

## 15. TONGASS

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*Reader’s Note: DEIS Alternatives T1 and T4 have been renamed and carried forward into the FEIS without any substantive change. DEIS Alternative T1 has been renamed the **Tongass Exempt Alternative** in the FEIS. DEIS Alternative T4 has been renamed the **Tongass Selected Areas Alternative** in the FEIS. Because of the decision to incorporate the procedures into the final Planning Regulations, the other Tongass DEIS alternatives (T2 and T3) have been modified from their original form in the DEIS, combined, and re-described in the FEIS as the **Tongass Deferred Alternative**. In addition, a **Tongass Not Exempt Alternative** has been added to the FEIS to describe the decision-maker’s option of applying the selected prohibition alternative (1 through 4) to the Tongass without any modification. It is not a new alternative, but a clarified and reformatted description of one that was implicit in the DEIS (p. 2-10).*

*In summary:*

<u>DEIS Alternative</u>	<u>Corresponding FEIS Alternative</u>
T1	Tongass Exempt
T2 and T3	Tongass Deferred
T4	Tongass Selected Areas
(No Exemptions)	Tongass Not Exempt

### General

**1. The Forest Service should defer action on the Tongass National Forest. The proposed rule regarding the Tongass National Forest appears valid, provided no delays or extensions are allowed after April, 2004; and**

**2. The Forest Service should not wait four years to realize that there are sufficient roads to meet**

**timber, recreational, and subsistence access needs in the Tongass.**

**Response:** These concerns are addressed in the DEIS Alternative T3 (DEIS pp. 1-13, 3-233), and in the Tongass Deferred Alternative in the FEIS. These alternatives allow for a deferral of a decision on inventoried roadless areas of the Tongass National Forest.

**3. The Forest Service should allow road construction on the Tongass National Forest.**

**Response:** Alternative T1 in the DEIS, and the Tongass Exempt Alternative in the FEIS would allow roading consistent with the current Tongass Land Management Plan Revision Record of Decision. Also, the Tongass Deferred Alternative in the FEIS would defer a decision on prohibition of road construction and reconstruction in inventoried roadless areas until 2004. See also Response 40 regarding forest-wide road management decisions.

**4. The Forest Service should implement the Tongass Land Management Plan Revision, and then evaluate the effects of implementing the Plan.**

**Response:** Under the Tongass Not Exempt Alternative, the FEIS includes a mitigation measure that, if selected by the responsible official, would delay implementation of prohibitions on the Tongass until 2004. During the delay, the current TLMP would be implemented.

**5. The proposed rule should better address Alaska’s needs so it does not end up like California—corrupted by greedy politicians, pork barrel politics, and people who refuse to occupationally diversify.**

**Response:** The Tongass National Forest was specifically identified in the DEIS as needing special consideration (DEIS pp. 1-11, 1-12). Consequently, the DEIS and FEIS included specific Tongass alternatives to address the unique ecological, social, and political issues on the Tongass National Forest (DEIS pp. 3-226 through 3-239). See Response 9 for discussion regarding the use of science, best available information, and scientific consistency in developing and analyzing the effects.

**6. The Forest Service should protect at least half of the inventoried roadless areas in the Tongass National Forest.**

**Response:** The DEIS and FEIS contain alternatives that address a broad spectrum of protection for inventoried roadless areas in the Tongass National Forest. These alternatives include full protection (Tongass Not Exempt), partial protection (Tongass Selected Areas), and no added protection (Tongass Exempt) in the FEIS.

**7. The Forest Service should include all inventoried roadless areas over 25,000 acres and adjacent to Wilderness areas in the Tongass National Forest.**

**Response:** The concern advocates that at a minimum, the very largest “blocks” of inventoried roadless areas should receive protection, specifically those inventoried roadless areas over 25,000 acres as well as those that are adjacent to existing Wilderness. All of the areas meeting these criteria could receive protection under the FEIS Tongass Not Exempt Alternative.

