

CATEGORICAL EXCLUSION

ETOLIN AND ZAREMBO ISLANDS ELK STUDY

Wrangell Ranger District Tongass National Forest

There is a current lack of information on elk, an introduced species, and their effects on the ecology of Zarembo and Etolin Islands. This information gap is hampering wildlife and habitat management for both the Forest Service and Alaska Department of Fish and Game (ADFG). The lack of data is impeding the Forest Service's ability to adequately assess effects of the elk on habitat and ecological functions on the National Forest, and specifically within the South Etolin Wilderness Area. The Forest Service would use information from this study to evaluate elk and deer habitats and the effect of elk on those habitats and to make informed decisions on management strategies and actions in the future. The lack of good information also inhibits the ability of ADFG and the Alaska Board of Game to make sound game management decisions for elk on these islands.

DECISION

It is my decision to enter into a cooperative study with ADFG on the characteristics and movement of the elk on Zarembo and Etolin Islands. I am authorizing ADFG to conduct elk telemetry collaring for a period of up to 4 years to track elk populations and movements. This information will be used to evaluate elk populations and their impact on habitat and other species on these islands, including their impact on the South Etolin Wilderness Area. Approximately 12 elk will be collared using helicopters on Etolin Island. The collaring effort will use the minimum number of helicopter landings possible, but up to 42 landings are authorized, if necessary, within the South Etolin Wilderness Area.

At the end of each year, ADFG and FS will meet to re-evaluate the effectiveness of the collaring and the helicopter operations. The Forest Service will adjust the number of helicopter landings and other components of the study to minimize effects to the wilderness resource, if necessary. ADFG and the Forest Service will use the telemetry information to develop future habitat impact assessments, with a primary focus on the South Etolin Wilderness.

To minimize effects from the study, I am requiring ADFG to coordinate operations with the Wrangell Ranger District at the beginning of each season of activity to minimize impacts to the Alaska Crossings groups and other known wilderness users. ADFG also must notify the Forest Service in advance of each day of helicopter operations through the Forest Service dispatch office. ADFG must conduct operations to minimize impacts to hunters during hunting seasons. While helicopter operations will occur primarily in the alpine and sub-alpine areas where eagle nests are rare, helicopters will avoid flying over known eagle nests during breeding season. ADFG will be required to recover all darts used in collaring the elk to avoid impacts to humans or wildlife. ADFG will also be required to share the data and findings from the study with the Forest Service at the end of each year of the study and the final results upon completion of the telemetry analysis.

This cooperative study is being implemented under the Memorandum of Understanding for Elk Management (No, 81009), Memorandum of Understanding For Wildlife and Fisheries Monitoring (09MU-11100500-030), and the December 3, 2009 Expectations Regarding State of Alaska Administrative Activities in National Forest Wilderness agreement.

Additional information on the proposal, the need for helicopter landings, and the anticipated effects are presented in the South Etolin Island Elk Study Minimum Requirements Decision Guide (MRDG) document incorporated here by reference. The MRDG was approved by the Regional Forester, who determined that the use of helicopters to collar 12 elk in the South Etolin Wilderness was necessary and that the use of helicopters was the minimum tool needed for completing the study, consistent with R10 FSM Supplement 2326.04(b) which allows for the temporary use of helicopters in wilderness to meet the minimum needs for administration of the area as wilderness. The Regional Forester approved the use of up to 42 helicopter landings in wilderness, if needed, over the four-year period of this study.

CATEGORICAL EXCLUSION

The Council of Environmental Quality regulations provide for categorical exclusions (CE) to implement the National Environmental Policy Act. This study falls within a category of actions which normally do not individually or cumulatively have a significant effect on the quality of the human environment and, therefore, may be categorically excluded from documentation in an environmental impact statement or environmental assessment. The applicable category is identified in 7 CFR 1b.3(a)(1) and FSH 1909.15 32.11 #3 as inventories, research activities, and studies when such actions are clearly limited in context and intensity.

Because of the limited nature of the study, the expected effects to the environment range from negligible to no effect. The direct, indirect and cumulative effects of the study were considered and found to be limited in context and intensity. I have determined that the implementation of this study will have no significant effect on the environment.

I also find that no extraordinary circumstances exist because they are either not present or the effects are negligible. While study activities, including helicopter landings to collar elk, would occur within the South Etolin Wilderness Area, the negative effects to the wilderness resource are limited and short term and do not trigger an extraordinary circumstance. The information gathered from the study will be beneficial to understanding and management of the wilderness resource and will support one of the public purposes for wilderness - scientific study. Effects to the wilderness resource are documented in the South Etolin Island Elk Study MRDG.

PUBLIC INVOLVEMENT

I considered public input on this proposal in making my decision. The proposal was scoped consistent with FSH 1909.15.11. A public scoping notice was placed in the Wrangell Sentinel. Other interested tribal governments, organizations and agencies were contacted. These included the Wrangell Cooperative Association and Alaska Crossings, a commercial guiding business operating on Etolin Island. The Forest Service worked extensively with ADFG staff. The project was presented at the quarterly Tongass/State of Alaska Agencies meeting held in Wrangell in April 2011. Four individuals and organizations who responded to a previous 2008 ADFG proposal to use land helicopters in wilderness for hunt management were also scoped for this project.

