

Appendix C

INDIVIDUAL ROADLESS AREA DESCRIPTION

ROADLESS AREA NAME: Sullivan (303)

ACRES (NFS): 66,143

BIOGEOGRAPHIC PROVINCE: Lynn Canal

ECOLOGICAL SECTION: St. Elias-Fairweather Mountains, Glacier Bay Fjordlands, and Kootznoowoo Fjordlands

2003 WILDERNESS ATTRIBUTE RATING: 26

I. Overview and Description

(1) **Location and Access:** The area is located on the mainland on the west side of Lynn Canal and extends north from the Endicott River Wilderness boundary to the north boundary of the Tongass National Forest. The area also includes the majority of Sullivan Island. The Chilkat Mountain Range and the Haines State Forest and Resource Management Area are located north of the National Forest boundary. Glacier Bay National Park and Preserve borders the roadless area to the west. The Endicott River Wilderness forms much of the south border of the area, with the remaining portion formed by the boundaries of a former timber sale area. The Sullivan Island portion of the area is bordered to the south by Sullivan Island State Marine Park, which encompasses the southern tip of the island.

The area is located approximately 15 miles south of the city of Haines and about 45 miles northwest across Lynn Canal from the city of Juneau. It is accessible by saltwater and floatplane, but much of this access is weather-dependent. There are no regularly scheduled small plane or ferry stops within this area. An airstrip is located adjacent to the Sullivan Roadless Area on an alluvial fan along Lynn Canal. This airstrip, located within an area that was harvested in the 1960s, is primarily used by hunters and occasionally by miners. There are several old roads in the harvested area in the vicinity of the mouth of the Sullivan River and in the other two areas, which have been harvested. One road was reopened in 2001 to provide access to a communication site. The road was closed and put to bed after this use. Access into the interior is by foot or helicopter.

(2) **History:** Documented historical use of this roadless area has been minimal. Native use of the area was probably limited to hunting or trapping mink, lynx, and other animals, including goat and bear, and gathering berries. Others cultivated garden plots, gathered seaweed and mussels, and hunted seal on the shore of Lynn Canal. Goldschmidt and Haas (1946) indicated that Native people caught shellfish in the area.

Mining began in more recent history and there are active mineral claims in the area. A fox farm was present in the 1930s. Timber harvest occurred in four separate areas along the shoreline in the 1960s. One of these areas forms part of the area's south boundary. The other three areas are located on the low-lying alluvial fans that were formed from glacial rivers feeding into Lynn Canal. These areas have more recently undergone thinning activities.

(3) **Geography and Topography:** The area is generally characterized by rugged, scoured terrain with large, vertical relief. The mountains are often snow-covered and reach elevations up to 4,700 feet. Glaciers have scraped steep, rugged slopes, and formed glacial bowls. Alluvial fans are formed from the glacial rivers that feed into Lynn Canal. These alluvial fan areas were the primary areas harvested in the 1960s. The roadless area contains 30 miles of shoreline on saltwater. The shoreline is flat and accessible at two river mouths; however, overall accessibility is poor. There are 21,455 acres inventoried as rock and 14,890 acres inventoried as ice and snow. Alpine makes up 1,021 acres. This roadless area encompasses two islands, including Sullivan Island, for a total of 3,976 acres.

(4) Ecosystem:

(a) Classification: Biogeographic Province. The area is located within the Lynn Canal Biogeographic Province. The topography in this province is typically rugged and glaciated. Rain shadows and the dominating influence of the continental climate make this the driest and seasonally warmest province in Southeast Alaska.

Ecological Section/Subsection. The Sullivan Roadless Area is contained mostly within the St. Elias-Fairweather Mountains Ecological Section (M244C) and contains portions within the Glacier Bay Fjordlands Ecological Section (M247A). In addition, the Kootznoowoo Fjordlands Ecological Section (M247D) can be found on the island in the eastern portion of the Sullivan Roadless Area. These areas are represented by three ecological subsections (see table below). The St. Elias-Fairweather Mountains Ecological Subsection represents about two-thirds of the Sullivan Roadless Area. The mountains were formed by tectonic collisions of Pacific arcing terranes and the North American continent, resulting in rugged peaks with elevations reaching 19,000 feet. Except for occasional rock cliffs and nunataks, ice and snow form a continuous sheet over these mountains. Where ice is not present, thin rocky soil supports low alpine vegetation communities. The Chilkat Peninsula Carbonated Ecological Subsection covers the remaining third or the roadless area and branches south of the St. Elias-Fairweather mountains to form a peninsula separating Lynn Canal and Glacier Bay. The vegetation varies from alpine at the higher elevations to spruce-hemlock forests on the mountain slopes and valleys (Nowacki et al., 2001).

