

Appendix B

Agency, Tribe, and Corporation Letters

B Agency, Tribe, and Corporation Letters

This page left blank.



July 11, 2006

Attn: FIA Helicopters in Wilderness EIS
USDA Forest Service
Alaska Regional Office
Ecosystem Planning Staff
P.O. Box 21628
Juneau, AK 99802-1628

Re: Helicopter Access to Conduct Forest Inventory and Analysis in Wilderness.

Attention FIA Helicopters in Wilderness EIS:

Sealaska Corporation has reviewed the above referenced DEIS dated May 2006 and supports Alternative Number 4 with the following modifications. The Forest Service person in charge of the field work and project should have the authority to modify the plan as circumstances may dictate. That supervisor should be able to substitute helicopter flights for hikes when the result is a more efficient use of the crew and field work time. In addition this includes substituting helicopter access to plot locations to take advantage of the weather and to assure that field work is accomplished within schedule objectives.

The use of a helicopter, while noisy, is so transitory that birds and other animals should return to their chosen site habitats soon after the inventory activity is accomplished. In fact, a field crew that has to hike into a site for a considerable distance is disturbing birds and animals all along its route. Helicopter access, while noisy, has a noise impact that takes much less time.

There may be situations where occupied nests will need to be avoided which may modify the use of the crew and equipment. The field supervisor should have authority to make such changes.

Thank you for allowing Sealaska to participate in this review process.

Sincerely,

SEALASKA CORPORATION

Michele Metz
Assistant Land Manager



United States Department of the Interior



OFFICE OF THE SECRETARY

Office of Environmental Policy and Compliance
1689 C Street, Room 119
Anchorage, Alaska 99501-5126

9043.1

August 4, 2006

ER06/623
PEP/ANC

Mr. Ken Post
USDA Forest Service
Alaska Regional Office
P.O. Box 21628
Juneau, AK 99802-2168

Dear Mr. Post:

The U.S. Department of the Interior has reviewed the June 2006 Draft Environmental Impact Statement (EIS) for Helicopter Access to Conduct Forest Inventory and Analysis in Wilderness in the Alaska Region. We believe the following comments need to be taken into account in the Final EIS. These comments are submitted in accordance with the Fish and Wildlife Coordination Act, the Multiple Use-Sustained Yield Act, the National Forest Management Act, the Alaska National Interest Land Conservation Act, the National Environmental Policy Act, and Council on Environmental Quality guidance for providing special technical expertise on water, biological, and geological resources.

Background

The U.S. Forest Service proposes using helicopters to access 540 forest inventory and analysis plots in wilderness or wilderness study areas in the Tongass and Chugach National Forests over a ten-year period.

Comments

A concern expressed during the scoping process for this Draft EIS is the potential effects that helicopter activity might have on wildlife in the project area (page 1-10, Chapter 1 – Purpose and Need). The Draft EIS acknowledges that helicopter noise could “affect” wildlife, and as such is a significant issue (page 1-12, Chapter 1). However, the Draft EIS indicates the array of wildlife responses to noise is so broad that disturbance to wildlife is difficult to evaluate (page 3-27, Chapter 3 Environment and Effects, Wildlife, Effects of Overflights on Wildlife).

We suggest, for your consideration, information that discusses specific noise-induced stress effects to wildlife mammals. Research by Creel and others (2002) addressed stress caused by snowmobiles by monitoring fecal glucocorticoid (GC) levels in both elk and wolves. These data found rises in GC concentrations correlated with snowmobile usage. The significance of this

research finding is that elevated fecal GC levels are associated with physiologic suppression of mammalian reproductive hormones and of immune systems. These results may provide insight into the effects of helicopter noise on the potential welfare of mammals at the project site, and could be used in preparing the Final EIS.

Thank you for the opportunity to comment on this document. If you have questions regarding general comments, please contact Lloyd Woosley, Chief of the U.S. Geological Survey Environmental Affairs Program, at 703-648-5028.

Sincerely,


for Pamela Bergmann
Regional Environmental Officer – Alaska

Reference

Creel, Scott, Fox, Jennifer E., Hardy, Amanda, Sands, Jennifer, Garrott, Bob, and Peterson, Rolf O., 2002. Snowmobile Activity and Glucocorticoid Stress Responses in Wolves and Elk, Conservation Biology 16(3):809-814.

