than the public at large.

Comment 008: The State of Alaska and others requested edits (additions/deletions) be incorporated into the FEIS.

Response 008: As a cooperating agency the State of Alaska, as well as, our other cooperating agencies, worked with the Forest Service to adjust and change the EIS and the rule language. Changes were made between the draft and final EIS in response to input.

ANILCA/Subsistence

Comment 009: Commenters disagree with the Forest Service's conclusion in the DEIS that "[a]n ANILCA Section 810 evaluation and determination is not required for the Alaska Roadless Rule because it is a programmatic level decision and not a determination whether to "withdraw, reserve, lease, or otherwise permit the use, occupancy, or disposition of National Forest System lands." Commenters said this conclusion is inconsistent with the other facts reported in the DEIS. Others said that because the finding was not made in the DEIS, the subsequent notice and hearings were out of order and therefore prevents the USDA from making a legal Section 810 determination for subsistence.

Commenters said the Forest Service violated the Alaska National Interest Lands Conservation Act (ANILCA), National Forest Management Act (NFMA), and National Environmental Policy Act (NEPA) by failing to make a subsistence finding and analyze factors necessary to make the finding.

Response 009: The Alaska Roadless Rule is not subject to Section 810 of ANILCA because a state-specific Roadless Rule does not withdraw, reserve, lease, or otherwise permit the use, occupancy, or disposition of public lands.

"Withdraw" is the removal of lands from certain legal rights, as an example, a mineral withdrawal precludes location, entry, and patent under the United States mining laws. The proposed Alaska roadless rule does not propose any such withdrawal.

"Reserve" is to legally set aside something for a specified purpose. The proposed Alaska roadless rule does not propose to set aside any specific lands for a specific purpose.

"Lease" is an agreement between the government and another party to access property. For example, an oil lease is a legal contract between the government and an oil company to

have access to oil minerals. The proposed Alaska roadless rule does not propose to lease any federal rights to any entity.

"Permit" is to allow the "use or occupancy" of public lands or to authorize certain activities to occur on public lands. The proposed Alaska roadless rule does not propose to authorize any activities on NFS lands. Ongoing authorized uses are allowed to continue.

"Disposition of public lands" is the sale, exchange, or purchase of lands. The proposed Alaska roadless rule does not propose any of these activities.

While the Alaska Roadless Rule is not subject to Section 810 of ANILCA, the EIS did analyze the potential effects on subsistence uses, subsistence hearings were held in 18 Southeast Alaska communities (Angoon, Craig, Ketchikan, Petersburg, Sitka, Tenakee Springs, Wrangell, Yakutat, Point Baker, Hoonah, Skagway, Gustavus, Haines, Thorne Bay, Kake, Kasaan, Hydaburg, and Pelican) during the public comment period on the DEIS, and the Forest Service committed to including a Section 810 determination in the final decision for the Alaska Roadless Rule. The analysis in the EIS focused on the three factors related to subsistence uses specifically identified by ANILCA: 1) resource distribution and abundance, 2) access to resources, and 3) competition for the use of resources. The Responsible Official will consider the analysis in the EIS, the valuable input received during the subsistence hearings, input from the cooperating agencies, and other information in the record in making his final determination with regard to Section 810 of ANILCA and subsistence uses and activities on the Tongass National Forest.

Comment 010: Title VIII, Section 810 of 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 of the proposed change does not adequately account for the impacts on Native peoples.

Response 010: As discussed above, the Alaska Roadless Rule is not subject to Section 810 of ANILCA because a state-specific Roadless Rule does not withdraw, reserve, lease, or otherwise permit the use, occupancy, or disposition of public lands. While the Alaska Roadless Rule is not subject to Section 810 of ANILCA, the EIS did analyze the potential effects on subsistence uses, subsistence hearings were held in 18 Southeast Alaska communities (Angoon, Craig, Ketchikan, Petersburg, Sitka, Tenakee Springs, Wrangell, Yakutat, Point Baker, Hoonah, Skagway, Gustavus, Haines, Thorne Bay, Kake, Kasaan, Hydaburg, and Pelican) during the public comment period on the DEIS, and the Forest Service has committed to including a Section 810 determination in the final decision for the Alaska Roadless Rule.

In addition, government-to-government consultation between the Forest Service and potentially affected federally recognized tribes is ongoing, and the Forest Service continues to consider information obtained from the tribes through this consultation. All of the information and input received to date has been considered and, as appropriate, incorporated into the EIS; it will all be used to inform the Secretary of Agriculture for his final decision on the Alaska Roadless Rule.

Comment 011: The Forest Service's failure to provide site-specific subsistence information and consider the Organized Village of Kake's use map in February 2019 violates ANILCA and NEPA.

Response 011: The EIS provides a programmatic assessment of the potential impacts that may result from the alternatives considered for a proposed Alaska Roadless Rule. This assessment and the alternatives are programmatic, meaning that they establish direction and allowable activities for broad land areas, rather than schedule specific activities in specific locations. This makes it difficult to predict effects on individual communities. The EIS discloses the types of activities that could occur and where they could occur; however, specific information about actual actions is not available sufficient to provide informed, site-specific subsistence information. This is consistent with the recent decision and order (District Court of Alaska 1:19-cv-00006-SLG) on the Prince of Wales Landscape Level Analysis Project.

The Forest Service used the Community Use Areas in Appendix E because they are a consistent data set for the entire Tongass National Forest. These community use areas are an analysis tool

to differentiate the effects of the alternatives by community and are not a record of traditional territories. The community use areas represent the general area commonly used or related to by many of the community's residents in their local day-to-day work, recreational use, and subsistence activities. In addition, the Sitka black-tailed deer habitat capability model output was analyzed for the Wildlife Analysis Areas (WAAs) where each community obtains approximately 75 percent of their average annual deer harvest. WAAs are a division of land used by the Alaska Department of Fish and Game (ADF&G) for wildlife analysis. Appendix E in the FEIS has been revised to include an assessment of potential subsistence impacts at the community level and the findings of the 2016 analysis are included as part of this analysis. Potential impacts by alternative and community are considered in the context of projected impacts following 100 years of implementation of the current Forest Plan.

The FEIS includes a discussion of the differences between the Forest Service analysis tool of Community Use Areas, the Alaska Roadless Area Community Priority, and the Traditional territories of the Alaska Native peoples throughout Southeast Alaska.

Comment 012: The Forest Service violated ANILCA and NEPA by refusing to consider mitigation measures proposed by Kake to protect all remaining, intact old-growth habitat in Kake's traditional use area, updating the Tongass roadless inventory to capture all roadless lands important to Kake, and allowing an improved role in management of lands in Kake's traditional territory.

Response 012: The roadless inventories were updated and additional areas were included in Alternatives 2 and 3 as designated Alaska Roadless Areas. All unroaded areas were reviewed and some areas identified in the 2003 and 2008 roadless analyses associated with Tongass forest planning efforts were included. In addition, small islands previously excluded from roadless designation were included if not substantially altered.

Mitigations such as identifying specific road segments, selling carbon credits, and workforce development are outside the scope of the Alaska roadless rulemaking, which is programmatic and does not evaluate projects or partnerships.

Co-management of the Tongass National Forest with tribal partners was considered as an alternative but eliminated from detailed analysis as it does not comport with existing legal authorities.

Comment 013: The Langdon and Sanderson (2009) publication should be used as a resource to define the K'iis Xaadas territory discussed in Appendices E and F of the Alaska Roadless Rule DEIS, and Table E-12 of the DEIS should reflect the corrected traditional territory. This area may be smaller than the "Community Use Area" currently defined in the DEIS, however the K'iis Xaadas traditional territory is more widely recognized and is still the currently recognized traditional use area for Hydaburg.

Response 013: The Community Use Areas in Appendix E were used for the analysis in the EIS because they are a consistent data set for the entire Tongass National Forest. These community use areas are an analysis tool to differentiate the effects of the alternatives by community, and not a record of traditional territories. The community use areas represent the general area commonly used or related to by many of the community's residents in their local day-to-day work, recreational, and subsistence activities. In addition, the Sitka black-tailed deer habitat capability model output was analyzed for the Wildlife Analysis Areas (WAAs) where data indicate that each community obtains approximately 75 percent of their average annual deer harvest. This analysis was originally prepared for the 1997 Forest Plan FEIS and was updated for the 2016 Forest Plan FEIS. WAAs are a division of land used by ADF&G for wildlife analysis.

Haa Aani: Tlingit and Haida Land Rights and Use (Goldschmidt and Haas 1998) was used for the mapping of traditional territories in the EIS, and the Forest Service recognizes that several tribes have been refining these maps of traditional territories.

The FEIS includes a discussion of the differences between the analysis tool used in the EIS (Community Use Areas), the Alaska Roadless Area Community Priority management category,

and the maps and other information about the traditional territories of the native peoples around Southeast Alaska.

Comment 014: There was concern that the traditional knowledge was not incorporated into the DEIS. The subsistence economy for residents of Southeast Alaska is strong, and the reliance upon fishing, hunting and gathering takes an understanding of the available habitat and environment.

Response 014: The EIS evaluates the effects of the alternatives relative to subsistence at the programmatic level. The EIS, including Appendix E, discusses the potential effects of the proposed Alaska Roadless Rule, including six alternatives, on 32 communities in Southeast Alaska. Appendix E in the FEIS has been revised to include an assessment of potential subsistence impacts at the community level. The subsistence economy is discussed in the *Subsistence* section of the FEIS. The Forest Service values the knowledge of the cooperating agencies and other Alaska Native tribes, and also the public input received at the public meetings and hearings. The Forest Service held public meetings in 19 communities throughout Southeast Alaska, plus Anchorage and Washington, D.C.

In addition, government-to-government consultation between the Forest Service and potentially affected federally recognized tribes is ongoing, and the Forest Service continues to consider information obtained from the tribes through this consultation. All of the information and input received to date has been considered and, as appropriate, incorporated into the EIS; it will all be used to inform the Secretary of Agriculture for his final decision on the Alaska Roadless Rule.

Comment 015: Commenters expressed concern that a rule change would have ripple effects across all communities regionally no matter the specific geographic extent of the changes. For example, if logging is introduced in one area, subsistence users will be displaced to other areas potentially increasing competition for resources in those areas.

Response 015: As discussed in the EIS, timber program output levels are expected to remain constant and involve a similar number of acres under all alternatives, varying only by the location of timber harvest. This assessment and the proposed alternatives are programmatic, meaning that they establish direction and allowable activities for broad land areas, rather than schedule specific activities, such as timber harvest, in specific locations. None of the alternatives authorize any site-specific projects or other ground-disturbing activities. Specific projects that include timber harvest, road construction, and/or road reconstruction will undergo site-specific environmental analysis when they are proposed in compliance with NEPA. Potential impacts to subsistence, such as increased competition from displaced subsistence users, will be assessed at the project-level. Project-level analyses require a subsistence evaluation and finding in accordance with ANILCA Section 810.

Comment 016: Commenters sought tabulations of the existing abundance conditions of local flora and fauna that would represent the current status of populations, for example, the amount of old-growth red cedars existing in the Tongass currently, counts of pinto abalone, herring, deer populations, etc. Commenters questioned how the impacts of historical logging or future impacts of the changed rule could be tabulated properly without baseline estimates.

Commenters sought effect analysis for specific impacts to the comprehensive elements of the traditional subsistence diet which can include deer, seal, salmon, king salmon, dog salmon, halibut, crab, oysters, herring, pinto abalone, berries, beach asparagus, beach greens, sea vegetables, shrimp, rockfish, fiddlehead ferns, mushrooms, seaweed, medicinals (sundews, usnea, devil's club, yew berries, golden thread), and fresh water.

Response 016: The Alaska Roadless Rule assessment presented in this EIS is a rulemaking process and programmatic-level decision. None of the alternatives authorize any site-specific projects or other ground-disturbing activities. Inventorying and counting individual populations of subsistence resources is outside the scope of this analysis. Similarly, assessing impacts for different elements of the traditional subsistence diet is not possible at the programmatic level. However, specific projects that include timber harvest, road construction, and/or road

reconstruction will undergo site-specific environmental analysis when they are proposed to comply with NEPA. Potential impacts to subsistence resources and users will be assessed as part of these project-level analyses, which require a subsistence evaluation and finding in accordance with ANILCA Section 810.

Site-specific information typically used in project-level analyses includes identification of subsistence resources that occur in the project area and may be affected and levels of use in the project area by subsistence and non-subsistence users, with subsistence users provided the opportunity to provide input with respect to their use of local resources and potential project-related impacts.

Comment 017: Comments sought additional analysis about how future needs will change regionally due to changes in population growth and distribution.

Response 017: Potential effects to subsistence are assessed at the Forest-level in the EIS in terms of the following factors: 1) resource distribution and abundance, 2) access to resources, and 3) competition for the use of resources (see the *Subsistence* section).

Appendix E in the FEIS has been revised to include an assessment of potential subsistence impacts at the community level. The findings of the 2016 Forest Plan Amendment EIS analysis are included as part of this analysis and potential impacts by alternative and community are considered in the context of projected impacts following 100 years of implementation of the current Forest Plan.

Comment 018: Commenters consider the proposed change in the Roadless Rule as a direct threat and attack on the subsistence way of life due to the extreme cumulative impacts the change would have on local communities, culture, native landscapes, self-reliance, food security, shelter, fuel, handicrafts, native medicines, emotional and psychological health, spiritual wellbeing, and future generations. Commenters said that removing the Tongass from the Roadless Rule would produce both existential, profound, and generational impacts on local native populations.

Response 018: As discussed in the EIS, timber program output levels are expected to remain constant and involve a similar number of acres under all alternatives, varying only by the location of timber harvest. This assessment and the proposed alternatives are programmatic, meaning that they establish direction and allowable activities for broad land areas, rather than schedule specific activities, such as timber harvest, in specific locations. None of the alternatives authorize any site-specific projects or other ground-disturbing activities. Specific projects that include timber harvest, road construction, and/or road reconstruction will undergo site-specific environmental analysis when they are proposed to comply with NEPA. Potential impacts to subsistence resources and users will be assessed as part of these project-level analyses, which will require a subsistence evaluation and finding in accordance with ANILCA Section 810.

Comment 019: Commenters said that the subsistence economy is not just about food, but also includes customary trade. Residents are entitled to this local economic tradition and changing the Roadless Rule would negatively impact resources involved in the practice.

Response 019: The section of the EIS that discusses the subsistence economy has been revised to include a discussion of the importance of sharing and trade of wild resources as a traditional practice across the region (see the *Subsistence* section in Chapter 3). Potential impacts to wildlife and fish are assessed in the *Key Issue 3* in the EIS. Impacts to subsistence are assessed at the Forest-level in the *Subsistence* section, with potential impacts addressed by community in Appendix E.

Comment 020: Commenters explained that the role of subsistence and potential lack of access or abundance is extreme for local island community members. Subsistence is considered the only viable option for many people, therefore socioeconomic conditions are highly tied to local healthy ecosystems, and the potential impacts of the rule change are amplified due to a basic lack of connectivity.

Response 020: The importance of subsistence to local economies is discussed in the section of the EIS that addresses the subsistence economy (see the *Subsistence* section in Chapter 3). Potential impacts are assessed by community in Appendix E, which considers potential impacts to 32 Southeast Alaska CUAs using four primary measures by alternative: 1) acres by Alaska Roadless Area (ARA) management category and change in acres managed as roadless; 2) change in acres in development Land Use Designations (LUDs); 3) change in suitable old-growth acres available for harvest, and 4) changes in estimated harvest over 100 years. Impacts are also considered for the WAAs where each community obtains approximately 75 percent of their average annual deer harvest.

Comment 021: Commenters found the term "subsistence" derogatory and that it implies a lack of creativity in utilization of resources. Local people refer to it as their “way of life”. The proposed rule change demonstrates a lack of understanding about the way of life in its historical and cultural context. Living off the land is not only essential and economical, it is fulfilling and exhausting.

Response 021: The use of the term subsistence is consistent with the definition provided in ANILCA Section 803 and is not meant to be derogatory or to imply a lack of creativity in the use of resources. A number of people providing testimony during the subsistence hearings held for this rulemaking stated a preference for the term “way of life,” rather than subsistence. This information has been added to the beginning of the *Subsistence* section in the EIS.

Comment 022: Commenters sought effects analysis considering how those reliant on the subsistence lifestyle are particularly sensitive to change in ecological health as it impacts their own human health in a myriad of ways.

Response 022: The EIS recognizes the important role that subsistence plays in Southeast Alaska communities. Potential impacts to subsistence are considered at the Forest-level (see the *Subsistence* section) and in community-specific discussions provided as part of Appendix E.

Comment 023: Commenters sought further effects analysis of the cumulative socioeconomic impact of the loss of deer, fish, and other resources to subsistence communities over time.

Response 023: The 2016 Forest Plan Amendment EIS considered the cumulative effects of timber harvest on deer habitat capability at the Forest-level and also for the WAAs where each community obtains approximately 75 percent of their average annual deer harvest. Appendix E in the FEIS has been revised to include an assessment of potential subsistence impacts at the community level. The findings of the 2016 analysis are included as part of this analysis. Forest-wide cumulative effects to subsistence are considered in the *Subsistence* section of the EIS, with further cumulative effects discussion provided in Appendix B.

Comment 024: Commenters stated that the United States has specific and enforceable fiduciary responsibilities to protect and refrain from impairing tribal dependent resources. These commenters believe that the Forest Service should keep the Roadless Rule intact to ensure the protection and preservation of these and other reserved rights, resources and habitats, and to safeguard the health, livelihood and well-being of tribal citizens of Alaska. Commenters said that, because the State of Alaska does not recognize subsistence rights, the federal priority to protect resources for subsistence users is even more crucial as a last line of defense.

Response 024: The Alaska Roadless Rule, developed in response to the State of Alaska's petition, was designed to provide for the continued conservation of roadless areas while accommodating timber harvest and road construction/reconstruction activities that are determined to be needed for forest management, economic development opportunities, and the exercise of valid existing rights or other non-discretionary legal authorities. No site-specific projects or ground-disturbing activities are authorized in the final rule. Any such projects would undergo environmental analysis in compliance with NEPA, and the final rule does not waive any applicable requirements regarding environmental analysis, public involvement, consultation with federally recognized tribes, Alaska Native Corporations, or other agencies, compliance with other laws, and/or compliance with the current Forest Plan.

Comment 025: Commenters said that Alaska's constitution mandates that preserving resources for subsistence use be prioritized over any commercial uses and that changing the Roadless Rule would therefore be unconstitutional because it only benefits large-scale commercial logging while negatively impacting subsistence resources.

> **Response 025:** The Alaska Roadless Rule, developed in response to the State of Alaska's petition, was designed to provide for the continued conservation of roadless areas while accommodating timber harvest and road construction/reconstruction activities that are determined to be needed for forest management, economic development opportunities, and the exercise of valid existing rights or other non-discretionary legal authorities. Potential impacts to subsistence are evaluated in the *Subsistence* section of the FEIS and Appendix E, which has been revised to include community-level subsistence assessments.

Comment 026: Commenters state that the proposed change to the Roadless Rule will directly impact both where and when subsistence communities may be able to hunt and search for food. As changes impact locations of subsistence access, these areas may be further and further from home which is a huge burden on these communities. Having to fish or hunt off-island or further from home presents a physical danger to subsistence communities. As changes impact timing of subsistence access, locals must go out during more dangerous times of year related to weather, ice, snow, and predators.

There was concern that increased roads and loss of habitat due to changes in the rule would mean that more subsistence users will be forced to use smaller and smaller areas of land which will make living the way of life even harder.

Commenters were concerned that changing the rule to increase areas open for logging would increase competition with loggers for subsistence resources that are already dwindling.

Commenters were concerned that changing the Roadless Rule would further decrease access to logging areas for locals. Existing logging areas available to local communities have already been whittled down due to prior logging activities by multiple entities. Corporate logging is profit-driven, however local logging is for subsistence needs such as firewood, canoe, home, and longhouse construction.

> **Response 026:** As discussed in the EIS, timber program output levels are expected to remain constant and involve a similar number of acres under all alternatives, varying only by the location of timber harvest. This assessment and the proposed alternatives are programmatic, meaning that they establish direction and allowable activities for broad land areas, rather than schedule specific activities, such as timber harvest, in specific locations. None of the alternatives authorize any site-specific projects or other ground-disturbing activities. However, potential impacts to communities are assessed for 32 Southeast Alaskan communities in Appendix E using four primary measures by alternative: 1) acres by ARA management category and change in acres managed as roadless; 2) change in acres in development LUDs; 3) change in suitable old-growth acres available for harvest, and 4) changes in estimated harvest over 100 years. Impacts are also considered for the WAAs where each community obtains approximately 75 percent of their average annual deer harvest.
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> Specific projects that include timber harvest, road construction, and/or road reconstruction will undergo site-specific environmental analysis when they are proposed in compliance with NEPA. Potential impacts to subsistence resources and users will be assessed as part of these project-level analyses. Project-level analyses require a subsistence evaluation and finding in accordance with ANILCA Section 810, which specifically address potential impacts in terms of: 1) resource distribution and abundance, 2) access to resources, and 3) competition for the use of resources.

Comment 027: Commenters expressed concern that the DEIS does not consider how exporting logs drains socioeconomic resources from the local area and subsistence communities.

> **Response 027:** The Region 10 Limited Export Shipment Policy is discussed in the EIS (see the *R10 Limited Export Shipment Policy* subsection included in Chapter 3 as part of the Key Issue 2 discussion). Reviewed on an annual basis, the Limited Export Policy is intended to boost appraised timber values and provide economic sale opportunities by providing additional

processing options for purchasers. The share of harvest exported over time is shown in Figure 3.2-6 in the EIS. In 2018, 46 percent (9.2 million board feet [MMBF]) of the total harvested (20.0 MMBF) was exported. As with local processing, timber harvested for export provides local socioeconomic benefits by supporting local jobs, including logging jobs and jobs in transportation and other services. Timber harvested for commercial purposes is no longer available for other uses, including subsistence, regardless of whether it is processed locally or harvested for export. The potential impacts of the proposed alternatives on the natural and human environment are assessed at the programmatic level in the EIS. Specific projects that include timber harvest, road construction, and/or road reconstruction will undergo site-specific environmental analysis when they are proposed in compliance with NEPA.

Comment 028: Commenters were concerned that the DEIS does not properly capture the timeline and processes of ecological succession associated with old-growth forests in the Tongass. For example, clear-cuts from previous logging activities are now in the "stem exclusive" phase which means there is limited understory and still no good habitat for deer to return to. Stem exclusion lasts some 50-150 years, with old-growth forests not returning to climax communities again for 200-300 years. The impact of this timeline on deer habitats and populations is multi-generational on both deer and the subsistence communities who rely on them.

Response 028: The 2016 Forest Plan Amendment EIS considered the cumulative effects of timber harvest on deer habitat capability at the Forest-level and also for the WAAs where each community obtains approximately 75 percent of their average annual deer harvest. Potential impacts were projected by alternative for 100 years of Forest Plan implementation. Appendix E in the FEIS has been revised to include an assessment of potential subsistence impacts at the community level. The findings of the 2016 analysis are included as part of this analysis and potential impacts by alternative and community are considered in the context of projected impacts following 100 years of implementation of the current Forest Plan.

Comment 029: Commenters said that deer cannot be found in clear-cuts; therefore, hunters lose access to deer populations when they move out of the area to avoid clear-cuts from logging activities.

Commenters were concerned with low deer populations due to over-hunting, rather than climate change or impacts from timber industries. Commenters said that hunting in clear-cuts is easier than hunting in old-growth forests and that changing the Roadless Rule will have a limited effect on deer hunting.

Response 029: The potential impact of clear-cuts on subsistence hunting is discussed at the Forest-level in terms of access (see the *Subsistence* section of the EIS). As noted in this discussion, subsistence hunters have varying opinions on the effects of clear-cut harvest on hunting success, with some saying that clear-cuts are productive for some years after harvest, while others prefer not to use clear-cuts.

Comment 030: Commenters sought effects analysis disclosing how the proposed rule change would directly and indirectly impact subsistence users and harvesters in the Tongass National Forest. Effects analysis should consider changes in subsistence distribution resulting from climate change.

Response 030: Potential direct and indirect impacts to subsistence users are evaluated at the Forest-level in the FEIS (see the *Subsistence* section). Impacts to individual communities are assessed in Appendix E. Climate change is considered as part of the cumulative effects analysis presented in Appendix B.

Comment 031: Commenters expressed concern with the adequacy of the analysis of effects of roadbuilding on subsistence resources. Commenters also requested the use of more current data rather than relying on the data used in the 2016 Forest Plan Amendment EIS.

Response 031: The impacts of roads on fish and wildlife resources are discussed under *Key Issue 3* in the EIS. The subsistence information presented in the EIS is the most current data available. Much of this data, including community level survey information compiled from ADF&G and existing deer harvest levels by WAA, has not been updated since 2016. Appendix E in the

FEIS has been revised to include an assessment of potential subsistence impacts at the community level.

Citizen Advisory Committee

Comment 032: There was concern that the Citizen Advisory Committee (CAC) membership was not representative of all stakeholders and that the CAC lacked procedural safeguards, an understanding of the 2001 Roadless Rule, sufficient to make informed recommendations.

Response 032: The committee was developed by the State of Alaska under an Administrative Order issued by Governor Walker in September 2018. The committee was charged with providing recommendations to assist the State of Alaska in fulfilling its role as a cooperating agency. The thirteen committee members were selected by Governor Walker, and the USDA and Forest Service had no part in the selection. The Forest Service provided an individual to participate on the committee as a non-voting member to provide procedural and technical information to the committee. The thirteen committee members were selected by Governor Walker to represent a diversity of perspectives, including Alaska Native corporations and tribes, fishing, timber, conservation, tourism, utilities, mining, transportation, local government, and the Alaska Division of Forestry. The Committee met for three in-person meetings in the fall of 2018 (October 2-3 in Juneau; October 24-26 in Ketchikan; and November 6-8 in Sitka). Meetings were open to the public, and each meeting included an opportunity for public comment. A final report was produced with options for the State of Alaska to consider, and the State included this report as part of their Cooperating Agency comments to the Forest Service.

Comment 033: Commenters were concerned that CAC recommendations did not appear to be considered and/or reflected in the DEIS and that the action alternatives lacked language proposed by CAC including the new road and timber cutting exceptions.