<u>Ecological Section</u>	<u>Ecological Subsection</u>	<u>Percent of Roadless Area</u>
St. Elias-Fairweather Mountains	St. Elias-Fairweather Icefields	62%
Glacier Bay Fjordlands	Chilkat Peninsula Carbonates	32%
Kootznoowoo Fjordlands	Stephens Passage Glaciomarine Terraces	6%

(b) Soils: Shallow mineral soils (less than 4 inches thick) on steep, V-notched, dissected side slopes are common in the area. Small organic soils (muskegs) occur on infrequent benches and at subalpine elevations. Soils and vegetation occurring on recently deglaciated areas are of concern. These soils are fragile and slight disturbance can eliminate or significantly set back vegetative succession.

(c) Vegetation: Vegetation is interspersed with spruce/hemlock rain forest typical of Southeast Alaska and contains frequently scoured, well-drained alluvial deposits supporting willow and alder. There are approximately 1,021 acres of alpine vegetation mapped in this area.

There are approximately 17,135 acres mapped as forest land, of which 12,883 acres (75 percent) are mapped as productive old-growth forest. Of the productive old growth, 5,693 acres (44 percent) are mapped as high-volume, old-growth forest. The productive old growth includes about 1,439 acres of high-volume, coarse-canopy old growth. The area does not include any second growth due to timber harvest in the past.

(d) Fish Resources: Fish resources were rated by the Alaska Department of Fish and Game (ADF&G) in its Forest Habitat Integrity Program (1983). These ratings described the value of VCUs for sport fish, commercial fish, and estuaries. None of the VCUs in this area was highly valued for sport or commercial fish. One VCU (VCU 105) received a high estuarine rating. However, only a small portion of this VCU is located in the Sullivan Roadless Area. The remaining majority of VCU 105 is located in the Endicott Wilderness. The Tongass Fish and Wildlife Resource Assessment (ADF&G, 1998) did not identify any of the VCUs in this area as primary salmon producers. They did, however, identify four of the six VCUs in the area as secondary producers.

(e) Wildlife Resources: Mountain goats, moose, brown and black bear, wolves, and some Sitka black-tailed deer are present in this area. Smaller wildlife include mink and lynx.

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(5) Management Direction and Current Uses: This area was allocated to five Land Use Designations (LUDs) under the 1997 Tongass Land and Resource Management Plan. These 3 LUDs are Modified Landscape, Scenic Viewshed, Minerals, Transportation and Utility System (TUS), and Semi-remote Recreation. Both the TUS and Minerals LUDs are secondary LUDs, which overlay the other land uses.

LUD	Acres
Modified Landscape	13,463
Scenic Viewshed	933
Minerals*	7,128*
Transportation and Utility System	NA
Semi-remote Recreation	51,747

* Note that acres in the Minerals LUD are included in the Modified Landscape LUD acres.

Approximately 22 percent of the roadless area (not including the LUD overlays) was allocated to LUDs (Modified Landscape and Scenic Viewshed) that allow timber harvest and associated road construction. Land on the mainland directly west of Sullivan Island was allocated to the Modified Landscape LUD, which accounts for approximately 21 percent of the roadless area. The Scenic Viewshed LUD was assigned approximately 1 percent of the roadless area located immediately north of the harvested area that forms part of the area's south boundary. Approximately 11 percent of the roadless area was allocated to the Minerals LUD overlay, located on the shoreline adjacent to Sullivan Island. A proposed state road corridor runs along the east shore of the mainland portion of the area, which was allocated to the Transportation and Utility System LUD overlay.

Most of this area, approximately 78 percent, was allocated to one non-development LUD. This predominant non-development LUD is the Semi-remote Recreation LUD.

The land allocated to the Minerals LUD overlay is known as the Sullivan Tract, which contains deposits of critical minerals. Areas under the Minerals LUD are managed to encourage the prospecting, exploration, development, mining, and processing of minerals in an environmentally sensitive manner. Until a plan of operation is approved, the underlying LUD in this area (Modified Landscape) will continue to apply.

Recreation use in the area is low mainly as a result of poor accessibility. There was no outfitter/guide use in this area in 1999. There are no public recreation facilities in the area. There are no developed trails within this area, but an airstrip is located adjacent to the Sullivan Roadless Area on an alluvial fan along Lynn Canal. This airstrip, located within an area that was harvested in the 1960s, is primarily used by hunters and occasionally by miners. Some thinning has occurred within the previously harvested units.

There is limited subsistence use on Sullivan Island and the adjacent mainland area. The remaining four VCUs that comprise the area are typically not used for subsistence (ADF&G, 1998).