"Cindy Hartmann"

<Cindy.Hartmann@noaa.gov>

08/03/2006 05:57 PM

To: "kpost" @fs.fed.us

cc: comments-alaska-regional-office@fs.fed.us,

Don Martin <dmartin02@fs.fed.us>, Jon Kurland <Jon.Kurland@noaa.gov>

Subject: DEIS Helicopter Access to Conduct

Forest Inventory and Analysis (FIA) in Wilderness

Ken, I reviewed the fisheries effects section for the Helicopter Access to Conduct Forest Inventory and Analysis (FIA) in Wilderness DEIS . I concur with the FS determination that the Proposed Action and alternatives are not expected to have any direct or indirect effects to essential fish habitat (EFH). Therefore, NMFS offers no EFH conservation recommendations.

Thanks for the opportunity to review the DEIS.

Best Regards,
Cindy

--

Cindy Hartmann
Fish Biologist
Habitat Conservation Division
NOAA Fisheries Service, Alaska Region
709 W. 9th Street, Suite 457
P.O. Box 21668
Juneau, AK 99802-1668
Phone (907) 586-7585
Fax (907) 586-7358

STATE OF ALASKA

FRANK H MURKOWSKI
GOVERNOR

ANILCA IMPLEMENTATION PROGRAM

550 W. 7TH AVENUE, SUITE 1660
ANCHORAGE, ALASKA 99501
PH: (907) 269-7529 / FAX: (907) 334-2509
susan_magee@dnr.state.ak.us

August 4, 2006

Dennis E. Bschor, Regional Forester
USDA Forest Service
Alaska Regional Office
P.O. Box 21628
Juneau, AK 99802-1628

Dear Mr. Bschor:

The State of Alaska reviewed the Draft Environmental Impact Statement (DEIS) for Helicopter Access to Conduct Forest Inventory and Analysis (FIA) in Wilderness in the Alaska Region. With the exception of a response to the Coastal Zone Management Act Negative Determination, which will be addressed separately by the Office of Project Management and Permitting, the following represents the consolidated views of state resource agencies.

The State appreciates the Service's recognition that safe access for field crews is one of the most important considerations in conducting the FIA inventory. We also agree helicopter access, through a limited number of landings, is the only reasonable way to accomplish most surveys described in the DEIS. In Alaska, many wilderness areas are difficult and hazardous for field crews to access. The State conducts many research projects and management activities in Service administered Wilderness areas and encounters many of the same challenges in accessing similar difficult and hazardous areas.

Wilderness Character

Impacts from helicopter landings on wilderness character are generally minor and short-term, primarily associated with the sight and sound of the helicopter, which could detract from some visitor's appreciation of wilderness. However, conducting the same research project without the use of helicopters can cause more impacts as it would substantially lengthen the on-the-ground field time with associated trails, campsites, noise, etc. Since helicopter access is short-term, it typically causes less impact on wilderness character than other methods of access in remote areas.

Wildlife

Similar to the impacts on wilderness character, wildlife responses to helicopter overflights and landings are usually minor and short-term. We agree the predominate factors influencing impacts on wildlife are duration and frequency of the activity. Interestingly, the effects on wildlife of both helicopters and hiking/camping are similar, per encounter, as they generally result in short-term disturbances and energetic costs, and do not result in long-term habitat abandonment. The possibility of long-term habituation associated with helicopter access is also negligible because the use is limited in duration and frequency. We therefore agree that the additional field time necessary to access plots by foot would likely increase the probability of encounters with wildlife; and especially for bears, increase the potential to disrupt feeding activities or cause negative encounters, which could result in injury or death to humans, the animals, or both.

Employee Safety

Safety of employees is of paramount concern in all field operations. Working in remote areas is inherently more dangerous than in more developed or accessible areas. Slips, trips, and falls are more likely during longer trips on foot carrying heavy packs. There is also increased danger associated with traveling and working in water in hip boots or waders where slips and falls can result in hypothermia and drowning. Boating accidents are more likely when traveling long distances up small, uncharted rivers. Potential for air accidents increases with fixed-wing aircraft as they are more limited by flight speed and visibility requirements than helicopters. The incidence of potential negative bear encounters is also greater when long periods of time are spent near salmon spawning areas and other concentrated food sources, particularly at overnight camps where cooking and food storage takes place.