**8. The Forest Service should address the relationship between the Alaska National Interest Land Conservation Act and the proposed rule.**

**Response:** The Forest Service has addressed agency legal requirements of the Alaska National Interest Land Conservation Act (ANILCA). The preamble to the proposed rule clarified that roading pursuant to valid rights granted in statute or treaty, such as access to non-Federal inholdings, would not be prohibited under any alternative (DEIS p. A-9). While the DEIS analyzed subsistence uses under the Tongass alternatives (see Response 25), the Forest Service has determined that the agency is not required to undertake an analysis pursuant to ANILCA Section 810. Further, the proposed rule does not seek to establish Conservation System Unit(s) as defined by ANILCA. See Response 3 in the Lands section.

## Science Consistency

**9. The Forest Service needs to use scientific data to back-up the roadless plan in the Tongass.**

**Response:** The best available science and data were utilized for alternative development and effects analysis in the DEIS. Analyses were based largely on the 1997 TLMP FEIS and supplemented where necessary with additional location-specific data.

Additional discussion regarding the use of science, best available information, and scientific consistency in the roadless area analysis can be found in Response 66 in the Landscape Ecology section and in the *Specialist Report for Biological and Ecological Resources on the Tongass (October 2000)*.

**10. There is no scientific basis for excluding the Tongass from a prohibition of road construction and reconstruction in inventoried roadless areas.**

**Response:** Social and economic considerations on the Tongass were key in analyzing all the alternatives presented in the DEIS and FEIS. The DEIS and FEIS identify and recognize the unique and sensitive ecological character of the Tongass, the abundance of roadless areas where road construction and reconstruction are limited, and the high degree of ecological health on the Tongass National Forest (DEIS pp. 3-226, 3-227) in developing and analyzing the alternatives. They will continue to be considered as a final decision is made. Further discussion regarding the role of science in the analysis can be found in Response 66 in the Landscape Ecology section and Response 9 in this section.

## Timber and Road Management

**11. In excluding the Tongass, the Forest Service has misunderstood the market demand provision of the Tongass Timber Reform Act.**

**Response:** The Tongass Timber Reform Act (TTRA) was only one of four unique social and economic reasons that the Tongass National Forest was specifically identified in the purpose and need as deserving special attention in formulating alternatives (DEIS pp. 1-11 and 1-12). As stated in the DEIS (p. 1-13), section 101 of the TTRA “... requires the agency to seek to provide a supply of timber from the Tongass National Forest that meets market demand, consistent with providing for multiple-use and sustained yield of all renewable resources, subject to other applicable laws, and requirements of the National Forest Management Act of 1976.” Thus, the agency does not interpret the market demand provision of the TTRA as a goal to be pursued at the expense of other environmental provisions embodied in applicable law, including the diversity provisions of the National Forest Management Act, or the Endangered Species Act.

The rationale for developing alternatives that exclude the Tongass from immediate road building prohibitions is much broader than maintaining timber supply in response to the market demand provision of the TTRA.

**12. *The Forest Service should comply with the Tongass Timber Reform Act.***

**Response:** The Tongass Timber Reform Act (TTRA) directs the Forest Service to seek to provide timber to meet market demand “to the extent consistent with providing for the multiple-use and sustained yield of all renewable forest resources.” Thus, meeting market demand is not a mandate; it is a conditional objective. The Roadless Area Conservation proposal recognizes the role of inventoried roadless areas in providing for certain types of forest resources and uses. Decisions regarding the appropriate use of these areas are consistent with the provisions of TTRA.

**13. *The Forest Service should prohibit road building on the Tongass National Forest. There is adequate road access to timber there already. The Forest Service should consider a moratorium on roading and logging in roadless areas of the Tongass lasting 50 years, or until such time that second growth on previously logged lands can be commercially harvested.***

**Response:** Decisions concerning roading throughout the entire Tongass National Forest are beyond the scope of the proposed action for this rulemaking for roadless area conservation. The DEIS and FEIS recognize that few commercial timber harvest opportunities will exist in second growth stands for several planning cycles (DEIS p. 3-233). A prohibition on road construction and reconstruction within inventoried roadless areas is projected to decrease the annual timber volume available for offer over the next five years. Low timber market demand annual harvest is currently projected to be 124 MMBF, leaving in question whether market demand for timber could be realized using the existing road system if prohibitions were applied to the Tongass.