Response 033: The CAC recommendations that were provided to the Forest Service through the State of Alaska were considered by the Alaska Roadless Rule interdisciplinary team, along with all of the information the team received from the public, the other cooperating agencies, and through consultation with affected federally recognized tribes. USDA believes the recommendations were incorporated into one or more of the action alternatives. The CAC's recommendations for Alaska-specific roadless area characteristics were considered and partially incorporated by considering, and in some instances combining, the intent of the recommended language with the 2001 Roadless Rule language. The Forest Service often utilizes the roadless area characteristics as a means of assessing impacts for projects on roadless area values. Much of the CAC's recommendations did not lend themselves to this. Table 3.1-1 in the FEIS compares the CAC's recommended roadless area characteristics with the proposed Alaska roadless area characteristics.

In addition, the CAC recommended a variety of changes and/or additions to the exceptions language compared to the 2001 Roadless Rule. The exceptions language for Alternatives 2-5 has been modified to better align with the CAC's recommendations and the State of Alaska's input as a cooperating agency.

Comment 034: Commenters expressed concern that granting funds to the State of Alaska to support the State's involvement in the Alaska Roadless Rulemaking process violated the Federal Advisory Committee Act, was a misuse of congressional appropriations, and created a conflict of interest.

Response 034: The agency provided the State of Alaska's Forestry Division with $2 million from the fiscal year 2018 Consolidated Program Grant (CPG), Modification 2, utilizing the State Fire Assistance budget line item as the source code. The modification discussed the specific use of the funding, which could be used for: convening and facilitating a group with a diverse mix of state-specific interests to inform the State's input as a cooperating agency, public meetings, cooperating agency support, economic analysis and planning, and to coordinate the proposed state rule with existing land management planning efforts in progress within the State of Alaska. A subsequent modification has been executed utilizing $1.3 million of the funding to undertake

wildland fire risk reduction projects in several Alaska communities, primarily construction of fuel breaks and maintenance of established fuel breaks.

The committee does not meet the definition of an advisory committee as defined by the FACA (41 CFR 102-3.25). The committee was established under state law by the Governor of Alaska. The committee reported directly to the Governor who submitted the committee's report to the USDA as part of the State's participation as a cooperating agency. Intergovernmental coordination with the Governor or his appointees is not subject to FACA. In any event, the USDA and Forest Service did not manage or control the committee's operation and did not utilize its work within the meaning of FACA. USDA's involvement with the committee was limited to non-voting participation, providing technical assistance. The committee did not have undue influence over the rulemaking process.

National Forest Management and the Tongass Forest Plan

Comment 035: Commenters express concern about the Forest Service's ability to manage forests, as they do not have the staff nor the budget to adequately enforce management of the forest.

Commenters provided examples of land management best practices for logging not being followed regionally and concern that expanding areas available for logging would only spread the implementation of harmful practices.

Response 035: While the successful achievement of the goals of Alaska Roadless Rulemaking is ultimately dependent on investments and funding decisions made by Congress, the Forest Service remains committed to allocating staff and financial resources to planning and implementing projects that are important to the communities of Southeast Alaska, and to the American public. Land management activities would continue to be managed in accordance with the 2016 Forest Plan under all the alternatives considered in this EIS. Specific issues related to best management practices are Forest Plan-related issues and are beyond the scope of this EIS. This EIS does not authorize logging or set annual limits on logging or establish specific silvicultural or logging practices or prescriptions.

Comment 036: Commenters were concerned that Alternative 6 is in direct conflict with the Tongass Land Management Plan (Forest Plan), and that moving forward with the proposed rule would negate the Forest Plan, requiring it to be updated. Commenters said that the Forest Plan should be updated before making any changes to the Roadless Rule's protections.

Response 036: Chapter 2 of this FEIS describes the relationship of Alaska Roadless Rulemaking to the 2016 Tongass Forest Plan. Except for the administrative change to the timber land suitability determinations discussed below, none of the alternatives would make any changes to the goals and objectives, land use designations or management prescriptions, forest-wide standards and guidelines, projected timber sale quantity, projected wood sale quantity, or the young-growth transition strategy of the Tongass Forest Plan.

An administrative change would apply to lands that were deemed unsuitable solely due to inventoried roadless area designation in the 2016 Tongass Forest Plan. However, no site-specific projects or ground-disturbing activities are authorized in the final rule. Any such projects would undergo environmental analysis in compliance with NEPA, and the final rule does not waive any applicable requirements regarding environmental analysis, public involvement, consultation with federally recognized tribes, Alaska Native Corporations, or other agencies, compliance with other laws, and/or compliance with the Tongass Forest Plan.

Comment 037: Commenters expressed concern about changes to the Forest Plan, saying that any substantial changes to suitable timber designations were not significantly raised during scoping and any substantial changes to suitable timber designations following the exemption of the Tongass National Forest from the Roadless Rule would require following the rulemaking guidance for Special Areas, Forest Plan Amendment Revisions, and the Administrative Procedures Act before the Forest Service could authorize any road construction, reconstruction, or timber harvest in those areas. The 2016 Forest Plan

does not address the impacts that changing timber suitability designations would have on roadless areas, which is required. The proposed changes would modify the Forest Plan as amended, including determinations that the Forest Plan is in alignment with Tongass Conservation Strategy and Recreation Opportunity Spectrum guidance.

> **Response 037:** The Secretary has extensive authority governing forest management and the development, amendment, or revision of land management plans, and new laws and regulations can supersede land management plan direction. The administrative change regarding timber suitability would only apply to lands that were deemed unsuitable solely due to inventoried roadless area designation in the 2016 Tongass Forest Plan. However, no site-specific projects or ground-disturbing activities are authorized in the final rule. Any such projects in these areas would undergo environmental analysis in compliance with NEPA, and the final rule does not waive any applicable requirements regarding environmental analysis, public involvement, consultation with federally recognized tribes, Alaska Native Corporations, or other agencies, compliance with other laws, and/or compliance with the Tongass Forest Plan.
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> Even the full exemption alternative would still result in full alignment of the Forest Plan with the Old Growth Habitat Conservation Strategy as that strategy, developed for the 1997 Forest Plan Revision, was developed in the absence of the Roadless Rule, which had not been enacted at that date. In addition, the current Forest Plan, without the Roadless Rule, is even more conservative of old-growth habitat than was the 1997 Forest Plan.

Comment 038: Commenters were concerned that if a Roadless Rule exemption occurs, the Forest Service will then revise or amend the 2016 Forest Plan. They believe a forest plan revision or amendment is reasonably foreseeable since the State of Alaska's petition specifically requested changes to the Tongass Forest Plan and the commenter(s) believe that rebuilding the timber industry in Southeast Alaska is the purpose of the Alaska Roadless Rule.

> **Response 038:** The proposed Alaska Roadless Rule, developed in response to the State of Alaska's petition, establishes a land classification system that conserves roadless area characteristics while analyzing alternatives that would accommodate timber harvest and road construction/reconstruction activities that are determined to be needed for forest management, economic development opportunities, and the exercise of valid existing rights or other non-discretionary legal authorities. As stated above, no site-specific projects or ground-disturbing activities are authorized in the final rule. With the exception of the administrative change to timber suitability discussed above, no other changes to the Tongass forest plan are included in the rule. Any future forest plan amendments or revision would undergo forest planning in compliance with NFMA and the 2012 Planning Rule and environmental analysis in compliance with NEPA, and the final rule does not waive any applicable requirements regarding environmental analysis, public involvement, consultation with federally recognized tribes, Alaska Native Corporations, or other agencies, compliance with other laws, regulation, or policy.

Comment 039: The Forest Service cannot administratively change the designation of lands suitable for logging because only a forest plan revision or amendment can be used to change a "plan component."

> **Response 039:** The Secretary has extensive authority governing forest management and the development, amendment, or revision of land management plans, and new laws and regulations can supersede land management plan direction. The 2012 Planning Rule recognizes this authority and provides for administrative changes to forest plans to conform to new statutory or regulatory requirements. While timber suitability is a forest plan component that would normally be addressed through the development, amendment, or revision of a forest plan, the Planning Rule recognizes that forest plan components may be changed administratively under certain circumstances, as noted above (36 CFR 219.13(a), (c)).

Comment 040: Commenters supported changes to the Forest Plan for increased timber harvest, including old growth. Some suggested the Forest Plan be revised to eliminate the transition to a predominantly young-growth timber program.

Response 040: Changes to the young growth transition strategy of the Tongass Forest Plan are outside the scope of this rulemaking effort. With the exception of the administrative change to timber suitability discussed above, no other changes to the Tongass Forest Plan are included in the rule.

Comment 041: There was concern that adjustments to timber suitability or old growth harvest acres by the proposed rule and alternatives would require amending or revising the Forest Plan to modify desired conditions and land suitability decisions to include IRAs. Commenters said there is no demonstrated urgent need for changing the Roadless Rule and that any Forest Plan revision should occur as a parallel process with the Roadless Rule change. Further, there was concern that the Timber Priority Area management category, as presented in Alternative 4, is not a narrowly focused exception to roadless area desired conditions.

Response 041: The Secretary has extensive authority governing forest management and the development, amendment, or revision of land management plans, and new laws and regulations can supersede land management plan direction. The 2012 Planning Rule recognizes this authority and provides for administrative changes to forest plans to conform to new statutory or regulatory requirements. While timber suitability is a forest plan component that would normally be addressed through the development, amendment, or revision of a forest plan, the Planning Rule recognizes that forest plan components may be changed administratively under certain circumstances (36 CFR 219.13(a), (c)).

No other changes to the Tongass Forest Plan are included in the rule. Any future forest plan amendments or revision would undergo forest planning in compliance with NFMA and the 2012 Planning Rule and environmental analysis in compliance with NEPA.

With regard to the Timber Priority Alaska roadless area land management category (included in Alternative 4), this category would apply to approximately 856,000 acres under that alternative. While there would be no regulatory prohibitions on timber harvest or road construction or reconstruction for the areas in this category, Forest Plan goals and objectives, standards and guidelines, and other forest plan components would remain in place and would help conserve roadless area characteristics and values.

Comment 042: Commenters were concerned that the use of the administrative change procedure to reclassify vast tracts of pristine old-growth forest to facilitate logging without amending the Forest Plan is not consistent with the intent of the administrative change provision in the 2012 Planning Rule. There was concern that this issue was not sufficiently identified or discussed by USDA or the Forest Service during scoping.

Response 042: The administrative change provision at 36 CFR 219.13(c) states that an administrative change includes changes to conform to new regulatory requirements. Although the provision was not expressly included in the proposed action during scoping, it was highlighted in the DEIS and conforms to the requirements of the NEPA implementing regulations.

Comment 043: Commenters were concerned that an exemption would undermine the collaborative work that went in to developing the Forest Plan. In the development of the Forest Plan, the collaborative group recommended phasing out large-scale old-growth logging over a 16-year period, easing standards and guidelines to allow increased access to young-growth timber as a way of encouraging the transition away from old-growth logging, and protecting important areas from future logging, including roadless areas, the Tongass 77 (T77) watersheds, and The Nature Conservancy (TNC)/Audubon Conservation Priority Areas. The expectation of the Forest Plan collaborative group was that its recommendations be taken as a whole and not adopted partially or in a piecemeal manner.

Response 043: No aspect of the Forest Plan is being changed, with the exception of the administrative change relating to lands that would be suitable were it not for roadless status (see previous comment response). The removal (or addition in some cases) of roadless designations is not directly related to the Forest Plan. Phasing out large-scale old-growth logging over a 16-year period and easing standards and guidelines to allow increased access to young-growth

timber as a way of encouraging the transition away from old-growth logging is still "in play" under all alternatives. Current protections for Tongass 77 watersheds and the TNC/Audubon Conservation Priority Areas also remain in place.

Comment 044: Commenters request that the forest be managed by the Forest Service to meet the agency mission and for multiple use and the health of the forest.

Response 044: This is a Forest Plan issue and is therefore beyond the scope of this EIS. Nonetheless, the sustained health of the Forest is of primary concern to Tongass National Forest managers.

Comment 045: Commenters said that control/management of the Tongass National Forest should be given back to the State of Alaska.

Response 045: This comment is beyond the scope of this EIS because this EIS is only analyzing prohibition of timber harvest and road construction within designated roadless areas.

Comment 046: Commenters were concerned that activities in old-growth stands would lead to a loss of opportunity to inventory, study and to further understand the aerosols, pheromones, and chemicals that occur with the oldest and largest trees of each species and subspecies of tree.

Response 046: Comment noted.

Comment 047: Commenters referred to how clearcut old-growth forests do not ever grow back in the same way, particularly due to the impacts of a changing climate on how these ecosystems and vegetation are able to respond.

Response 047: This comment is beyond the scope of this EIS because the Alaska Roadless Rulemaking EIS is programmatic and does not evaluate the site specific impacts of timber harvest.

The analyses in the FEIS are a generalized review which the Council on Environmental Quality recognizes as appropriate for any broad or high-level NEPA review of proposed policies, plans, programs, or projects. It is reasonable and efficient to limit detailed site-specific impact analyses to when specific proposals are brought before the agency. Locations of potential timber harvest and road construction are not known at this time. It is not known if, when, or specifically where they would occur. When specific timber harvest or other projects are proposed, site-specific NEPA analysis and required pubic involvement would be conducted at that time. No on-the-ground actions are authorized by the final rule.

Comment 048: The Forest Service’s proposal for exemption and claim that it will not cause direct harm, without explanation, contradicts its own findings from 2001 that logging, development, and roads have direct correlations with harm to National Forests.

Response 048: The USDA does not dispute that timber harvesting and road construction impact roadless area values and characteristics. However, the impact analyses in the Rulemaking for Alaska Roadless Areas FEIS do not analyze the effects of harvesting timber and constructing roads in a specific roadless area or location. Rather the FEIS analyzes the difference in effects under the 2001 Roadless Rule, the current Tongass Forest Plan, and the other action alternatives.

The programmatic impacts of logging, development, and roads are discussed throughout the FEIS, which presents analysis to document the conclusions. The commenter should be reminded that the effects of the alternatives with more acres of exemption are generally presented as higher, even though the overall effects are not substantially different because the overall level of harvest is expected to be similar.

Comment 049: Commenters asked whether the Chicken Creek area on the north end of Chichagof Island which is presently managed under the Old-Growth Habitat LUD would remain protected under the full exemption alternative (Alternative 6).

Response 049: Under the current Forest Plan, the Chicken Creek area is allocated to the Old-Growth Habitat LUD. The area would continue to be managed in accordance with the Old-Growth Habitat LUD under all of the alternatives.

Comment 050: Commenters sought a Forest Plan amendment to include updates to the suitable lands designation and timber transition strategies in consideration of the economic viability of the timber industry.

Response 050: Forest Plan amendments are outside of the scope of this analysis. The alternatives do include an administrative change regarding timber suitability that would only apply to lands that were deemed unsuitable solely due to inventoried roadless area designation in the 2016 Tongass Forest Plan.

Comment 051: Commenters are concerned that the project will reduce scenery standards and values on NFS and adjacent lands by allowing additional clearcutting, namely through Forest Plan Amendment.

Response 051: Any future forest plan amendments or revision would undergo forest planning in compliance with NFMA and the 2012 Planning Rule and environmental analysis in compliance with NEPA, and the final rule does not waive any applicable requirements regarding environmental analysis, public involvement, consultation with Alaska tribes, Native Corporations, or other agencies, compliance with other laws, regulation, or policy.

Comment 052: Commenters were concerned that projecting over 25 years is not appropriate because Forest Plans should be revised every 10-15 years.

Response 052: The forests of Southeast Alaska are very long-lived ecosystems. Stands of trees do not begin to gain old-growth characteristics until they are 150 to 250 years old. Some commenters wanted us to project for 250 years. Projecting for only 25 years would allow only relatively short-term effects to be quantitatively addressed. The 100-year projection was used to be able to consider the long-term effects of decisions that are made today and that last for well over 100 years. The 100-year projection has been used for many resources on the Tongass in the NEPA evaluations for all Forest Plan revisions and amendments over the past 25 years, so consistency allows comparisons.

Comment 053: Commenters stated that the Change to Timber Land Suitability acres should be updated to remove the Alaska Roadless Areas and LUD II Priority lands and reflect that timber production will not occur in these areas. Designated Alaska Roadless Areas and LUD II Priority lands are not suitable for timber production, since timber production and road construction are inconsistent with Roadless Area and LUD II desired conditions.

Response 053: For each of alternatives 2 through 5, the Tongass Forest Supervisor would issue a ministerial Notice of Administrative Change pursuant to 36 CFR 219.13(c) identifying plan changes made in conformance with the selected alternative.

Chugach National Forest

Comment 054: Commenters were concerned with the proposed provisions that allow changes to designations within the Chugach National Forest. Commenters felt the provisions were too broad and not specific enough and could lead to additional logging and associated impacts in the Chugach. Commenters sought clarity as to the definition and scope of modifications and classifications for Chugach NF proposal, and sought a more thorough discussion of the Chugach in the EIS. Some commenters were concerned that the administrative boundary provisions for the Chugach National Forest were not part of the State's petition and not responsive to the purpose and need, and thus felt it should be removed.

Response 054: Based on public comments, consultation(s), and discussions with cooperating agencies, the provisions described in the draft environmental impact study relating to inventoried roadless areas on the Chugach and the allowance for administrative boundary modifications and corrections have been removed from all alternatives. No aspects of the Final Rule will have an effect of the inventoried roadless areas within the Chugach National Forest.

Comment 055: Commenters suggest the Forest Service extend the exemption from the Roadless Rule to the Chugach National Forest to improve access for hydropower development.

> **Response 055:** The State's petition for an exemption from the 2001 Roadless Rule only requested it for the Tongass National Forest and not the Chugach National Forest. Therefore, the agency did not extend the exemption to the Chugach. However, hydropower development is not an activity prohibited by the 2001 Roadless Rule and thus hydropower development could occur on the Chugach National Forest.

Purpose and Need

Comment 056: The State of Alaska's petition does not reflect the national importance (described in the 2001 Roadless Rule) of the Tongass National Forest roadless areas and gives preference to the State of Alaska's desires for local timber production.

> **Response 056:** The FEIS acknowledges the importance of roadless areas for wildlife and fish habitat, recreation values, multiple economic sectors, traditional properties and sacred sites for local indigenous people, inherent passive use values, and the ecosystem services values they provide for all Americans (see Chapter 1). The Alaska Roadless Rule, developed in response to the State of Alaska's petition, was designed to provide for the continued conservation of these areas while accommodating timber harvest and road construction/reconstruction activities that are determined to be needed for forest management, economic development opportunities, and the exercise of valid existing rights or other non-discretionary legal authorities.

Comment 057: Commenters asked how changes to the Roadless Rule would help the agency meet its responsibilities for sustaining health, diversity, and productivity of forests to meet the needs of present and future generations.

> **Response 057:** Changes to the Roadless Rule do not have a direct effect on the mission of the Forest Service, which is to sustain the health, diversity, and productivity of the nation's forests and grasslands to meet the needs of present and future generations. These issues may be directly affected by projects that are permitted in the areas affected by changes to the Roadless Rule, but these projects are subject to their own NEPA review.

Comment 058: Commenters question the need for project because the 2001 Roadless Rule already provides flexibility and natural resource extraction through exemptions.

> **Response 058:** The Alaska Roadless Rule, developed in response to the State of Alaska's petition, is designed to provide for the continued conservation of roadless areas while accommodating timber harvest and road construction/reconstruction activities that are determined to be needed for forest management, economic development opportunities, and the exercise of valid existing rights or other non-discretionary legal authorities. The Tongass National Forest is unique from other national forests in respect to the size of the forest, the large percentage of roadless areas that comprise it, the degree of dependency of local communities on the forest, and forest-specific statutory considerations. While the 2001 Roadless Rule included some exceptions that allow activities that accommodate the biological, social, and economic situation of communities in Southeast Alaska, additional exceptions were added to the alternatives considered for the Alaska Roadless Rule to improve overall clarity and to respond to specific Southeast Alaska needs not anticipated by or provided for in the 2001 Roadless Rule. For example, the 2001 Roadless Rule does not allow roads to be built for new leasable mineral projects such as geothermal.

Comment 059: Commenters question the need for the exception that allows for timber harvest to improve, restore or maintain fish and wildlife habitat.

> **Response 059:** The exception to the prohibition on timber harvest that would allow timber harvest in Alaska roadless areas to maintain, restore, or improve fish and wildlife habitat is included in Alternatives 2-5 of the Rulemaking for Alaska Roadless Areas DEIS. Alternative 1, the No-Action Alternative (which would retain the 2001 Roadless Rule on the Tongass National

Forest) includes a similar exception that allows timber harvest to improve threatened, endangered, proposed, or sensitive species habitat or to maintain or restore the characteristics of ecosystem composition and structure (36 CFR 294.13(b)(1)(i), (ii)). The harvest of timber under this exception would provide for habitat patches, connectivity, structural diversity, and stream conditions determined, through project-specific analyses, to be needed for the improvement of fish and wildlife habitat on the forest.

Comment 060: The purpose and need statement is vague and confusing and lacks meaningful criteria for formulation and comparison of alternatives.

Response 060: The purpose and need statement is a brief statement as to what underlying purpose the agency is responding to in the proposed action and alternatives. It is not necessarily a means of providing meaningful criteria for formulation and comparison of alternatives. The key issues were identified to assist in the formulation and comparison of alternatives.

Comment 061: The proposed rule gives preference to the State of Alaska's idea of local timber production desires and does not support the national need to protect roadless areas within the Tongass National Forest.

Response 061: The Notice of Proposed Rulemaking (84 FR 55523) states the USDA gave "substantial weight to the State's policy preferences," which is not the same as giving preference to the State's desires on local timber production. The State's desire to emphasize rural economic development opportunities is consistent with the Department's desires to support rural economic development. In addition, the majority of the areas considered for exemption from the 2001 Roadless Rule would not be available for timber harvest due to Forest Plan direction.

Comment 062: Commenters are concerned about the rationale used to support and demonstrate need.

Response 062: As stated in the Notice of Proposed Rulemaking, the Alaska Roadless Rule reflects a different policy perspective on the roadless management issue rather than a change in the underlying facts and circumstances. This administration believes the states have valuable insight in understanding the balance between rural economic development and environmental protection, and that overall reduction in federal regulations is good for the American public due to reduced burden to the taxpayer and reduced burden to business.

Comment 063: Commenters stated that exempting 9.2 million acres of inventoried roadless acres (Alternative 6) would not resolve controversy with regards to managing roadless areas and does not adequately meet the purpose and need.

Response 063: History highlights that Roadless Rulemaking has been controversial and often litigated since promulgation of the 2001 Roadless Rule. Since that time, several states requested state-specific rulemaking in order to develop a Roadless Rule that best fits the circumstances of the state, its geography, and public interests. With regard to Alaska specifically, the Secretary is aware of the ongoing controversy related to the 2001 Roadless Rule and to management of roadless areas on the Tongass National Forest in general. Roadless rulemaking is a programmatic-level decision with broad authority given to the Secretary, and, after considering the ongoing controversy related to roadless areas on the Tongass, he has prioritized economic opportunity, federal deregulation, and the expressed positions of statewide-elected officials in selecting an alternative he believes best responds to the overall purpose of the project.

Public Involvement

Comment 064: Commenters state that the Roadless Rule should reinforce the Tongass Advisory Committee (TAC) recommendations in the 2016 Forest Plan by protecting the Tongass 77 watersheds and TNC/Audubon Conservation Priority Areas. The TAC can serve as a roadmap for incorporating public interest and economic realities into an Alaska Roadless Rule.

Response 064: The 2016 Tongass Forest Plan is based on the recommendations of the Tongass Advisory Committee (TAC). Except for the administrative change to the timber land

suitability determinations discussed above, none of the alternatives considered for the Alaska Roadless Rule would make any changes to the goals and objectives, land use designations or management prescriptions, forest-wide standards and guidelines, projected timber sale quantity, projected wood sale quantity, or the young-growth transition strategy of the Tongass Forest Plan. This includes all forest plan direction applicable to the T77 Watersheds and TNC/Audubon Conservation Priority Areas. Therefore, these areas would continue to receive the protections outlined in the 2016 Tongass Forest Plan, which includes no old growth harvest in these areas, as recommended by the TAC.

Comment 065: Commenters were concerned with the adequacy of public involvement efforts, such as, length of the public comment period, requests for additional public meetings (including outside Alaska), opportunities for oral testimony at public meetings, and scoping being initiated late in the process. Commenters felt that decisions of this magnitude should be discussed and decided over a longer period of time. Some commenters believe USDA and the Forest Service are in violation of the 1st Amendment by not allowing oral testimony. Another commenter felt that public hearings should allow for anonymous statements from community members who are not comfortable stating their names for the record. Commenters requested community education workshops on the 2001 Roadless Rule.

Response 065: The Forest Service conducted two cycles of public comment: the first was a 45-day scoping period from August 30, 2018, to October 15, 2018, in which about 144,000 comment letters were received; and the second was a 60-day comment period on the proposed rule and DEIS from October 18, 2019, to December 17, 2019, which resulted in about 267,000 comment letters. During the scoping period 17 public meetings were held and during the comment period 21 public meetings were held throughout southeast AK, Anchorage, AK, and Washington, DC. The USDA recognizes that many would have desired long scoping and comment periods. The length of the scoping and comment periods are standard for both the rulemaking and EIS processes. The robust meeting attendance and the 411,000 total comments received indicates the timing and length were adequate.

The USDA values the comments received, and the concerns expressed during the rulemaking process. The USDA considered public comments received, the range of alternatives examined in the DEIS and FEIS, and input from cooperating agencies and elected officials. Public comments were utilized to craft the range of alternatives examined in the DEIS and FEIS. The NEPA and rulemaking public comment process are not vote-counting processes. Every comment has value, whether expressed by one individual or thousands. The public comment process considers the substance of each individual comment rather than the number received. No interest group's views, or comments are given preferential treatment or consideration, and comments are considered without regard to their origin, commenter's affiliation, or number received. The information the Forest Service received was also used to inform the Responsible Official for the Alaska Roadless Rulemaking effort, the Secretary of Agriculture.

Comment 066: There was concern that the rulemaking processes contributed to a practice of discrimination by minimizing or eliminating the voices of marginalized and low-income communities.

Response 066: The Alaska Roadless Rulemaking effort provided opportunity for meaningful engagement by tribes, other government agencies, stakeholder groups, communities, and the general public. The public participation process employed for the Project is described in Chapter 1 of the EIS in the *Public Participation* section.

