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December 11, 2019

Alaska Roadless Rule

United States Forest Service

Alaska Region

Ecosystem Planning and Budget Staff

P.O. Box 21628

Juneau, AK 99802

Alaska Roadless Rulemaking #54511

Comments from Alaska Power Association supporting a full Tongass National Forest exemption from the 2001 Roadless Area Conservation Rule.

Dear Forest Service Rulemaking Team:

Thank you for this opportunity to comment on the proposed exemption of the Tongass National Forest (the Tongass) from the 2001 Roadless Area Conservation Rule. Alaska Power Association (APA) is the statewide trade association for electric utilities in Alaska. Our members provide power to a majority of Alaskans from Utqiagvik to Unalaska, through the Interior and Southcentral, and down the Inside Passage.

APA supports a full Tongass exemption from the Roadless Rule. The proposed exemption would return decision-making authority for development to the Forest Service, allowing decisions concerning road construction and roadless area management of the Tongass to be made by local officials on a case-by-case basis. This is a preferable approach to the one-size-fits-all regulation the Tongass has been subjected to under the Roadless Rule. We also urge the Forest Service to adopt the Alaska Citizen Advisory Committee exception language for Alternatives 2-5.

APA encourages the Forest Service to expand the exemption to the Chugach National Forest, so electric consumers living in the area can benefit from projects that are now severely impacted by the Roadless Rule.

The Roadless Rule has caused significant roadblocks and expense to electric consumers in Southeast Alaska due to regulatory barriers on utility operations and hydropower development. Many communities in Southeast utilize hydropower to generate clean, stable-priced electricity, and even more communities are integrating hydropower to lower or eliminate their dependence on diesel generation.

The following are examples from the Alaska electric utility industry that support the necessity for a Tongass

exemption in the Roadless Rule:

The Roadless Rule significantly limits the ability to construct new hydropower plants. Construction activities for new hydropower plants in Southeast Alaska need road access from tideline to transport

materials and equipment. Elimination of this access has prohibited the development of future low-cost renewable energy resources. If the Rule doesn't prohibit a project altogether, it can substantially increase the time and cost to develop new projects, thus making a project too costly to develop.

For instance, a planned intertie's cost ballooned to four times what was estimated - more than $51 million - due a requirement that more than 80 helicopter landing pads be used to transport materials to the project site from the air. This requirement was implemented to prevent a primitive road from being built to the project site.

APA cannot emphasize enough the development of renewable energy in Alaska. Alaska's alternatives to renewable energy are fossil fuels. Any decision that stifles the development of hydropower and other forms of renewable energy should be carefully reconsidered.

The Roadless Rule is also a limiting factor in developing and maintaining reliable power transmission lines in Southeast Alaska. During one electric utility's avalanche mitigation studies, it was required to eliminate mitigation options that were dependent on material and equipment access from tideline. Simply being able to pioneer a path for an excavator to track from tideline to the transmission line - a distance of approximately 500 feet - was not permittable under the Roadless Rule, which prevented activities such as developing earthen berms around structures or positioning heavy wire reels for repairing a damaged conductor.

Under these restrictions, the alternative is to contract an expensive heavy-lift helicopter, which more than doubles the cost of a project and limits design parameters due to the weight limitations of helicopters. In addition, such helicopters are not readily available and potentially extend the period of repair and back-up diesel powered generation usage. Being permitted to construct an access road to a project drastically cuts overall costs for construction and maintenance, costs that are ultimately passed on to ratepayers.

Electric utilities that construct hydropower projects and associated transmission must abide by significant environmental regulations under Federal Energy Regulatory Commission rules and/or state regulations. Alaska's electric utilities are exceptional stewards of the environment; Alaskans live, work and recreate in pristine wilderness while at the same time understanding that the economies of many parts of the state are dependent on natural resources.

By returning decision-making to local forestry officials, as opposed to a blanket ban on development within the Tongass, important projects that stabilize electric rates and lower diesel dependency can assist with economic development in Southeast Alaska. Additionally, necessary maintenance projects on hydroelectric sites and other electric infrastructure will become easier and less costly to accomplish if the Tongass is fully exempted from the Roadless Rule.

Respectfully submitted:

[signature]

Crystal Enkvist

Executive Director

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