(6) Appearance (Apparent Naturalness): Overall, this roadless area has high scenic quality with a mostly natural appearing landscape. Existing modifications to the area include small mining claims and timber harvest activities. Three areas originally harvested in the 1960s are found along the alluvial fans formed by glacial rivers flowing into Lynn Canal. These areas have more recently undergone thinning activities.

The Sullivan Roadless Area is visible from Lynn Canal, which is a major transportation route, as well as from locations in the adjacent Sullivan Island State Marine Park, Endicott River Wilderness, Glacier Bay National Park, and the Chilkat Range. Parts of the area are also visible from the Juneau-Skagway Icefield Roadless Area located east across Lynn Canal.

(7) Surroundings (External Influences): The area is part of a larger unroaded mainland land mass. The area extends north from the Endicott River Wilderness and is bordered to the west by Glacier Bay National Park and Preserve. Land uses to the north include the Chilkoot Range and Haines State Forest and Resource Management Area. The area is bordered to the east by Lynn Canal, which serves as a major travel corridor for flights, ferries, ships, and boats. Small planes, ferries, small boats, and cruise ships traveling the Lynn Canal corridor are visible from some locations within the area, but Sullivan Island screens much of the water traffic. Mining and other

activities across Lynn Canal in the Berners Bay area may also be visible from some locations. The state owns land adjacent to the roadless area on Sullivan Island, which is the Sullivan Island State Marine Park.

The area is separated from the Chilkat-West Lynn Canal Roadless Area to the south by a narrow roaded area that was harvested in the 1960s. There is also an airstrip located in this roaded area. This airstrip primarily receives use from hunters and occasionally from miners. Planes using this airstrip are visible from within the Sullivan Roadless Area.

(8) Attractions and Features of Special Interest: The opportunity to hunt for both moose and bear is the primary interest in this area. However, similar hunting opportunities exist within the adjacent Endicott River Wilderness. The area contains five inventoried recreation places, which cover 26,432 acres, or 40 percent of the roadless area. There are no improved trails or public recreation cabins in the area.

(9) Differences between the 1989 and 2003 Roadless Area Boundary: The boundaries of the area have changed since 1989 to include the areas along the shoreline that were logged in the 1960s. These areas were excluded from the 1989 roadless area boundary. There have been no other changes to the boundary.

II. Capability for Management as Wilderness

(1) Natural Integrity and Apparent Naturalness: Humans and past or present human activity have had limited effects on the natural ecological processes and conditions within this area, with the exception of the areas where timber management activities have occurred on the low-lying alluvial fans along the coastline. There have been a number of mining claims in the area, but the effects of these claims have been primarily localized. The area’s overall natural integrity and appearance is, therefore, primarily natural and appropriate for wilderness designation.

(2) Opportunity for Solitude and Serenity, Self-reliance, Adventure, Challenging Experiences, and Primitive Recreation: There is a very high opportunity for solitude and an outstanding opportunity for primitive recreation within the area and associated with adjacent roadless land. Present use of the area is low which is undoubtedly related to poor access opportunities. Much of the access is weather-dependent. There are no regularly scheduled small plane or ferry stops within or adjacent to the area. Along the shoreline of Lynn Canal, there is a greater opportunity for seeing or hearing others, primarily small planes, ferries, small boats, or cruise ships, but Sullivan Island screens much of the water traffic. Some thinning has occurred within the old shoreline harvest areas.

Travel within the area can be extremely challenging, requiring a high degree of mountaineering skills and experience. The presence of both black and brown bears also presents a degree of challenge and a need for woods skills and experience.

There was no outfitter/guide use in this area in 1999. There are no public recreation facilities in the area. The character of the landforms generally allows the visitor to feel remote from the sights and sounds of human activity, except when on the shoreline. The area is part of a larger unroaded mainland land mass that includes the Endicott River Wilderness, Glacier Bay National Park and Preserve, and the Chilkat-West Lynn Canal Roadless Area.

The area provides primarily primitive recreation opportunities. The table below lists the acreage and percent of the various Recreation Opportunity Spectrum (ROS) classes that have been inventoried in the roadless area.

ROS Class	Acres	Percent of Total ROS
Primitive (P)	35,761	54%
Semi-Primitive Non-Motorized (SPNM)	25,195	38%
Semi-Primitive Motorized (SPM)	4,287	6%
Roaded Modified (RM)	898	1%

The area contains 5 inventoried recreation places, which cover 26,432 acres, or 40 percent of the roadless area.

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ROS Class	# of Rec. Places*	Total Acres
P	1	27
SPNM	2	22,811
SPM	2	2,695
RM	4	898

* Rec. Places may occur in more than one ROS Class; the sum of this column may exceed the total number of Rec. Places.

