



APPENDIX E

U.S. FOREST SERVICE COMMENT LETTER



File Code: 1900; 7710
Date: July 21, 2023

Megan Flory

Subject: Unit 395 Land Use Master Plan Draft

To: Megan Flory

This memo responds to your request for public comment on the Unit 395 Land Use Master Plan Draft. We appreciate the opportunity to provide comment on behalf of the Forest Service, U.S. Department of Agriculture. We look forward to continuing to collaborate with the Kenai Peninsula Borough in managing our lands adjacent to Unit 395.

In providing our specific comments below, we would like to highlight many specific comments made during the Sterling Highway Environmental Impact Statement (EIS) and subsequent Record of Decision (ROD) related to Unit 395. Those documents provide a thorough analysis of impacts and identification of potential mitigations with regards to access, wildlife, and cultural resources.

One of the key elements the FS is interested in with regards to development of Unit 395 is access. West Juneau Road is a Forest Service maintenance road that is neither designed nor maintained for purposes of public access. West Juneau Road is closed to public access by motorized vehicles except for snowmachine users accessing the Resurrection Pass trail system. Should ownership change, we would want to ensure that access is retained, either as existing, or from a new proposed trailhead as highlighted in the preferred plan on page 20. As you continue in planning and design efforts, we are interested in collaborating to provide the best outcome in terms of safety, community interest, and resource protection.

From the preferred plan on page 20 it appears that proposed recreation infrastructure including trails, a cabin, and a day use recreation site are on National Forest System lands. The Forest Service does not wish to maintain additional recreation infrastructure. Should the Borough wish to pursue improvements on Forest System lands a Special Use Permit would need to be authorized.

There appears to be the creation of both a non-motorized and motorized access trail to Forest System lands, it would be preferred to combine these if possible to reduce the number of trails leading to National Forest System lands.

The following comments are a compilation of sources and meeting notes all relevant to Parcel 395 land management:



- Excerpts from “*Delineation of Landscape Linkages in the Cooper Landing Planning Area*”:
- Impermeability effectively fragments available habitat, which can reduce population size, genetic variability, and free movement of individual animals across the landscape.
- Thoughtful planning in the area surrounding Cooper Landing could help mitigate the loss of landscape connectivity between the northern and southern portions of the Kenai Peninsula. Benefits to such an approach include avoiding conflicts between humans and wildlife, ensuring wildlife viewing opportunities, conserving wildlife populations, facilitating wildlife movements, promoting genetic exchange, and retaining ecological processes (e.g., stream flow).
- Juneau Creek drainage is the major corridor for north – south wildlife movement.
 - Provides key connectivity for important species utilizing the Kenai Mountains such as brown bear, moose, Dall sheep, & lynx.

Recommendations

- Manage corridors to maintain landscape connectivity.
 - Maintain vegetation and habitat continuity throughout the linkages.
 - Minimize new roads, developments, fencing, predator control, and night lighting within 300 meters of habitat linkages. Consider managing domestic pets, livestock, off-road vehicles, and recreational activities within linkages.
 - Maintain at least 750’ of vegetation on each side of anadromous streams and rivers to provide cover for wildlife.
- Work with adjacent landowners and partners to improve wildlife habitat and maintain habitat connectivity.
 - Collaborate with the Kenai Peninsula Borough and Forest Service to develop joint fuel reduction/habitat improvement projects that will improve habitat and connectivity and reduce fuels adjacent to the community.
 - Work with USFS, USFWS, ADFG, and DOT to develop highway crossing structures where identified linkage areas cross the Sterling highway. Develop structures that are suitable for a variety of large and small wildlife species. Use vegetation management, fencing and other methods to direct wildlife toward crossing structures.
 - Make sure food and garbage is stored in bear proof containers in general and particularly within linkages that may be used by bears.
 - Work with USFS, USFWS, and ADFG to monitor wildlife movements using radio telemetry and evaluate the effectiveness of wildlife linkages over time. Use adaptive management and revise strategies and linkages if needed to improve effectiveness.
 - Work with USFS, USFWS, ADFG and other partners to coordinate land management for habitat connectivity.
- Follow Best Management Practices for new developments and roads.
 - Development plans should strive to reduce new road development in order to maintain existing habitat connectivity.
 - Consider concentrating future development in already developed areas rather than spreading out to new areas to conserve habitat and connectivity.