An analysis was conducted of the Alaska Roadless Rule alternatives and documented in the Civil Rights Impact Analysis. The analysis concluded that the final rule is not projected to exclude, limit, or otherwise disadvantage any group or class of persons from using or benefiting from resources on the Tongass National Forest. In addition, the analysis found the final rule would not create any barriers to equal program participation nor access to benefits available to all affected populations.

Additionally please refer to our responses to comment 007.

Comment 067: Commenters expressed concern that Native Tribes, organizations, and people are not properly supported, represented, heard, or understood when it comes to these kinds of regulatory changes and that involvement processes are not effective.

> **Response 067:** The Forest Service has worked hard to involve Native tribes and the public through participation as cooperating agencies, holding 17 public scoping meetings and 21 public meetings during the DEIS comment period, and holding numerous government-to-government consultation meetings. As a result of the input gathered through these meetings and consultations, many changes have been made to the alternatives. However, the Forest Service is open to and continually seeks improvement in our Native tribe and public involvement processes.

Comment 068: Commenters expressed concern that the agency does not heed the will of the public majority when it comes to action on public lands and that results in consequences, such as increased logging with effects like habitat destruction, patchworks of roads, clear cuts and wide-reaching negative impacts.

> **Response 068:** Please refer to our responses to other comments under Public Involvement.

Comment 069: Commenters questioned how and whether public opinion would influence decision making. In addition, given challenges with attending hearings in-person (distance, access, obligations, scheduling), commenters suggested that public opinion counts should be weighted to reflect that those unable to attend likely agreed with the majority present.

> **Response 069:** Information received from the public during public scoping, the public comment period for the DEIS, during public meetings and subsistence hearings following publication of the DEIS, and at other times during the rulemaking process highlighted the issues important to the communities in Southeast Alaska and to the national public and was used to inform the proposed alternatives and analysis of potential impacts in the EIS. This information will be used to inform the Responsible Official for the Alaska Roadless Rulemaking effort, the Secretary of Agriculture.
>
> Public comments on the DEIS are summarized and responses to the summarized comments are provided in Appendix H of this FEIS. In addition, all public comments are available as part of the project record.
>
> The Forest Service appreciates the participation of those people who were able to attend public meetings and the subsistence hearings in person. Other opportunities to provide input are also available for those unable to attend meetings in person and all input provided is considered equally regardless of whether it is provided in person or written form. The Forest Service does not compile counts of public opinion.

Comment 070: Commenters sought public outreach about Alternative 6 to reduce opposition through education by clarifying that concern about environmental effects of large-scale clearcutting is based upon inaccurate information and not supported by USDA rules governing timber sales.

> **Response 070:** Public outreach and involvement activities conducted as part of the Alaska Roadless Rulemaking process are summarized in the *Public Participation* section of Chapter 1 of the EIS. The potential impacts of the alternatives are evaluated by resource in the EIS. Public comments on the DEIS, including concerns regarding the impacts of timber harvest and Alternative 6, are addressed in this appendix. No additional targeted outreach of the type described in the comment is proposed or considered necessary as part of this rulemaking process.

Comment 071: Resolutions were received from local governments in support and opposition of exempting Roadless Rule protections for the Tongass National Forest.

> **Response 071:** The Forest Service values the input received, and the concerns expressed, during the rulemaking process to date. They have highlighted the issues important to both the communities in Southeast Alaska and to the national public, which were used to develop alternatives that provided a range of management options. The range of management options

analyzed in the EIS range from Alternative 1 representing continued application of the 2001 Roadless Rule and Alternative 6 representing a full exemption from the 2001 Roadless Rule while Alternatives 2 through 5 fall between those two. Effects for those alternatives are described in the EIS.

The information the Forest Service received was also used to inform the Responsible Official for the Alaska Roadless Rulemaking effort, the Secretary of Agriculture.

Comment 072: Comments and resolutions were provided in support of the Southeast Alaska electrical intertie and transportation corridor projects to promote regional economic development.

Response 072: The 2001 Roadless Rule (Alternative 1) does not prohibit the construction or maintenance of electrical transmission lines that do not require road construction or reconstruction. Temporary or permanent roads are not currently permitted in IRAs, with exceptions, though temporary linear construction zones can be authorized. However, Alternatives 2 through 5 added an exception to most ARA categories that would allow road construction for electrical interties and other utility systems.

The 2001 Roadless Rule also provides exceptions to allow construction, reconstruction, or realignment of a Federal Aid Highway in IRAs and road construction or reconstruction pursuant to reserved or outstanding rights, or as provided by statute or treaty. This includes the State of Alaska's rights under Section 4407 of Public Law 109-59, as amended. Alternatives 2 through 5 include additional exceptions for road construction in response to transportation needs identified by the cooperating agencies and through public and tribal input.

Comment 073: Commenters sought disclosure of public opinion about the proposed exemption.

Response 073: Public comments are summarized and responses to the summarized comments are provided in Appendix H of this EIS. In addition, all public comments are available as part of the project record.

Alternatives

Comment 074: Respondents said that the DEIS should have included an alternative that updates the roadless inventory to include all roadless areas that were not included as inventoried roadless areas under the 2001 Roadless Rule.

Response 074: The starting point for the Alaska Roadless Areas was the Inventoried Roadless Areas from the 2001 Roadless Rule. Alternatives 2 and 3 both include areas outside of these inventoried roadless areas. These areas are identified in the 2003 and 2008 roadless analyses conducted as part of forest planning efforts. Further, Alternatives 2 and 3 include small islands excluded from all three previous inventories/analyses.

Comment 075: Commenters suggested modification of some alternatives by including components of another alternative (mixing and matching). An example of this would be modifying Alternative 2 by adding the proposed regulatory prohibition of old-growth harvest in T77 Watersheds and TNC/Audubon Conservation Priority Areas outside of roadless areas (similar to the Forest Plan) that is part of Alternative 3.

Response 075: Mixing and matching various components of an alternative is always an option for the Responsible Official, as long as the effects are within the range of effects disclosed in the EIS. The effects of adding the regulatory prohibition (as opposed to a Forest Plan prohibition) on old-growth harvest in T77 Watersheds and TNC/Audubon Conservation Priority Areas outside of roadless areas is the same for both Alternatives 2 and 3. The difference between Alternatives 2 and 3 for this particular issue is that in Alternative 2 the prohibition on old-growth harvest in those watersheds is provided for through the Forest Plan, which could be changed through a revision or amendment, and in Alternative 3 it would be provided for through regulation, which could only be changed through additional rulemaking.

Comment 076: Commenters expressed concern that the DEIS did not satisfy the requirements of NEPA. There was concern that DEIS does not present a range of reasonable alternatives and that the alternatives presented were contradictory with arbitrary differences in roadless acreage and logging.

> **Response 076:** The alternatives in the EIS were developed in an effort to respond, in different ways, to the issues identified during scoping, particularly the key issues discussed in Chapter 1 of the EIS.

Comment 077: The Forest Service does not explain the differences between the administrative boundary correction and modification provisions proposed for Alaska and prior similar provisions.

> **Response 077:** Based on public comments, consultation(s), and discussions with cooperating agencies, the provisions described in the DEIS and proposed rule relating to inventoried roadless areas on the Chugach and the allowance for administrative boundary modifications and corrections have been removed from all alternatives, including the preferred alternative. No aspects of the Final Rule will have an effect on the inventoried roadless areas within the Chugach National Forest. In addition, the Forest Service official to approve corrections on the Tongass National Forest has been changed from the Regional Forester to the Chief of the Forest Service in Alternatives 2-5.

Comment 078: Commenters express concern regarding the existing regulatory language which was retained from the 2001 Roadless Rule.

> **Response 078:** The regulatory language for all action alternatives has been modified in response to the comments received on the DEIS and in response to cooperating agency input.

Comment 079: Commenters expressed preference for Alternative 1 and then provided secondary preferences. Individuals listing Alternative 2 as a secondary preference did so because there would not be a significant net change in acres protected. Commenters expressed that each national forest belongs to all Americans and should be protected by the Roadless Rule.

> **Response 079:** Comment noted.

Comment 080: Commenters requested that the Forest Service select an alternative that balances environmental protections with economic development.

> **Response 080:** Each alternative balances environmental protections with economic development to varying degrees.

Comment 081: Commenters expressed opposition to both Alternatives 4 and 5 as they would convert inventoried roadless areas into roadless priority areas, reducing protections for these designated areas.

> **Response 081:** Comment noted.

Comment 082: Commenters supported providing regulatory protection of areas identified in the 2016 Forest Plan as T77 watersheds and TNC/Audubon Conservation Priority Areas (high-priority watershed areas) that are outside of designated roadless. Specifically, old-growth timber harvest would be prohibited, as is proposed as a component of Alternative 3.

> **Response 082:** The current Forest Plan prohibits old-growth harvest within these areas.

Comment 083: Commenters request the Forest Service reinstate the Transportation Utility System Land Use Designation (TUS LUD) that had been removed in the 2016 Tongass Forest Plan. This would allow access for renewable energy projects that would have climate change benefits and benefit the local community.

> **Response 083:** This is outside of the scope of the Alaska Roadless Rule analysis. However, Roadless Priority, Community Use Priority, and Timber Priority designations provide exceptions or otherwise allow tree cutting and road building for utility systems.

Comment 084: Commenters sought an alternative that broadly protects fish habitat, continues the phase-out of industrial scale old-growth clear-cutting, and prioritizes the restoration of degraded watersheds and streams.

> **Response 084:** None of the alternatives would change the ongoing transition away from old-growth harvest. Protections to fish habitat and watershed restoration projects would continue under all alternatives. There is variation between the alternatives in the degree of protection afforded T77 Watersheds and TNC/Audubon Conservation Priority Areas, as described in Chapter 2.

Comment 085: Commenters sought protections in addition to what is offered by the existing rule. For example, minimizing additional clearcutting and adding lands set aside for specific cultural significance (e.g. old-growth trees like red cedar required for canoes, etc.).

> **Response 085:** A broad range of alternatives was analyzed in the EIS. Please refer to the discussion in Chapter 2 about development of alternatives. Most of the alternatives include specific roadless designations, which provide for a range of protections and exceptions to address a range of issues. The Roadless and Community Priority ARAs provide for access to and harvest of trees for cultural purposes while at the same time prohibiting commercial timber harvest. The issue of restricting clearcutting vs. other types of silvicultural prescriptions is a Forest Plan issue and beyond the scope of this EIS.

Comment 086: Commenters express support for designating specific areas in the Tongass as managed tree farming zones.

> **Response 086:** This request is outside of the scope of the Alaska Roadless Rule analysis.

Comment 087: Commenters express support for designating the Tongass as a national monument and others supported designation as a National Park to increase protections.

> **Response 087:** These requests are outside of the scope of the Alaska Roadless Rule analysis and beyond the authority of the Secretary of Agriculture. Designating the Tongass National Forest as a National Park would take an act of Congress. National monuments may only be established through legislation enacted by the U.S. Congress or proclamation of the President.

Comment 088: Commenters expressed support for expanding the Roadless protections in the State of Alaska, so additional lands would be designated as off-limits to development. Commenters also specifically requested expanded protections for T77 Watersheds and TNC/Audubon Conservation Areas outside of current roadless areas.

> **Response 088:** Alternative 3 provides new regulatory protections for T77 Watersheds and TNC/Audubon Conservation Areas outside of current roadless areas.

Comment 089: Commenters requested that projects already allowed to be permitted in roadless areas should be expressly provided for in any new Alaska Roadless Rule, including the powerline corridor to Takatz Lake, Blue Lake, or Glacier Lake licensing or relicensing or additional generational capacity, and corridors for road connections.

> **Response 089:** The rule does not affect existing permits or authorizations for occupancy or use of National Forest System Lands. Any proposed modifications or future licensing would have to be addressed on a case-by-case basis including public participation and preparation of project specific analyses.

Comment 090: Commenters request protection for specific watersheds or areas that have been identified as the most important to their community, notably but not limited to encompass culturally and traditionally important sockeye salmon systems. In many areas within these watersheds, the 2001 Roadless Rule are the only protections that apply. Further, the Watershed Priority management category applied to TNC/Audubon Conservation Priority Areas and Tongass 77 Watersheds does not add any additional protections for these areas as these watersheds were not included on the lists of those areas.

Response 090: The Forest Service reviewed the specific areas suggested for protection. In some cases, no change was made because the areas were already affected by or adjacent to existing roads or harvested areas. However, based on comments and input from tribal cooperating agencies, Alternatives 2 and 3 were evaluated and changed, where appropriate, to minimize effects to high priority sockeye watersheds. See Chapter 1, Changes Between the DEIS and FEIS.

However, watershed protection is well provided for even without the 2001 Roadless Rule. Large tracts of undeveloped lands and watershed protections are provided by existing statutory and forest plan direction, including lands in designated Wildernesses and National Monuments. In addition, the TTRA (Pub. L. 101-626, Title II, Section 201) and the National Defense Authorization Act for Fiscal Year 2015 (Pub. L. 113-291, 128 Stat. 3729, Section 3720(f)) designated approximately 856,000 acres as LUD II areas, which are managed in a roadless state to retain their wildland character. Approximately 3.6 million acres in key watersheds (defined in the Forest Plan as Tongass 77 Watersheds and The Nature Conservancy/Audubon Conservation Areas) are managed for no old-growth timber harvest, thus minimizing adverse impacts to fisheries. Management direction of LUD II areas and key watersheds would remain unaffected with the final rule."

Comment 091: Commenters sought preservation of key wetland areas in the Tongass, such as the T77 Watersheds and TNC/Audubon Conservation Priority Areas.

Response 091: Alternatives 2 and 3 provided additional protections for the T77 Watersheds and TNC/Audubon Conservation Priority Areas. T77 Watersheds and TNC/Audubon Conservation Priority Areas are protected from old-growth timber harvest under all alternatives.

Comment 092: Commenters provided input in both support and opposition of each Alternative.

Response 092: A broad range of alternatives was analyzed in the EIS. Please refer to the discussion in Chapter 2 about development of alternatives.

The Forest Service values the input received, and the concerns expressed, during the rulemaking process to date. They have highlighted the issues important to the communities in Southeast Alaska and to the national public, which were used to develop alternatives that provided a range of management options. The range of management options analyzed in the EIS range from Alternative 1, representing continued application of the 2001 Roadless Rule, to Alternative 6, representing a full exemption from the 2001 Roadless Rule, while Alternatives 2-5 fall between those two. Effects for those alternatives are described in the EIS.

The information the Forest Service received was also used to inform the Responsible Official for the Alaska Roadless Rulemaking effort, the Secretary of Agriculture.

Comment 093: Commenters expressed opposition to changing the Roadless Rule protections for the Tongass and Chugach National Forests. Rationale for maintaining the current rule (Alternative 1) include preserving old-growth habitat and avoiding habitat fragmentation. Commenters expressed belief that reducing protections would result in an increase in timber harvest and road building that, in turn, would result in increased adverse impacts to multiple resources (e.g., habitat, watersheds, subsistence). Commenters were generally opposed to exemption because they believed it would result in harm to the environment and to tribal dependent resources. Many generally objected to resource extraction by private industry. Many supported Alternative 1 over exemption because it was more protective of natural resources and still provided economic development.

Response 093: The conservation of aquatic and terrestrial habitat was identified as a key issue for the Alaska Roadless Rule EIS, and the EIS addressed the potential effects of each alternative on that key issue. While there would be more acres potentially available for harvest of productive old growth with each of the Alaska Roadless Rule action alternatives, there would be no change in the projected harvest amount from Alternative 1. Table 3.3-8 has been added to the FEIS and displays the estimated percent of original high-volume productive old growth (POG) remaining

after 100 years (total and within non-development LUDs). Under all alternatives, this would be about 85 percent of total and the percent within non-development LUDs would be about 62.

All elements of the proposed Alaska Roadless Rule that would apply to the Chugach National Forest have been removed.

Comment 095: Commenters expressed opposition to changes of the Roadless Rule protections for the Tongass and Chugach National Forests because they felt this process disregarded local input, collaboration, and the public interest. Commenters stated support for local decision-making for forest projects, activities, and rules.

Response 095: Alternative 1 represents continued application of the 2001 Roadless Rule. Regarding local input, collaboration, and the public interest, the Forest Service values the comments that have been received, and the concerns expressed, during the rulemaking process to date. They have highlighted the issues important to both the communities in Southeast Alaska and to the national public, which were used to develop alternatives that provided a range of management options as displayed in the Final Environmental Impact Statement.

Comment 096: Commenters expressed support for changes to the Roadless Rule, including the full exemption, because they believe the 2001 Roadless Rule (Alternative 1) is too restrictive. Commenters believe the Roadless Rule does not provide flexibility for timber and mining industries, forest treatment to prevent fires or manage for grazing, and impedes renewable energy and other development.

Response 096: As stated above, the EIS includes a range of alternatives that were developed in response to the key issues identified for the Alaska Roadless Rulemaking project.

Comment 097: Commenters expressed concern about the phrasing of the proposed action changing between publishing the Notice of Intent and the 2019 publication of the Notice of Availability of the DEIS for comment.

Response 097: As part of the Forest Service effort to improve environmental analysis and decision making, proposed actions are more iterative. As additional information is gathered and analysis occurs, the proposed action is refined.

Comment 098: Commenters explained that adding the suitable timber lands proposed in the exemption would provide the necessary flexibility in selection to allow the Forest Service to offer economic timber sales that meet the needs of the timber industry and provides for other development on the Tongass that contributes to rural economies.

Response 098: Each alternative varies in the amount of suitable timber lands available for harvest and the exceptions allowing for other development.

Comment 099: Commenters expressed that the proposed rule will lead to the extraction of natural resources, which will bring jobs to the area, reduce demand for select imports, and stimulate the economy. Additional roads and rights of way for utilities are necessary for economic development, particularly for the 29 of 32 communities in the region that are not connected to the nation's highway system and are typically surrounded by marine waters and undeveloped Forest land. Exemption will support local communities that live, work, hunt, and fish in the Tongass.

Response 099: Potential impacts to the social and economic environment are addressed in the Issue 2 section of Chapter 3 of the EIS and in other detailed sections.

Comment 100: LUD II Priority and Roadless protections should overlap to ensure the greatest restriction on road construction. One of the strongest combinations of protecting National Forest System lands from degradation is overlapping special area designations. These overlapping designations provide a complimentary framework for a high-level of protection from overuse and development of federal lands.

Response 100: Alaska Roadless Rulemaking has presented the opportunity to resolve long-time errors in roadless boundaries, clarify points of confusion, and develop a straightforward approach to managing Tongass National Forest roadless areas. The overlap in statutory (and Tongass

Forest Plan) management direction for the LUD II land use designation and roadless regulatory provisions (under the 2001 Roadless Rule) for the roadless portions of those LUD II areas makes it more difficult to determine which direction has primacy over the other for policy makers, land managers, and the public. While the statutory direction is similar to roadless area direction, there are some differences and this has created confusion for land managers and the public. Under Alternatives 2, 4, and 5, LUD II areas would be designated as LUD II Priority ARAs, which would be managed in accordance with applicable statutory direction. Specifically, these lands will continue to be managed in a roadless state to retain their wildland character as defined in the Tongass Timber Reform Act (TTRA; Title II, Section 201) and the National Defense Authorization Act for Fiscal Year 2015 (Public Law 113-291, 128 Stat. 3729, Section 3720(f)). Under Alternative 3, the roadless designation is removed from these LUD II areas, but the statutory direction would continue to apply to these areas.

Rationale

Comment 101: The rationale for Alternative 6 as the proposed rule is not supported by the facts. The DEIS projects minimal beneficial effect on the forest product industry and thus does not support the assertion that eliminating the Roadless Rule will support rural economic development. The assertion that the Tongass should be managed locally ignores the Forest Service's 2001 conclusion that national rulemaking was needed to protect roadless areas. The DEIS recognizes that logging is most likely to be economically efficient in areas where there are already roads which is contrary to the assertion that opening roadless areas will result in more economic timber sales.

> **Response 101:** As stated in the Notice of Proposed Rulemaking, the Alaska Roadless Rule reflects a different policy perspective on the roadless management issue rather than a change in the underlying facts and circumstances. This administration believes the states have valuable insight in understanding the balance between rural economic development and environmental protection and that overall reduction in federal regulations is good for the American public due to reduced burden to the taxpayer and reduced burden to business.

Comment 102: The NPRM provides no justification to support any additional exceptions. The 2001 Roadless Rule already provides for access to hydroelectric projects, construction of communication infrastructure, construction of transmission lines, access for locatable minerals, development of energy projects, and regional transportation projects. Although the 2001 Roadless Rule prohibits building roads for leasable minerals, the DEIS states there is no current or anticipated demand for leasable minerals on the Tongass.

> **Response 102:** The proposed rule to exempt the Tongass National Forest from the provisions of the 2001 Roadless Rule does not include exceptions. However, many of the exceptions proposed in Alternatives 2 through 5 were developed to respond to comments from the public, Alaska tribes, and cooperating agencies.

Comment 103: Commenters perceived impropriety associated with how this proposed Alaska Roadless Rule came about between the Governor of the State of Alaska and the President. There was concern that the State’s petition to initiate this rulemaking process was filed under false pretenses and did not involve any public scoping. Further, they are concerned that this change is motivated by politics and outdated timber-specific economics rather than being informed by the best available science.

> **Response 103:** The APA and USDA’s implementing regulation (7 CFR 1.28) allows any interested person to petition the Secretary to change a regulation. There is no prescribed process for developing or responding to a petition other than that it must be given prompt consideration and the petitioner will be notified promptly of the disposition made of their petition. The Secretary has no control over the underlying motivations or data offered in support of a petition. However, once a petition is accepted, a rulemaking in response to a petition will be conducted in compliance with applicable law and regulations. The USDA has conducted this rulemaking in compliance with all applicable law and carefully considered the information provided by all those who participated in the various public meetings and comment periods. The Department has drawn its own conclusions based on the information provided by all parties and its own analysis.

Comment 104: Commenters were concerned that there was inadequate reasoning given for the selection of the preferred alternative in the DEIS, and that it was politically influenced, arbitrary and capricious. There was concern that selection of Alternative 6 as the preferred polarized the discussion, making nuanced conversation difficult.

> **Response 104:** Development of federal policy is often inherently political. In this case, USDA gave substantial weight to the State's policy preferences, which is within the discretion of the Secretary. The Secretary considered a multitude of factors when selecting the preferred alternative, including the effects disclosed in the DEIS; input from the public, tribes, and cooperating agencies; overall changes in policy preferences by this administration; divergent views on roadless policy; as well as political considerations. These are all factors that a responsible official can consider when making new policy. The Notice of Proposed Rulemaking outlined how the Secretary considered the various aspects related to management of roadless areas on the Tongass National Forest. The selection of the full exemption as the proposed rule considered the important aspects related to the roadless policy question and the impacts outlined in the EIS and was not arbitrary and capricious.

Comment 105: The proposed rule is unlawful because it fails to provide a rational explanation for changing the Forest Service's roadless policy in the Tongass.

> **Response 105:** The preferred alternative removes a discretionary federal regulation and returns the regulatory landscape back to what it was prior to promulgation of the 2001 Rule. Returning roadless management on the Tongass National Forest to USDA's traditional, unit-based, land management regime is unquestionably permissible under the relevant statutes. The incoming State Petition and USDA's consideration of present conditions and various alternative rulemaking approaches indicates that there are good reasons to consider adjusting the regulatory landscape. USDA's final assessment and rationale concerning roadless management on the Tongass National Forest will be discussed in the record of decision.

Comment 106: The effects disclosed in the DEIS are based on the premise that the proposed rule will fail because the proposal will not increase mining, development of leasable mineral, energy projects, infrastructure, timber output, and jobs.

> **Response 106:** The effects analyses are based on the baseline conditions presented in the EIS, application of current management practices under the Forest Plan, and the changes that may occur in response to the Alaska Roadless Rule alternatives, including exemption.

Comment 107: Commenters expressed that including the Timber Priority LUD within the ARA boundary is confusing and inappropriate. They felt that timber production is incompatible with protecting roadless area values.

> **Response 107:** The Timber Priority ARA allows timber harvest, road construction, and road reconstruction to facilitate timber management and provide economic opportunity. It is only included in Alternative 4 and would apply to approximately 757,000 acres. While management of lands in this ARA management designation would not be subject to any regulatory prohibitions on timber harvest or road construction, retaining them in roadless designation is one way to acknowledge the roadless values of these lands to ensure appropriate consideration in future, site-specific project planning and analysis.

Roadless Areas and Mapping

Comment 108: Commenters sought a baseline that includes an accurate accounting of roadless areas that still have roadless characteristics, rather than inventoried roadless areas.

> **Response 108:** We are not exactly sure what is meant by the comment, but the 2003 Supplemental EIS evaluating roadless areas for Wilderness recommendations included an extensive description and accounting of the current conditions including all roadless area characteristics of each Tongass roadless area (see Appendix C).

Comment 109: Commenters were concerned that prior to the October 2019 DEIS release, the Forest Service deleted all young growth age-class data from their public portal, making it impossible for the public to consider the high-production of young growth timber.

> **Response 109:** It is difficult to know which young growth data and which portal the commenter was referring to. However, young growth age-class data are part of the Tongass Young Growth inventory, which is separate from the Alaska Roadless Rule project. All young growth data and information related to that inventory are available to the public now and were available during the comment period.

Comment 110: There was concern that the DEIS did not use the most current roadless inventory. This would include roadless areas in the Keex' Kwaan traditional area that were not included in the 1996 inventory used as the basis for the 2001 Roadless Rule, specifically critical lands in Three-mile Arm, Seclusion Harbor, and No Name, Alvin, and Reid Bays. Commenters urged the Forest Service to update the 2001 Roadless Rule to apply it to all Tongass Inventoried Roadless Areas, particularly those important to Keex' Kwaan.

> **Response 110:** The inventoried roadless areas subject to Alternatives 2 and 3 include Alaska Roadless Areas outside of the 2001 Roadless Rule's inventoried roadless areas. Some of these were identified in the 2003 and 2008 roadless analyses for the Tongass forest planning efforts. Further, Alternatives 2 and 3 include small islands previously excluded from any roadless inventory or analysis.

Effects Analysis - Other

Comment 111: Commenters believed that the DEIS unlawfully postpones analysis of key impacts.