**14. *The Forest Service should define vital access.***

**Response:** The phrase “vital linkages” and “vital Forest transportation system linkages” are used interchangeably in the Tongass National Forest Land and Resource Management Plan prescriptions that

were included in Appendix E of the DEIS. Vital Forest transportation system linkages were described on p. E-29 of the DEIS.

**15. *The Forest Service should adopt Alternative T4 to provide protection now. Don’t wait four years. Bring the Tongass in line with other forests.***

**Response:** Under the FEIS Tongass Not Exempt Alternative, the same prohibitions would be applied to all national forests and grasslands, including the Tongass. Therefore, under the Tongass Not Exempt Alternative, Alternatives 2, 3, or 4 could be applied immediately to all inventoried roadless areas on the Tongass. The Tongass Selected Areas Alternative in the FEIS applies prohibitions immediately but is limited to inventoried roadless areas in four specific land use designations.

**16. *The proposed rule should apply prohibitions to the Tongass immediately to improve timber management on the Tongass National Forest, insure local decision-makers conform to roadless area protection needs, and protect the Tongass from timber industry interests.***

**Response:** This comment supports the Tongass Not Exempt Alternative that could result in prohibitions applied to all inventoried roadless areas on the Tongass National Forest. Alternatives in the DEIS and FEIS containing prohibitions could reduce the amount of timber harvested from roadless areas of the Tongass, and subsequently the total amount of timber volume available for harvest on the Tongass National Forest. A comprehensive examination or analysis of overall timber management on the Tongass National Forest, however, would be beyond the scope of the analysis for this rulemaking.

**17. *The Tongass National Forest should adopt restrictions on road construction and reconstruction in inventoried roadless areas when its five-year plan is proposed.***

**Response:** The DEIS Alternatives T2 and T3 (Tongass Deferred Alternative in the FEIS) provide for possible prohibitions on road construction in roadless areas at the time of the 5-year plan review. At such time, the responsible official would conduct an evaluation to determine if some or all of the inventoried roadless areas on the Tongass merit protection provided by the prohibition alternatives. Also, the FEIS includes a possible mitigation

measure for the Tongass Not Exempt Alternative that, if included in the final decision, would delay implementation of prohibitions on the Tongass until the five-year forest plan review in 2004.

**18. *The Forest Service should demonstrate how logging and roading the Tongass National Forest could have a positive effect on the environment.***

**Response:** Logging and roading have very little environmental benefit on the Tongass. Logging occurred primarily through even-aged (clear cut) harvest methods that convert old-growth forest to early seral forest. The result of this practice has been a decline in the amount of productive old growth in several intensely managed areas on the Tongass as well as heightened concerns over habitat loss and increased species mortality rates (DEIS p. 3-338). Because the majority of subsistence and game species are integrally linked to old-growth and riparian habitats often found in roadless areas, the effects of logging and roading as currently practiced on the forest is in general detrimental to such Tongass species. Those benefits that may occur, such as increased forage for deer in clearcuts, are very short in duration and are offset by the loss of the overstory tree canopy that provides thermal cover in winter. Additionally, the DEIS indicated that “in general, relatively few forest health vegetative treatment opportunities exist on the Tongass in comparison to forests in the lower 48 States” (DEIS p. 3-228).

**19. *Stringent road building and logging standards need to be implemented on the Tongass to maintain high quality fish and wildlife habitat. Funding should be linked in any timber sale plan to safeguard stricter standards and the USFS needs to provide solid, ongoing support for research in order to gain a better understanding of the effects of habitat degradation.***

**Response:** The DEIS did not conclude that logging and road building are incompatible with fish and wildlife habitat protection. However, there is substantial scientific evidence that roading and logging often do have adverse effects to these resources as outlined in Chapter 3 of the FEIS. While the manner in which roading and timber harvest occur can affect fish and wildlife habitat differently, analysis of specific forest plan standards and guidelines, including funding mechanisms to ensure

they are carried out, are beyond the scope of the proposed action for this rulemaking.