The Sullivan Island State Marine Park is adjacent to this roadless area on Sullivan Island.

(3) Wilderness Attribute Rating System: In 1977, the Forest Service, along with public interest groups, developed the Wilderness Attribute Rating System (WARS), which was used to inventory the wilderness characteristics of roadless areas during the second Roadless Area Review and Evaluation process (referred to as RARE II). The purpose of WARS was to provide a measure of the area's wilderness quality, based on the key attributes of wilderness as defined in the Wilderness Act. It is largely based on the attributes described above in items 1 and 2 of this section (natural integrity, apparent naturalness, outstanding opportunity for solitude, and primitive recreation opportunities).

The inventoried roadless areas of the Tongass National Forest were rated according to this system in 1989 for the Analysis of the Management Situation developed in support of the Forest Plan Revision. At that time, the Sullivan Roadless Area was given a rating of 25 out of 28 possible points. The rating was re-evaluated for this updated version of the Analysis of the Management Situation. Based on this re-evaluation, the area was given a rating of 26. This rating reflects the very low effects of localized past management activities and the influence of the large roadless land adjacent to the area.

(4) Ecologic and Geologic Values: The area is part of a larger unroaded mainland land mass that includes the Endicott River Wilderness, Glacier Bay National Park and Preserve, and the Chilkat-West Lynn Canal Roadless Area. There is limited vegetation in much of the area due to the glaciated and mountainous terrain. Areas of old-growth forest tend to occur along the shorelines and at lower elevations.

(a) Fish Resources: The Tongass Fish and Wildlife Resource Assessment (ADF&G, 1998) did not identify any of the VCUs in this area as primary salmon producers or sport fish producers. They did, however, identify four of the seven VCUs in the area as secondary producers.

Sullivan River is the only named stream in this roadless area. No species or abundance information is currently available.

(b) Wildlife Resources: Mountain goats, moose, brown and black bear, wolves, and some Sitka black-tailed deer are present in this area. Smaller wildlife include mink and lynx.

(c) Threatened, Endangered, and Sensitive Species: The only federally listed threatened or endangered species likely to occur within or adjacent to the roadless area are the humpback whale (endangered) and the Steller sea lion (threatened). Both of these species are found in adjacent marine waters. Three Forest Service Region 10 Sensitive Species are suspected or known to occur within the area, including the trumpeter swan, Peale's peregrine falcon, and the Queen Charlotte goshawk. Trumpeter swans nest in the lowlands on small lakes and along large rivers and winter in ice-free areas throughout the Tongass. Peale's peregrine falcons nest on cliff faces and islands and feed primarily on seabirds. Inhabitants of late seral forests, Queen Charlotte goshawks are closely associated with productive old growth. In addition, eight sensitive plant species are known or suspected to occur in the Juneau Ranger District.

(d) Karst, Cave, and Other Geologic Resources: The area includes a large swath of karst with low and medium vulnerability that is primarily located in the mountainous region surrounding Sullivan Island State Marine Park and extends to the shoreline south of Sullivan Island. The karst resources are mapped as approximately 10,277 acres, or 16 percent, of the roadless area. All of the karst is mapped as medium or low vulnerability.

There are a number of unnamed glaciers in this area. There are no other known unique geologic features.

(5) Scientific and Educational Values: There are no known special features in this area.

(6) Scenic Values: Overall, the roadless area has high scenic quality with a mostly natural appearing landscape. Existing modifications to the area include small mining claims and timber harvest activities. Three areas originally harvested in the 1960s are found along the alluvial fans formed by glacial rivers flowing into Lynn Canal. These areas have more recently undergone thinning activities. The visual character type of this roadless area is primarily Coast Range. Much of the area is characterized by moderately complex to complex terrain dominated by angular profiles and sharply defined crests often penetrated by prominent inlets and bays.

Visual Priority Routes and Use Areas identified by the Forest Plan that are within or adjacent to the area include Lynn Canal (Alaska Marine Highway and a Tour Ship Route) and the Sullivan Island State Marine Park (State Marine Park).

Approximately 28 percent of this area was inventoried in Variety Class A (possessing landscape diversity that is unique for the character type) with 70 percent in Variety Class B (possessing landscape diversity that is common for the character type). Approximately 1 percent was in Variety Class C (possessing a low degree of landscape diversity).

The Existing Visual Condition (EVC) of 97 percent of this roadless area is EVC I. These areas appear to be untouched by human activity. Two percent was inventoried in EVC III. These are areas in which changes in the landscape are seen by the average person, but they do not attract attention. The natural appearance of the landscape remains dominant.