> **Response 111**: Timber harvests, road building, and other developments are expected to occur under all alternatives with little variation. The locations of these activities and associated roads may change under the various alternatives, but these locations are not known at this programmatic level of analysis and required pubic involvement. When specific timber harvest or other projects are proposed, site-specific NEPA analyses would be conducted at that time. No on-the-ground actions are authorized by the final rule.

Comment 112: There was concern that deferring analyses of localized effects (community scale analyses) to subsequent site-specific proposals would place undue burden on local communities, particularly low income and marginalized communities that may lack resources necessary to conduct these analyses.

> **Response 112**: The Forest Service recognizes the challenge this presents; however, the locations of timber harvests and associated road building are not known at this time. While the locations of other developments like regional energy or transportation projects may be more predictable, based on published information, it is not known if or when they will occur. When specific timber harvest or other projects are proposed, site-specific NEPA analysis and required pubic involvement would be conducted at that time. No on-the-ground actions are authorized by the final rule.

Comment 113: The DEIS does not recognize the environmental effects of potential road construction and reconstruction in non-development LUDs that may occur to access the development LUDs within roadless.

> **Response 113**: Road construction and reconstruction needs are estimated in the FEIS, independent of which LUD they occur in. In addition, there would be very few instances where roads would have to be developed through non-development LUDs to access a development LUD that was removed from roadless. Development LUDs were mapped with access to road systems or to potential marine terminals. Furthermore, the most isolated development LUDs on the Tongass continue to be off-limits to logging even though they may have their roadless designations removed, because they are in Phases 2 and 3 of the Tongass Timber Sale Program Adaptive Management Strategy, which will continue to be not suitable for timber production.

Comment 114: Commenters expressed concern at the perception of a conflict between the Forest Service position that the proposed rule will not lead to more logging and the State of Alaska's petition, comments from Alaska's elected officials, and industry proponents demonstrating that the purpose of the proposed rule is to revitalize and expand the failing old-growth logging industry.

> **Response 114**: The proposed action does not adjust the Projected Timber Sale Quantity (PTSQ) identified in the Forest Plan. Current harvest levels are well below the PTSQ and, although it is possible that actual harvest levels will increase as a result of opening up roadless areas by increasing options for economic sales, it is not anticipated that harvest levels will reach or exceed the PTSQ on average. However, analyses in this EIS, as well as in the 2016 Forest Plan EIS, assume that harvest levels do reach the PTSQ and remain there over the planning horizon (100 years). Tongass timber sale levels for the last 3 years have averaged 15 MMBF per year, or about 1/3 of the PTSQ.

Comment 115: Commenters sought analysis of direct and indirect effects to the qualities of the Biosphere Reserve, particularly Glacier Bay National Park and Preserve – Admiralty Island.

> **Response 115**: Existing roadless areas within the Admiralty Island National Monument would retain their roadless designation under Alternatives 1 through 5. Under Alternative 6, roadless designation would be removed; however, the Monument would still be managed in compliance with ANILCA and the Forest Plan. Figure 1-1 was added to the EIS, showing such areas within the Tongass. Based on recent trends, it is reasonable to assume that most harvests will occur in the southern ranger districts, further away from the Biosphere Reserve.

Comment 116: Commenters questioned the effects disclosed for inventoried roadless areas with Developmental Land Use Designations (Development LUDs), and sought clarification that the alternatives identify both prohibitions and permissions for land use such as timber production and road construction.

> **Response 116**: Development LUDs within inventoried roadless areas are subject to the "prohibitions and permissions" identified for the development LUD in the Forest Plan, in addition to the restrictions provided by the roadless area designation under the 2001 Roadless Rule (for Alternative 1) or the new Alaska Roadless Area designation (for Alternatives 2-5). The former are found in the Forest Plan Management Prescriptions for each LUD, as well as the Forest-wide Standards and Guidelines, and the latter are shown in Appendix G and Tables 2-2 and 2-3 of this FEIS.

Comment 117: The impact analysis fails to accurately identify differences among the range of alternatives and minimizes the impact of even the most extractive alternative. Such an approach grossly misrepresents the impact of the preferred alternative and ignores a key requirement under the National Environmental Policy Act. The lack of impact analysis sets a dangerous precedent for future proposed rulemakings impacting our public lands, parks and forests.

> **Response 117:** The effects of each alternative have been quantified extensively. Differences among the alternatives are limited due to the fact that no changes in the PTSQ are associated with the proposed action or any alternatives. For all alternatives, we assumed that the PTSQ was fully harvested over the 100-year planning horizon, just as was done for the 2016 Forest Plan Amendment EIS.

Comment 118: Commenters were concerned that the impacts analysis for alternatives was flawed because the basis for estimating volume of forest harvested and the assumed definition of "detrimental impacts" illustrated a misunderstanding of the local resources and ecosystems. For example, a geographic information system analysis conducted by a member of the Kake community found that over 6 million acres of key ecologically important areas would be impacted from the proposed change, which is quite different from what the Forest Service produced in the DEIS.

> **Response 118:** The impact analyses in the EIS assume that timber harvest levels would remain the same for all alternatives, with similar or only slightly different miles of road construction and reconstruction also anticipated. The Record of Decision for the 2016 Forest Plan estimated that a total of approximately 24,000 old-growth acres would be harvested Forest-wide after 25 years,

with a total of 42,500 old-growth acres harvested after 100 years. These estimates represent an approximate upper ceiling of the number of roadless acres that could be potentially harvested under any of the alternatives. It is unclear why the commenter believes that this projected level of harvest would affect 6 million acres.

Comment 119: Comments sought additional discussion in the DEIS of logging industry impacts which can include poor culvert construction and maintenance, poor trash management, excess forest debris, and clear-cuts being left impassable for 30-50 years.

Response 119: Specific issues related to best management practices are Forest Plan-related issues and are beyond the scope of this EIS. This EIS does not authorize logging or set annual limits on logging or establish specific silvicultural or logging practices or prescriptions.

Comment 120: The DEIS is insufficient and misleading because it underreports or fails to disclose the many, potentially significant, environmental impacts of removing the Roadless Rule protections from the Tongass. This misrepresentation makes it impossible for the public and decision-makers to assess the exemption's adverse effects on the economy and ecosystems.

Response 120: This action is programmatic and therefore, does not include specific locations of natural resource extraction. When projects are proposed, site-specific NEPA analysis will be conducted. Potential impacts are described throughout Chapter 3, including economic and ecosystem effects. Quantification of impacts is more extensive in the FEIS.

Comment 121: The Forest Service's proposal for exemption and claim that it will not cause direct harm, without explanation, contradicts its own findings from 2001 that logging, development, and roads have direct correlations with harm to National Forests. The DEIS seems to disregard information in its impact analysis about impacts of clear-cutting old growth forests. This leads to DEIS conclusions that are in disagreement with the FEIS generated in 2000 when the Roadless Rule was created which clearly documented the negative cumulative impacts the Tongass would be subject to.

Response 121: The effects of timber harvest are not disregarded in the effects analysis of this EIS. However, the question of how much logging is to take place and what type of prescription should be used is a Forest Plan issue and was decided in 2016 with a major Forest Plan Amendment, which developed a young-growth transition strategy to move the industry away from old-growth clearcutting, and old-growth harvest in general. That strategy is currently being implemented. The average timber volume sold per year over the last 3 years has been 15 MMBF including only 4 MMBF of old growth. It should also be noted that in 2000, the allowable timber sale quantity (ASQ) and the level of old-growth clearcutting on the Tongass were substantially higher than the current level (by a factor of more than 10) and substantially higher than the PTSQ of the current Forest Plan.

Comment 122: The Roadless Rule has been in effect on the Tongass for 20 years and removing it would cause adverse and irreparable harm.

Response 122: The EIS addresses the effects of removing or modifying the Roadless Rule for the Tongass in detail. It should be noted that, although the rule was implemented beginning in 2001, the Tongass was exempt from the Rule between 2003 and 2011, so the Rule has actually only been in effect on the Tongass for about 11 years.

Comment 123: Commenters expressed concern with effects analysis, saying that the definition of "old growth" is oversimplified and that by discussing effects in terms of acres of old- or second growth lost does not account for total roadless acreage impacted.

Response 123: Impact evaluations in the EIS cover far more than acreage impacted. For example, habitat impacts evaluations that are associated with harvest and roads do not only address the footprint of the direct impacts, but also address the fragmentation of adjacent habitats and the associated landscape connectivity. Detailed analyses of fragmentation and connectivity, however, cannot be conducted until site-specific proposals are evaluated. As another example, the evaluation of impacts on outfitters and guides considers areas proximal to

harvest and roads. Finally, the scenery analysis evaluates entire viewsheds, using the harvest acres as measures of the degree of disturbance.

Comment 124: Commenters sought effects analysis, with more detail about the location and consideration of long-term secondary impacts, of natural resource extraction, including clear-cutting or development activities. Commenters further sought analysis showing the amount of forest fragmentation expected; documenting the amount of contiguous productive old-growth and contiguous large tree old-growth currently remaining; and disclosing effects on maintaining viable, well distributed populations of yellow cedar. Commenters sought studies to determine harvest data, especially old-growth harvest data, for yellow cedar, detailed mapping of climate envelope maps for yellow cedar for the next 400 years, and analysis of range shifts.

Response 124: This action is programmatic and therefore does not include specific locations of natural resource extraction. When projects are proposed, site-specific NEPA analysis will be conducted. Forest fragmentation is analyzed in a general way through evaluating the number of intact watersheds, but detailed analysis is not possible without site-specific project information. The amounts of POG, high-volume POG, and large-tree POG remaining now and after 100 years are presented for each alternative in Tables 3.3-7, 3.3-8, and 3.3-9 for NFS lands and in Tables 3.3-10, 3.3-11, and 3.3-12 for all lands including non-NFS lands. Evaluating effects on yellow cedar is done on a site-specific and at the Forest Plan level and is beyond the scope of this EIS, which does not change the PTSQ.

Comment 125: Commenters sought information about adaptive risk management, including monitoring and mitigation, for all action alternatives.

Response 125: Monitoring occurs at the Forest-level. The Tongass National Forest implements its plan monitoring program in accordance with 36 CFR 219.19. This process is a quality control tool for implementation of the Tongass Forest Plan, which will continue regardless of the Alaska Roadless Rule. It provides the public, the Forest Service, and other involved resource agencies with information on the progress and results of Forest Plan implementation. As such, monitoring, along with the evaluation of that monitoring, comprise an essential feedback mechanism within an adaptive management framework to keep the Forest Plan dynamic and responsive to changing conditions.

Comment 126: Commenters said that using the same LUD categories for the action alternatives that are found in the Forest Plan would allow for better integration of the rule direction and plan components.

Response 126: The analysis and data used in the EIS considered all underlying Forest Plan LUD designations, standards and guidelines and other Forest Plan Direction. Assigning different roadless categories based on underlying LUD would have unnecessarily complicated the analysis..

Comment 127: Commenters expressed concern that greater human access through additional road construction would lead to increased potential for invasion by pests such as hemlock woolly adelgid, emerald ash borer, and Douglas-fir beetle and other exotic invasive species and pathogens.

Response 127: We agree that more road construction in more isolated areas will create corridors for expansion of invasive species and other pests into more remote areas. This is disclosed in the FEIS (see *Sensitive and Invasive Plants* section).

Comment 128: The only portion of the DEIS that discloses impacts in development LUDs within roadless areas is the outfitter/guide uses section which demonstrates the Forest Service could have provided more detailed analysis for every other resource.

Response 128: For the most part, there is no reason to break down the impacts by development LUDs vs. non-development LUDs. The vast majority of the timber harvest and road construction will be conducted in development LUDs. Road development for state transportation corridors or energy projects may occur anywhere, but would be infrequent. Table 2-12 presents the acres of development LUDs protected by roadless areas for each alternative.

Economic and Social Environment

Comment 129: Commenters sought effects analysis disclosing how the proposed rule will directly and indirectly impact ecosystem services in the region including economic cost and benefits related to impacts on ecosystem services. There was concern that exemption from the rule could lead to removal of trees and damage to ecosystems which can negatively impact ecosystem services.

> **Response 129:** Ecosystem services are discussed in the EIS in the *Key Issue 1* section of Chapter 3. As discussed in this section, under the 2016 Forest Plan, timber management activities are governed by a number of laws, regulations and Forest Plan direction designed to protect or mitigate adverse impacts to natural resources that provide ecosystem services. The effects of the alternatives on these types of services are assessed in the sections of this FEIS that address fisheries, wildlife and subsistence use, and timber and vegetation, among others. Monetary values are not assigned to these services, but this does not lessen their importance in the decision-making process. Additional discussion related to ecosystem services has been added to the separate Regulatory Impact Assessment prepared in support of this Project.

Comment 130: Commenters expressed concern that exempting the Tongass from the Roadless Rule could lead to disturbance, development, or logging resulting in the damage or loss of ecosystem services in sensitive or pristine ecosystems including oxygen production, filtration of air, water and soil, as well as loss of fisheries and game populations.

> **Response 130:** See response to the comment above.

Comment 131: Commenters expressed concern about the cost-benefit analysis using changes in suitable old-growth and young-growth acres as an indicator for potential displacement of recreationists interested in primitive recreation experiences. There was concern about the methodology used to measure adverse visitor impacts. Commenters also sought consideration of scenic values in the cost-benefit analysis.

Commenters sought a full cost-benefit economic analysis that uses best available science to assess socioeconomic impacts of each alternative as well as analysis of the socioeconomic value and impact on fisheries, ecotourism, special use permits, recreation, game populations, and subsistence resources.

> **Response 131:** The EIS does not include a cost-benefit analysis. The cost-benefit analysis referred to in the comment is part of the separate Regulatory Impact Assessment and Cost-Benefit Assessment (Regulatory Impact Assessment) prepared for the Project (USDA Forest Service 2020). This comment and other concerns about that analysis are discussed in the preamble to the final rule and many comments are addressed in the final version of the Regulatory Impact Assessment.

Comment 132: The recreation-related assessment provided in the separate Regulatory Impact Assessment and Cost-Benefit Assessment prepared for the Project (USDA Forest Service 2020) understates potential impacts to the visitor industry because it considers only changes in suitable timber acres and does not address indirect effects to adjacent areas. Timber harvest and road building activities have the potential to affect much larger areas than the area that is logged.

Concern was expressed that the Forest Service did not analyze the corresponding effects on rural communities from the displacement of outfitters, guides, and tour operators.

> **Response 132:** These comments pertain to the analysis in the separate Regulatory Impact Assessment prepared for the project, not the DEIS. These comments and related concerns are discussed in the preamble to the final rule and many comments are addressed in the final version of the Regulatory Impact Assessment.

Comment 133: Commenters seek to keep any profits from timber harvesting in the local economy.

> **Response 133:** The sawmills currently operating in Southeast Alaska are all locally owned, as are the logging firms that operate in the region. Timber harvested and processed locally supports local jobs in logging and sawmills, as well as local employment in transportation and other

services, which include: water transportation, independent trucking, stevedoring, scaling, and export marking and sort yard employment for export volume; and water transportation, scaling, and independent trucking for locally sawn volume.

Comment 134: There was concern that any economic benefit from exempting the Tongass National Forest from the Roadless Rule would not last long and would benefit only a small group of individuals and minority of industries while the long-term impacts would be substantial and negatively impact a larger group of individuals and a majority of industries.

Response 134: Potential impacts to natural resource-based industries, including forest products, recreation and tourism, salmon harvesting and processing, and mining and mineral development, are assessed in the EIS. None of the alternatives are expected to result in substantial, negative impacts to natural resource-based industries in the short or long term based on the existing Forest Plan. Similarly, no substantial, long-term, negative impacts have been identified to groups of individuals.

Comment 135: Commenters requested that any profits made from logging should be paid back to taxpayers to relieve the federal deficit.

Response 135: The distribution of revenues received from timber sales on the NFS lands is outside the scope of this analysis. However, the analysis in support of the final rule included the Regulatory Flexibility Analysis which includes discussion of returns to the U.S. Treasury from revenue producing Forest Service activities such as timber sales in the section *Information Relevant to Small Governments*.

Comment 136: Commenters were concerned with the adequacy of economic analysis and whether the analysis incorporated the best available science. Further, there was concern that issues about economic analysis were brought forward during scoping but not adequately addressed in the DEIS.

Response 136: As noted in above responses, potential impacts to natural resource-based industries, including forest products, recreation and tourism, salmon harvesting and processing, and mining and mineral development, are assessed in the EIS.

With respect to comments provided during scoping, the Forest Service values the comments that have been received, and the concerns expressed, during the rulemaking process to date. They have highlighted the issues important to both the communities in Southeast Alaska and to the national public, which were used to develop alternatives that provided a range of management options as displayed in the FEIS. The information the Forest Service received was also used to inform the Responsible Official for the Alaska Roadless Rulemaking effort, the Secretary of Agriculture.

Many of the specific concerns identified by this commenter related to the economic analysis presented in the separate Regulatory Impact Assessment prepared in support of this Project. These concerns are addressed in the preamble to the final rule and many comments are addressed in the final version of that document. Other specific comments raised by the commenter that also relate to the analysis in the DEIS are addressed in this comment response appendix.

Comment 137: Commenters asked that the EIS affected environment section include historical numbers (used in the Regulatory Impact Assessment) of timber harvest and road density during/through/after the temporary exemption period.

Response 137: The EIS includes detailed information on the Forest Products sector in the Key Issue 2 section of Chapter 3. This includes information on past harvest and timber production. The cost-benefit analysis provided in the separate Regulatory Impact Assessment prepared for the Project (USDA Forest Service 2020) has been updated. Information related to that analysis and supporting materials are included in the updated Regulatory Impact Assessment document and/or planning record for the Alaska Roadless Rulemaking project.

Comment 138: Commenters sought cost data for road building and maintenance (per mile) in the areas considered for exemption from the rule.

> **Response 138:** Estimated cost data per mile for road maintenance is incorporated into the updated Regulatory Impact Assessment prepared for the project. Potential effects to NFS and non-system roads on the Tongass are discussed in the *Transportation, Energy, Communications, and Infrastructure* section of the EIS. This discussion has been updated for the FEIS and includes projections of road miles by alternative.

Comment 139: Commenters sought comparison of respective socioeconomic contributions of timber sale purchasers and the visitor industry. They requested that analysis of effect include more current information and changes in assumptions to better consider the regional scale of the visitor industry.

> **Response 139:** The DEIS summarized employment and income by industry using data from 2017, the most current available at the time of preparation. This discussion has been updated in the FEIS to incorporate information from 2018, which has become available since the DEIS was prepared. Both the wood products and recreation and tourism industries are discussed in detail in the DEIS and FEIS documents.

Comment 140: Commenters expressed concern that exempting the Tongass from the Roadless Rule would cause economic harm to Southeast Alaska residents by threatening tourism, commercial fishing, sport fishing, and subsistence economies. They requested that these impacts be accounted for in the rulemaking process and countered with mitigation efforts. Commenters also noted that economic concerns extend to Washington State where the commercial fishing and cruise industries are directly affected by what occurs in Alaska.

> **Response 140:** Impacts to the recreation and tourism and commercial fishing sectors are discussed under Key Issue 2 in the EIS. Impacts to subsistence are assessed in the *Subsistence* section. The analysis presented in the EIS focuses on the regional economy, but the Forest Service recognizes that impacts to resource-based industries in Southeast Alaska have potential economic implications for other regions, including Washington State, as noted in the comment. This includes the forest products sector as well as the commercial fishing and visitor industries.

Comment 141: Commenters were concerned that the action alternatives would not have an economic impact in terms of regional jobs/employment and would only benefit timber sale purchasers.

> **Response 141:** As discussed in the EIS, timber program output levels are expected to remain constant and involve a similar number of acres under all alternatives, varying only by the location of timber harvest. The proportion of cutting activity occurring within versus outside of roadless areas would vary by alternative, but overall regional economic impacts (jobs and employment) are assumed to remain constant across all alternatives. The action alternatives would allow the Forest Service greater flexibility in the selection of future timber sale areas, as well as the potential for more flexibility in sale design, depending on the project areas selected. This improved flexibility could, in turn, potentially improve the Forest Service's ability to offer economic sales that meet the needs of industry. In addition, the Forest Service believes that the action alternatives would provide for other types of development that would contribute to rural economies.

Comment 142: Commenters were concerned that opening more areas to logging would lead to an increase in timber sales that are not economically viable.

Commenters questioned the need for changing the Roadless Rule considering examples of recent timber offerings that failed to sell and others that sold at a loss.

Commenters expressed concern that changes to the Roadless Rule to allow logging access would not improve outcomes for a dying timber industry. Commenters indicated that any large-scale timber industry locally would be unsustainable, even if properly managed. There was concern about the industry's failure to modernize and innovate and most areas in the Tongass not being profitable for logging.

Commenters said that small-scale logging practices would be more beneficial to local economies, that switching focus to special and value-added forest products would allow the forest to be more self-sustaining and would not require any new roads. Therefore, exempting the Tongass from the Roadless Rule is not necessary to revitalize a sustainable local timber-based economy.

Response 142: As discussed in the DEIS, the Record of Decision for the 2016 Forest Plan estimated that a total of approximately 24,000 old-growth acres would be harvested Forest-wide after 25 years, with a total of 42,500 old-growth acres harvested after 100 years. These estimates represent an approximate number of roadless acres that could be potentially harvested under any of the alternatives. The conversion of previously identified unsuitable lands to suitable old-growth lands that would be available for harvest is expected to improve the Forest Service's ability to offer economic sales. None of the alternatives are expected to affect the total number of old-growth acres harvested. This is discussed further in Chapter 3 of the EIS in the section that addresses Key Issue 2. Under current legislation, all timber sales need to appraise positive.

The transition to young growth guided by the 2016 Forest Plan would be unchanged by the Alaska Roadless Rule alternatives, with transition to a young growth-based timber program anticipated in 10 to 15 years. Old-growth volume offered is projected to decrease until it reaches 5 MMBF per year (expected to occur about Year 16), at which point it is to be stabilized, with an average volume of 5 MMBF per year offered to support small operators and specialty products such as wood for musical instruments.

Comment 143: Commenters expressed that fishing and tourism industries should be supported over logging because those industries are sustainable and more important to the area economy. Commenters note that the existing Roadless Rule protects the environmental quality on which these industries rely.

Response 143: The DEIS provides an overview of the regional economy in the Key Issue 2 section of Chapter 3. This information has been updated for the FEIS in cases where new annual data has become available since the DEIS was prepared. This discussion shows the relative importance of the various natural resource-based industries in southeast Alaska. In addition, the 2016 Forest Plan supports and provides protections for the fishing and tourism industries. Potential impacts to the commercial fishing and recreation tourism industries are discussed in the *Key Issue 2* section of Chapter 3.

Comment 144: Commenters said that tourism and outdoor recreation are major driving economic forces for the Alaskan economy and worth more than the timber industry (four times as many jobs in the state as oil & gas, mining & logging combined). Commenters are concerned that changes to the rule will impact recreation and tourism because currently, visitors travel to Alaska for pristine wilderness, clean air, water, wildlife habitat, scenic values and primitive and semi-primitive recreation opportunities. There is concern that these impacts will be experienced on 165,000 acres directly and thousands of acres indirectly plus more acres pending changes to the Forest Plan that would occur following a rule change.

Response 144: The DEIS provides an overview of the regional economy in the Key Issue 2 section of Chapter 3. This information has been updated for the FEIS in cases where new annual data has become available since the DEIS was prepared. This discussion shows the relative importance of the various natural resource-based industries in Southeast Alaska. Potential impacts to natural resource-based industries, including recreation and tourism, are assessed in the EIS.

As discussed in the DEIS, the Record of Decision for the 2016 Forest Plan estimated that a total of approximately 24,000 old-growth acres would be harvested Forest-wide after 25 years, with a total of 42,500 old-growth acres harvested after 100 years. These estimates represent an approximate upper ceiling of the number of roadless acres that could be potentially harvested under any of the alternatives. Removal of roadless protections under the action alternatives would revert areas of previously identified unsuitable lands to suitable old-growth lands that would be available for harvest. Increases in suitable old-growth acres would range from 20,000 acres (Alternative 2) to 168,000 acres (Alternatives 5 and 6). Projected increases in suitable old-growth acres could potentially improve the Forest Service's ability to offer economic sales but are not

expected to affect the total number of old-growth acres harvested, with a maximum of 42,500 acres expected to be harvested over 100 years. This is discussed further in the EIS in the Key Issue 2 section of Chapter 3.

Comment 145: Commenters were concerned that jobs provided by the tourism industry are insufficient to support local communities and, therefore, not a reason to consider keeping the Roadless Rule in place.

Response 145: None of the alternatives are expected to result in substantial impacts to the recreation and tourism industry. This is discussed further in the EIS in the Key Issue 2 section of Chapter 3.

Comment 146: Commenters said that the ecotourism industry is not carbon neutral and that should be considered when weighing it against activities that may occur following a change to the Roadless Rule.

Response 146: This proposed action does not change the PTSQ for the Tongass. Therefore, no significant change in timber harvest is expected, although the distribution of harvest may be different under each alternative. There could be some additional mineral extraction and/or renewable energy projects under some alternatives, especially Alternatives 4, 5, and 6, but increases are expected to be minor. As noted above, none of the alternatives are expected to result in substantial impacts to the recreation and tourism industry.

Comment 147: The tourism industry is projected to increase to over 2.4 million visitors to the area. The Forest Service is not ready for this increase, and no plan is in place to prepare for this increase. Large group sites and trails are underdeveloped, and the Forest Service must focus on preparing for an increase in tourism, rather than support logging.

Response 147: Management of the Tongass National Forest is, in part, dependent on investments and funding decisions made by Congress. The Forest Service remains committed to allocating staff and financial resources to planning and implementing projects that are important to the communities of Southeast Alaska, and to the American public. If needed, later proposals for changes in the recreation program would be addressed in appropriate analysis.

Comment 148: Commenters said that the local economy needs logging and fishing industries to grow and that a rule change would have a positive impact on growing those industries which would improve local economies. Even a small number of new jobs would have a large impact on these small, isolated communities. Similarly, taxes from the timber industry can help local schools improve, and local wood manufacturing jobs could be created for products potentially.

Response 148: As discussed in the EIS, timber program output levels are expected to remain constant and involve a similar number of acres under all alternatives, varying only by the location of timber harvest. The proportion of cutting activity occurring within versus outside of roadless areas would vary by alternative, but overall regional economic impacts are assumed to remain constant. As a result, all alternatives are assumed to support a similar level of timber-related economic activity and a similar range of direct jobs and income. None of the alternatives are expected to affect the commercial fishing industry.