**20. *The Forest Service should consider the Tongass National Forest extensively “roaded” by inland waterways and prohibit road building.***

**Response:** The DEIS and FEIS recognize the importance of marine waterways for transportation and recreational use (DEIS p. 3-277). However, the beneficial and detrimental ecological, social, and economic effects of roading in inventoried roadless areas of the Tongass remain an issue for a variety of uses, most notably logging. The FEIS Tongass Not Exempt Alternative could result in prohibitions being applied to all inventoried roadless areas on the Tongass.

**21. *The Forest Service should select Alternative 1 because the commercial fisheries industry requires fast freight transportation of large quantities of fresh seafood and does not wish to preclude the possibility of building a surface road out of Alaska; and***

**22. *If the Forest Service prohibits roads on the Tongass National Forest in the Final Rule, additional funding should be budgeted to the Alaska Marine Highway System and air subsidies to mitigate impacts on reduced transportation options.***

**Response:** The question of how State highways may be affected by this rulemaking is a core issue associated with these concerns. An exception for Highway Safety Act roads has been developed as possible mitigation measure in the FEIS. A discussion regarding Secretary of Agriculture authorities and potential exceptions in the final rule related to highway projects can be found in Response 43 in the Roads section. Subsidies to mitigate marine ferry and air travel are not within the scope of the purpose and need for this rulemaking.

## **Socio-Economic Effects**

**23. *The economic effects of not applying restrictions on road building to the Tongass National Forest need to be addressed.***

**Response:** The “economic effects of not applying restrictions on road building on the Tongass National Forest” were described for DEIS Alternative T1 (p.

3-231). The economic effects of the Tongass Exempt Alternative have been further refined in the FEIS.

**24. *The Forest Service should exempt the Tongass National Forest from the proposed rule. Logging is important to the economy of Southeast Alaska.***

**Response:** The importance of logging to the Southeast Alaska economy was described both in the affected environment for the Tongass (DEIS Chapter 3) and in the effects analysis for the Tongass (DEIS Chapter 3, Alternatives T1 through T4). The effects in local communities where logging is a cornerstone of the local economy have been further refined and described in the FEIS for each of the alternatives.

Among the alternatives in both the DEIS and FEIS, those that exempt the Tongass from prohibitions or defer a decision on whether prohibitions should be applied to the Tongass best accommodate a transition in the timber program in Southeast Alaska under the recent 1999 Record of Decision on the Tongass National Forest Land Management Plan Revision (DEIS p. 1-13). See the reader's note at the beginning of this section for a summary of DEIS alternatives as carried forward into the FEIS.

**25. *The Forest Service should consider the impacts of roadless areas on subsistence foods, hunting, and fishing in Southeast Alaska.***

**Response:** The DEIS recognized the importance of subsistence hunting, fishing, and gathering in Southeast Alaska (DEIS p. 3-228). Effects on the subsistence resource were described in the context of both ecological effects and social values for each of the alternatives (DEIS pp. 3-231, 3-233, 3-236, and 3-237). In summary, alternatives in both the DEIS and FEIS containing prohibitions were expected to benefit subsistence users by providing greater quality and quantity of habitat for important subsistence species, and by decreasing human competition for subsistence resources. See the reader's note at the beginning of this section. See Response 2 in the Social Effects section for discussion regarding concerns that prohibiting roading may have a negative impact on access to natural resources. Additional discussion addressing subsistence use is in the *Socioeconomic Specialist Report (May 2000)* and the Civil Rights Impact Assessment for this rulemaking.

**26. *The Forest Service should address subsidies and taxpayer economic concerns about the Tongass timber sale program.***

**Response:** Reduced timber harvest occurring under any of the prohibition alternatives could reduce taxpayer costs. These effects are addressed in the DEIS and FEIS. The DEIS displayed the average net revenue per thousand board feet harvested by Forest Service Region in Table 3-39 (DEIS p. 3-184), and the results indicate a substantial net loss of revenue for the Tongass. The FEIS Tongass Not Exempt Alternative, which could apply prohibitions to all inventoried roadless areas of the Tongass, could greatly reduce the amount of timber harvested from inventoried roadless areas and from the Forest as a whole.

