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First name: Duff

Last name: Mitchell

Organization: JUNEAU DISTRICT HEATING

Title:

Comments: Roadless Rule comments attached.

The following text was copy/pasted from an attached letter. The system cannot display the formatting, graphics, or tables from the attached original.

December 16, 2019

The Honorable Sonny Perdue  
Secretary

US Department of Agriculture  
1400 Independence Ave, SW  
Washington D.C. 20250

RE: Roadless Rule Comments

Dear Secretary Perdue,

I would like to preface my comments with the statement that I am associated with many business and organizational interests and have business experience in seafood, commercial fishing, mining services, tourism, and renewable energy development for several decades all of which have occurred in Southeast, Alaska. Although I am associated with many organizations such as the Juneau Commission on Sustainability, the Alaska Independent Power Producers Association among others and including a hydropower development mentioned several times in the DEIS, my comments are my own. I would also state that it is an honor, opportunity, and privilege to live and work in the Tongass for over 50 years and have lived through all episodes and turns of the Roadless Rule history, it's legal developments and where we stand today. To put matters in a historical context, it is very understandable why this special land territory was jealously guarded and protected by the Tlingit and Haida peoples whose ancestral lands that modern-day Southeast Alaskans now have the benefit to inhabit. The Tongass is blessed with abundant resources: hydropower, minerals, rare earth minerals, geothermal resources, fishing, timber, and scenic resources that are breathtaking and the envy of the world. Luke 12:48 commends us that for whom much is provided, much is required. As collective stewards of the Tongass National Forest, much is required.

We are at a Roadless crossroads; can we collectively and sustainably develop the Tongass resources in a productive and harmonized nature? Or do we bury the treasure by cementing a Roadless Rule that would preclude responsible development now and for future generations of Alaskans/Americans?

My comments on the Roadless Draft Environmental Impact Statement (DEIS) primarily focus that the Roadless Rule is a defacto foreclosure to responsible renewable energy development and that the DEIS is lacking an acknowledgment and analysis that responsible renewable energy development in the Tongass National Forest has significant climate change benefits and reduction of emissions benefits through the displacement of fossil fuel use in Southeast Alaska. Advocacy and support for renewable energy development are aligned with the official policy of the multi-use purpose of the Tongass National Forest.

Public Law 106-511 (2000) established an authorization for the Southeast Alaska Intertie (Exhibit A) would interconnect all Southeast Alaska communities to sustainable, lower cost and clean hydropower generated in and for Tongass Forest communities and industry that would displace diesel electrical generation and diesel heating while reducing emissions and Green House Gasses now and forever. Apparently, in all 585 pages of the DEIS, there is not one mention of the Southeast Intertie or the Public Law creating its authorization (although all other relevant Public Laws were cited) or the fact that

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virtually every community of Southeast Alaska is on record supporting the Southeast Intertie (Exhibit B). Further, the Roadless DEIS is noticeably absent on the recognition and protection of the several powersite classifications authorized in perpetuity to several hydropower sites in the Tongass. These powersites are not trivial as mineral exploration and other uses/claims are prohibited or restricted on these sites. However, reading the DEIS, one would not know that these federally protected Tongass powersite classification sites even exist.

The USFS has an extensive list of the over 200 hydropower sites identified in Southeast Alaska in Waterpowers of Southeast Alaska-1947 (with earlier and later studies verifying these sites). The USFS is internally aware of every powersite classification in Southeast Alaska. My purpose in raising federal powersite classifications and the Southeast Intertie issue is that all Alternatives except for Alternative 6 do not permit or recognize the legal standing and body of law related to US federal powersite classification on select hydropower resources and the Public Law authorizing the Southeast Intertie. Only Alternative 6 protects the pre-existing powersite classifications and the Southeast Intertie Public Law 106-511, both of which were established by Congress, not an executive branch rule such as the Roadless Rule. For further understanding about powersite classifications, I refer you to the Department of Interior publication, "It has been debated, decided and declared, A chronical of the requirements for the Waterpower and Reservoir Resources Program", May 2000. Bureau of Land Management. National Applied Resource Sciences Center.

Additionally, the DEIS does not address the impacts of an ever-changing Southeast Alaska energy landscape where if we do not connect smaller, primarily Native Alaskan village communities to a unified Southeast Intertie grid, they will be forever subjugated to expensive (and a heavy pollution source of emissions) based diesel generation. The current diesel dependency is already economically crippling and disadvantageously impacting these communities due to their lack of access to lower-cost, clean energy through hydropower and intertie resources. The Roadless Rule Alternative 1 will regulatorily and unfortunately eliminate fiscally prudent and market-based hydropower development and interties. Alternatives 2 through 5 cause any proposed or permitted hydropower or intertie development to face regulatory uncertainty, increased investor and government risk and therefore precludes their financial development of the project...forever.

Consider this preclusionary bias against federal power site classification hydropower sites, USFS recognized hydropower and geothermal resources in the Tongass and bias against the Southeast Intertie (why else would they not be mentioned in the DEIS?) as a backdrop against the fact that within the Tongass National Forest there is the greatest disparity of electrical costs of anywhere in the Nation. We have non-intertie connected communities suffering high unemployment, social problems and a lower standard of living due to electrical power costs that exceed 5 times the national average for electricity (due to diesel, lower economies of scale, and no interties to low-cost hydropower). Juxtaposed against this national disgrace, we have predominately urban Southeast Alaska communities on hydropower (primarily built pre-Roadless Rule) based electricity that's cost is closely aligned with the national average for electricity. It is not just Native Alaskan communities without interties

that benefit from a repeal of the Roadless Rule, but also other remote development interests which would have their regulatory fuel handling and emission compliance much easier to attain with access to clean, renewable energy.