Comment 149: Commenters sought agency support for rural economic development through supporting local fishing and tourism industries, investing in recreational infrastructure, and streamlining permitting processes for community projects.

Response 149: As noted above, management of the Tongass National Forest is, in part, dependent on investments and funding decisions made by Congress. The Forest Service remains committed to allocating staff and financial resources to planning and implementing projects that are important to the communities of Southeast Alaska, and to the American public. Streamlining or adjusting existing permitting processes is outside the scope of this rulemaking effort. However, the Forest Service believes that the action alternatives would provide for other types of development that would contribute to rural economies.

Comment 150: There was concern that timber in the Tongass is primarily exported overseas to European and Asian countries. This helps other countries' economies while negatively impacting the Alaskan economy.

> **Response 150:** Old-growth timber harvested on the Tongass is not primarily exported. The Region 10 Limited Export Shipment Policy is discussed in the EIS (see the R10 Limited Export Shipment Policy subsection included in Chapter 3 as part of the Key Issue 2 discussion). Reviewed on an annual basis, the Limited Export Policy is intended to boost appraised timber values and provide economic sale opportunities by providing additional processing options for purchasers. The share of harvest exported over time is shown in Figure 3.2-6 in the EIS. In 2018, 46 percent (9.2 MMBF) of the total harvested (20.0 MMBF) was exported. As with local processing, timber harvested for export supports local jobs, including logging jobs and jobs in transportation and other services.

Comment 151: The NPRM states the proposed rule is a deregulatory action and would create an incremental reduction in the cost of conducting compliance reviews, thus reducing expenditure of taxpayer dollars. Neither the DEIS nor the NPRM attempt to quantify this potential reduction and reviews for projects in roadless areas do not impose a significant burden, as demonstrated by the 50 projects approved in roadless areas on the Tongass. In addition, the incremental saving for reviewing projects would be far outweighed by the additional expense taxpayers would incur from expanding the Tongass timber project into roadless areas.

Commenters expressed concern that the Forest Service had not adequately evaluated the costs of this proposed rule, stating that the proposed rule has a total cost greater than zero, making it a "new regulatory action," not a "deregulatory action" under Executive Order 13771.

> **Response 151:** Agency costs under the rule and the requirements of Executive Order 13771 are considered and discussed in the separate Regulatory Impact Assessment prepared for the Project (see the *Agency Costs including Control of Regulatory Costs* subsection in that document). This subsection provides detail on costs to the agency of environmental analysis, sale preparation, sale administration, and engineering support of treatment projects and timber sales on the Tongass. In addition, language has been added to the Regulatory Impact Assessment qualitatively addressing the incremental reduction in cost associated with conducting compliance reviews, alongside other costs to the agency. An "EO 13771 deregulatory action" is an action that has been finalized and has total costs less than zero. As presented in the Regulatory Impact Assessment, the upper bound estimate of net benefits for the final rule are positive.

Comment 152: Commenters disagreed with the cumulative effects discussion about timber program decline over the past century, saying instead, that the timber industry has been sustainably operating and that the average market prices of Tongass timber have been rising.

> **Response 152:** There is no question that the timber industry in Southeast Alaska has declined over the past 30 years and is continuing to decline, by almost any measure. Timber industry employment in Southeast Alaska peaked at the end of the 1980s, before decreasing sharply in the 1990s. Much of this job loss was associated with closure of the large pulp mills in Sitka (1993) and Ketchikan (1997). Timber employment has continued to decline since the 1990s, falling from a high of 561 jobs in 2003 to 193 jobs in 2018 (Table 3.2-2; Figure 3.2-4). Similarly, timber harvest in Southeast Alaska has declined from 191 MMBF in 2002 to 96 MMBF in 2018 (Table 3.2-3). Likewise, sawmill production for surveyed mills declined from 87 MMBF in 2000 to 15 MMBF in 2018.

Comment 153: Commenters were concerned that the DEIS did not quantify the reduction in expenses from exempting the Tongass from the Roadless Rule.

> **Response 153:** Agency costs under the rule are considered and discussed in the final version of the separate Regulatory Impact Assessment prepared for this project (see the *Agency Costs including Control of Regulatory Costs* subsection in that document).

Comment 154: Commenters sought analysis showing potential financial returns from future projects involving opening roadless areas and actual return from timber including a full inventory of economically viable old growth timber.

> **Response 154:** This DEIS provides a programmatic assessment of the potential impacts that may result from the alternatives considered for a proposed Alaska Roadless Rule. This assessment and the proposed alternatives are programmatic, meaning that they establish direction and allowable activities for broad land areas, rather than schedule specific activities in specific locations. None of the alternatives authorize any site-specific projects or other ground-disturbing activities and, therefore, it is not possible to estimate potential financial returns from future projects. The projected distributions of old-growth and young-growth harvest under the proposed alternatives have, however, been updated in the FEIS. These proposed distributions are projections based on the best available information at this time and provide a general indication of where future harvest could be expected to occur. Future timber sales will undergo site-specific environmental analysis when they are proposed to comply with NEPA, with economic and financial analyses conducted at that time, as appropriate.

Comment 155. Commenters disagreed with the assertion that the proposed rule would not increase agency costs because it would not increase timber harvest levels and sought a more comprehensive estimate of anticipated agency costs and losses from below-cost timber sales. The Regulatory Impact Assessment and DEIS violate NEPA by failing to account for significant costs to taxpayers as a result of-below cost Tongass timber sales.

> **Response 155:** Below cost timber sales is an issue that was eliminated from detailed consideration in the DEIS. This is discussed further in Chapter 1 of the EIS. Agency costs under the rule are considered and discussed in the final version of the separate Regulatory Impact Assessment prepared for this project (see the *Agency Costs including Control of Regulatory Costs* subsection in that document). This section provides detail on costs to the agency of environmental analysis, sale preparation, sale administration, and engineering support of treatment projects and timber sales on the Tongass National Forest.

Comment 156: Commenters wrote that timber sale projections used in the 2016 Forest Plan exceed the industry needs and that timber available for harvest with the Roadless Rule in place satisfies the current market demand. Commenters referred to recent research showing that merchantable volumes for sites open to timber harvests surpass past and future old-growth sale volumes.

> **Response 156:** As discussed in the EIS (see, for example, the *Key Issue 2* section of Chapter 3), under the current Forest Plan, there are an estimated 227,000 acres of suitable old growth available for harvest, almost 10 times the area expected to be harvested over the next 25 years. None of the alternatives are expected to affect the total number of old-growth acres harvested, but the conversion of previously identified unsuitable lands to suitable old-growth lands that would be available for harvest may improve the Forest Service's ability to offer economic sales.

Comment 157: Commenters expressed a concern that exempting the Tongass from the Roadless Rule may lead to more federal funds spent on timber subsidies and that losses incurred for administration of the timber program illustrate making more lands available to the program would not be prudent. Further, that high production costs and distance to market would make this timber unprofitable. Commenters wrote that reforming timber sale administration on the Forest prior to development of a rule would better align the agency's management priorities and responsibilities with the needs of the local and indigenous communities.

> **Response 157:** Below cost timber sales is an issue that was eliminated from detailed consideration in the DEIS. This is discussed further in Chapter 1 of the EIS. Under current legislation, all timber sales need to appraise positive and this would be the case under all the alternatives evaluated in the EIS. Reform of timber sale administration is outside the scope of this rulemaking effort.

Cultural Resources

Comment 158: Commenters expressed concern about the removal of trees and harm to the old-growth ecosystems that provide mental, spiritual, and physical well-being to people. Removal of old-growth trees and secondary development would result in degradation of the environment and loss of the wilderness that will not recover quickly, leading to spiritual and cultural loss for many generations. The negative mental, spiritual, and physical impacts resulting from loss of the old-growth forests would be magnified for those who witness it directly.

> **Response 158:** This EIS does not establish the amount of old growth to be harvested. The PTSQ for the Tongass is established by the Forest Plan and this EIS does not change the PTSQ. Therefore, it is not expected to affect the amount of timber harvest, but it may affect where timber is harvested. In addition, this Roadless EIS is programmatic and individual timber sale projects are subject to their own NEPA evaluation and public involvement.

Comment 159: Commenters were concerned about negative impacts to the quality of the total environment and subsequent negative impacts to human health and well-being because the quality of the total environment (soil, air, water, and food) is intrinsically connected to human health and survival.

> **Response 159:** Potential impacts to the physical and social and economic environment are assessed in the EIS.

Comment 160: Because changes to Roadless Rule protections may lead to natural resource extraction and developmental activities, commenters expressed concern that cultural traditions would be affected, could stop and would not be taught to future generations.

> **Response 160:** As discussed in the EIS, natural resource extraction and development activities are not expected to vary substantially among the action alternatives. Potential impacts to natural resources are evaluated in detail in the EIS, with limited differences identified by alternative. Therefore, potential effects to cultural traditions are also not expected to vary by alternative. In addition, this Roadless EIS is programmatic and individual development projects are subject to their own NEPA evaluation and public involvement.

Comment 161: Commenters expressed concern that the historical and cultural context of local communities being tied to specific geographies is not appreciated or understood by outside parties like the Federal Government. Damage to communities as a result of exempting the Tongass from the Roadless Rule has not been adequately or critically explored in this context. There are key archeological and ancient tribal lands, unsettled traditional lands, sacred sites, and the cultural significance of specific practices such as being the caretakers of the land which cannot simply be relocated geographically.

> **Response 161:** Issues related to local community concerns were extensively considered in the development of the alternatives for the Alaska Roadless Rule EIS and in the evaluation of effects, as shown by the following measures:
>
> - Alternative 3 established Community Priority ARAs, based on community input, around seven Southeast Alaska communities.
> - Appendix E, Communities, provided individual community profiles and analyzed impacts to communities, followed by the development of individual community assessments for all Southeast Alaska communities. Additional analyses were added to Appendix E.
> - Appendix F provided the traditional territories map developed by Goldschmidt and Haas' federal government landmark report titled Possessory Rights of the Natives of Southeastern Alaska (1946). Overall effects were summarized in the EIS.
> - The Forest Service conducted 17 public meetings to hear local concerns during the scoping period, including meetings in communities throughout Southeast Alaska – Angoon, Craig, Gustavus, Hoonah, Kake, Ketchikan, Petersburg, Point Baker, Sitka, Tenakee Springs, Thorne Bay, Wrangell, Yakutat, and two meetings in Juneau.

- During the 60-day comment period, the Forest Service conducted 21 public meetings including Southeast Alaska communities – Angoon, Craig, Gustavus, Haines, Hoonah, Hydaburg, Juneau, Kake, Kasaan, Ketchikan, Pelican, Petersburg, Point Baker, Sitka, Skagway, Tenakee Springs, Thorne Bay, Wrangell, and Yakutat.

Comment 162: Commenters expressed concerns that the EIS violates NHPA because cultural and historic resources exist within the project area and cultural surveys have not been conducted in coordination with Alaska Native Tribes.

> **Response 162**: See Chapter 1, Issues Eliminated from Detailed Analysis. The Forest Service consulted with the State of Alaska Department of Natural Resources, Division of Parks and Outdoor Recreation, and the Office of History and Archaeology, resulting in a letter (10/08/2018) from the State Historic Preservation Officer concurring with the Forest Service's determination that changes in management direction for designated roadless areas on the Tongass does not meet the definition of an undertaking, as defined in 36 CFR 800.16(y). Although road construction and/or timber harvest could potentially increase within some designated roadless areas, impacts under the NHPA would be based on site-specific proposals, which are currently unknown, and would be addressed in subsequent project environmental analyses.

Environmental Justice

Comment 163: Commenters said that environmental justice concerns for the proposed rule should be considered as effects on culture, not solely based on race designations.

> **Response 163:** The Environmental Justice assessment in the EIS was prepared in accordance with Executive Order 12898 and considers impacts to all populations.

Comment 164: There was concern that compliance with Executive Order 12898, Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations, was insufficiently analyzed because Organized Village of Kake tribal citizens rely on the surrounding intact habitat provided by inventoried roadless areas for our food security, cultural practices and traditional way of life. Therefore, tribal communities would be disproportionately impacted by proposed regulatory changes which would be a potential violation of regulations concerning environmental justice.

> **Response 164:** The *Environmental Justice* section in the DEIS notes that the potential effects of the alternatives on the economic and social environment of Southeast Alaska include those associated with changes in the timber industry and recreation and tourism. The section also notes that there could also be potential effects upon subsistence use and heritage resources that have particular significance for Alaska Native populations. The effects of the alternatives on communities are discussed by community in Appendix E, with changes in roadless management and acres estimated for each community use area. Impacts to subsistence are discussed in the *Subsistence* section of the EIS.

Comment 165: Commenters were concerned that the impacts of climate change that would result from increased development authorized by a full exemption from the 2001 Roadless Rule stand to disproportionately affect minority communities, especially rural Alaska Natives communities in Southeast Alaska.

> **Response 165:** Potential impacts with respect to climate and carbon are discussed in the *Climate and Carbon* section of the EIS. As discussed in this section, there would be only negligible differences among the alternatives because timber program output levels are expected to remain constant and involve a similar number of acres under all alternatives, varying only by the location of timber harvest. As a result, the alternatives would not differ in regard to their contributions to GHG emissions, changes in forest carbon stocks, carbon sequestration, or global climate change. Therefore, none of the alternatives are expected to result in climate change-related impacts that could disproportionately affect minority or low-income populations.

Comment 166: Commenters said that the Tongass National Forest is critical to Native Alaskans and the general southeastern Alaskan communities for various subsistence activities such fishing for salmon,

hunting for moose, and foraging for wild foods. Low-income families require subsistence to keep a stable food supply.

Response 166: The effects of the alternatives on communities are discussed by community in Appendix E, with changes in roadless management and acres estimated for each community use area. Impacts to subsistence are discussed in the *Subsistence* section.

Recreation and Tourism

Comment 167: Commenters sought site-specific information showing whether guided visitors are now using areas classified as "Roaded Natural" or other more developed settings and further effects analysis to describe the impacts of displacement and congestion on outfitter/guides.

The outfitter/guide analysis is inadequate because it does not disclose the locations where future logging is likely to occur. Rather, the analysis simply shows the number of suitable acres added in large geographic areas.

Response 167: The outfitter/guide analysis provided in the *Recreation and Tourism* section of the DEIS provides a detailed look at the potential impacts of the alternatives on outfitter/guide use using data provided by outfitter/guides as part of their permit requirements. The analysis identifies areas where the potential for conflict exists based on existing patterns of use and changes in the suitable land base and provides a qualitative assessment of potential impacts by location and alternative.

As explained in the DEIS and discussed elsewhere in this comment response document, this EIS provides a programmatic assessment of the potential impacts that may result from the alternatives considered for a proposed Alaska Roadless Rule. This assessment and the proposed alternatives are programmatic, meaning that they establish direction and allowable activities for broad land areas, rather than schedule specific activities in specific locations. When specific timber harvest or other projects are proposed, site-specific NEPA analysis and required pubic involvement would be conducted at that time. No on-the-ground actions are authorized by the final rule.

The potential spatial distribution of old-growth and young-growth harvest across the Tongass under the proposed alternatives has, however, been updated in the FEIS. These proposed distributions are projections based on the best available information at this time and provide a general indication of where future harvest could be expected to occur based on the relative distribution of suitable acres. Estimates were developed by outfitter/guide use area and the outfitter/guide impact analysis has been updated in the FEIS to include this information.

While the Forest Service cannot predict where future timber sales will occur, several map sets provided in the EIS show where timber exists that could be harvested (this is suitable timber). Forest-wide maps showing areas with suitable timber are in Maps 7-12 and suitable timber by alternative for each community are in Appendix D. In addition, areas in development LUDs without roadless designations are shown for the six alternatives in Figures 3.10-5 to 3.10-10, which also highlight the 15 outfitter/guide use areas that are assessed in detail in the EIS. More detailed maps showing suitable old-growth and young-growth acres available for harvest for each alternative and outfitter/guide use area are provided as Maps 13 to 18 (on thumb drive or website).

Comment 168: Commenters provided opposing views about the impacts of logging on the tourism industry, some saying it does impact the industry and others saying it does not.

Response 168: The EIS evaluates the potential impacts of the alternatives on recreation and tourism in the Recreation and Tourism section. Impacts to the recreation and tourism industry are discussed under Issue 2.

Comment 169: The outfitter/guide analysis is inadequate because it only assesses the impacts of acres considered suitable under the current Forest Plan and not all IRA acres that are in development LUDs and could be designated suitable for timber under future Forest Plan amendments

> **Response 169:** As discussed elsewhere in this comment response volume, with the exception of the administrative change to timber suitability discussed in the EIS, no other changes to the Tongass Forest Plan are included in the rule. This is reflected in the analyses presented throughout the document, including the outfitter/guide analysis. Any future forest plan amendments or revision would undergo forest planning in compliance with NFMA and the 2012 Planning Rule and environmental analysis in compliance with NEPA, and the final rule does not waive any applicable requirements regarding environmental analysis, public involvement, consultation with Alaska tribes, Native Corporations, or other agencies, compliance with other laws, regulation, or policy.

Transportation and Roads

Comment 170: Commenters were concerned with road access. Some expressed concern about the unmet need for access under the current rule, as well as seeking to get and retain public access to newly constructed roads built for timber sales and other projects. Commenters said that removing Roadless Rule protections would allow more roads to be built which would decrease traffic congestion and allow locals better access to hunting grounds. Others expressed concern that increased access would lead to resource degradation. Commenters were concerned that increased development of roads would lead to increased commercialization in the area.

> **Response 170**: Access Travel Management plans are completed at the island, district, or project levels to allow for more localized analysis of road densities in relation to resource concerns and which roads are needed to access areas for resource management (or those that are not needed which can be closed). In addition, road closures are prioritized based on financial constraints in addition to resource concerns. While there may be some new road access under all alternatives in the long run, nearly all new roads constructed under the alternatives would be closed following harvest, based on current practices

Comment 171: Commenters opposed language in the exceptions under Alternatives 2 through 5 that would require the Responsible Official to decide whether a road is needed. Commenters consider this an unnecessary requirement that impedes development because the decision is made without any criteria and development projects are sufficiently regulated by meeting requirements for complex federal, state and local permitting, and complying with the Forest Plan and other requirements.

> **Response 171**: The Forest Service retains the authority to review individual project needs for road(s). The language for the exceptions under each alternative were modified between draft and final in part due to the concerns expressed in this comment.

Comment 172: Commenters expressed concern that the DEIS understates the impacts because it does not recognize that shifting timber production from roaded areas to roadless areas would result in more road building, causing greater environmental impact.

> **Response 172**: The FEIS provides estimates of the mileage of new roads, roads over decommissioned road beds, and reconstructed roads that would be developed under each alternative. Estimates of the increase in new road building have been added to the EIS, showing an increase ranging up to about 50 miles over 100 years (Table 3.3-21) and estimated road densities were added (Table 3.3-15).

Comment 173: Road building is not cost-effective and is a waste of taxpayer money, while damaging the fragile and unique forest.

> **Response 173**: Estimates of the increase in road building within roadless areas have been added to the EIS, showing a range of about 50 miles over 100 years (Table 3.3-21) between the alternatives.

Comment 174: Commenters expressed support for building additional roads.

> **Response 174**: Comment noted.

Comment 175: Commenters said that additional access roads are not needed for timber harvests because the existing roads are sufficient.

> **Response 175**: Existing roads are often sufficient for harvest of young growth because of past road construction (although these roads often need to be reconstructed), and in some cases they may be sufficient for harvesting old-growth units along existing roads. But existing roads are not sufficient for harvesting old-growth units that are not adjacent to existing roads (unless close enough to an existing road to be economically yarded by helicopter).

Comment 176: Commenters expressed concern that the DEIS did not accurately describe the current limitations on the construction, operation, and maintenance of roads and utilities connecting the communities of Southeast Alaska.

> **Response 176:** Limitations to regional transportation and energy system projects under the 2001 Roadless Rule were added to the FEIS.

General Analysis and Editorial

Comment 177: Commenters sought a comparative summary format in Chapter 1 for Water Quantity and Quality, Air Quality, General Vegetation, General Wildlife Species/Habitat, and General Aquatics. The general discussion for impacts to Wetlands in Chapter I, Purpose and Need for the Action (p. 1-9), was suggested as an example of a comparative summary among the alternatives.

> **Response 177**: In response to this comment, the comparative summary in the Water Quantity and Quality, Air Quality, General Vegetation, General Wildlife Species/Habitat, and General Aquatics sections of Chapter 1 have been expanded.

Comment 178: Commenters were concerned that maps did not provide an accurate picture of existing protections that cover much of the Tongass. As an example, maps did not clearly identify the various protective land use designations for the Tongass, such as areas designated as Wilderness, LUD II, and National Monument lands.

> **Response 178**: The requested map was added to Chapter 1.

Comment 179: Commenters sought clarification on the process for subsequent NEPA analyses for future ground-disturbing activities and how future site-specific NEPA analyses relate to this EIS as well as the 2016 Forest Plan Final EIS. Commenters sought a graphic display, such as a flow chart, to better explain the process and the relationship to other NEPA documents.

> **Response 179**: When a future project is proposed, either by Forest Service or another party, the Forest Service will evaluate the need for the project and determine its consistency with the Forest Plan and other laws and regulations. Based on the anticipated scale of effects, the Forest would conduct NEPA analysis, which is often an Environmental Assessment or Environmental Impact Statement. For each of these, the Forest Service is required to offer opportunities for public involvement. Future projects would have to be consistent with both the Forest Plan and the Alaska Roadless Rule.

Comment 180: Commenters sought a summary of the effects for each of the various impacts from the 2016 Forest Plan Amendment Final EIS to reduce the need for the reader to search for the summary findings in the 2016 Forest Plan Amendment Final EIS.

> **Response 180**: In response to this comment and others, this EIS has been updated to better incorporate the analysis directly.

Comment 181: The exemption does not set a maximum limit on logging, which increases risk of significant environmental damage. The Projected Timber Sale Quantity is insufficient to determine

maximum limits to logging because it only determines maximum harvest by a suitable yield limit, which could increase with exemption by increasing the total amount of suitable forestland.

> **Response 181:** The Tongass Forest Plan will continue to guide timber harvest, and the PTSQ and Forest Service market demand estimates will continue to inform the harvest levels under the Plan. The TTRA directs the Forest Service to seek to meet timber demand on both the longer-term planning cycle and an annual basis, subject to appropriations, other applicable law, and the requirements of the National Forest Management Act and consistent with providing for the multiple use and sustained yield of all renewable forest resources. Through peer-reviewed methods, best available information, and observed current industry conditions, estimates of timber harvest are developed on an annual basis. These projections guide timber harvest and do not provide an upper limit or a lower limit. The TTRA envisions not an inflexible harvest level, but a balancing of the market, the law, and other uses, including preservation. TTRA's demand projection requirements operate not as a mandate, but rather as an instruction to assure consideration of timber demand together with other goals in managing the Forest.

Comment 182: Commenters were concerned that the DEIS improperly relied on the 2016 Tongass Forest Plan Amendment EIS as an excuse for not disclosing environmental effects. For example, in the issues dismissed section the Forest Service dismisses soils, yet Alternative 6 opens the amount of land in "high hazard" soils to commercial logging by 38 percent but the DEIS denies that further analysis is needed.

> **Response 182:** As stated in the EIS, issues that are not significant or that have been covered by prior environmental review were eliminated from detailed analysis. Many of the issues dismissed are anticipated to have similar resource effects for each of the various alternatives as those effects disclosed in the 2016 Forest Plan Amendment EIS. This is because implementation of Forest Plan standards and guidelines would be the same for all alternatives and none of the alternatives predict a PTSQ greater than the amount disclosed in the 2016 Forest Plan Amendment EIS.

Comment 183: Comments suggested "remoteness" as defined in the EIS should be replaced with desired Recreation Opportunity Spectrum (ROS) descriptions and that the EIS should describe that, "Primitive, semi-primitive non-motorized, and semi-primitive motorized Recreation Opportunity Spectrum class settings have a natural or natural-appearing environment. These ROS settings are not suitable for timber production."

> **Response 183:** Remoteness was retained as an Alaska Roadless area characteristic. Total suitable acres are presented in the EIS as a relative measure of timber opportunity by ROS setting to differentiate between alternatives.

Energy and Utilities

Comment 184: Commenters sought inclusion of effects analysis for the renewable energy sector; how would the proposed rule change the facilitation of renewable energy development including hydropower, geothermal, and wind.

> **Response 184**: Renewable Energy projects are addressed in Chapter 3, Transportation, Energy, Communications, and Infrastructure. Roadless Priority, Community Use Priority, and Timber Priority land management designations provide exceptions or otherwise allow community utility systems.

Comment 185: Commenters were concerned with the lack of mention of the federal power site classification and Southeast Intertie, its authorization in the Public Law, and its support from the Southeastern Alaskan communities. Only Alternative 6 permits or recognizes the legal standing of the US federal power site classification on select hydropower resources. Commenters asked that the contradiction between Public Law 106-511, Title VI, and the Roadless Rule be addressed.

Response 185: The FEIS, Appendix G, provides revised proposed rule language for each alternative, which includes exemptions to the prohibition of timber harvest and road construction when conducted pursuant to reserved or outstanding rights or as provided for by statute or treaty.

Comment 186: Commenters were concerned about long-term financial impacts from lack of access for maintaining transmission lines. Rights of way must be maintained and continually brushed and structures must be inspected on an annual basis.

Response 186: In the final proposed rule language, exceptions to the prohibition of road building have been added to Roadless Priority and Community Priority ARA designations for community utility systems. The positive effects of maintenance access have been added to the FEIS.

Minerals

Comment 187: Commenters sought effects analysis for mining projects that may occur following a rule change.

Response 187: See Chapter 3, Minerals. There would be minimal effects on locatable mining projects, as those are allowable under the 1872 Mining Law and the 2001 Roadless Rule recognizes that statutory right. While roads for access to valid mining claims are not currently prohibited in roadless areas, each of the ARA action alternatives would add reference to this law as an example of a road authorization pursuant to reserved or outstanding rights, or as provided for by statute or treaty (see Table 2-2 and Appendix G). This may be a benefit by reducing regulatory uncertainty in mining and other projects. Any future proposed mining projects would undergo appropriate site-specific analysis.