**27. *The Forest Service should consider the economic impacts of the proposed rule on businesses and business ventures within the Tongass National Forest.***

**Response:** Regional economic impacts were addressed on pp. 3-226 and 3-229 of the DEIS and in the FEIS in the Tongass section of Chapter 3. Some of the alternatives would be expected to negatively affect the timber industry and communities that are dependent on this industry as part of their economic base. Little or no impact would be anticipated for other resource-based businesses. See Response 36 in the Economics section and Response 1 in the Minerals section, addressing concerns about effects to tourism and mining. Impacts on small businesses in Alaska are also described in both the Initial Regulatory Flexibility Analysis and Final Regulatory Flexibility Analysis.

**28. *By delaying any decision on the status of the Tongass in regards to this proposal, the Forest Service effectively precludes any new timber industry ventures in the Tongass.***

**Response:** Under DEIS Alternatives T2 and T3 (Tongass Deferred Alternative in the FEIS), the Tongass National Forest would determine whether the prohibition against road construction and reconstruction should apply to any or all of the inventoried roadless areas on the Tongass. This evaluation would be conducted in association with the 5-year review of the April 1999 Tongass Land and Resource Management Plan.

Forest programs and outputs are subject to shifts in public values and sentiments, as well as new scientific information as it becomes available. The scientific and social basis for resource management is continuously evolving. Thus, industries that depend on the timber supply from public lands – by definition – operate in a climate of change and uncertainty. The protection of roadless area characteristics is one of a number of influences that may affect the timber industry associated with the Tongass National Forest.

***29. The Forest Service should promote small scale local value-enhanced logging, fisheries, and tourism in the Tongass National Forest.***

**Response:** The Forest Service supports small timber businesses through Small Business Association (SBA) set-aside sales, Special Salvage Timber Sales (SSTS) and a newly initiated micro-sale program. Regardless of the outcome of the alternative chosen for Roadless Area Conservation, these programs can be expected to continue. With regard to other resource-dependent industries, the DEIS spoke to the broad range of economic benefits associated with other forest resources. See Responses 30, 31, and 36 addressing concerns about recreation and fisheries resources.

## Non-Consumptive Uses

***30. Numerous non-consumptive uses of the Tongass National Forest do not require roads.***

**Response:** The non-consumptive uses and qualities for which the Tongass National Forest is valued were recognized in the DEIS (p. 3-227). Prohibition alternatives were described as lower risk to scenic quality and likely to help conserve the “wild and unspoiled” nature of many roadless areas currently scheduled for development (DEIS p. 3-230). Conservation of these areas would provide more of the remote and semi-remote types of recreational opportunities that are commonly sought on the Tongass National Forest (DEIS p. 3-230). Future demand for remote and semi-remote recreation opportunities is expected to be met under the current TLMP (DEIS pp. 3-227 and 3-232) regardless of the roadless area conservation alternative chosen for the Tongass.

***31. The Forest Service should not destroy scenic areas with highly historical, recreational, and subsistence use values.***

**Response:** Scenic values of the Tongass National Forest were recognized (DEIS pp. 3-227, 3-228) and analyzed in the DEIS (pp. 3-230, 3-231, 3-233). The TLMP includes specific land allocations as well as standards and guidelines to maintain scenic quality on the Tongass National Forest. None of the DEIS or FEIS alternatives would compromise these goals, objectives, or standards and guidelines pertaining to scenic quality.

***32. More roads should not be built in the Tongass National Forest. There have been no studies that demonstrate a demand for more roaded recreation.***

**Response:** Citing the TLMP FEIS, the roadless area conservation DEIS projected that recreation opportunity demand for semi-primitive roaded recreation will not be met in the future (DEIS p. 3-227) under any alternative. A prohibition of roading that would provide semi-primitive roaded recreation could further accentuate unmet levels of demand. The effects of the alternatives on recreation are described in the DEIS and FEIS in Chapter 3.

***33. The Forest Service should consider that Alternative T1 will not cause a decline in dispersed recreation in Alaska.***

**Response:** This concern has been considered and addressed in the DEIS and FEIS. The effects analysis for DEIS Alternative T1 (Tongass Exempt Alternative in the FEIS) stated that human uses would continue at levels projected under the current TLMP (DEIS p. 3-231). Further, the DEIS projected that under the current TLMP, future demand for dispersed recreation would be met (DEIS pp. 3-227, 3-232).

