

STATE OF ALASKA

SARAH PALIN, Governor

**ANILCA IMPLEMENTATION PROGRAM
Office of Project Management and Permitting**

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December 21, 2007

Dennis E. Bschor, Regional Forester
USDA Forest Service, Alaska Regional Office
ATTN: Forest Inventory and Analysis (FIA) Helicopters in Wilderness EIS
P.O. Box 21628
Juneau, AK 99802-1628

Dear Mr. Bschor:

The State of Alaska reviewed the Helicopter Access to Conduct Forest Inventory and Analysis (FIA) in Wilderness Final Environmental Impact Statement (EIS). The following represents the consolidated comments from the State's resource agencies.

In response to the Draft EIS, the State commented in support of allowing limited helicopter access to remote sites in designated Wilderness for the specified baseline vegetation research. The Final EIS, however, identifies Alternative 1 as the Service's "Preferred Alternative," which differs significantly from Alternative 4 by not allowing any helicopter landings in designated Wilderness. Thus these comments supplement our August 4, 2006 letter.

We previously expressed understanding and support for the Service's original intent to allow the use of helicopters to conduct FIA in designated Wilderness. We based our support on our considerable experience conducting research projects and activities associated with state management of fish and wildlife throughout Alaska, including the Tongass National Forest. We understand the challenges and safety issues associated with field work in remote and difficult terrain, and we specifically appreciated the pragmatic assessment in the Draft EIS.

Consequently, we were surprised to see selection of Alternative 1 in the Final EIS. The proposed decision is confusing especially since the Final EIS contains the same information and thorough analyses that led to the original conclusion that helicopters are indeed the minimum tool to conduct the proposed field work. In researching the change in direction, we have learned that the Alaska Region may be concerned about the magnitude and intensity of helicopter use combined with the assumption of repeated FIA studies over time, leading to unprecedented cumulative impacts to Wilderness values. Based on the cover letter, it appears that some in the agency are also questioning the inherent value of conducting the FIA in non-forested areas in designated Wilderness, on the basis that the inventory of these non-forested areas is not required by law. Unfortunately, the final EIS does not address these concerns.

The State of Alaska has a strong interest in the outcome of this decision, and more importantly, the basis for the decision. We are very concerned about the perception that even when helicopter access is clearly shown to be reasonable and necessary, that decision makers can deny such access, seemingly arbitrarily. For the State's own fish and wildlife research in remote areas, including on national forest lands, we rely on the judicious use of helicopters (with Forest Service approval) for the safety of our employees. It would be unacceptable for a state agency to openly and purposefully put their employees at "extreme risk" by forcing them to access dangerous terrain on foot; yet this is exactly the approach the Forest Service seems to be taking based on the Final EIS (see page 104). The Record of Decision needs to address this serious problem. Alternatively, if the Forest Service is concerned about the inherent danger of helicopter access itself, this concern was not developed within the EIS analysis.

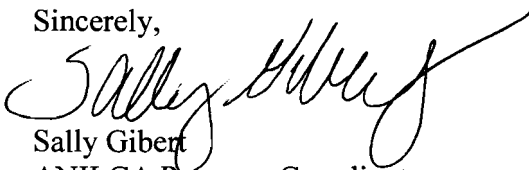
Recommendation

We request the ROD either 1) revisit the 2005 Minimum Requirements Decision Guide (MRDG) and EIS findings and conclusions or 2) modify the final decision to allow helicopters where they are indeed necessary. For example, if a larger issue involves concern over the appropriateness of the FIA study itself, then the ROD should revisit the MRDG "Step One" question about whether the work is necessary in the first place. We can understand the potential validity of the argument that, in non-forested areas (which correspond to many of the remote and inaccessible sites), the work may not be necessary for the administration of Wilderness. The Tongass includes approximately twelve million acres of similar ecotypes outside designated Wilderness that will be inventoried. This information can be readily extrapolated using air photos and other means to determine the vegetation of similar areas within designated Wilderness.

If concern over the magnitude and cumulative impacts of the many hundreds of landings is influencing the final decision, we urge these factors also be explicitly addressed in the ROD. We also request the ROD clarify that smaller scale research and management projects, such as those conducted by the State, would not be expected to cause the same level of concern about cumulative impacts and that this decision is not intended to set a precedent toward precluding other helicopter access for management purposes in designated Wilderness.

Thank you for the opportunity to comment. Please contact me if you have any questions.

Sincerely,



Sally Gibert
ANILCA Program Coordinator