Comment 188: Commenters said that changing the Roadless Rule for mineral access is unnecessary as the Mining Act of 1872 ensures access to minerals, transportation, and energy development needs in the Tongass National Forest.

Response 188: While roads are not currently prohibited in roadless areas, each of the ARA action alternatives would add reference to this law as an example of a road authorization pursuant to reserved or outstanding rights, or as provided for by statute or treaty (see Table 2-2 and Appendix G). Other commenters have expressed that this would be a benefit by reducing regulatory uncertainty in mining and other projects.

Comment 189: Commenters said that the 2001 Roadless Rule inhibits access to new leases for minerals, including geothermal resources, and that it inhibits mining and other mining related activities that are protected by U.S. mining laws. Discovering economic mineralization requires exploration to determine size and grade, which is not feasible without roads. The Roadless Rule also inhibits mining because it does not allow cutting and removal of trees associated with mining exploration and development. Exploration requires an ever-increasing level of investigation to add certainty to resource/reserve information to support financing in public markets

Response 189: Leasable minerals are discussed under the *Minerals* section in Chapter 3 of the EIS. The commenter is correct that the Roadless Rule restricts roaded access to new authorizations for leasable minerals. Roads for geothermal projects providing community power could be constructed under exceptions provided for community utility systems in Alaska Roadless Rule Roadless Priority (Alternatives 2 through 5) and Community Priority (Alternative 3) designations. Roads could also be developed in Timber Priority (Alternative 4) areas. The Roadless Rule does not prohibit access to locatable minerals. See responses to other Minerals comments.

Comment 190: Natural resource extraction like mining is environmentally safe and has a small, temporary footprint. Regulations by permits require that mines including the roads, infrastructure and surface impacts are reclaimed upon the end of mine life.

Response 190: Comment noted.

Wildlife and Biological Diversity

Comment 191: Commenters sought keeping the Roadless Rule in place because exemption could lead to disturbances in sensitive habitat that would negatively impact both plant and animal communities and cause decreased biodiversity in the Tongass.

> **Response 191**: As noted previously, fragmentation can be caused by timber harvest, road building, and powerline and facility development. Under any of the action alternatives, there could be some change in the distribution of timber harvest, roads, and other facilities relative to Alternative 1. Alternatives 4, 5, and 6 would increase roads and timber harvest farther into currently roadless areas than under Alternatives 1, 2, or 3, resulting in a greater degree of fragmentation. However, regardless of the selected alternative, the overall protection due to the degree of protections provided by the underlying Forest Plan LUDs and Forest Plan standards and guidelines would not change.

Comment 192: Commenters sought keeping the Roadless Rule intact to protect the old-growth habitats which provides sensitive habitat for over 30 endemic species.

> **Response 192**: The Forest Plan included a review of the most recent information available during the current Forest Plan process due to the fact that endemic species tied to island archipelagos are more sensitive to human activities. The Forest Plan standards and guidelines for endemic mammals direct the Forest to "maintain habitat to support viable populations and improve knowledge of habitat relationships of rare or endemic terrestrial mammals that may represent unique populations with restricted ranges. Because this decision does not authorize site-specific harvest, additional endemic species could be addressed in detail considering site-specific landscape characteristics and species of greatest conservation need at the project level. However, it is agreed that Alternative 1 would provide the highest degree of protection for endemic species, although differences among the alternatives are slight because the PTSQ remains the same.

Comment 193: Commenters were concerned that activities would accelerate mass extinction. Changes to Roadless Rule protections could lead to natural resource extraction and developmental activities, reducing the acreage of suitable undisturbed habitat for sensitive species. This loss of habitat would reduce population sizes of sensitive species and increase their risk of extinction.

> **Response 193:** Energy, transportation, or other projects that may become permissible in new areas could affect various wildlife species and their habitat through direct disturbance or through removal or modification of habitats. These effects would be evaluated at the project level. The Forest-wide standards and guidelines would minimize overall impacts to wildlife and their habitats during project construction and operation.

Comment 194: Commenters were concerned that exempting the Tongass National Forest will lead to activities that would harm the survival of the Prince of Wales flying squirrel, both a keystone and indicator species that is endemic to the area.

> **Response 194**: Potential impacts to the Prince of Wales (POW) flying squirrel is addressed in the *Wildlife* section. Under all alternatives, old-growth timber harvest implemented under the Forest Plan could reduce the quality and quantity of flying squirrel nesting, foraging, and denning habitat.
>
> However, the Old-growth Habitat Conservation Strategy would continue to maintain suitable old-growth habitat and provide landscape connectivity for flying squirrels. In addition, the Legacy Forest Structure and other standards and guidelines that retain POG forest in harvested areas (e.g., beach and estuary fringe, RMAs, and Scenic Integrity Objectives) would also ensure the maintenance of a functional and interconnected old-growth ecosystem on the Tongass.

Comment 195: Commenters were concerned that the proposed rule would violate the Endangered Species Act (ESA) for various ESA listed species such as the marbled murrelet, short tailed albatross, humpback whale, and Eskimo curlew. Commenters asked that the EIS identify all the listed species that

may be present and affected in the action areas and questioned findings showing minimal consequences on the survival of the species as well as the lack of a biological assessment.

Response 195: The Forest Service requested lists of threatened and endangered species from both NOAA and FWS and considered these species in the analysis. These T&E species are identified in the wildlife and fish sections of the EIS and included in the project record (FEIS 3-91 to 92 and 3-133 to 134). The analysis presented in the FEIS and project record clarifies the findings related to anticipated effects to threatened or endangered species and clarifies that due to the determination of 'no effect' for threatened and endangered species that consultation is not necessary.

Comment 196: The DEIS does not discuss the impact of environmental issues that it claims to address and instead references the 2016 Tongass Forest Plan Amendment EIS. The DEIS must be changed to discuss significant environmental impacts rather than simply incorporating them by reference. The majority of this DEIS relies on the biological assessments (BA) conducted by the National Marine Fisheries Service (NOAA) for the 2016 Forest Plan. However, the new Forest Service plan is fundamentally different to that introduced in 2016. The new plan aims to open areas for logging that will no longer be protected by the Roadless rule.

Response 196: The Alaska Roadless Rule EIS extensively addresses the effects of the proposed action and the alternatives on the environmental issues. It does reference the 2016 Forest Plan Amendment EIS, where appropriate. However, the FEIS for the Alaska Roadless Rule, more extensively quantifies the effects of the alternatives by conducting new analyses of effects and presenting many new tables documenting baseline conditions and effects.

Effects to listed wildlife and fish were considered in the 2016 Forest Plan Amendment FEIS, which included preparing a biological assessment and informal consultation and NMFS concurrence with effects determination that the selected Forest Plan's management regime would not adversely affect listed species or critical habitat. That consultation established the baseline of effects to be considered in subsequent consultations. The biological analysis for the Alaska Roadless Rule Final EIS also includes a separate analysis for threatened and endangered species, however developing a biological assessment for NOAA-NMFS/FWS or engaging in informal consultation with NOAA-NMFS/FWS was not necessary since it was determined that a decision regarding an action alternative on the roadless rule would have no effect to listed species or designated critical habitat and the FEIS itself is the functional equivalent of a biological assessment. In addition, when future projects that could be implemented are defined, they would still be required to adhere to Forest Plan requirements and would be subject to ESA consultation, as well as NEPA review, when site-specific information is available.

See the response to Comment 274 concerning changes to suitable acreage.

Comment 197: Commenters sought consideration of the science of the impacts of island ecology as key regions for sustaining the evolutionary processes related to diversification.

Response 197: The Old-Growth Conservation Strategy addressed the importance of the islands that make up the Archipelago and further broke out the Tongass into biogeographic providences (see Biodiversity Section. Further the Forest Plan protects all small islands of 1,000 acres or less. The percentages of original POG, high-volume POG, and large-tree POG would result under all of the other actions alternatives as well (Tables 3.3-10, 3.3-11, and 3.3-12); however, harvest associated with all action alternatives would contribute slightly to the cumulative reduction in POG and associated increase in fragmentation and loss of connectivity, which has the potential to reduce biological diversity.

Comment 198: Commenters sought information on plans to restore or maintain the diversity of ecosystems and habitat types within the planning area including large-tree old growth and old-growth cedar stands.

Response 198: From a biological diversity standpoint, high-volume POG and large tree POG are thought to have the highest importance for diversity. High-volume POG is defined as the grouping

of the three tree size and density classes that represent the highest volume strata—SD5S, SD5N, and SD67 types. Large-tree POG is defined as the SD67 class, representing the most productive of the POG types, and typically containing the highest density of large trees.

There are approximately 5 million acres of POG forest on the Tongass. Of this, approximately 42 percent is high-volume POG (SD5S, 5N, and 67 types) with approximately 11 percent classified as Large-tree POG (SD67 type). See Tables 3.3-3 and 3.4-4, 3.4-8 and 3.4-9 which shows the distribution of existing POG forest by biogeographic province and POG type and amount remaining. Transition to predominantly young-growth harvest over time would enhance biological diversity and the functioning of the Old-growth Habitat Conservation Strategy over the long-term.

Comment 199: There was concern about the adequacy of effects analysis for Old-growth Habitat. Commenters referred to the 'Old-growth Habitat Conservation Strategy' as outdated and were concerned that the DEIS does not consider the impact of high grading, habitat connectivity, climate change, and road effects. Determining the impact of exemption on old-growth trees requires mapping the quantity, age, and species of old-growth trees in the Tongass, taking inventory of champion trees, and preserving the genetics of old-growth trees. The DEIS also needs to consider and document the aerosols, pheromones, and chemicals that the oldest and largest trees of each species and subspecies of tree in the Tongass produce.

Response 199: The Conservation Strategy was implemented in 1997 as an overall conservation framework for wildlife. It provides for the diversity of plant and animal communities as required by NFMA. Redesigning the very large Old-Growth Habitat reserves, one component of the Conservation Strategy, is outside the scope of this EIS. Under all of the alternatives, long-term protection of POG would continue to occur under the Old-growth Habitat Conservation Strategy.

In addition, the substantially less old-growth harvest relative to the analysis for the 1997 Forest Plan (under which the Old-growth Habitat Conservation Strategy was developed) would enhance biological diversity and the functioning of the Old-growth Habitat Conservation Strategy over the long-term. No changes to these Forest Plan features are proposed under any of the alternatives.

Comment 200: Commenters sought disclosure of deficiencies of the Old-growth Habitat Conservation Strategy for conserving goshawks.

Response 200: The history of the development of the Old-growth Habitat Conservation Plan is discussed in the EIS along with the viability assessments that were conducted prior to implementation. All action alternatives retain a very high rating in terms of the likelihood of maintaining viable, well-distributed populations after 100 years. The Queen Charlotte goshawk is a wide-ranging species that seems to prefer mature and old-growth forest habitats for nesting and foraging. Impacts to goshawks are assessed in terms of the reduction in total and high-volume POG, which provides potential high-quality nesting and foraging habitat. This species would be affected under all alternatives; effects would generally be similar among the alternatives but slightly higher for Alternatives 4, 5, and 6 because of longer and more road developments and associated fragmentation expected under these alternatives relative to Alternatives 1, 2, and 3.

The transition to young growth guided by the 2016 Forest Plan, unchanged by the Alaska Roadless Rule alternatives, is likely to benefit goshawks by reducing the amount of POG harvest that would occur over the planning horizon, thereby maintaining more old-growth forest that provides potential foraging, nesting, and post-fledging habitat. Individual projects would be required to conduct goshawk surveys and implement the goshawk standards and guidelines which would minimize impacts to this species at the project level. The Old-growth Habitat Conservation Strategy predicted highly likely viability for the goshawk under a much more intensive harvest regime than has been conducted over the past two decades and that will be conducted over the long-term future. Thus, the Old-growth Habitat Conservation Strategy was developed to maintain viable populations for a worst-case scenario that will never occur.

Comment 201: There was concern that the temporal scales used in the DEIS rationale for maintaining viable, well-distributed wildlife populations are not correct for projecting the loss of old-growth habitat and

its impact on species. The analyses refer to 100-year projections, yet it takes at least 250 years for Tongass forest lands to reflect characteristics of old-growth forest structure. The population viability analyses should include a time horizon of at least 250 years.

> **Response 201:** The history of the development of the Old-growth Habitat Conservation Plan is discussed in the EIS along with the viability assessments that were conducted prior to the 1997, 2008, and 2016 Forest Plan revisions and amendments. All action alternatives in this EIS retain a very high rating in terms of the likelihood of maintaining viable, well-distributed populations after 100 years. The vast majority of productive old growth stands on the Tongass are older than 250 years and, with the transition to young growth, harvest of these old-growth stands in the distant future is expected to be very minimal (i.e., 5 MMBF or less per year). The Old-growth Habitat Conservation Strategy was developed under the assumption that logging of old growth would be conducted at a much more intensive pace and that a much higher proportion of the Tongass would be under intensive management after 100 years than is currently planned (including the inventoried roadless areas). In other words, the future footprint representing managed stands will be much smaller after 100 years than was anticipated, so viability concerns are reduced compared to what was expected in 1997 and 2008, and comparable to what was expected in 2016.

Comment 202: Commenters sought analysis of the effects of roads on air, light, sound, endangered species, wildlife, wildlife habitat, wildlife habitat connectivity and movement corridors within the project area as well as on and between nearby National Park Service (NPS)-managed lands. Commenters requested the analysis include impact to 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.

> **Response 202:** New road construction and road density would be similar under all alternatives because roads on the Tongass are largely developed in support of timber harvesting, and the PTSQ under the 2016 Forest Plan does not vary among the alternatives. Estimates of existing road conditions in 2016 included about 5,000 miles of existing roads on NFS lands (from the 2016 Forest Plan FEIS, see Table 3.3-21.4-6 of this EIS). The projection over the next hundred years was modeled to include an additional 1,000 miles of new roads of new roads after 100 years. This would be an increase of nearly about 20 percent over existing conditions in 2016. In addition to new roads, roads would be constructed over decommissioned roadbeds or reconstructed. The number of new road miles estimated beyond the current forest plan (Alternative 1) would range from 0 to 49 miles total for the action alternatives (see *Transportation* section). It is important to recognize that this is a programmatic action and that potential effects will be addressed under separate project-specific NEPA analyses. However, most timber harvest and associated road building are expected to occur on the southern ranger districts, furthest from NPS lands and the Skagway River.

Comment 203: Commenters sought effects analysis for Alexander Archipelago wolves, that provides site-specific baseline information on impacts to wolf populations, survival and viability. Commenters were concerned with the effects analysis for wolf due to reduced deer habitat capability, road density, development, habitat fragmentation, den disturbance, and impacts to reproductive success. Commenters sought analysis of effects associated with how opening previously inaccessible acres to roadbuilding would increase wolf harvest from legal and illegal hunting and trapping.

> **Response 203:** Although this EIS does not analyze site specific areas, the alternatives would be similar in terms of overall harvest levels. However, Alternatives 4, 5, and 6 may result in the larger adverse effects on these species because of greater road lengths, penetration into remote roadless areas, and habitat fragmentation that they would produce relative to Alternatives 1, 2, and 3. Any Alaska Roadless Rule decision would not result in on-the-ground effects.

Comment 204: Commenters sought cumulative effects analysis for bears and bear habitat associated with future logging or roadbuilding that could occur if areas were exempted from the Roadless Rule.

Response 204: The EIS discusses potential impacts to bears from timber harvest, roads and other human developments and that these activities increase the opportunity for human-induced mortality of bears through legal hunting, defense of life or property kills, and illegal killing. Roads can affect water quality and productivity of salmon streams. It should be noted that black bear harvest risk has not been linked to a particular road density level. Cumulative effects to wildlife, including bears, is provided in the Wildlife section of the EIS.

Comment 205: Commenters were concerned with analysis of the impacts on endemic terrestrial mammals (examples included ermine, flying squirrel, Pacific marten, and wolves) and the findings of a moderate to high probability of maintaining viable, well distributed wildlife populations for all species identified for the DEIS. Commenters questioned whether scientific rationale was used or scientific analyses beyond referral to the Habitat Conservation Strategy in the 2016 Tongass Plan. There was concern that many of the species, including endemic mammals and Management Indicator Species such as the American marten, illustrate declines on the Tongass since large-scale, industrial logging began in the 1950s.

Response 205: The analysis in the EIS relied on existing information and the landscape protection efforts outlined in the Conservation Strategy. The Tongass Old-Growth Conservation Strategy was designed through a collaborative effort by a broad range of scientists, Alaska Department of Fish and Game, and U.S. Fish and Wildlife Service, and the strategy underwent intensive peer review prior to it being established as part of the 1997 plan revision process. The Tongass Conservation Strategy was developed to maintain a functional and interconnected old-growth forest ecosystem on the Tongass by retaining intact, largely undisturbed habitat. Outside of reserves, components of the old-growth ecosystem are maintained by standards and guidelines to protect important areas and provide old-growth forest habitat connectivity. A series of expert risk assessment panels prepared viability risk assessments based on this framework. Using the panels' assessments, the Forest Service determined that there was a moderate to very high probability of maintaining sufficient habitat to maintain viable populations of wildlife species on the Tongass under the 1997 Plan. It is worth noting that the Conservation Strategy was developed prior to the Roadless Rule. In addition, the Forest Service believes those probability estimates are very conservative because the panels of experts assumed timber harvest at 267 MMBF annually for 100 consecutive years, with no change in applicable Standards and Guidelines.

Comment 206: Commenters sought effects analysis for marbled murrelet.

Response 206: Marbled murrelets are addressed in the EIS. Because they nest in structurally complex old-growth forest stands, timber harvesting and road construction within POG forest stands (especially high-volume POG) can remove nest trees or disturb nesting birds. Indirectly, timber harvest and road building increase fragmentation, reducing the effectiveness of interior forest habitat and creating habitat edges, which may result in increased rates of nest predation by avian predators. Under all alternatives, marbled murrelet nesting habitat would be protected by the Old-growth Conservation Strategy. Legacy Forest Structure standards and guidelines are intended to maintain old-growth structure in areas that are already highly fragmented, as well as areas that will experience increased harvest levels over the life of the Forest Plan. Large trees may provide nesting habitat for marbled murrelets. Differences in effects among the alternatives would be very slight because of the lack of differences in harvest volumes. Potential impacts to marbled murrelet will also be addressed at the project level.

Comment 207: Commenters sought effects analysis for road construction or other activities that would pose environmental risks to marine wildlife and marine habitat.

Response 207: Effects to marine wildlife and fish, including listed species, were considered in this EIS for the Alaska Roadless Rule alternatives. In addition, the 2016 Forest Plan Amendment FEIS addressed these species and it included informal consultation and NMFS concurrence with effects determinations on listed marine-associated species. Implementation of any projects under the Alaska Roadless Rule alternatives would follow the Forest Plan standards and guidelines and Biological Assessments prepared for the Forest Plan, and their determinations, represent the

baseline condition (no action). While there would be more acres potentially available for harvest with each of the Alaska Roadless Rule action alternatives, there would be no change in the projected harvest amount, and these changes are not expected to affect the BAs conclusions for any of the listed species. Future projects that could be implemented would still be required to adhere to Forest Plan direction and would be subject to ESA consultation when site-specific information are available, as well as NEPA review.

Comment 208: Commenters requested that the best available information be used in analyzing effects for Prince of Wales ermine.

Response 208: Endemic mammals in general were addressed in the EIS and are expected to maintain a moderate to high likelihood of maintaining viable, well distributed populations where present. New information on the POW ermine may be incorporated at the project-level; however, this decision would not authorize site-specific harvest, and additional endemic species could be addressed in detail considering site-specific landscape characteristics and species of greatest conservation need at the project level. The 2016 Forest Plan standards and guidelines for endemic mammals direct the Forest to "maintain habitat to support viable populations and improve knowledge of habitat relationships of rare or endemic terrestrial mammals that may represent unique populations with restricted ranges.

Comment 209: Commenters sought cumulative effects analysis to determine if exemption threatens viability of the Queen Charlotte goshawk including location specific information showing where inventoried roadless areas provide habitat features for Queen Charlotte goshawk nest sites and foraging habitat, especially on Prince of Wales Island.

Response 209: The locations of timber harvest and associated activities may change under the various alternatives, but these are not known at this programmatic level of evaluation. When specific timber harvest or other projects are proposed, site-specific NEPA analysis would be conducted at that time. For these reasons, the Roadless Rule (all alternatives considered) would not result in affects above what was analyzed for the 2016 Forest Plan Amendment FEIS. It should be recognized that under the current Forest Plan, far more goshawk habitat will be preserved than was anticipated by the Old-Growth Conservation Strategy, because of the substantially lower old-growth harvest rate and the full transition to young-growth management.

Comment 210: There was concern that the specific wooded areas which represent prime timber-harvesting land are also the same areas which represent prime habitats for deer, bear, wolves, and salmon. This conflict means that changing the Roadless Rule will directly impact the most crucial habitats for many species and the cumulative effects will be dramatic on both ecosystems and communities which rely on those ecosystems and species.

Response 210: The 2016 Forest Plan Amendment specifically and extensively addressed this issue by adopting a strategy for transitioning away from a timber industry based primarily on old-growth harvesting to a young-growth based timber industry. That strategy is currently being implemented. The average timber volume sold per year over the last 3 years has been 15 MMBF including only 4 MMBF of old growth. This is a dramatic decrease from harvest levels of just 10 or 20 years ago. As noted in Tables 3.3-7 and 3.3-8 of the EIS, after 100 years under any of the alternatives, assuming the current Forest Plan is still being implemented, 91 percent of the original old growth that was present in 1954 and 85 percent of the original high-volume old growth that was present in 1954 will remain. These percentages are within 1 percent of the current percentages (existing condition).

Comment 211: Commenters sought separate effects analysis for two species of marten present on the Tongass National Forest due to one having an extremely limited range. American marten and Pacific marten are both found on the Tongass National Forest.

Response 211: Pacific marten is addressed under endemics and although the Forest Service understands the limited range of Pacific marten, the overall affects analyzed in the EIS for

American marten would apply, as well as the specific standards and guidelines since both species use the same habitat and prey base. Impacts would be analyzed at the project-level.

Comment 212: Commenters identified Sitka black-tailed deer as the most important land mammal species for traditional and customary use by indigenous peoples of Prince of Wales Island. Commenters were concerned that deer populations have already decreased due to environmental pressures such as timber harvest and development and because they expect changes to the Roadless Rule would lead to natural resource extraction and developmental activities, there was concern about adverse impacts and cumulative effects on deer habitat. Other respondents anticipated improved deer population numbers for hunters as outlined in the Quality Deer Management Association methods.

Commenters sought effects and cumulative effects analysis for Sitka black-tailed deer and deer winter range including an evaluation of the size of deer populations in roadless areas, annual harvest of deer for subsistence, and the percent of deer using roadless areas versus those using previously harvested areas in the winter months.

Commenters are concerned that removing roadless protections would negate the larger Tongass conservation strategy and that analysis is needed to either a) prove otherwise; b) conclude that the conservation strategy without roadless is adequate; or c) result in a change in program direction to fully ensure that there is a viable and robust population of Sitka black-tailed deer across the landscape that can survive winters with heavy snow.

Area-specific requests were also made for inclusion within the analysis, which includes Duffield Peninsula.

Concerns that old-growth timber harvest at higher elevations will create bottlenecks restricting movement of deer were expressed. Concerns that restrictions on altitudinal migration and movement will lead to starvation and death, negatively impacting total deer populations were expressed.

Additionally, concerns were expressed about young-growth forests growing thicker and reducing sunlight to the understory. The reduced light source prevents vegetative growth in the understory that provides important food sources for deer.

Commenters sought assessment of the stability of deer populations as a function of deer habitat and commented that the removal of lower elevation productive old-growth forest habitats is a key factor in determining the effects of an action on the species.

Commenters sought analysis regarding the potential effects of the removal of essential deer habitat in areas where unfragmented habitat still exists. Commenters said that deer depend on old-growth forest habitat for foraging and refuge from severe weather. Commenters were concerned that deer populations have already decreased due to environmental pressures such as timber harvest and development.

Commenters discussed effects of clear-cuts on deer habitat. There was concern about losses to deer populations due to their avoidance of clear-cut areas and there was discussion about those clear-cut areas serving as a continued food source because they serve as moose habitat instead of deer habitat.

Response 212: Impacts to deer and their habitat are discussed in detail in the 2016 Forest Plan Amendment FEIS and summarized in the Wildlife section of this EIS. Based on habitat capability modeling, 89 percent of the original deer habitat capability on NFS lands of the Tongass is currently supported and 78 percent of the original habitat capability on all lands (NFS and non-NFS) is still present. Cumulative effects analyses show that modeled deer habitat capability would maintain 78 percent of the original level in 25 years and at 100 years for all lands. WAAs with the greatest impacts under the alternatives are located in GMU 2 (Prince of Wales and surrounding islands) where concentrated past timber harvest has occurred. Harvest associated with all alternatives would contribute to the cumulative reduction in POG and associated increase in fragmentation and loss of connectivity, which has the potential to reduce biological diversity. Potential impacts to deer would be analyzed at the project level for all future projects. Improved deer population numbers are possible with mild winters (which may be more frequent). Improved numbers may also occur in local areas where closed-canopy young growth is harvested and

productive forage is produced for 15-25 years; it can also occur in older young-growth areas where stands move out of the closed-canopy stage, but this requires many years. However, on average across the Tongass, improved deer population numbers are not expected.

An ANILCA Section 810 evaluation and finding is required for any action to withdraw, reserve, lease, or otherwise permit the use, occupancy, or disposition of public lands in Alaska. The initial evaluation assesses the expected effect of the proposed action on subsistence uses and needs and concludes with a finding that the proposed action would or would not have a significant possibility of a significant restriction on subsistence use. If the evaluation results in the finding of a significant possibility of a significant restriction of subsistence uses, a subsistence hearing would be held. This evaluation and hearing would allow for site specific information to be used in the analysis such as what subsistence resources occur in the project area and may be affected, what levels of use occur in the project area by subsistence and non-subsistence users, and for subsistence users of the project area to tell managers what impacts the project may have on them. Subsistence uses would be given preference over non-subsistence uses if any restrictions are determined necessary. The 2016 Forest Plan determined an overall possible risk while project-level subsistence evaluations better identify specific impacts to abundance and distribution, access to resources, and competition with non-rural users.

Comment 213: When road systems are connected to communities, commenters sought road density limits (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 the area.