## Biological Resources

***34. The Forest Service should apply prohibitions to the Tongass now to protect fish and wildlife, their habitat, and old-growth forest.***

**Response:** The sensitivity of the Tongass to fragmentation, the importance of unroaded areas in maintaining healthy populations of Tongass species, and the natural disturbance processes that shape habitats on the Forest were all recognized within the

DEIS and FEIS. The DEIS described effects to old-growth ecosystems, species viability and biodiversity for each of the alternatives. Cumulative effects of the alternatives with respect to fragmentation, historic species abundance, and species population interactions and extirpations were also described (DEIS p. 3-238). See Responses 20, 25, and 32 in the Terrestrial and Aquatic Habitat section.

**35. *The Forest Service should adopt the recommendations of the 1992 viable populations (V-POP) strategy.***

**Response:** The original V-POP strategy was incorporated into various alternatives in the 1997 Tongass Land Management Plan Revision (TLMP). As stated in the TLMP FEIS: “The V-POP strategy was well supported by earlier views but was considered to need improvement as a comprehensive conservation strategy” (TLMP FEIS p. 3-428). Thus, the Wildlife Viability Panel Assessments in the 1997 FEIS process were used to further develop and integrate the best available information into planning for wildlife viability on the Tongass National Forest. This information was incorporated into the current TLMP. The final roadless area decision would not compromise the viability concepts in the current TLMP. Selection of the FEIS Tongass Not Exempt Alternative, which could apply prohibitions in inventoried roadless areas throughout the Tongass, would provide additional benefits to viability consistent with the concept of maintaining a “reserve” system included in the V-POP strategy recommendations.

**36. *The Forest Service needs to consider the importance of the Tongass National Forest to the commercial fishing industry in southeast Alaska and consider the impacts of roads and clear cutting within the Tongass National Forest, weather changes, and fishery management policy.***

**Response:** The importance of the Tongass National Forest to the commercial fishing industry was recognized on p. 3-229 of the DEIS. The decision under this rulemaking would apply only to logging and roading within inventoried roadless areas on the Tongass National Forest. None of the DEIS or FEIS alternatives would compromise existing Tongass Land Management Plan Revision (TLMP) management practices benefiting commercially valuable fish species. The FEIS includes a discussion of current TLMP management practices relevant to

commercial fish species. Alternatives containing prohibitions would further benefit commercially valuable species as compared to no action alternative (DEIS pp. 3-231, 3-233, 3-236). While weather changes and fishery management decisions by fishery management agencies and governing bodies do affect the commercial fishing industry, these aspects of commercial fishery management are beyond the scope of the purpose and need for this rulemaking.

**37. *The Forest Service should address the impact of log dumps on the marine environment.***

**Response:** Log dumps are used to transfer logs that have been trucked to the log dump site into salt water for barge transport. These facilities can have a deleterious impact on marine ecosystems, particularly at the dump site (*Specialist Report for Biological and Ecological Resources on the Tongass, (October 2000)*).

The TLMP analyzed the impact of log dump facilities on the marine environment and established standards and guidelines for their development and use on the Tongass National Forest. Such standards and guidelines contained within the forest plan would not be compromised under any roadless area conservation alternative. Construction of a log dump or transfer facility would not be prohibited under any of the alternatives. However, log dump facilities are only needed in situations where logs are transferred from a road system to salt water. Therefore, the FEIS Tongass Not Exempt Alternative, which could prohibit roading or logging in all inventoried roadless areas of the Tongass, would likely eliminate or reduce the need for new log dump facilities, particularly in inventoried roadless areas.

**38. *The proposed rule should include an analysis of logging levels by volume and elevation classes in order to determine the impacts to low elevation, high volume old-growth forests, those that are of high conservation value.***

**Response:** The DEIS and FEIS analyze roadless areas by elevation, size, and adjacency to Wilderness lands in Alaska. The DEIS did not analyze volume class within inventoried roadless areas. The DEIS and FEIS express the importance of inventoried roadless areas to old-growth ecosystems, species viability, and biodiversity. The DEIS indicated that the abundance and high quality of inventoried

roadless areas on the Tongass contributes to the overall high degree of biological integrity found on the Forest (DEIS p. 3-226).