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Interestingly, the USFS removed the Transportation Utility System Land Use Designation (TUS LUD) with the 2016 version of the TLMP. I would suggest that such removal was misguided, and the TUS LUD should be reinstated for the reasons I have brought forward but would also add and recognize that the development of hydropower has profound climate change and greenhouse beneficial impacts in Southeast Alaska.

Transporting, importing and burning fuel oil into the Tongass with the nature of inevitable fuel spills and emissions to generate electricity unnecessarily contributes to GHG emissions and a large carbon footprint. This phenomenon is directly caused, in part, by the Roadless Rule and its restrictions on hydropower development and transmission interties. The DEIS discusses climate change and carbon sequestration of the Tongass forest for environmental habitat but fails to address how Tongass based hydropower and geothermal development would displace fossil fuel importation and burning in the region and assist in the transformation from a diesel-based economy to a no-emission, renewable-energy-based economy. This omission in the DEIS diminishes the position that removing Roadless Rule provisions for hydropower development and transmission interties between Southeast Alaska communities or from generation to load centers is critical for anyone truly concerned with climate change and the transformation of cleaner, renewable energy sources to displace fossil fuel use. Unfortunately, the Roadless Rule makes any renewable energy development and interties in the Tongass speculative, regulatory uncertain, and economically more expensive thereby lessening the competitive cost advantage of responsible renewable energy development over fossil fuel use for heating and electrical generation in Southeast Alaska. In essence, all alternatives except for Alternative 6 lock our region into a "stuck on diesel" destiny.

Responsible hydropower development requires complex federal, state and local permitting, compliance with the USFS TLMP and a Federal Energy Regulatory Commission (FERC) EIS. These requirements are strenuous enough to weed out irresponsible hydropower development and good projects should not bear the additional risk that a non-elected Forest Service official will reserve a Roadless Rule approval or not (As Alternative 2-5 suggest). "If the Responsible Official determines that... a road is needed," thereby leaving it up to the Forest Service's "Responsible Official" to decide whether a road is needed without any criteria for doing so. This is a needless and burdensome requirement that unnecessarily manufactures risk and uncertainty that consequently disincentivizes and impedes responsible development that would otherwise meet all other regulatory thresholds.

As previously highlighted in earlier remarks, only Alternative 6 protects and grandfathers federal powersite classifications and the Southeast Intertie against the restrictions of the Roadless Rule. The DEIS does not focus forward to the future use and demand for renewable energy (hydropower, geothermal, tidal) or critical rare earth minerals in the Tongass to fuel local sustainable energy requirements and US renewable requirements. The Tongass, therefore, has regional and national renewable energy and climate change implications since rare earth minerals are used in wind turbines, solar voltaic cells/panels, and other electric equipment to include electric vehicles. Importantly, the DEIS socio-economic analysis should have considered the renewable energy transformation occurring in our country now (Juneau, Alaska has one of the highest electric vehicle ownership per capita in the US<sup>1</sup>) and

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the sustainable energy requirement of Southeast Alaska communities in the Tongass 10, 20 or 50 years henceforward.

Juneau, Alaska is a world leader in the adoption of electric-based heat pump technology which is the most efficient form of electric heating known to man. As more heat pumps are installed and used in Southeast, Alaska, the more renewable energy will be required to supply this load. Juneau's airport, schools, swimming pool, library are already on heat pumps. The electric transformation and dynamic environment we are now seeing are prescient of the demand for renewable energy in the future of the Tongass. This demand is not limited to the heating of Tongass communities. Consider that Baltic countries have already converted to "electric" ferries and the State of Washington is beginning to convert its ferry systems to electric. All-electric ferry cuts emission by 95% and costs by 80% compared to fuel-powered counterparts and the results are attracting customers<sup>2</sup>. Without low-cost sources of hydropower and the transmission lines to fuel, this new marine transportation and ferry technologies now being adopted, our Native villages will be unable to economically dock and recharge these ferries.

Failure to overturn the Roadless Rule and make concrete and unequivocal safeguards for hydropower resources and the Southeast Intertie will continue the downward economic cycle for our currently lowest economically endowed communities and will only get worse. However, access to hydropower installations producing lower-cost power and then transmission of this lower-cost power to these communities should be a mission-critical consideration of the Roadless Rule DEIS. Sentencing our poorest diesel energy-based Southeast communities to a stuck-on-diesel-destiny is an unintended economic and environmental consequence of the Roadless Rule. Regardless of the intention, the corresponding contentious impact on Southeast Alaska and our poorest communities can be abated by overturning the Roadless Rule in Alternative 6.

Consider that in the book of Mathew, the "Parable of the Talents" where the unworthy servant buries the talent, neglecting their duty and was rightfully chastised with the mistaken belief they were protecting their Master's resource, but instead were found dishonorable. So too failing to fully utilize a given resource for the good of providing renewable energy to the citizens of Southeast Alaska is a similar dereliction of duty. Instead, for whom much is provided, much is required. Much is provided to our region of Alaska for the Tongass National Forest provides resources to be harvested, mined, and renewable resources developed in harmony with nature through permitting. The requirement is to properly develop resources through established Environmental Impact Assessments and Statements coordinated with the TLMP. The Roadless Rule instead circumvents this time-honored and proven process to unwisely preclude reasonable and responsible renewable energy development for this and future generations of Alaskans and Americans. I ask that you wisely not bury the Talent, but instead allow the Tongass (our Talent) to prosper.

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Sincerely,

Duff Mitchell

Juneau, AK 99801

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