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March 6, 2015

Angoon Airport EIS
1220 SW Morrison, Suite 700
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Dear Federal Aviation Administration,

The following comments come from Wilderness Watch on the Draft Environmental Impact Statement (DEIS) for the Angoon Airport in southeast Alaska. Wilderness Watch is a national nonprofit wilderness conservation organization focused on protecting the designated Wildernesses in the National Wilderness Preservation System. Wilderness Watch has members in Alaska, including some who work and recreate on Admiralty Island and in the Kootznoowoo Wilderness.

The Alaska Department of Transportation and Public Facilities (DOT&PF) has proposed the construction of a new airport at Angoon, the action that has triggered the preparation of this DEIS. Wilderness Watch has the following comments on the DEIS:

1. The Kootznoowoo Wilderness must be protected.

The Kootznoowoo Wilderness is an incredible Wilderness. The indigenous people of southeast Alaska, the Tlingit, named the island later re-named as Admiralty Island as Kootznoowoo, meaning "Bear Fort" or "Fortress of the Bears" due to the unsurpassed density of Alaskan brown or grizzly bears that inhabit the island. The island stretches nearly 100 miles long, located at the north end of the famous Inside Passage. Massive Sitka spruce and western hemlock dominate the coastal forests on the island. Bald eagles nest in great numbers in Admiralty Island's forest. Despite being located at sea level, some peaks in the Kootznoowoo Wilderness climb to over 3,000 feet in height.

The Kootznoowoo Wilderness is protected in large part by the 1964 Wilderness Act, Public Law 88-577, 16 U. S. C. 1131-1136. The Wilderness Act established the National Wilderness Preservation System, of which the Kootznoowoo Wilderness is a part. The Wilderness Act also establishes protections for Wildernesses that Congress designates, including prohibitions on roads, structures and permanent installations, motor vehicle use, aircraft landings, etc. The 1980 Alaska National Interest Lands Conservation Act

(ANILCA), P. L. 96-487, modified the management and protection of the Kootznoowoo Wilderness, as discussed below.

The area was initially established as a conservation unit in 1978 by President Carter as the Admiralty Island National Monument under the authorities of the 1906 Antiquities Act. In 1980 Congress recognized the critical significance of the place and designated nearly all of Admiralty Island as the Admiralty Island Wilderness under Section 703(a)(1) of ANILCA. In the language of ANILCA, it became a “conservation system unit.” The Admiralty Island National Monument Land Management Act of 1990 (P. L. 101-378) renamed the Admiralty Island Wilderness as the Kootznoowoo Wilderness. Today the Kootznoowoo Wilderness encompasses 956,255 acres. It is part of Admiralty Island National Monument, which in turn is part of the Tongass National Forest. The U.S. Forest Service administers the Kootznoowoo Wilderness.

The value of Admiralty Island National Monument and the Kootznoowoo Wilderness as an intact conservation system unit cannot be overstated. It has been designated as a UNESCO Biosphere Reserve, and the 2013 Biosphere Reserve Review Report (NPS and USDA Forest Service 2013) documents many of Admiralty Island’s unique features:

- Admiralty Island continues to host one of the highest densities of nesting bald eagles (*Haliaeetus leucocephalus*) in the world (more than found in the other 49 states combined), one of the world’s densest populations of brown bear (*Ursus arctos*) (1 animal per square mile, or approximately 1600 brown bears in total) and unique island biota distinct from mainland species.
- Recent research has illuminated the extent of Admiralty Island’s unusual island endemism and led some to call for managing the area as its own distinct biological unit to preserve populations of high conservation significance.
- Out of Southeast Alaska’s 22 biogeographic provinces, the Admiralty Island province:
 - ranks 2nd highest in relative biological value for focal species brown and black bear (*Ursus americanus*), marbled murrelet (*Brachyramphus marmoratus*), Sitka black-tailed deer (*Odocoileus hemionus sitkensis*), salmon and large-tree forest and estuarine ecological systems;
 - ranks 6th highest in percentage of original habitat remaining intact
 - ranks 4th highest in percentage of existing habitat protected
 - ranks 6th highest in percentage of original habitat values at risk
 - scores as the only province that is both highly productive for the full suite of focal resources and also managed primarily for fish and wildlife conservation and ecosystem integrity (Albert and Schoen 2007).
- Recent studies have documented that Admiralty Island contains some of the best remaining examples of highly productive lowland Sitka spruce (*Picea sitchensis*)–western hemlock (*Tsuga heterophylla*) temperate rainforest, including 602,708 acres (243,913 hectares) of productive old growth and 99,937 acres (40,444 hectares) of large-tree old growth (the highest timber volume) (Schoen and Dovichin 2007).