Additionally, the effects analysis predicted that risk to old-growth ecosystems, species, and biodiversity may be very low under Alternatives 2 through 4 (Alternative 2, 3, or 4 could be applied to the Tongass under the FEIS Tongass Not Exempt Alternative). Additional discussion regarding these comparisons can be found in the *Specialist Report for Biological and Ecological Resources on the Tongass* (May 2000).

**39. *The proposed rule should ensure protection for the Northern flying squirrel.***

**Response:** The intent of this rulemaking is to address inventoried roadless areas and their value, including species viability and biodiversity. Ensuring protection of individual species is beyond the scope of the purpose and need of this rulemaking. The Tongass Not Exempt Alternative, which could apply prohibitions to all inventoried roadless areas of the Tongass, poses the least risk to the viability of northern flying squirrel populations. See Response 38 and the *Specialist Report For Biological and Ecological Resources on the Tongass* (October 2000) for discussion regarding TLMP FEIS Alternative 1.

**40. *Forest Service statistics show that 4/5 of culverts are inadequate for allowing the passage of juvenile fish. The Forest Service should develop a sound roads policy to protect water quality and fish passage in the Tongass.***

**Response:** The roadless rulemaking is intended to address roadless areas and their value, including fish, fish habitat, and water quality. The FEIS Tongass Not Exempt Alternative, which could apply prohibitions to all inventoried roadless areas of the Tongass, would provide the greatest level of protection for fisheries and water quality values on the Tongass by avoiding roading in inventoried roadless areas that may negatively affect fish. The prohibitions only apply, however, to inventoried roadless areas. The development of a roads policy for the Tongass National Forest would be accomplished at the forest level and is not within the scope of the purpose and need for this rulemaking. The issues raised within this concern are perhaps best addressed under the proposed Forest Service Roads Policy that

is described in the expanded cumulative effects analysis of the FEIS (Chapter 3, Cumulative Effects).

## Physical Watershed Resources

**41. *The Forest Service should not build new roads into the Tongass and Chugach forest in order to reduce stress on the forests from green house warming and global climate change.***

**Response:** The air quality section in the DEIS did not specifically address the Alaska Region or the Tongass National Forest (NF) in particular in relation to these issues. In response to public concerns, the FEIS now addresses these issues. The *Specialist Report on Physical Resources for the Tongass* (October 2000) includes a more inclusive discussion of the role of the Tongass NF in relation to global climate change, carbon sequestration, and related issues. The appendix on references cited of the FEIS includes numerous additional articles covering these issues.

None of the alternatives, including those specially addressing the Tongass National Forest, are likely to have measurable effect on global atmospheric issues by themselves. In a national perspective, planned timber offer from the Tongass is less than 0.2 % of the total planned timber offer for all ownerships across the United States. When viewed on a global scale, this effect is even smaller. In addition, any reductions in harvest from inventoried roadless areas on the Tongass NF will likely be offset by increased harvest on other lands within the United States and by harvest and imports from other nations such as Canada. These actions should result in no net change in atmospheric conditions regardless of harvest offer levels in inventoried roadless areas on the Tongass.

**42. *The Forest Service should address its failure within the NEPA process to account for the cumulative effects of damaging karst formations in recent timber sales in the Tongass. The Forest should address the effects of road building on karst formations, habitat, old growth, and the entire ecosystem.***

**Response:** The FEIS recognizes the importance of caves and karst resources on the Tongass National Forest. The effects that logging and roading can have on caves and karst formations were described in the DEIS (pp. 3-148, 3-149). The standards and guidelines contained in the current TLMP to protect

karst and cave resources would not be compromised under any of the DEIS or FEIS alternatives. Also see Response 76 in the Minerals section.

## Other Concerns

### ***43. The Tongass should be considered a North American Natural Heritage Area.***

**Response:** National Heritage Areas are designated by the United States Congress. They are places where natural, cultural, historic, and recreational resources combine to form a cohesive, nationally distinctive landscape arising from patterns of human activity and geography. Designation of a heritage area at the national level recognizes a community's efforts to identify its natural and cultural resources that define its sense of place and its stories. Such a designation was considered but not analyzed in detail because it is beyond the purpose for this proposed rulemaking (FEIS Chapter 2, Alternative Land Use Designations).