Response 213: Road densities were analyzed at varying scales including WAAs, 6th Field sub-watersheds, elevations below 1,200 feet, and estimated average road density on the Tongass NF over 100 years. Although slightly more road miles may be developed under the action alternatives, the average road densities on NFS lands and the percent of WAAs with road density less than 0.7 miles per square mile are expected to be similar to that predicted under the Forest Plan (See Table 2-12).

Comment 214: There was an expectation that changes to Roadless Rule protections would lead to natural resource extraction and developmental activities that would negatively impact the viability of apex predators, including bears, which are important for regulating populations of herbivores such as moose, elk, caribou and provide economic, social, and cultural benefits.

Response 214: While there would be more acres potentially available for harvest of productive old growth with each of the Alaska Roadless Rule action alternatives, there would be no change in the projected harvest amount from Alternative 1. Some other natural resource development projects (e.g. hydropower, transmission lines, and mining) and certain transportation projects, are already allowable in roadless areas. As such, The Forest Service does not anticipate a great increase in natural resource extraction and developmental activities under any of the alternatives that would affect the viability of apex predators.

Comment 215: Commenters were concerned that the wildlife viability assessments conducted for the Forest Plan to determine viability risk for 30 endemic species had flaws with the calculations, which resulted in substantially underestimated viability risks for wildlife.

Response 215: The analysis for the 2016 Forest Plan Amendment included a review of the most recent information available during the current Forest Plan process due to the fact that endemic species ties to island archipelagos are more sensitive to human activities. The Forest Plan standards and guidelines for endemic mammals direct the Forest to “maintain habitat to support viable populations and improve knowledge of habitat relationships of rare or endemic terrestrial mammals that may represent unique populations with restricted ranges. Because this decision does not authorize timber harvest, additional endemic species could be addressed in detail considering site-specific landscape characteristics and species of greatest conservation need at the project level.

Comment 216: Commenters said that the Roadless Rule protects habitat for the Prince of Wales spruce grouse and the northern goshawk, which are environmentally and culturally important. There is concern that roadbuilding and development activities may decrease nesting and foraging habitat and increase mortality rates.

> **Response 216:** The 2016 Forest Plan does include standards and guidelines for endemics and goshawk. The Roadless Rule EIS discusses the potential impacts to both of these species; however, species and their habitat would remain protected regardless of the alternative chosen. Despite the potential for localized effects, the transition to young growth guided by the 2016 Forest Plan, unchanged by the Alaska Roadless Rule alternatives, is likely to benefit both spruce grouse and goshawks by reducing the amount of POG harvest that would occur over the planning horizon, thereby maintaining more old-growth forest that provides potential foraging, nesting, and post-fledging habitat.

Comment 217: There was concern that natural resource extraction and development, that could occur throughout the Forest should there be an exemption to the rule, would fragment habitat and destroy landscape connectivity.

> **Response 217:** Energy, transportation, or other projects that may become permissible in new areas could affect various wildlife species and their habitat through direct disturbance or through removal or modification of habitats. These effects would be evaluated at the project level. The Forest-wide standards and guidelines would minimize overall impacts to wildlife and their habitats during project construction and operation.

Comment 218: Commenters sought additional analysis on causes and impact of decreased biodiversity associated with the clear-cutting and timber industry activities that changing the Roadless Rule would allow, taking a wholistic view of the ecosystem and understanding the full cycle of ecosystem wellbeing and biodiversity as an invaluable resource. Commenters sought analysis of effects to the rainforest ecosystem that includes specifics such as: impact of habitat fragmentation, capturing the true life cycle of ecosystem succession and the length of time required to re-establish climax communities.

> **Response 218:** The issues raised are Forest Plan issues and are beyond the scope of this programmatic EIS. However, this EIS does include extensive analysis and projections of effects based on modeled future disturbances. The projects that produce these disturbances are all subject to future NEPA review.

Comment 219: Commenters sought effects analysis considering habitat contiguity to provide refuge for wildlife impacted by climate change. Habitat connectivity facilitates wildlife adaptation by allowing wildlife to adjust their home ranges and movement patterns.

> **Response 219:** The Forest Plan Old-growth Habitat Conservation Strategy was designed to maintain a resilient old-growth forest ecosystem in the face of this uncertainty. The potential for contributions to climate change from continued old-growth timber harvest on the Tongass, which could indirectly affect wildlife species is addressed in the *Biodiversity, Wildlife,* and *Climate and Carbon* sections of the EIS. It is clear that climate change may also contribute to cumulative effects. Warmer temperatures and increased precipitation are anticipated to result in changes to vegetation and thus, the suitability of wildlife habitat, among other impacts (Haufler et al. 2010, Shanley et al. 2015; see the *Climate and Carbon* section). Although many species may benefit (e.g., greater overwinter survival of deer, and thus a greater prey base for wolves, resulting from warmer winter temperatures during normal years), habitat changes resulting from a longer growing season, wind, fires, insect infestations, and disease would have variable effects on others. The greatest concerns for wildlife populations in relation to climate change, however, are the weather extremes that can be expected to occur periodically (Haufler et al. 2010).

Comment 220: Commenters sought additional effects analysis considering the cumulative impacts of deforestation and climate change and changing the Roadless Rule on the existing and future declines for deer population and the required minimum deer population capabilities of existing ecosystems.

Response 220: Climate change is considered in Chapter 3, *Climate and Carbon*. It should be noted that deforestation involves removal of all trees on forested land to convert it to other land uses. Since the mid-1950s, changes in land use have been minor in the Tongass. Development pressure for land use conversion in Southeast Alaska has been slight. This is true for the non-NFS lands as well. Also see responses to *Climate and Air* comments and the comment above.

Comment 221: Commenters said that the Roadless Rule was enacted, in part, to improve wildlife conditions, therefore a change to the Roadless Rule would negatively impact the strides made in conservation regionally.

Response 221: This may be true in other national forests, which have been extensively roaded, harvested, and developed, but changing the Roadless Rule on the Tongass would not have a direct effect on regional wildlife conservation and the potential for significant indirect effects is very slight. The Tongass National Forest developed a protective Forest Plan in 1997, prior to the 2001 Roadless Rule. This Plan allocated the majority of the Forest to non-development LUDs, which severely restrict timber harvest and road development. These reserves along with standards and guidelines implemented within the development LUDs, such as beach and estuary fringe buffers and riparian buffers, comprise the Old-growth Habitat Conservation Strategy. In 2008, the geographical extent of the reserves in this strategy was effectively expanded by the Timber Sale Program Adaptive Management Strategy, which restricted all future harvest to Phase 1 and eliminated all harvest in Phases 2 and 3 (which are mostly roadless areas), unless harvest levels reach an established threshold (which they have not come close to). In 2016, the Young-growth Transition Strategy was adopted, which established a much lower harvest rate for old-growth, while transitioning to predominantly a young-growth timber industry. Since 2016, old-growth timber sales have been well below the 2016 reduced level. Therefore, the Tongass has moved strongly in the direction of wildlife conservation, with or without the Roadless Rule, which has only applied to the Tongass for about half of the time it has existed (the Tongass was exempt from 2003 to 2011).

Comment 222: Commenters were concerned that removing Roadless Rule protections could lead to increases in human-wildlife conflict, threatening the well-being of humans and wildlife.

Response 222: Human-wildlife encounters can occur throughout much of the Forest. In some instances, that may pose a risk. In many cases, that is a desirable experience for residents and tourist. We believe the opportunity for human-wildlife encounters is similar between alternatives.

Comment 223: Roadless Rule protections could lead to natural resource extraction and developmental activities that resulting in displacement of wildlife and have detrimental effects on functional behaviors such as breeding and movement, that are essential for functional, healthy wildlife populations.

Response 223: Energy, transportation, or other projects that may become permissible in new areas could affect various wildlife species and their habitat through direct disturbance or through removal or modification of habitats. These effects would be evaluated at the project level. The Forest-wide standards and guidelines would minimize overall impacts to wildlife and their habitats during project construction and operation.

Comment 224: Commenters stated that wildlife use roads and may be affected by road development.

Response 224: Forest Plan requirements would still apply regardless of the alternative selected; however, there would still only be a slight potential increase in roads and essentially no change in harvest amount, so effects to wildlife and their habitat would be nearly identical to current plan conditions over the Tongass. The Transportation Forest-wide standards and guidelines that require travel access road objectives to be developed for all roads and would not be affected by any Alaska Roadless Rule alternative.

Comment 225: Commenters said that Roadless Rule protections helped maintain salmon populations which helps preserve the food source for bears, sustaining their population numbers.

Response 225: Current information on commercial salmon harvest has been added to the FEIS (see Figures 3.3-3 and 3.3-4). The effects of timber harvest, resource extraction and related actions at the forest-planning level are summarized in the included text. Effects of these actions on fish resources and their habitat are address in the 2016 Forest Plan Amendment EIS, which has been cited as the source for type and magnitude of effects. That document sufficiently addresses the issues raised in the comment relative to important fish resources at the planning level. Relative changes between alternatives that could affect fish resources and habitat are presented. Additional detail on differences between the alternatives concerning potential changes in quantity of roads (including road densities by sub-watershed) and timber harvest have been added, including changes to fish resources from those presented in the 2016 Forest Plan Amendment EIS. It is important to recognize that this is a programmatic action and that potential site-specific effects will be addressed under separate project-specific NEPA analyses, as this assessment will not authorize any site-specific actions.

Alternative 6 would be less protective to fish resources within T77 watersheds and TNC/Audubon Conservation Priority Areas than Alternatives 2, 3, and 4 because it does not restrict timber harvest and road building in these areas, removing all regulatory roadless designations. Forest Plan requirements would still apply, including the prohibition on old-growth harvests within these areas. However, there would still only be a slight potential increase in roads and essentially no change in harvest amount, so effects to fish and their habitat would be nearly identical to current plan conditions over the Tongass.

Comment 226: Changes to Roadless Rule protections could lead to natural resource extraction and developmental activities resulting in activities that negatively impact rare and endangered species.

Response 226: Energy, transportation, or other projects that may become permissible in new areas could affect various wildlife species and their habitat through direct disturbance or through removal or modification of habitats. These effects would be evaluated at the project level. The Forest-wide standards and guidelines would minimize overall impacts to wildlife and their habitats during project construction and operation.

Comment 227: Commenters sought disclosure of how the agency would restore or maintain the diversity of ecosystems and habitat types within the area affected by the proposed changes to the Roadless Rule and that large-tree old growth be considered a distinct habitat type. Commenters described large-tree old growth and old-growth cedar stands as being at risk of being eliminated on northern Prince of Wales Island and other bio-geographic areas on the Tongass. There was concern that reductions in these forest communities would lead to a reduction in Sitka black-tailed deer populations and Alexander Archipelago wolf populations on Prince of Wales.

Response 227: From a biological diversity standpoint, high-volume POG and large tree POG are thought to have the highest importance for diversity. High-volume POG is defined as the grouping of the three tree size and density classes that represent the highest volume strata—SD5S, SD5N, and SD67 types. Large-tree POG is defined as the SD67 class, representing the most productive of the POG types, and typically containing the highest density of large trees.

There are approximately 5 million acres of POG forest on the Tongass. Of this, approximately 42 percent is high-volume POG (SD5S, 5N, and 67 types) with approximately 11 percent classified as Large-tree POG (SD67 type). See Tables 3.3-3 and 3.4-4, 3.4-8 and 3.4-9 which shows the distribution of existing POG forest by biogeographic province and POG type and amount remaining. Transition to predominantly young-growth harvest over time would enhance biological diversity and the functioning of the Old-growth Habitat Conservation Strategy over the long-term.

Comment 228: The DEIS relies on outdated and inadequate monitoring data for goshawks and other wildlife in order to support its conclusions. The agency has not presented the limited wildlife survey data conducted in connection with timber sales or explain how these monitoring data have helped inform the DEIS.

Response 228: The information used in the development of the Forest Plan is sufficient for the analysis of this EIS. As none of the alternatives authorize any site-specific projects or other ground-disturbing activities, the most current site-specific data will be used during project-level reviews.

Comment 229: The DEIS fails to rationally assess impacts to migratory birds.

Response 229: Migratory birds are assessed in the Wildlife section. Impacts and measures to avoid/minimize impacts would be addressed at the project level.

Comment 230: The Forest Service must reinitiate ESA consultation before adopting the proposed rule. The Service cannot forgo additional consultation because the prediction that logging will not increase if roadless areas are opened to new development is unsubstantiated.

Response 230: None of the alternatives authorize any site-specific projects or other ground-disturbing activities. Specific projects that include timber harvest, road construction, and/or road reconstruction must undergo site-specific environmental analysis when they are proposed to comply with NEPA. None of the alternatives considered in this FEIS waive any applicable requirements regarding site-specific environmental analysis, public involvement, or consultation with the Services, or compliance with other applicable laws.

Watershed and Fish

Comment 231: Commenters disagreed with DEIS findings and expressed concern about effects analysis for fish and the region's commercial, sport, subsistence and ursine fisheries. Commenters requested the use of more current baseline data, including consideration of climate change, in this analysis. Commenters sought analysis for anadromous fish streams, salmon (including coho and pink) habitat and survival. In analyzing effects for fish, commenters sought use of data that incudes current harvest data or information about project area salmon populations.

Response 231: Current information on commercial salmon harvest has been added to the EIS (see Figures 3.3-3 and 3.3-4). The effects of timber harvest, resource extraction and related actions at the forest-planning level are summarized in the included text. Effects of these actions on fish resources and their habitat are address in the 2016 Forest Plan Amendment EIS, which has been cited as the source for type and magnitude of effects. That document sufficiently addresses the issues raised in the comment relative to important fish resources at the planning level. Relative changes between alternatives that could affect fish resources and habitat are presented. Additional detail on differences between the alternatives concerning potential changes in quantity of roads (including road densities by sub-watershed) and timber harvest have been added, including changes to fish resources from those presented in the 2016 Forest Plan Amendment EIS. It is important to recognize that this is a programmatic action and that potential site-specific effects will be addressed under separate project-specific NEPA analyses, as this assessment will not authorize any site-specific actions.

Comment 232: Because there was concern that changes to Roadless Rule protections would lead to natural resource extraction and developmental activities, commenters sought consideration of effects to fish, Dungeness crabs, wetlands and watershed ecosystems including soil erosion and sedimentation, edge effects on windthrow or blowdown, mass erosion and channel erosion resulting from hydrologic changes caused by logging, the effects of roads altering hydrology and erosion processes, and alteration of groundwater temperature by logging. Commenters sought analysis of cumulative effects to salmon streams and salmonid habitat associated with future road system expansion. Commenters questioned the effectiveness of mitigations discussed in the DEIS.

Response 232: See response to above comment under *Watershed and Fish*. Additionally, Forest Plan level effects are addressed in the 2016 Forest Plan Amendment EIS which addresses the effects on the issues noted in the comment including resource extraction and nearshore marine habitat. Actions that may affect marine environment such as beach fringe harvest and log transfer facilities would be similar among all alternatives and effects are addressed in the 2016 Forest

Plan Amendment EIS. This document addresses only how the Alaska Roadless Rule alternatives would change those effects at the planning level. Fishery and habitat-related issues not presented in more detail would not vary substantially among alternatives and would be the similar to those discussed for the existing management actions in the 2016 Forest Plan Amendment EIS.

Comment 233: There was concern that changes to Roadless Rule protections would lead to natural resource extraction and developmental activities that would accelerate acidification of water bodies; reducing the survival of calcifying species such as oysters, clams, corals, urchins, and certain phytoplankton which are food sources for humans and other wildlife. The loss of these species could have substantial consequences on the ecosystem structure, food systems, and subsequently negatively impact the economy.

Response 233: See responses to two comments above under *Watershed and Fish*. The proposed action and the alternatives do not expand levels of timber harvest and current/future timber harvest levels are low relative to historic levels. The acidification of water bodies is not a current issue nor is it expected to result from future actions. In particular, effects on marine species are expected to be very minor. Specific timber sale projects, mineral projects, energy projects, and other road project proposals are all subject to individual NEPA analysis and mitigation of effects.

Comment 234: The DEIS fails to substantively and accurately address fisheries and watershed effects, such as windthrow/blowdown, mass erosion, channel erosion, roads, erosion processes, alteration of groundwater temperature, post-logging fluvial erosion, gullying and channel expansion, and sedimentation. The assumption in the DEIS that road building and logging can occur in currently roadless watersheds with no risk to aquatic habitat and fisheries is not supported by available scientific literature. Commenters were concerned that impacts of the rule change on aquatic ecosystems (both freshwater and saltwater) are not adequately analyzed in the DEIS.

Response 234: See other responses to the two previous comments. The general types of effect from timber harvest and related actions (e.g. road building) identified in the above comment are summarized in this EIS document with further reference to the 2016 Forest Plan Amendment EIS, which provides details of the type and potential magnitude of these effects. When specific timber harvest or other projects are proposed, site-specific NEPA analysis and required pubic involvement would be conducted at that time. No on-the-ground actions are authorized by the final rule.

Comment 235: Concern was expressed that the DEIS fails to adequately assess the current status of fish and fish habitat on the Tongass, discuss how the current status relates to historic abundance, and to analyze how the proposed action will affect fisheries, fish habitat, and the important waters that support these resources. Underlying the DEIS and made explicit by various statements of Forest Service officials at public meetings, is the misguided belief that expanding logging and logging roads into roadless areas will have no effect on fish and fish habitat.

Response 235: The EIS summarizes the main factors of logging-related actions that affect fisheries resources, especially as they relate to roads. More analysis was supplied in the FEIS assessing effect of each specific alternative on number of roads and road density in Tongass watersheds which indicate nearly identical conditions among all alternative to Alternative 1. Additionally, more details on the current fisheries and fish habitat, related water quality and quantity, and the effect of currently approved actions on these resources are provided in the 2016 Forest Plan Amendment EIS, which is referenced as suppling this information. As discussed in the DEIS, the current Forest Plan direction include measures to reduce potential impacts to fish and their habitat that will remain in place under all of the Roadless Rule alternatives. Also as noted in the EIS, none of the alternatives substantially change the number of road miles, harvest acres, type of harvest, harvest of old growth, or harvest in T77 Watersheds and TNC/Audubon Conservation Priority Areas and, as a result, potential effects to important fish and fish resources would be similar across all alternatives. As noted elsewhere in the comment response document, it is important to recognize that this is a programmatic action and that potential site-specific

effects will be addressed under separate project-specific NEPA analyses, as this assessment will not authorize any site-specific actions.

Comment 236: There was concern expressed that the analysis assumed that logging can occur in roadless areas without harm to fish resources.

Response 236: As noted in the analysis, future timber on the Tongass would be managed under the current Forest Plan, which includes specified BMPs for harvest, vegetative buffers, and other measures designed to reduce potential impacts to fish. These measures would be implemented in newly opened roadless areas in the same way as they are in areas where harvest is presently allowed. Under these conditions, it was concluded that logging and road building can be done without substantial adverse effects to fish habitat and fish resources. The assessment in the 2016 Forest Plan evaluation included consideration of building new roads and harvesting old growth timber, both of which could be part of the any Alaska Roadless Rule alternative. Site-specific concerns would be evaluated in a separate process prior to any on the ground disturbing actions.

Comment 237: Concern was expressed that the proposed plans have not designated what protections would occur in T77 Watersheds and TNC/Audubon Conservation Priority Areas relative to new road building. Also, that the proposed plan will result in significant entry into roadless areas to access adjacent timber that is not part of these protected watersheds.

Response 237: No old-growth harvest would occur in the T77 watersheds or TNC/Audubon Areas under any alternative due to Forest Plan requirements. Within ARAs, roads would be prohibited unless they meet the exceptions, varying by ARA designation, provided in the rule (see appendix G and Table 2-2 in the EIS. A limited increase in young-growth harvest could occur in these areas. However, nearly all young growth is found where roads are already present, which greatly limits the need for new road construction in these watersheds. Site-specific future actions will be evaluated when specific actions are proposed.

Comment 238: Commenters expressed concern that the DEIS analysis, which concluded that logging and road building in roadless areas would not have substantial adverse effects to soil, water quality, water quantity, and riparian conditions due to the implementation of current Forest Plan BMPs and other requirements is not valid. Concerns were related to the effects from logging and road building on high hazard soils, stream buffer effects on windthrow, effects of roads on hydrology and erosion, related effects to sediment in stream channels and stream channel stability, and upslope clearing effects to stream temperature.

Response 238: These issues were fully addressed in 2016 Forest Plan Amendment EIS, primarily in the Water section. Many of these parameters are presented in the updated Fish analysis in the FEIS. The literature reviewed in the 2016 Forest Plan EIS assessment that addressed these potential effects emphasized Tongass monitoring results, which are most relevant to addressing these issues as they include measured effects of implementation of current BMPs. While there is some level of risk with increased roads and logging, effects to fish and fish habitat that may occur under the current Forest Plan were not considered to be substantial in the evaluation in the 2016 Forest Plan EIS. The estimated amount and type of harvest and roads would be similar to the current Forest Plan under all of the proposed Roadless Rule alternatives with similar effects to water quantity and quality and harvest and road-related parameters. Estimated miles of road construction and reconstruction have been added to the FEIS for each alternative. These estimates consider road miles over the next 100 years of Project implementation.

Comment 239: Commenters noted that the DEIS did not include most recent status of Pink and Coho salmon numbers especially recent decreases in abundance.

Response 239: Current information on commercial salmon harvest has been added to the EIS (see Figures 3.3-3 and 3.3-4). The reasons for recent declines have not been fully developed but recent changes are more likely due to adverse ocean conditions that have been reducing ocean salmon survival (Heinl et al. 2017) and non-harvest related drought conditions that have also

adversely affected both Pink and Coho salmon in streams than the result of recent harvest practices.

Comment 240: Commenters noted that declines of pink salmon appear worse in the northern inside areas of Southeast Alaska and on Prince of Wales Island. There is concern that timber harvest in these areas is a major contributing factor.

Response 240: Timber harvest has occurred for decades in many of these areas and was much more intensive prior to 1990 in the most productive areas (riparian and flood plain areas). These areas have received more protections over the last three decades and rates of timber harvest have been greatly reduced. Recent changes in Pink salmon numbers are more likely due to ocean effects and non-harvest related drought conditions that affect spawning and rearing fish in freshwater than the result of recent harvest practices.

Comment 241: Commenters noted that low harvest number of coho salmon in 2018 and 2019 may be related to timber harvest practices including a lack of buffers on small streams and culvert blockages of fish passages.

Response 241: While small streams were not well buffered in the past and culverts were not always properly installed, these practices have changed. For over three decades, all fish bearing streams have been buffered and many others that are not fish bearing have also had buffers included during timber harvest. Additionally, all newly installed culverts are required to meet fish passage criteria. While some past culverts still block some fish areas, less than 0.5 percent of all anadromous stream length on the Tongass has some blockage. In addition, anadromous fish were found above culverts with passage issues in more than half of these streams. The reasons for recent declines in Coho salmon have not been fully developed but recent changes are more likely due to adverse ocean conditions that have been reducing ocean salmon survival (Heinl et al. 2017) and non-harvest related drought conditions that have also adversely affected both Pink and Coho salmon in streams than the result of recent harvest practices.

Comment 242: Commenters expressed concern that fish populations and stocks are already declining due to existing regional logging and mining activities, which would be exacerbated by a change in the Roadless Rule. For example, deforestation results in decreased stream shading and increased water temperatures. A specific example of already declining fish populations are the Dog salmon.

Response 242: Although commercial salmon harvest numbers have been trending downward for the past 5 years or so, there are many factors at play, and there is no evidence that existing regional logging and mining activities are the cause. The highest total salmon catch in history for Southeast Alaska took place only 7 years ago, in 2013 (Figure 3.3-4 of the EIS). Timber harvest levels have been declining on the Tongass for many years; during the last 3 years only an average of 15 MMBF of timber have been sold, including only 4 MMBF of old growth. Establishing timber harvest levels, authorizing timber sales, and permitting mining activities are all covered by separate NEPA review that is independent of the Roadless Rule EIS.

Comment 243: Commenters said that fish populations are already low in many fisheries and asked if fish populations completely disappear due to changes in the Roadless Rule, who would be responsible for replenishing fish stocks.

Response 243: Please see the response to the previous comment. Implementing the Alaska Roadless Rule would not directly affect fish populations. The Tongass Forest Plan includes an extensive array of standards and guidelines that protect fish habitat and specific development projects would be subject to separate NEPA reviews. The disappearance of fish populations on the Tongass as a result of Tongass forest management is not a realistic scenario.

Comment 244: Because the region is prone to windthrow, commenters sought buffer zones to be half a mile wide to adequately protect streams from the heat exposure and sedimentation that is detrimental to fish populations. Current policies only require a 100-foot stream buffer, which logging companies often ignore and harvest timber to the water's edge. Changing the Roadless Rule would expose more miles of important fish habitat to these destructive practices.

Response 244: The current Forest Plan requires a minimum of a 100-foot stream buffer on fish streams. Most streams are given buffers wider than that following a set of prescriptions outlined in the Forest Plan, including the requirement of assurance of windfirmness. Logging activities are inspected and logging companies are required to comply with the established buffers on NFS lands. The buffers on non-NFS lands are not as restrictive.

Comment 245: Concern was expressed that roadless areas supply unique areas for protection of fish and fish habitat and this was not properly assessed in the analysis in the DEIS. Areas with limited roads often have healthier fish resources.

Response 245: The 2016 Forest Service Plan BMPs are intended to help protect fish habitat and would be implemented in newly opened roadless areas in the same way as they are in areas where harvest is presently allowed. The alternatives evaluated in this EIS consider similar levels of harvest and road building, with relatively small variations in miles of road construction and reconstruction anticipated over the next 100 years. As noted in the DEIS, with this in mind, moving where harvest and roads would occur is not expected to result in substantial changes at the planning level. When specific timber harvest or other projects are proposed, site-specific NEPA analysis and required pubic involvement would be conducted at that time, including evaluation of changes in the amount of road miles and road density. No on-the-ground actions are authorized by the final rule.

Comment 246: Concern was expressed that pending DEISs on Prince of Wales Island that propose increased timber harvest, road building, and stream crossings have delayed final analysis until the Roadless Rule proposal is finalized. The concern is that these projects would greatly expand harvest into areas currently not accessible due to current Roadless Rule prohibitions and that if this rule is implemented these plans would then be finalized with these expansions included, which would damage fish and fish habitat.