The text on Page 3-51 makes a very good point that injuries in remote areas can become particularly serious because of the delay in reaching medical facilities. A nearby helicopter with an experienced pilot familiar with the area can quickly provide an emergency evacuation if necessary.

Subsistence

There is no reference to subsistence activities in the document and an ANILCA Section 810 evaluation is not included, therefore we assume that subsistence is not a relevant issue. If subsistence uses are not occurring in the affected areas, we request the Service insert a statement to that effect into the final EIS. Alternatively, if subsistence activities do occur in any or all of the affected areas, we recommend the final EIS include the required ANILCA Section 810 evaluation.

Without helicopters, many of the wilderness areas referenced in the DEIS are essentially inaccessible and as such, the objectives of the forest inventory and analysis project cannot reasonably be met. We therefore support the Service in its effort to authorize helicopters to access remote areas as a means to both limit impacts to wilderness character and wildlife, and to protect the health and safety of field crews.

Mr. Dennis Bschor
August 4, 2006
Page 3

Thank you for the opportunity to comment.

Sincerely,

A handwritten signature in black ink, appearing to read 'SE Magee', with a long horizontal flourish extending to the right.

Susan E. Magee
ANILCA Project Coordinator

cc: US Forest Service Ecosystem Planning Staff
Sally Gibert, ANILCA Program Coordinator



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue
Seattle, WA 98101

August 7, 2006

Reply to
Attn Of: ETPA-088

Ref: 06-007-AFS

Ken Post
Alaska Region Office
P.O. Box 21628
Juneau, AK 99802-1628

Dear Mr. Post:

The U.S. Environmental Protection Agency (EPA) has reviewed the draft Environmental Impact Statement (EIS) for **Helicopter Access to Conduct Forest Inventory and Analysis in Wilderness** (CEQ No. 20060257) in southeast Alaska. Our review is conducted in accordance with our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act. Section 309, independent of NEPA, specifically directs EPA to review and comment in writing on the environmental impacts associated with all major federal actions. Under our policies and procedures we evaluate the document's adequacy in meeting NEPA requirements.

The draft EIS describes five action alternatives to inventory a total of 913 plots in nineteen (19) wilderness areas on the Tongass National Forest and one wilderness study area on the Chugach National Forest over a ten-year period. The Forest Service has identified Alternative 4 as the preferred alternative. Alternative 4 would access approximately 370 plots by day hike and 540 plots by helicopter. The draft EIS concludes that there are no significant impacts to air or water quality (p. 3-68 – 3-70) and that the project will not affect the coastal zone and therefore does not require a formal Coastal Zone Management Act consistency determination by the Alaska Coastal Management Program (p. 1-13). We recommend the final EIS include a statement confirming the Alaska Department of Natural Resources concurs with your conclusion.

EPA has no objections to the proposed project and rates the EIS "Lack of Objections" (LO), consistent with EPA's policies and procedures. A copy of our rating system is enclosed for your reference. A copy of our rating and a summary of our comments will be published in the federal register.

Thank you for the opportunity to review the draft EIS. If you have any questions, please contact Peter Contreras at (206) 553-6708.

Sincerely,

// s //

Christine Reichgott
NEPA Review Unit

Enclosure

**U.S. Environmental Protection Agency Rating System for
Draft Environmental Impact Statements
Definitions and Follow-Up Action***

Environmental Impact of the Action

LO – Lack of Objections

The U.S. Environmental Protection Agency (EPA) review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

EC – Environmental Concerns

EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce these impacts.

EO – Environmental Objections

EPA review has identified significant environmental impacts that should be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no-action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

EU – Environmentally Unsatisfactory

EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potential unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the Council on Environmental Quality (CEQ).

Adequacy of the Impact Statement

Category 1 – Adequate

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis of data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

Category 2 – Insufficient Information

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses or discussion should be included in the final EIS.

Category 3 – Inadequate

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the National Environmental Policy Act and or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

* From EPA Manual 1640 Policy and Procedures for the Review of Federal Actions Impacting the Environment. October 1984.