- Other parts of the Sitkan Biogeographic province assessed by the United Nations in the 1980s, prior to selecting the Glacier Bay–Admiralty Island Biosphere Reserve, have since been overharvested with rare and critical forest ecosystems lost. This loss heightens Admiralty’s value as a Biosphere Reserve where these habitat types (e.g., large-tree old-growth) are still abundant in their natural diversity.
- Admiralty Island hosts various endemic populations of mammals: endemic subspecies (beaver [*Castor canadensis*], meadow vole [*Microtus pennsylvanicus*] and ermine [*Mustela erminea*]); an endemic lineage (Pacific marten [*Martes caurina*]), and an evolutionarily distinct lineage of brown bear (with polar bear ancestry, found also on Baranof and Chichagof Islands) – all of which “represent populations of high conservation significance” (Schoen and Dovichin 2007).
- Recent work has also shown that salmon are a keystone species for these northern temperate rainforest ecosystems with key functions in animal food webs both in coastal marine and upland terrestrial ecosystems (Orians and Schoen 2013).

Admiralty is exceptional in that most of its coastal watersheds are still intact, and it is the only island in the Southeast Alaska region that has king salmon (*Oncorhynchus tshawytscha*) breeding habitat (they usually breed in large mainland watersheds). Salmon populations on the island are particularly important for monitoring the effects of climate change in the region (Bryant 2009).

- Admiralty Island is one of the largest forest reserves for a number of North Pacific coast rainforest bird species. At least a dozen songbird species that are dependent on mature conifer forest have significant population strongholds within Admiralty, including northern residents such as Brown Creeper (*Certhia Americana*), and long-distance migrants such as Pacific-slope Flycatcher (*Empidonax difficilis*).
- Marbled Murrelets were detected over land on breeding bird surveys on Admiralty Island. Old growth forests provide essential nesting areas for this seabird that is listed under the Endangered Species Act elsewhere in its range (Piatt et al. 2007). Likewise, the Queen Charlotte Goshawk breeds within Admiralty Island. The subspecies has been petitioned for listing, but was declined because sufficient wilderness habitat has been set aside (U.S. Fish and Wildlife Service 2007).
- Relatively sheltered and less disturbed near-shore waters provide an important refuge for molting White-winged Scoter (*Melanitta fusca*) and Surf Scoter (*Melanitta perspicillata*); surveys indicate that at least 16,000 scoters molt in the northern half of Seymour Canal. These sea ducks have been experienced troubling population declines in the last decade.
- The large peat bog “muskeg” complexes such as found on the Glass Peninsula provide a unique habitat. Locally important Vancouver Canada Geese (*Branta canadensis fulva*) are genetically distinct from other populations and adapted to breed in these forested bogs (Hupp et al. 2011; Hupp et al. 2010).

- Admiralty Island also contains the Pack Creek Zoological Area that encompasses a unique world-class brown bear viewing site that is frequented by brown bears that have tolerated human presence in close proximity for generations. This rare situation has allowed thousands of visitors to appreciate bears in a non-consumptive and non-disruptive manner, to overcome their innate fear of large carnivores, and to learn of the need for conservation of large intact ecosystems.

These features all derive from Admiralty Island’s intact natural integrity and undegraded wilderness character. As an irreplaceable and unparalleled crown jewel of the National Wilderness Preservation System, the Kootznoowoo Wilderness must be protected by whichever alternative is selected in the Final EIS.

2. Some of the alternatives analyzed in the DEIS will irreparably and irretrievably harm the Kootznoowoo Wilderness.

The alternatives analyzed in the DEIS include the following:

- No Action
- Airport 3a with Access 2 (the alternative proposed by Alaska DOT&PF)
- Airport 3a with Access 3
- Airport 4 with Access 2
- Airport 4 with Access 3
- Airport 12a with Access 12a (FAA preferred alternative)

All four of the options dealing with Airport 3a and Airport 4 will irreparably and irretrievably damage the Kootznoowoo Wilderness by building an airport and access road within the wilderness boundaries. These actions directly contravene the Wilderness Act’s intent to ensure that not all lands are occupied and modified by humankind. They would seriously degrade the superlative values of the conservation units established by the Alaska National Interest Lands Conservation Act, including “unrivaled scenic and geological values associated with natural landscapes,” “sound populations of, and habitat for, wildlife species of inestimable value to the citizens of Alaska and the Nation, including those species dependent on vast relatively undeveloped areas,” “extensive unaltered ... coastal rainforest ecosystems” and “opportunities for scientific research and undisturbed ecosystems.” Only the No Action alternative and the Airport 12a with Access 12a will prevent irreparable and irretrievable damage to the Kootznoowoo Wilderness.