(7) Social, Cultural, and Historical Values: Documented historical use of this roadless area has been minimal. Native use of the area was probably limited to hunting or trapping mink, lynx, and other animals, including goat and bear, and gathering berries. Others cultivated garden plots, gathered seaweed and mussels, and hunted seal on the shore of Lynn Canal. Goldschmidt and Haas (1946) indicated that Alaska Native people caught shellfish in the area.

The area is located on the mainland approximately 15 miles south of the city of Haines and about 45 miles northwest across Lynn Canal from the city of Juneau.

There was no outfitter/guide use in this area in 1999. There are no public recreation facilities in the area.

The Wildlife Analysis Area that includes Sullivan Island and the nearby mainland area accounted for 1 to 3 percent of annual average Haines deer harvest during 1987 to 1994. The area also accounted for less than 1 percent of annual average deer harvest by Juneau residents over the same period. The Tongass Fish and Wildlife Resource Assessment (ADF&G, 1998) indicated that subsistence use on Sullivan Island had a moderate to high sensitivity to disturbance. The adjacent mainland VCU was rated as having a relatively low sensitivity to disturbance. The remaining four VCUs that comprise the area were identified as not typically used for subsistence. None of the VCUs in this roadless area was included among the VCUs in the highest, second, or third groups of community use values, nor were any VCUs included among the VCUs with the highest sensitivity to disturbance of subsistence use areas (ADF&G, 1998).

(8) Manageability as Wilderness and Boundary Conditions/Changes: The area is generally well defined by topographic features. The area is bordered to the east by Lynn Canal, to the south by the Endicott River Wilderness, and to the west by the Glacier Bay National Park and Preserve. The area is, however, bordered to the north by the National Forest boundary, which is a straight line that bisects Mt. Sullivan.

LUD designations adjacent to the south boundary of the area include Wilderness, Scenic Viewshed, and Semi-remote Recreation. The area is bordered to the north and west by non-National Forest System land.

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Designating this area wilderness could enlarge the Endicott River Wilderness and expand the total area of wilderness to include areas of wilderness characteristics in Glacier Bay National Park and Preserve. The feasibility of managing this area in a roadless condition is generally high throughout the area. Older development has, however, occurred at three shoreline locations and there are parcels of private land at the mouth of the Sullivan River. Sullivan Island, which is essentially undisturbed, has been identified as a potential wilderness or unroaded area on a number of occasions. Management as wilderness could be in conflict with valid existing mineral rights and associated potential activities.

III. Availability for Management as Wilderness (including effects of wilderness designation on adjacent areas)

(1) **Recreation, Including Tourism Potential:** There is a possibility of developing public recreation cabins within the area but because of the difficulty and cost of access, the potential is considered low. Outfitter and guide services may be increased in the future, especially in relation to big game hunting. There was no outfitter/guide use in the area in 1999.

In 1996, the Alaska Visitors Association (AVA) proposed the following recreation developments for the west coast of Lynn Canal and for Sullivan Island: a backcountry recreation lodge with a 100-person capacity, a leased proprietary camp for 15 persons, a day use recreation area for 150 persons, and boardwalks, paths, and trails.

(2) **Subsistence Uses:** The existing patterns of subsistence activities in the area would not be affected by wilderness designation.

(3) **Fish Resources:** The potential remains low for fish enhancement projects within this area.

(4) **Wildlife Resources:** No habitat improvements are planned in the roadless area.

(5) **Timber Resources:** There are approximately 12,883 acres mapped as productive old growth and no acres mapped as second growth due to harvest in the roadless area. Of these acres, 9,223 are categorized as tentatively suitable for timber production. Based on the Forest Plan LUDs assigned to this area (and estimated falldown and scheduling reduction factors), 955 acres, or 1 percent, of this roadless area are estimated to be suitable for timber production. Approximately 569 of the suitable acres are mapped as high-volume old growth; of these acres, 229 are mapped as high-volume, coarse-canopy old growth.

(6) **Fire, Insects, and Disease:** The area has no significant fire history. Endemic tree diseases common to Southeast Alaska are present. There are no known epidemic disease occurrences.

(7) **Minerals:** The area generally has Priority Two and Three mineral development potential ratings, and there are numerous known current claims. An area along the mainland shoreline across from Sullivan Island was allocated to the Minerals LUD in the 1997 Tongass Land and Resource Management Plan for its deposits of critical minerals.