Results of scoping were both in support and opposition to the project. The Alaska Board of Game commented in support of the project. Alaska Crossings expressed support for the project and thought it could contribute to the outdoor education component of their program. Two individuals commented that use of helicopters was not appropriate in wilderness and that other methodologies should be used. One commenter also objected to the analysis process.

I reviewed the public comments received from a previous ADFG proposal in 2008 and the comments received on this proposal. This proposal differs from the 2008 proposal in that this study is needed to determine the elk impacts to habitats and native species within the wilderness. The temporary use of helicopters in wilderness is appropriate to meet the minimum needs for administration of the area as wilderness. The MRDG process further determined that the temporary use of helicopters in wilderness is necessary and the minimum tool necessary to complete the study. Methods to collar elk without the use of helicopters were considered but found not to be practical or effective in achieving the goals of the study. I have determined that a CE is the appropriate documentation of NEPA for this study.

ENVIRONMENTAL CONSIDERATIONS

The direct, indirect and cumulative effects of the proposed action were considered and found to be limited in context and intensity. Because of the limited nature of the study, there will be negligible to no effects expected to any resource. There will be no ground disturbance or vegetation cut. The study would have no effect on historic or archeological sites. There would be temporary one time disturbance of grass and sedge muskeg vegetation from the helicopter skids during each landing. This impact is well below the natural levels of vegetation trampling by elk and other wildlife.

Biological Evaluations were completed for TES plant and animal species. No species will experience impacts that would cause or contribute to a trend towards federal listing or cause a loss of viability to the population or species. The mountain lady slipper orchid, a sensitive plant species, is known to have been impacted by elk on Etolin Island. This study will help to evaluate the viability of this and other species by gaining information about elk population and movements and their impacts to the vegetation on the islands. Helicopter noise may disturb some individual wildlife but the effect will be limited and short term.

The helicopter landings could have a minor temporary effect to the wilderness resource by reducing opportunities to experience solitude or a primitive experience in the South Etolin Wilderness Area if a visitor happened to be within sight or sound of helicopter flights and landings. However, very few visitors use the interior of the South Etolin Wilderness Area where the landings will occur in the alpine. The helicopter landings will occur on only a few days each year and only for short periods of time and will affect a relatively small area of the wilderness. Time on the ground will be minimal. The MRDG documents the effect of the elk study on the wilderness resource and the practices to be used to minimize those effects. While up to 42 landings are authorized, it is anticipated that fewer landings will be needed. In a similar project where ADFG used helicopters to collar elk on Afognak Island in June 2011, it only took three days to collar fifteen elk.

I have determined that no significant adverse effects are expected to occur as a result of this elk study. No irreversible or irretrievable commitment of resources is anticipated.

MANAGEMENT DIRECTION AND REQUIRED FINDINGS

National Forest Management Act - 2008 Tongass Land and Resource Management Plan

This decision is consistent with the 2008 Tongass Land and Resource Management Plan (Forest Plan) which states *To the extent feasible, minimize the impacts of administrative activities on the Wilderness resources and visitors. Administrative activities include authorized use and Wilderness resource-related work being done by other agencies and cooperators.*

. . . The administrative use of helicopters may be allowed on a case-by-case basis after evaluation of the need and full consideration of all alternative options for access. (page 3-23).

Helicopter use in the wilderness and other options are evaluated in the South Etolin Island Elk Study MRDG. The Regional Forester reviewed the Minimum Requirements Decision Guide analysis for the South Etolin Island Elk Study and found that the study, which includes capturing and collaring of twelve elk in the South Etolin Wilderness, was necessary in wilderness and that the helicopter was the minimum tool needed for completing the study. She approved up to 42 helicopter landings over the four-year period of this study.

ANILCA Section 810, Subsistence Evaluation and Finding

Consistent with Section 810 of ANILCA, this project was evaluated to determine potential effects on subsistence opportunities and resources. Since no change in access to and competition for subsistence resources are expected, the proposed project will not result in a significant possibility of a significant restriction of subsistence use of wildlife, fish, or other subsistence resources.

ANILCA Section 811, Subsistence Evaluation and Finding

The effects of this project have been evaluated to determine potential effects on reasonable access to subsistence resources on National Forest System Lands. There is no documented or reported access that will be restricted as a result of this decision. For this reason, this action will not result in a significant possibility of a significant restriction of subsistence users having reasonable access to subsistence resources on National Forest System Lands.

Wilderness Act

Several sections of the Wilderness Act apply to this study:

Section 4b of the Wilderness Act includes a mandate that each agency administering designated wilderness shall be responsible for preserving the wilderness character of the area. It also says that wilderness areas shall be “devoted to the public purposes of recreational, scenic, scientific, educational, conservation, and historical use.” This study supports the public purpose of scientific and conservation use as there is a need to adequately assess effects of the introduced elk on habitat and ecological functions in the South Etolin Wilderness in order to make informed decisions on management strategies and actions in the future.

Section 4c of the Wilderness Act prohibits certain uses including motorized equipment and mechanical transport and structures or installations, “except as necessary to meet minimum requirements for the administration of the area for the purpose of this Act.” The use of helicopters has been found to be necessary and the minimum activity in order to obtain the scientific information to assess the effects of the introduced elk on the South Etolin Wilderness.