- From *Chugach National Forest letter of Support for trapping/hunting setbacks (March 2023)*:
- The construction of the new 10-mile segment of the Sterling Highway MP 45-60 Project north of Cooper Landing, and associated recreational development planned for the area, substantially impairs crucial north-south wildlife movement. The new 3-lane highway segment bisects the Juneau Creek drainage which is the primary wildlife movement corridor connecting nearly 1 million acres of habitat north of the highway with 1.4 million acres on the south side. Combined with the existing 2-lane highway, residential, commercial, and recreational development of Cooper Landing and the Russian River Area, and the natural barriers of Kenai and Skilak lakes, this new highway segment represents a substantial new impediment to effective north-south wildlife movement on the Kenai Peninsula.
 - A study completed in 2010 in anticipation of future development along the Sterling Highway found **“almost 80% of the area historically available for north-south movement by wildlife on the Kenai Peninsula has been lost”** (Morton et al., 2010). This study considered the 65-mile linear distance from the mouth of the Kenai River to the Seward Highway along the eastern most edge of Kenai Lake. Within this stretch Kenai Lake and Skilak Lake act as natural barriers, leaving the remaining 38.5 miles for wildlife movement. Expanding urbanization in the Kenai-Soldotna-Sterling area and in Cooper Landing has further bottlenecked these corridors. In addition to the new Sterling Hwy MP 45-60 Project, the Kenai Peninsula Borough has selected approximately 1,000 acres of land for community development. Cumulatively, these projects leave only two potential landscape-scale corridors across the Sterling Highway without additional, significant human interference: a 3.5-mile-wide segment immediately west of the outlet of Skilak Lake, and the area between the Skilak Lake inlet and Cooper Landing.
 - Project mitigation measures for the Sterling Highway MP 45-60 Project include 5 dedicated wildlife crossing structures intended to help maintain wildlife movement patterns and minimize wildlife/vehicle collisions on the highway. To identify the best locations for mitigation measures that would help to retain wildlife movement patterns, DOT&PF sponsored a wildlife mitigation study in collaboration with wildlife management agencies. The scope of the study was developed in consultation with an interagency wildlife team (USFWS, Forest Service, and ADF&G). The results of the study, initiated in 2014, have been used to refine the location of wildlife crossing structures to accommodate wildlife movement.
 - To function effectively and sustain habitat connectivity, wildlife use of these crossing structures must not be inhibited or impaired by human activities occurring on, within, or in proximity to these structures. The objective is to ensure that human activities occurring on or near the dedicated wildlife crossing structures do not function as a population mortality sink due to hunting or trapping.
 - Long-term effectiveness of this substantial, multi-million-dollar investment in dedicated wildlife crossing structures requires a cooperative interagency approach to effectively manage and control human activities in the vicinity of these structures.
 - To maintain long-term public safety in the Sterling Highway MP 45-60 project area, and to successfully achieve the project’s wildlife mitigation objectives, management actions are necessary to prevent human activities such as trapping and hunting in and near the dedicated

wildlife structures from impairing the effectiveness of dedicated wildlife crossing structures. In March 2023, the Alaska Board of Game approved a proposal to prohibit trapping and hunting on and within a quarter mile of the wildlife over and underpasses along the Sterling Highway. This is a big step for maintaining functional and effective wildlife crossings.

➤ From Tony Clevenger, Wildlife Research Scientist, Western Transportation Institute, Montana State University USA (*Wildlife Crossing Structures for Sterling Highway MP 45-60 Project: Design and Land Use Considerations, prepared for DOWL and Associates and Alaska Department of Transportation and Public Facilities*):

- The effectiveness of wildlife crossing structures can be compromised if current land-use plans within a municipality or project area are not conducive to protecting wildlife movements through the area.
- The Juneau Creek corridor, just east of Parcel 395, is one of the most important north-south wildlife corridors in the Project area. The protection of this area from increased human activity and disturbance given the existing recreation trail use and network activity will be critical for local and regional scale connectivity of wildlife populations, brown bears in particular.
- *Larger corridor network*: Wildlife crossings must connect to, and form an integral part of, a larger regional corridor network. They should not lead to “ecological dead-ends.” The integrity and persistence of the larger corridor network is not the responsibility of the transportation agency, but that of neighboring land management agencies and municipalities.
- Future and adjacent land use is critical to wildlife crossing structure performance. It is more important than design. Wildlife may be able to adapt and use a crossing structure, but if they are unable to access important habitats from using the structure or are removed from population from human-wildlife conflicts, the crossing structure will have failed in its function to safely move animals and connect important habitats.
- Wildlife crossing mitigation two main objectives:
 - Facilitate connections between habitats & wildlife populations
 - Improve motorist safety & reduce wildlife–vehicle collisions
- Basic principles of wildlife crossing structures:
 - Topographic features
 - Multiple species
 - Adjacent land management
 - Larger corridor network
- Land management plan must be conducive to protecting wildlife movements through area
 - Examples of land use not conducive to wildlife movement:
 - residential development
 - human disturbance (human presence and activity)
 - change of habitat quality (fragmentation, loss of habitat or alteration)
 - Alteration of wildlife corridor by future activity (commercial/industrial,

recreational/residential developments) may negatively affect wildlife movement and the function and performance of wildlife crossing structures