The roadless area contains 7,129 acres of land identified as a mineral activity tract having a high potential for expanding mineral exploration or development of locatable minerals (Coldwell, 1990; USDA Forest Service, 1991). A total of 7,128 of these acres is allocated to the Minerals LUD. The Minerals LUD is intended to encourage the prospecting, exploration, development, mining, and processing of locatable minerals in areas with the highest potential for minerals development. The Minerals LUD is also intended to ensure that minerals are developed in an environmentally sensitive manner, and that other high-valued resources are considered when minerals development occurs. In addition, the roadless area contains an estimated 45,569 acres of undiscovered locatable mineral resources (Brew et al., 1990; USDA Forest Service, 1991); 1,730 of these acres are considered to have moderate potential for development.

(8) **Transportation and Utilities:** The 1997 Juneau Access Draft EIS prepared by the U.S. Department of Transportation, Federal Highway Administration, and State of Alaska Department of Transportation and Public Utilities evaluated the possibility of constructing a road from Juneau to Haines/Skagway. A route along the west side of the Lynn Canal was one of the alternatives considered. This project is not currently being pursued as part of

Southeast Alaska's transportation planning efforts. However, it is still part of Southeast Conference as a route of interest in long-term transportation needs for Southeast Alaska.

(9) **Water Availability and Use:** No developed recreation cabins or other facilities exist to create a water demand. There are no existing or planned hydroelectric or domestic water projects in the area.

(10) **Areas of Scientific Interest:** This roadless area contains no designated or inventoried potential Research Natural Areas. There are approximately 10,277 acres, or 16 percent of the roadless area, mapped as karst resources.

(11) **Land Use Authorizations:** Numerous mining claims exist in this area, and AT&T has a special use permit for a communication site near the mouth of the Sullivan River.

(12) **Land Status:** All of the area is National Forest System land. Two areas with encumbrances are located along Lynn Canal within the Sullivan Roadless Area.

IV. Wilderness Evaluation (Need for Wilderness)

(1) Public and Congressional Interest:

(a) **Interest Expressed by Local Users and Residents:** Most use of the area is associated with moose or bear hunting.

(b) **Congressional Interest:** Sullivan Island has been identified as a proposed "moratorium" area or proposed as wilderness in legislative initiatives to date. In 1989, U.S. House of Representatives Bill HR 987 proposed to designate 23 areas as wilderness on the Tongass National Forest. One of these areas was the proposed Sullivan Island Wilderness, which was identified for its high wildlife and recreation values. Sullivan Island was not included in the Tongass Timber Reform Act wilderness designations. In 2001, HR 2908 identified Sullivan Island as a LUD II area and the remainder of the Sullivan Roadless Area as Proposed Wilderness. The bill also proposed that three rivers, partially located within the area, receive Wild and Scenic River designation.

(c) **Public Input During Forest Plan Revisions and Appeals:** Parts of this area were specifically addressed in public input received during the Forest Plan revision and appeal. The AVA proposed recreation developments for the west coast of Lynn Canal and for Sullivan Island, including a backcountry recreation lodge with a 100-person capacity, a leased proprietary camp for 15 persons, a day use recreation area for 150 persons, and boardwalks, paths and trails.

A number of comments specifically addressed Sullivan Island. These included several requests for protection from logging (some for "permanent" protection as wilderness), citing deer hunting (important to Haines community), scenic quality (ferry and air routes), and recreation uses. The area was identified as a "spectacular old growth area" and a popular anchorage on the ferry route. Other comments addressed the Chilkat Range, which is partially located within the boundaries of the Sullivan Roadless Area. Commenters requested that the range not be developed for timber harvest due to its high scenic value and its importance as wildlife habitat. One timber industry commenter felt that the entire west shore of Lynn Canal, including the portion located within the Sullivan Roadless Area, should be developed for timber harvest and motorized recreation, as well as a north-south road connection.

The South Sullivan River and the Sullivan River area were identified in the September 24, 1997, appeal filed by Lynn Canal Conservation, Inc. (LCC). LCC objected to the fact that the 1997 Record of Decision did not include all of Sullivan River as a "Wild River" under the Wild and Scenic River Act. They noted that the South Sullivan River is popular with hunters and recreationists and produces abundant chum salmon and Dolly Varden. They also noted that the surrounding area is prime habitat for deer, moose, and brown bears.

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(d) Public Input During Roadless Area Conservation Rule and Road Management Policy

Review: This area was not specifically identified in the comments received on the Roadless Area Conservation Rule or Road Management Policy Review. However, some commenters wanted all unroaded lands in the Tongass to be protected from development.

(e) Public Input Expressed for Project-level EISs and Other Input: This area is not within the study area of any recently completed project-level EISs.