### ***44. 8.5 million acres of the Tongass should be designated as permanent Wilderness immediately.***

**Response:** The National Wilderness Preservation System (NWPS) is managed to preserve its primeval and undeveloped character, and maintain a condition affected primarily by the forces of nature. The United States Congress has the sole authority to add areas to the NWPS. A proposal for Wilderness designation was considered but not analyzed in detail because the agency has already evaluated the inventoried roadless areas for potential Wilderness, and because the NFMA planning process (36 CFR 219) is the appropriate process for the Forest Service to formulate Wilderness recommendations (FEIS Chapter 2, Alternative Land Use Designations).

### ***45. The proposed rule should include the native-owned lands of southeast Alaska.***

**Response:** The Forest Service can only make management and policy decisions regarding land under Forest Service jurisdiction. Both the draft and final rules would be applicable only to National Forest System lands and cannot be extended to include native-owned lands of Southeast Alaska. Therefore, the proposal would be beyond the scope of the proposed action for this rulemaking.

### ***46. The Forest Service should address the expansion of timber harvest units/sales (to get more volume out) in the Tongass and whether an EIS must be completed for these expansions to occur.***

**Response:** Most timber harvest activities on the Tongass National Forest are analyzed in environmental impact statements the agency prepares. When site-specific changes associated with individual timber sales occur after EIS completion, local deciding officials must decide whether additional analysis under the National Environmental Policy Act is required. These local, site-specific decisions and decision-making processes are beyond the scope of the analysis of this national level rulemaking effort.

### ***47. The Forest Service should amend section 101 of the Tongass Timber Reform Act to give conservation of the forest priority over timber yield.***

**Response:** The Tongass Timber Reform Act (TTRA) is legislation that was enacted by the United States Congress. Any amendment(s) to the TTRA must similarly be enacted by the United States Congress through the legislative process. The Forest Service considered alternatives that would entail legislative proposals, but did not analyze them in detail because the President did not instruct the agency to formulate proposals for legislation, but rather instructed it to conduct rulemaking (FEIS Chapter 2, Alternative Processes Other Than Rulemaking).

### ***48. The Forest Service should modify the Tongass Land Management Plan Revision to provide comprehensive protection of wildlife populations.***

**Response:** The intent of this rulemaking is to address roadless areas and their values. While roadless areas do provide important habitat value to wildlife, amending the TLMP for the purpose of providing comprehensive protection of wildlife populations is beyond the scope of the purpose and need of the proposed action for this rulemaking. In comments to the DEIS, another alternative was suggested that would lead to a revision of the 1997 TLMP and its 1999 Record of Decision. As discussed in the FEIS, the Forest Service believes it is not feasible to single out a revision of the TLMP through this national rule. Typically, these types of alternatives are best left to the agency's land and resource management planning procedures (36 CFR 219) where specific

land capabilities and suitability can be accurately evaluated.

***49. The Forest Service should phase out logging and road building in the Tongass National Forest within ten years.***

**Response:** The intent of this rulemaking is to address protection of roadless areas and their values. DEIS Alternative T4 (FEIS Tongass Selected Areas Alternative) would reduce roading in four land use designations (LUDs) where timber harvest is not scheduled. However, the inability to construct roads through these four LUDs could isolate suitable timber lands from access, thereby reducing timber harvest opportunities (DEIS p. 3-235). The FEIS Tongass Not Exempt Alternative, which could apply prohibitions to all inventoried roadless areas on the Tongass, could greatly reduce timber volume available for harvest from inventoried roadless areas (DEIS p. 3-230). DEIS Tongass Alternatives T2 and T3 as well as the FEIS Tongass Deferred Alternative also provide local decision-makers with discretion to reduce roading and timber harvest to protect roadless area values (DEIS pp. 2-11 and 2-12). However, phasing out of logging and road building completely on the Tongass National Forest would be beyond the intent and scope of the proposal and would not occur under any of the DEIS or FEIS alternatives.

*End of Tongass Section*