- Life span of crossing structures is 70-80 years
 - adjacent habitat needs to be managed for long term for wildlife occurrence & ensured movement between core areas
- Land Use Planning:
 - The importance of land use planning around wildlife crossing structures cannot be understated.
 - All landowners need to coordinate effective means of preserving habitat adjacent to proposed crossing structures and habitat corridors that lead to larger regional corridor networks
 - Brown bear movements and migration to and from salmon feeding areas are critical for maintenance of long-term population stability. Particularly important in areas already compromised by increasing habitat loss/fragmentation due to human-related activities and development.
 - Effective movement corridors should reduce the frequency of human/wildlife conflicts and property damage
- Manage land use and human activity in a way that promotes wildlife movement and conservation adjacent to wildlife crossing structures to meet the Project goals of “commitments to extensive mitigation for wildlife movement”, and “design of the wildlife crossings for the greatest effectiveness”.
- Parcel 395:
 - KPB land development and human activity should be managed in a way that is conducive to wildlife movement and corridor use.
 - require coordination among KPB and land management agencies, land trusts etc.
 - identify the critical wildlife movement corridors (north-south) that bisect the Sterling Highway and the KPB lands.
 - An effort to do this began nearly a decade ago and can be revived now that highway design planning is underway (Morton et al. 2010).
 - Motorized recreation and high levels of human use have negative effects on wildlife occupancy and movement. The solution is coordinated land use management.
 - identify and plan key north-south wildlife corridors across the KPB lands
 - develop plan in an ecologically sustainable manner that will protect traditional movement patterns of brown bears and other seasonally migratory wildlife and manage human use and activity in key north-south wildlife movement corridors.
 - increase in human activity in this particular area could increase human disturbance and potential for human-bear conflicts
 - If left unmitigated disturbance can disrupt wildlife movements, severing habitat connections and have important demographic effects on populations
- Benefits of managing for wildlife:
 - Increase the effectiveness and functionality of planned wildlife crossings
 - Maintaining functional wildlife corridors=safes residential areas; decrease/avoid human-

- wildlife conflict
 - North – south connectivity for important wildlife species while still impaired by the new highway would be more effective
 - Ensure short- and long-term protection of important wildlife corridors in this already highly human-altered area
 - Allow for migration/movements that are critical for maintenance of long-term population stability and promoting genetic exchange
- Notes from June 28, 2022 meeting with KNWR, USFS, KPB:
- Wildlife overpass, which will be the 1st in Alaska, will be ~ 700-ft west of the 395, and will direct wildlife into subdivision, creating wildlife/human conflict including DLP's.
 - Need to be considering ways to avoid and minimize human/wildlife interactions with creation of buffers, corridors, and/or some sort of conservation easements.
 - Combined effects of improvements to the highway and residential development in Unit 395, would have the greatest overall impacts on brown bears and other wide-ranging wildlife species due to increased habitat alteration, fragmentation of movement corridors, and increased mortality from wildlife/vehicle collisions, and DLP takings
 - Mitigating human caused wildlife impacts is essential
 - Public use trails and campgrounds are utilized by bears travel along riparian corridors, in the valleys and along existing trails
 - Conservation-minded development-design with wildlife in mind; plan it with open space / green space; bear resistant trash containers
 - Form a working group to determine locations of important wildlife travel corridors, i.e. camera study; Kenai Landscape and Habitat Management Project
- Development Recommendations, Preferred Plan Map comments (pg. 20):
- Further study is needed to identify more exact locations of important wildlife corridors through Parcel 395, but in general, it seems beneficial to:
 - prohibit development of any kind (including trails) west of West Juneau Rd within the parcel due to the wildlife overpass being ~700 feet outside of the parcel's northwest boundary.
 - The *Delineation of Landscape Linkages in the Cooper Landing Planning Area* identified the Juneau-Cooper Creeks landscape connection to the east and south of Parcel 395. Following the recommendation in the white paper, new roads, developments, fencing, predator control, and night lighting should be minimized within 300 meters of habitat linkages.
 - Consider no additional trail or road development in eastern 1/3 and southern portion of Parcel 395 because this has already been identified as an important wildlife corridor and further fragmentation should be avoided.
- The Squilantnu Archaeological District intersects a portion of this area and we coordinate with USFWS, Cook Inlet Region, Inc, Kenaitze Tribe and USFS as part of an MOU we have in place to mitigate any issue that may arise within this sensitive area. Ensuring we continue to work closely within this boundary is critical.
- In addition to the wetlands shown in Figure 4-2, there are numerous freshwater forested/shrub and

emergent wetlands present on the USFWS National Wetlands Inventory mapper. If not already complete, it's recommended that pre-implementation wetland delineations be completed in areas of concern. If wetlands are present, those areas should be avoided. If it is not possible, impacts should be mitigated as best able and ACOE permit filed for fill in wetlands.

This letter highlights several items that need further discussion and coordination between KPB and the Forest Service. We look forward to the opportunity to continue to collaborate as you move forward with development of Unit 395.

We recognize the significance and need of this project and look forward to further coordination. If you have any questions, please contact me by phone at (907) 288-7730 or via email ruth.damico@usda.gov.

Sincerely,

RUTH D AMICO Digitally signed by RUTH D
AMICO
Date: 2023.07.21 16:55:15 -08'00'

RUTH L. D'AMICO
District Ranger

cc: Jeff Schramm, Griffith Berg, Deyna Kuntzsch, Jesse Labenski, Becky Jones