(f) Public Input Expressed During Supplemental EIS Process: The U.S. Department of the Interior identified this roadless area as having important fish and wildlife habitat and populations; although not a top priority for protection, it ranked in their top third among all roadless areas. They indicated that protection of this area, particularly because it adjoins the Endicott River Wilderness and Glacier Bay National Park, would conserve valuable remaining undisturbed forested habitats on the mainland.

SEACC recommended that the Sullivan and Chikat-West Lynn roadless areas, which are adjacent to the existing Endicott River Wilderness and to Glacier National Park, should be permanently protected through expansions of the Endicott River Wilderness. They indicated that this combination would create a contiguous wilderness of over 3.1 million acres.

The Alaska Rainforest Campaign (a coalition of national and Alaska conservation groups) identified Roadless Areas 303 and 304 as adjacent to the existing Endicott River Wilderness and to Glacier Bay National Park. They recommended the two roadless areas for permanent protection as wilderness and as an addition to Endicott River Wilderness to create a contiguous wilderness area of just over 3.1 million acres.

Sullivan Island was recommended for wilderness or other protection by a number of individuals.

(2) Nearby Roadless and Wilderness Areas and Uses: The Sullivan Roadless Area is part of a larger mainland unroaded landmass of approximately 383,799 acres located between the northern National Forest boundary at Point Sullivan to the southern tip of the Chilkat Peninsula at Point Couverden. This larger acreage total includes the Endicott Wilderness and Chilkat-West Lynn Roadless Area (304). In addition, this area is adjacent to Glacier Bay National Park and Preserve

(3) Distance From Population Centers (Accessibility): Approximate distances from population centers are as follows:

Community	Air Miles	Water Miles
Juneau (Pop. 30,711)	45	50
Sitka (Pop. 8,835)	120	160
Hoonah (Pop. 860)	50	60
Angoon (Pop. 572)	95	100

The nearest stop on the Alaska Marine Highway is Haines.

(4) Relative Contribution to the National Wilderness Preservation System: The Sullivan Roadless Area is located on the mainland on the west side of Lynn Canal and extends north from the Endicott River Wilderness boundary to the north boundary of the Tongass National Forest. The area also includes the majority of Sullivan Island. The Chilkat Mountain Range and the Haines State Forest and Resource Management Area are located north of the National Forest boundary. Glacier Bay National Park and Preserve borders the roadless area to the west. The Endicott River Wilderness forms much of the south border of the area, with the remaining portion formed by the boundaries of a former timber sale area. The Sullivan Island portion of the area is bordered to the south by Sullivan Island State Marine Park, which encompasses the southern tip of the island. The area is generally characterized by rugged, scoured terrain with large, vertical relief. The mountains are often snow-covered and reach elevations up to 4,700 feet. Glaciers have scraped steep, rugged slopes and formed glacial bowls. Alluvial fans are formed from the glacial rivers that feed into Lynn Canal. The area includes a large swath of karst with low and medium vulnerability that is primarily located in the mountainous region surrounding Sullivan Island State Marine Park and extends to the shoreline south of Sullivan Island.

The area is mostly unmodified and natural appearing. The natural integrity is rated outstanding and the apparent naturalness rated very high for the area. The opportunity for solitude is very high and the opportunity for primitive recreation is outstanding.

Overall, the area has high scenic quality. Approximately 28 percent of the landscape is considered distinctive for the character type from a scenery standpoint. The area has some karst and much glaciated geology.

The roadless area includes about 5,693 acres of high-volume, old-growth forest. Of these acres, 1,439 are mapped as high-volume, coarse-canopy old growth.

The Sullivan Roadless Area lies within the Lynn Canal Biogeographic Province and makes up about 10 percent of the province. It is 1 of 4 inventoried roadless areas that collectively make up about 77 percent of the province. The Endicott River Wilderness makes up about 15 percent of the Lynn Canal province, and the Berners Bay LUD II area makes up another 6 percent of the province.

The Sullivan Roadless Area lies within three ecological sections; it represents 4 percent of the St. Elias-Fairweather Mountains Ecological Section, 6 percent of the Glacier Bay Fjordlands Ecological Section, and less than 1 percent of the Kootznoowoo Fjordlands Ecological Section. All three Ecological Sections are well represented by existing wilderness (35, 28, and 78 percent, respectively) and by other existing non-development LUDs (63, 50, and 11 percent, respectively). The St. Elias Fairweather Mountains and Kootznoowoo Ecological Sections have 1 percent each of land in LUD II.