Airport 12a with Access 12a would be located on lands owned or managed by private landowners; Kootznoowoo, Inc. (the local Alaska Native corporation); and the City of Angoon. Both the airport and access road would be on the Angoon peninsula southeast of the community of Angoon; no part of this alternative would be located in the Kootznoowoo Wilderness. Access 12a would begin at the existing BIA Road and travel directly to the proposed airport location.

Unlike the access roads to Airport 3a or Airport 4, this road would be built wider to two 10-

foot lanes with 5-foot shoulders and would require no bridge.

3. ANILCA can allow construction within conservation system units in Alaska.

As mentioned above, ANILCA modified the protections for the Kootznoowoo Wilderness and other Wildernesses in Alaska.

Title XI of ANILCA, entitled “Transportation and Utility Systems In and Across, and Access Into, Conservation System Units,” allows transportation and utility systems such as roads, transmission lines, or airports to be built in conservation system units in Alaska, even in Wildernesses that are part of the National Wilderness Preservation System. ANILCA supersedes the 1964 Wilderness Act in this regard for Wildernesses in Alaska.

Sections 1104, 1106, and 1107 of ANILCA outline the process by which transportation and utility systems may be sited in conservation system units, including the proposal for the Angoon Airport in the Kootznoowoo Wilderness.

ANILCA Section 1104(b)(2) describes which federal agencies should have decision-making responsibilities for the placement of a transportation and utility system in a conservation system unit. For this EIS, the agencies with decision-making responsibilities in the Title XI process are the Federal Aviation Administration (FAA), the U.S. Forest Service, and the U.S. Army Corps of Engineers. The FAA is the lead federal agency with statutory authority over airports and airways in the United States.

4. ANILCA Title XI also requires addressing eight decision criteria before approving a transportation or utility system in a conservation system unit.

ANILCA Section 1104(g) requires that each federal agency make a tentative decision to approve or disapprove the transportation and utility system. The tentative decisions would be based on the detailed findings in this EIS and the Standard Form 299 application for eight ANILCA decision criteria. The second criterion in particular has significant bearing on the Angoon Airport proposal:

“(B) alternative routes and modes of access, including a determination with respect to whether there is any economically *feasible and prudent alternative* to the routing of the system through or within a conservation system unit, national recreation area, or national conservation area and, if not, whether there are alternative routes or modes which would result in fewer or less severe adverse effects on the conservation system unit.”

ANILCA, Sec. 1104(g)(2)(B) (emphasis added)

Of the action alternatives analyzed in the Angoon Airport DEIS, the alternative for Airport 12a with Access 12a represents an economically feasible and prudent alternative to building the airport and access road within the Kootznoowoo Wilderness. Because this alternative exists, the other action alternatives should not be selected in the Final EIS.

ANILCA Section 1103 also reaffirms that other applicable laws must apply. This means that Section 4(f) of the 1966 Department of Transportation Law applies (prohibiting transportation projects in areas like the Kootznoowoo Wilderness unless “there is no prudent and feasible alternative to using that land.”) This law provides another statutory reason why the Kootznoowoo Wilderness cannot be selected as a site for the airport or road when other viable options exist.

5. The only alternatives that protect the Kootznoowoo Wilderness and meet the ANILCA decision criteria are the No Action alternative and the Airport 12a with Access 12a alternative.

Wilderness Watch believes that the only alternatives in the Angoon Airport DEIS that would protect the Kootznoowoo Wilderness and meet the decision criteria found in ANILCA Title XI are the No Action alternative and the alternative for Airport 12a with Access 12a (the FAA’s preferred alternative). Because of this conclusion, Wilderness Watch supports either the No Action alternative or the alternative for Airport 12a with Access 12a, the non-wilderness alternative.

Thank you for this opportunity to comment on the Angoon Airport Draft EIS. Please keep our organization informed of further steps on this issue.

Sincerely,



Kevin Proescholdt
Conservation Director

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