Response 246: No site-specific projects or ground-disturbing activities are authorized in the final rule and the amount of old-growth timber harvest is not expected to vary by alternative, with effects to fishery resources expected to be similar to those evaluated in the 2016 Forest Plan Amendment EIS in all cases. Any projects that include timber harvest or road construction will undergo environmental analysis in compliance with NEPA, including those currently proposed or in process.

Comment 247: Commenters expressed that the protected T77 Watersheds and TNC/Audubon Conservation Priority Areas watersheds are a small portion of the major fish producing watersheds on the Tongass and protections for these areas alone will not protect overall fish production in the Tongass and will also result in the concentration of fisheries in some areas and lack of fisheries in other areas.

Response 247: The T77 Watersheds and TNC/Audubon Conservation Priority Areas were determined to be priority areas by special interest groups and environmental organizations including Trout Unlimited. While the Forest Service does supply extra protections for these areas, the Tongass National Forest has a variety of projections from LUDs that exclude most types of development, including timber harvest, to major BMPs that will be implemented in areas where harvest is permitted and will adequately protect fisheries resources including commercially harvestable stocks of salmon. When specific timber harvest or other projects are proposed, site-specific NEPA analysis and required pubic involvement would be conducted at that time. No on-the-ground actions are authorized by the final rule. The standard BMPs and site-specific actions that will be determined during a separate process will be designed to protect fish resources of concern.

Comment 248: Past analysis of roadless areas concluded that logging related practices have the risk of affecting fish habitat and fish populations. Current analysis cannot now be justified in saying that allowing harvest and related actions in these areas can now occur without adverse effects to fish. Also, the current analysis relies on the 2016 Forest Plan analysis that concluded actions could be taken and result in minimal harm to fish resources. This analysis cannot be used to justify the conclusion of no adverse

effects to changes in the Roadless Rule. Some adverse effects would be expected with even the best planned or implemented actions.

> **Response 248:** The current analysis is not substantially different than the 2016 Forest Plan analysis. The amount and type of areas that would be disturbed by harvest and roads would be similar to those considered in the 2016 Forest Plan EIS under all alternatives. The relative changes are discussed in the DEIS for this Project and noted in more detail in the FEIS. While there are low, long-term risks to fish habitat from the relatively low amount of proposed harvest and associated construction and reconstruction of roads, the 2016 Forest Plan analysis indicated that with riparian protections in place there would be no substantial adverse effects to fish. Because changes in the main parameters that would be affected by implementation of the changes in the Roadless rule under all alternatives (e.g. acres of harvest, new and rebuilt road miles, likely number and type of stream crossings), the conclusions at this planning level are similar to that of the Forest Planning level analysis of 2016.

Comment 249: Commenters expressed that many existing barrier culverts in the Tongass have not been repaired and continue to block suitable fish habitat. Construction of more roads in currently roadless areas will add more barriers and add to the backlog of culverts that are not repaired reducing further available habitat. There was concern about the Forest's road maintenance backlog.

> **Response 249:** Many culverts that were constructed in the initial logging years were not adequate for fish passage. Current requirements are that all new culverts meet fish passage requirements. While some existing culverts have not been repaired and some new culverts may have passage issues, the relative effect to Tongass anadromous stream habitat is very low. As estimated in 2016 Forest Plan culverts have partly blocked about 0.5 percent of total Tongass anadromous habitat. However, most of the stream habitat indicated to have limited access to anadromous fish have fish upstream of these culverts. As a result, no substantial loss of anadromous fish habitat is expected to occur from new culvert installation under any of the proposed alternatives.

Comment 250: Commenters sought more full consideration of the effects of climate change in both the ocean and freshwater on salmon stocks. Commenters also noted that Roadless Areas may supply better fish habitat than other Tongass Forest areas after climate change effects occur.

> **Response 250:** There are many potential effects of climate change that would affect logged and unlogged areas and streams and estuaries. Some may be positive in some areas and negative in others. The range of these effects are discussed in detail in the EIS. While roadless areas may have some benefit, it cannot be reasonably estimated that overall differences in effects to fish resources would occur with or without the changes in roadless areas considered in the proposed alternatives.

Comment 251: Because changes to Roadless Rule protections may lead to natural resource extraction and developmental activities, commenters expressed concern about soil erosion and hydrology. This included concerns about effects such as landslides, river channelization, flow patterns, streamflow, snowmelt, wetlands, changing water chemistry, and flooding. Commenters were concerned that leaving unlogged riparian forests is insufficient to mitigate for the effects of upland logging on streams.

> **Response 251**: See responses above under *Watershed and Fish*. The proposed action and the alternatives do not expand levels of timber harvest and current/future timber harvest levels are low relative to historic levels. Specific timber sale project, mineral project, energy project, and other road project proposals are all subject to individual NEPA analysis and mitigation of effects.

Climate and Air

Comment 252: Commenters expressed concern that exempting the Tongass National Forest from the Roadless Rule may lead to the removal of trees which would impact air quality. Removing protections can lead to indirect effects that may increase air toxic emissions, further reducing air quality. Negative impacts to air quality from the removal of trees and secondary effects would exacerbate or worsen pre-existing

conditions and disease risk. An increase in disease risk could lead to increases in health care costs, creating a reinforcing feedback loop where limitations to health care access further worsen health outcomes.

> **Response 252**: The Roadless Rule would not directly lead to the removal of trees. Under all alternatives, the PTSQ for the Tongass, remains the same. Therefore, it would affect where trees are harvested, but would have little effect on how many trees are harvested. None of the action alternatives propose specific actions that would alter air quality. Impacts to air quality would be based on site-specific proposals. No increase in disease risk or health care costs are expected as a direct result of any of the alternatives.

Comment 253: There was concern that exempting the Tongass National Forest from the Roadless Rule protections would lead to climate change and the subsequent long-term economic impacts of climate change would significantly outweigh any short-term economic benefits from natural resource extraction and development. Investing in the development of sustainable and innovative resource management can mitigate climate change effects, while providing jobs for Alaskans.

> **Response 253**: Refer to the analysis presented in the Climate and Carbon section and to the response to the previous comment. Implementation of any of the alternatives would be similar to how the Forest is managed today and would not convert additional forest land to non-forest uses. The largest source of GHG emissions in the forestry sector globally and within the United States is deforestation, defined as the removal of all trees on forested land to convert it other land uses. This EIS does not authorize more or less timber harvest. The PTSQ for the Tongass is established by the Forest Plan. This action does not change the PTSQ. Therefore, it is not expected to affect the amount of timber harvest, but it will affect where timber is harvested. In addition, the amount of timber harvest expected over the next 100 years is low by historical standards.

Comment 254: There was concern that developmental activities exacerbate climate change effects and will lead to communities being displaced.

> **Response 254**: See previous two responses. The level of development on the Tongass is controlled by the Forest Plan and development projects require their own NEPA analysis prior to implementation.

Comment 255: Commenters were concerned that global loss of forests to deforestation and wildfires have made large intact forests increasingly rare. Exempting the Tongass National Forest can result in further loss in intact ecosystems that have global importance for sustaining life.

> **Response 255**: As noted in previous responses (see the previous three responses), the PTSQ for the Tongass is established by the Forest Plan. This action does not change the PTSQ. Therefore, it is not expected to affect the amount of timber harvest, but it will affect where timber is harvested. In addition, the amount of timber harvest expected over the next 100 years is low by historical standards.

Comment 256: There was concern that exempting the Tongass National Forest from the Roadless Rule protections would lead to natural extraction and developmental activities that would exacerbate uncertain and extreme weather events that can have catastrophic consequences such as increases in the incidence of flooding, fires, drought, landslides, as well as intensified hurricanes. Increased incidence and severity of natural disasters can have profound economic and public safety consequences by putting human health, infrastructure, and natural resources at risk.

> **Response 256**: As noted in previous responses (see the previous four responses), the PTSQ for the Tongass is established by the Forest Plan. This action does not change the PTSQ. Therefore, it is not expected to affect the amount of timber harvest, but it will affect where timber is harvested. In addition, the amount of timber harvest expected over the next 100 years is low by historical standards. Differences among the alternatives may result in some changes in mineral extraction or energy production, but these differences are expected to be minor.

Comment 257: There was concern that exempting the Tongass National Forest from the Roadless Rule protections could lead to lead to developmental activities that increase the release of greenhouse gas emissions. Atmospheric concentrations of greenhouse gases (water vapor, nitrous oxide, carbon dioxide, methane, and chlorofluorocarbons) have changed with increases of emissions from human activities such as deforestation, burning of fossil fuels, production of energy, land use changes, landfill waste decomposition, as well as industrial and agricultural practices. Increases in these natural occurring greenhouse gases reinforce the trapping of heat from the Sun on Earth. Increases in temperature can create reinforcing feedback loops that can further increase greenhouse gases in the atmosphere, examples include increased water vaporization, demand for heating and cooling, as well as increased releases of methane and carbon dioxide from thawing ice stores and permafrost.

Response 257: Please see the previous four responses.

Comment 258: Commenters said that by keeping the Roadless Rule protections in place, a considerable amount of carbon sequestration can occur that will contribute to climate change mitigation, while maintaining critical habitat. There was concern that exemption from the rule would lead to logging, in which case, the Forest would release considerable carbon reserves in addition to the loss of the carbon sequestration capabilities, contributing to the acceleration of climate change. Because old-growth trees sequester more carbon than new growth, the carbon sequestration capabilities cannot be recovered following logging on a time scale sufficient for the mitigation demand. Removal of trees and secondary development activities (logging, road construction, resource extraction) that damage the old-growth ecosystem will impact the capacity of other flora to sequester carbon. Climatic changes disrupt normal environmental parameters such as environmental fluid dynamics, ambient air temperature, water temperature, rainfall, and water acidity, which can have detrimental impacts on ecosystem services and natural resource availability.

Response 258: Please see the previous responses under Climate and Air. As noted, this action does not change the PTSQ for the Tongass. Therefore, no significant change in timber harvest is expected, although the distribution of harvest may be different under each alternative.

Comment 259: Commenters were concerned about the impact of the carbon footprint from shipping timber overseas, asking that it be properly accounted for as an additional impact on climate change.

Response 259: Please see the previous responses under Climate and Air. As noted, this action does not change the PTSQ for the Tongass, nor does it affect the level of exported timber. Therefore, no significant change in timber harvest or export is expected, although the distribution of harvest on the landscape may vary by alternative.

Comment 260: Commenters said that exempting Tongass National Forest from the Roadless Rule protections will lead to natural extraction and developmental activities that would accelerate climate change effects negatively impacting human health and survival.

Response 260: Please see previous responses under Climate and Air. As noted, this action does not change the PTSQ for the Tongass. Therefore, no significant change in timber harvest is expected, although the distribution of harvest may be different under each alternative. There could be some additional mineral extraction and/or renewable energy projects under some alternatives, especially Alternatives 4, 5, and 6, but increases are expected to be minor.

Comment 261: Commenters sought effects analysis disclosing how the proposed rule change will directly and indirectly impact carbon stores and sequestration, as well as the resulting environmental and economic effects from climate change associated with the rule change. Commenters sought analysis of either the potential value of carbon storage on the Tongass or the socioeconomic costs of carbon emissions and associated climate effects.

Commenters were concerned that there was a lack of analysis associated with increased road construction, logging, and mining with the comprehensive cumulative impacts that would occur in both the near and far term in the face of a changing climate. For example, deforestation leads to increased heat energy to the land surface due to lack of canopy which impacts both water temperatures and snowmelt, both of which will be amplified due to climate change.

Response 261: Please see previous responses under Climate and Air. As noted, this action does not change the PTSQ for the Tongass. Therefore, average timber harvest is not expected to exceed the PTSQ level, although the distribution of harvest may be different under each alternative. Therefore, the proposed rule change will not significantly affect carbon stores and sequestration, nor will it result in environmental and economic effects from climate change.

Comment 262: Commenters disagreed that logging in the Tongass National Forest could lead to reductions of greenhouse gases.

Response 262: The EIS does not state that logging would lead to reductions of greenhouse gases. Rather, the EIS states the following. "The effects of implementing the Forest Plan under the nationwide Roadless Rule (i.e., the No Action Alternative) and the action alternatives on GHG emissions and climate change would likely be small though there is considerable uncertainty regarding these effects. For instance, there is uncertainty regarding long-term carbon release particularly because of the importance of how the wood is used (durable or nondurable products), the regrowth of young forests, and market dynamics related to substitution. Considering the alternatives in a global atmospheric carbon dioxide context, treatment levels would have a small contribution to GHG emissions and therefore would have a negligible effect on climate change."

Comment 263: The DEIS inadequately analyzes and unlawfully discounts the proposed rule's potential climate impacts. The DEIS unlawfully discards in silence the Forest Service's earlier conclusions that logging on the Tongass can cause significant greenhouse gas emissions.

Response 263: The EIS does not state that logging would not increase greenhouse gases. As stated in other responses above, this EIS does not affect the PTSQ. The Forest Plan is the process that identifies the level of harvest; this process only identifies the land base where harvest can take place. As noted above, the EIS states: “Considering the alternatives in a global atmospheric carbon dioxide context, treatment levels would have a small contribution to GHG emissions and therefore would have a negligible effect on climate change. There would be only negligible differences among the alternatives because the harvest levels and the mix of old growth and young growth to be harvested are expected to be very similar, and thus unaffected by implementation of the Alaska Roadless Rule. As a result, the alternatives would not differ in regard to their contributions to GHG emissions, changes in forest carbon stocks, carbon sequestration, or global climate change. Given the level of uncertainty in parameters related to the net contribution of GHGs, an attempt to quantify the evaluation would not provide a clearer understanding of potential effects.”

Comment 264: The Forest Service violated NEPA and NFMA requirements to use high quality, accurate, scientific information by failing to recognize the global importance of the Tongass for carbon storage; use of an inappropriate analysis scale to understate the value of the Tongass; and analyze that old growth forests in roadless areas store substantially more carbon than saw logs and young growth.

Response 264: Please see previous responses under *Climate and Air*. As noted, this action does not change the PTSQ for the Tongass. Therefore, average timber harvest is not expected to exceed the PTSQ level, although the distribution of harvest may be different under each alternative. This comment is relevant to a Forest Plan analysis where the PTSQ is under evaluation, which is not the case with this action.

Comment 265: The DEIS failed to disclose the economic value of roadless areas of the Tongass on the carbon markets and the social cost of carbon emissions resulting from logging.

Response 265: Please see previous responses under Climate and Air. As noted, this action does not change the PTSQ for the Tongass. Therefore, average timber harvest is not expected to exceed the PTSQ level, although the distribution of harvest may be different under each alternative. This comment is relevant to a Forest Plan analysis where the PTSQ is under evaluation, which is not the case with this action.

Comment 266: When the Forest Plan was originally developed it was based on the best available information; however, new information is available regarding the impacts of climate change on the area that should be incorporated into the Forest Plan.

> **Response 266:** The climate change and carbon analysis presented in this EIS was based on extensive new information since the 2016 Forest Plan Amendment FEIS. The references cited in the *Climate and Carbon* section that were not available in 2016 include: Birdsey et al. (2019), Domke (2018), EPA (2019), Hayward et al. (2017), IPCC (2018), Markon et al. (2018), Sealaska (2018), and Smith et al. (2019).

Comment 267: The Forest Service failed to disclose and analyze the cumulative effects of expected climate change, road development, and logging on watersheds considered "safe havens", refugia, or core areas for conservation of salmonid and other sensitive fish species. The analysis also fails adequately detail these areas importance to vulnerability and resilience on freshwater habitats and the fish populations' dependent upon them.

> **Response 267:** The vast majority of Tongass watersheds considered "safe havens", refugia, or core areas for conservation of salmonid and other sensitive fish species are within Wilderness, National Monument, LUD II and other non-development LUDs, which do not permit logging or road development (with minor exceptions), and within T77 watersheds and TNC/Audubon Conservation Areas and Conservation Core Areas, which do not permit old-growth logging and associated road development. Furthermore, the Forest Plan prohibits old-growth logging in Phases 2 and 3 of the Timber Sale Program Adaptive Management Strategy, which includes a large portion of the Tongass National Forest development LUDs. The actions proposed in this analysis do not significantly affect timber harvest levels, which will remain at or below the PTSQ established by the Forest Plan.

Comment 268: Roadless Rule changes affect the opportunity, or lack, for renewable energy development (ex. Southeast Alaska Intertie) which has climate change impacts.

> **Response 268:** The differences among the alternatives in terms of renewable energy development are expected to be minor to insignificant.

Timber and Logging

Comment 269: Commenters sought expanded regulations to ensure that timber industries are restricted from logging in any old-growth and rainforest habitats.

> **Response 269**: This EIS does not authorize nor prohibit the harvest of old-growth timber. The PTSQ for the Tongass is established by the analysis for the Forest Plan. This EIS does not change the PTSQ nor does it change the composition of the PTSQ (i.e., the portion that is made up of old growth or young growth). Therefore, it is not expected to significantly affect the amount of timber harvest, nor the portion that is old growth or young growth, but it may affect where timber is harvested.

Comment 270: Commenters sought more site-specific analyses.as they believe the assumption used in the DEIS for even distribution of logging is arbitrary and the EIS needs to make a reasonable projection of likely areas of logging. The Forest Service should provide this analysis based on VCUs.

> **Response 270**: In response to this comment and internal concerns, a model was developed to allocate the old-growth harvest acres in a more realistic pattern based on current assumptions. This model incorporated three factors: 1) it dropped the lowest volume areas; 2) it dropped the poorest economic VCUs based on old-growth timber values from 2007; and 3) it assumed that the vast majority of the harvest would take place in the southern part of the Tongass south of Frederick Sound where the majority of the infrastructure and the most economic timber are located. In addition, a model for predicting road mileage was developed and many additional project-specific analyses were conducted.

Comment 271: Commenters said that virgin old growth forests may have future research potential and resources that could lead to new medicines and medical treatments.

> **Response 271**: Under all alternatives the percent of productive old growth (POG) remaining on the Tongass after 100 years will be 91 percent of the original POG (in 1954) (see Table 3.3-7). Similarly, see Table 3.3-8 and 3.3-9 for the percent of the original high-volume POG and the original large-tree POG.

Comment 272: The assumption that the Roadless Rule will not result in additional logging is arbitrary and capricious because the PTSQ is not a limitation on harvest as described in the DEIS and increased harvest is reasonably foreseeable. The exemption does not set a maximum limit on logging, which increases risk of significant environmental damage. The PTSQ is insufficient to determine maximum limits to logging because it only determines maximum harvest by a suitable yield limit, which could increase with exemption by increasing the total amount of suitable forestland.

> **Response 272**: This EIS does not affect the limits on acres or volume to be harvested. The sustained yield limit (SYL), the PTSQ, and the projected wood sale quantity are established by Forest Plan analyses and these were established for the Tongass based on the 2016 Forest Plan Amendment EIS. No changes would occur in any of these components as a result of this EIS.
>
> Although the PTSQ is not a cap, it is the projected amount of timber to be sold that meets applicable utilization standards and is consistent with all plan components and the fiscal capability of the planning unit. Therefore, it is unlikely to be exceeded for any length of time, otherwise it would become inconsistent with other plan components and/or not be sustainable in terms of the fiscal capability of the Tongass. As a result, the Forest Plan would need to be amended or revised.
>
> The PTSQ for the Tongass is far below the SYL for the Tongass. It was established at a level that was far below the capability of the 2016 suitable timber base, which is the SYL. Therefore, if the suitable timber base should increase as a result of the Alaska Roadless Rule EIS, it is highly unlikely that there would be pressure to increase the PTSQ (which was already far below the SYL).
>
> Current harvest levels are well below the PTSQ and, although it is possible that actual harvest levels will increase as a result of opening up roadless areas by increasing options for economic sales, it is not anticipated that harvest levels will reach or exceed the PTSQ on average. However, analyses in this EIS, as well as in the 2016 Forest Plan EIS, assume that harvest levels do reach the PTSQ and remain there over the planning horizon (100 years) – a very conservative assumption based on current conditions. Also see response to following comment.

Comment 273: Commenters were concerned that the assumption that harvest levels would be equal across the action alternatives was flawed. The Forest Service fails to provide any support for its claim that the proposed rule will not increase logging in the Tongass.

> **Response 273:** Effects throughout the EIS were analyzed assuming harvest at the PTSQ level for 100 years. Current levels of timber sales on the Tongass are far below the PTSQ level. Total volumes sold were 30.9 MMBF in 2017, 9.3 MMBF in 2018 and 5.6 MMBF in 2019 (from the PTSAR Report), while the current PTSQ is 46 MMBF. Thus, the average has been 15 MMBF or 1/3 of the PTSQ for the first 3 years of implementation of the 2016 Forest Plan. On average about 11 MMBF has been young growth and only 4 MMBF has been old growth. The largest problem with recent sales has been economics. It is likely that sales would increase above current levels with selection of one of the action alternatives, because of a greater number of options for putting together economic sales. However, it is not anticipated that harvest levels would reach or exceed the PTSQ on average. It should also be noted that the PTSQ would remain the same for all alternatives. Also, see the response to the previous comment, which explains why the PTSQ would not be exceeded for any length of time.

Comment 274: The assumption that changing the Roadless Rule will not lead to changing the forest plan and, subsequently, subject more than 165,000 additional acres to logging is flawed.

Response 274: Increasing the number of suitable acres does not mean that harvest levels need to increase. This may have been true 20 years ago or so, but it is no longer true. If this were true, then the current PTSQ would be much higher because the current sustained yield limit (SYL) is 248 MMBF. Although the PTSQ will increase in future decades as young-growth stands become mature enough to harvest, it never exceeds half of the SYL. Therefore, it is not reasonable to assume that, just because the suitable timber base increases the harvest level will increase as well. The Forest Service is committed to the young-growth transition strategy developed for the 2016 Forest Plan Amendment.

Comment 275: Commenters expressed concern and sought effects analysis that considered the potential increased quantity of roads and acreage impacted to harvest the same amount of timber from young-growth, at 65 years of age, instead of waiting until the timber was at its maximum growth potential of 90–100. Commenters also sought information about reforestation plans for projects that may occur following an exemption to the rule.

Response 275: The issues raised in this concern are Forest Plan issues and are beyond the scope of this EIS.

Comment 276: Commenters provided input about logging practices in Alaska and logging in roadless areas. Some said that logging either enhances, or does not harm, watershed ecosystems and others expressed support for a second growth timber management strategy and still others were concerned with the sustainability of current harvest practices. There was concern that logging in roadless areas would impact a greater area and cost more than areas with roads and that logging old-growth also requires building more roads than logging young-growth. There was support for logging and forest treatment practices that are sustainable and protective of ecosystems and communities.

Response 276: The proposed action does not adjust the PTSQ identified in the Forest Plan. Current harvest levels are well below the PTSQ and, although it is possible that actual harvest levels will increase as a result of opening up roadless areas by increasing options for economic sales, it is not anticipated that harvest levels will reach or exceed the PTSQ on average. However, analyses in this EIS, as well as in the 2016 Forest Plan EIS, assume that harvest levels do reach the PTSQ and remain there over the planning horizon (100 years).

Comment 277: Commenters sought a discussion in the EIS considering young-growth as a sustainable supply when compared to old-growth and a productivity comparison of young- and old-growth.

Response 277: This is a Forest Plan issue and is beyond the scope of this EIS.

Comment 278: Commenters were concerned about the cost and necessity of logging old-growth and intact forests when compared to the costs for other timber resources available for harvest that are more sustainable and cost efficient.

Response 278: This is a Forest Plan issue and is beyond the scope of this EIS.

Roadless and Wilderness

Comment 279: Commenters sought consideration for changing the roadless areas to Wilderness.

Response 279: A full evaluation of all roadless areas on the Tongass for Wilderness recommendations was conducted by the Forest Service in 2003. A range of alternatives with a range of recommendations was developed, but the no action alternative was selected. This was documented in: USDA Forest Service. 2003. Tongass Land Management Plan Revision. Roadless Area Evaluation for Wilderness Recommendations. Final SEIS. USDA Forest Service Alaska Region, R10-MB-481.

Comment 280: Commenters sought effects analysis for changes in roadless status of Tongass National Forest lands adjacent to National Park Service-managed wilderness and how they may affect wilderness qualities, viewshed, and visitor experience within the Glacier Bay National Park Wilderness.

Response 280: This concern is addressed in the FEIS under Key Issue 1 - Roadless Area Conservation.

Comment 281: Commenters expressed concern that the Forest Plan does not protect roadless area values in Development LUDs and that removing roadless area protections provided by the "not suitable for timber production" plan component would lead to degradation of unroaded area values.

Response 281: It is true that removal of roadless designations for development LUDs may result in timber harvest and road construction when the roadless designation is removed. Timber harvest is not expected to increase significantly overall, but the more roadless designations that are removed, the more roadless area degradation is likely.

Comment 282: Commenters were concerned that removing the Roadless Rule in Alaska could lead to the precedent of removing Roadless Rule protections in other areas which could lead to a precedent of excessive logging and road construction in forests across the United States.

Response 282: Currently only the State of Utah has a petition for a state-specific Roadless rule and the Secretary of Agriculture has yet to accept their petition. The State of Utah's petition does not ask for a full exemption, rather it petitions for greater flexibility to respond to climate change, drought, disease, historic suppression of natural wildfires, insect infestations, and other challenges facing the state. If the Utah petition is accepted or other states petitions the Secretary for a state-specific Roadless rule, each rulemaking effort would consider the petition based on the merits of the request in context of issues, resource conditions, and economic conditions of each individual state.

Out of Scope

Comment 283: Comment letters included introductory narrative and other information that was reviewed and noted with no further response required.

Response 283: Examples of comments for which no further response will be provided are those unrelated to the decision being made, already decided by law, policy or regulation, beyond the scope of the proposal, conjectural in nature or not supported by scientific evidence, general in nature or position statements.

Comment 284: Commenters expressed general opposition for logging in the Tongass and Chugach National Forests.

Response 284: This comment is beyond the scope of this EIS because this EIS is only analyzing prohibition of timber harvest and road construction within designated roadless areas.

Comment 285: An assessment of Alaska's potential energy production contribution on NFS lands should be considered in the Roadless Rule issues under analysis since the rule does not adequately address other forms of renewable energy outside of hydropower and wind.

Response 285: An assessment of Alaska's potential energy production contribution on NFS lands is outside of the scope of this analysis.

Appendix H

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