The majority of this roadless area (62 percent) is within the St. Elias Fairweather Icefields Ecological Subsection; this portion of the roadless area represents 5 percent of the entire ecological subsection. Approximately 27 percent of this ecological subsection is in existing wilderness, an additional 1 percent is in existing LUD II, and an additional 70 percent is protected by other existing non-development LUDs. The Chilkat Peninsula Carbonates Ecological Subsection represents 32 percent of the Sullivan roadless area; this portion of the roadless area represents 6 percent of the entire ecological subsection, which is well represented in existing wilderness (26 percent) and other non-development LUDs (51 percent). The Stephens Passage Glaciomarine Terraces Ecological Subsection represents 6 percent of this roadless area; this portion of the roadless area represents 1 percent of the entire ecological subsection, which is well represented in existing wilderness (36 percent) with an additional 5 percent in LUD II and 31 percent in other non-development LUDs.

The Sullivan Roadless Area was rated 26 out of a possible 28 points under the WARS. As such, its WARS rating is ranked 5th from the highest (along with 6 other roadless areas) among the 109 Tongass inventoried roadless areas.

There is considerable local and national support for wilderness designation for the area. Designation would create a wilderness that would add to a much larger wilderness area including the Endicott River Wilderness and the Glacier Bay National Park Wilderness. Overall, the factors identified here indicate that the relative contribution of this area to the National Wilderness Preservation System would be very high.

V. Environmental Consequences

The Sullivan Roadless Area would be managed under the existing Forest Plan if Alternative 1, 2, 3, or 4 is implemented. Approximately 78 percent of the roadless area would be managed under non-development LUDs. Timber harvest and road development could occur in the remaining 22 percent. The land in the development LUDs provides an estimated 955 acres that are suitable for timber production (2 percent of the suitable land on the Juneau Ranger District). Approximately 229 of the suitable acres are classified as high-volume, coarse-canopy old growth. The roadless area contains 7,129 acres of land identified as a mineral activity tract having a high potential for expanding mineral exploration or development of locatable minerals. In addition, the roadless area contains an estimated 45,569 acres of undiscovered locatable mineral resources; 1,730 of the acres are considered to have moderate potential for development. Recreation, minerals, timber sales and special uses programs would continue. The values associated with the natural settings of the area, especially along the coastal areas where timber management activities are allowed, could be affected. The karst, geologic, and most of the scenic values are protected in the roadless area by the Forest Plan.

Appendix C

Under Alternative 5, Sullivan Island would be converted from Semi-remote Recreation to Recommended Wilderness LUD. This would not affect timber sale projects because this area is currently allocated to a non-development LUD. The total area suitable for timber production would not change from Alternative 1. Mineral prospecting and development on Sullivan Island would be allowed up to the time that the area is actually designated as wilderness by Congress. Recreation, mineral activities, timber sales, and special uses would continue in the remainder of the area. The values associated with the natural settings of the Sullivan Island portion of the roadless area would be provided long-term protection if designated wilderness.

Under Alternative 6, Sullivan Island would be converted to Recommended LUD II and the remainder of the roadless area would be converted to Recommended Wilderness LUD. No timber harvest would be allowed in the roadless area. The potential for other uses and development, including recreation, minerals, and some special uses, could be restricted in the Recommended Wilderness area. Mineral prospecting and development would be allowed up to the time that the area is actually designated as wilderness by Congress. The values associated with the natural settings of the roadless area, including the scenic, karst, and geologic values, would be provided long-term protection if designated LUD II or wilderness.

Under Alternative 7 or 8, the entire roadless area would be converted to Recommended Wilderness. No timber harvest would be allowed and the potential for other uses and development, including recreation, minerals and some special uses, could be restricted. Mineral prospecting and development would be allowed up to the time that the area is actually designated as wilderness by Congress. The values associated with the natural settings of the roadless area, including the scenic, karst, and geologic values, would be provided long-term protection if designated wilderness.

Land Use Designation Allocations and Suitable Timber Lands by Alternative for Roadless Area 303 (in acres)								
Land Use Designation	Alt 1	Alt 2	Alt 3	Alt 4	Alt 5	Alt 6	Alt 7	Alt 8
Recommended Wilderness					3,976	62,167	66,143	66,143
Wilderness								
Recommended Wilderness Nat. Mon.								
Wilderness National Monument								
Non-wilderness National Monument								
Research Natural Area								
Special Interest Area								
Remote Recreation								
Enacted Municipal Watershed								
Old-growth Habitat								
Semi-remote Recreation	51,747	51,747	51,747	51,747	47,771			
Recommended LUD II						3,976		
LUD II								
Wild, Scenic, Recreational River								
Experimental Forest								
Scenic Viewshed	933	933	933	933	933			
Modified Landscape	13,463	13,463	13,463	13,463	13,463			
Timber Production								
TOTAL	66,143	66,143	66,143	66,143	66,143	66,143	66,143	66,143
Suitable Timber Lands	955	955	955	955	955	0	0	0