

Data Submitted (UTC 11): 12/16/2019 9:00:00 AM

First name: Andy

Last name: Moderow

Organization: Alaska Wilderness League

Title: State Director

Comments: Please see the attached comment

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Alaska Alpine Adventures - Alaska Guide Collective LLC - Alaska Quiet Rights Coalition  
Alaska Sea Kayakers - Alaska Wilderness League - Alaska Wildland Adventures  
Eyak Preservation Council - NOLS Alaska - Prince William Sound Stewardship Foundation  
Remarkable Adventures LLC

December 16, 2019

USDA Forest Service

Attn: Alaska Roadless Rule

P.O. Box 21628

Juneau, Alaska, 99802

Submitted electronically to [akroadlessrule@fs.fed.us](mailto:akroadlessrule@fs.fed.us)

RE: Chugach National Forest Inclusion in the Alaska Roadless Rule

Dear Chief Christiansen,

As businesses and Southcentral non-profits with a clear interest and stake in the management of the Chugach National Forest, we are writing today about one particular provision that was unexpectedly inserted into the Notice of Proposed Rulemaking<sup>1</sup> and Draft EIS for an Alaska Specific Roadless Rule, as published on the Alaska Roadless Rulemaking site in mid-October. We ask that you remove any and all inclusion of the Chugach in this process, because we support the existing Roadless Rule on Chugach National Forest lands, and the rulemaking process led many of us to believe that a state-specific rule wouldn't incorporate any changes for the Chugach National Forest.

Today, the Roadless Rule maintains and supports multiple uses on national forest lands in Southcentral Alaska, and removing it could do damage to numerous interests and industries that rely on an intact forest while only benefiting a select few corporate interests. Currently the Roadless Rule protects 5.4 million acres of the Chugach from logging road construction and large-scale commercial logging projects. It should stay that way, and not be subject to change with merely 45 days of notice from the Regional Forester, and a minimally-defined requirement that some form of public comment is conducted.

The recently finalized Chugach Forest Plan was correct to find that a commercial timber sale program doesn't make sense for the Forest, due to a variety of factors, including current regulations, recent spruce beetle kills, the lack of infrastructure or nearby sawmills, and largely

inaccessible terrain<sup>2</sup>. We are concerned that the most accessible forested terrain for commercial clear-cut logging would coincide with the places that our members or customers access for personal recreation, hunting, fishing, or sustainable tourism activities. These uses could be greatly impacted by road construction and associated commercial logging, and in many areas [ndash] such as lands located in the Kenai Mountains-Turnagain Arm National Heritage Area [ndash] the management objective [ldquo]to preserve, protect, and promote the cultural, natural, historic, scenic and recreational resources of the area<sup>3</sup>[rdquo] shouldn[rsquo]t be compromised.

We also understand that Roadless doesn[rsquo]t mean no roads, and are confident that the exemption process [ndash] which, to date, has been used to permit renewable energy projects, power transmission lines, mines, and other community needed projects, to name a few<sup>4</sup> [ndash] will

continue to work to suit the needs of Alaskans in the region, while simultaneously safeguarding the wild landscapes that our members or customers utilize on a regular basis. It is clear that the exemption process isn[rsquo]t too burdensome. Our understanding is that, to date, all requested exemptions have been granted by the Forest Service in Alaska. In that way, the system in place today is working, and doesn[rsquo]t need changes to meet our community needs or interests.

Moving on to our process concerns, it[rsquo]s crystal clear [ndash] from the State of Alaska[rsquo]s petition<sup>5</sup> through numerous Forest Service documents produced during or after scoping [ndash] that the primary, if not only driver for this rulemaking process is to benefit commercial interests within the Tongass National Forest. The State of Alaska[rsquo]s petition makes no reference to the Chugach National Forest, and the scoping notice kickstarting the Alaska Roadless Rulemaking process in the Federal Register only mentioned the Chugach twice, to specifically highlight that the Roadless Rule would still apply to the Chugach National Forest<sup>6</sup>. Only those who asked questions in person at the Anchorage hearing were likely to be tipped off that language related to the Chugach National Forest may even be considered, and even there, it wasn[rsquo]t clear that far reaching language like the inclusion in the Notice of Proposed Rulemaking<sup>7</sup> released on October Federal Register was a likely possibility. In this way, including the Chugach in any form is on shaky ground, in that the public wasn[rsquo]t meaningfully given notice to be made aware of the inclusion of the Chugach in this process.

Therefore, on both policy and process fronts, we feel the only course of action for this rulemaking process is the straight up removal of the Chugach National Forest from the Alaska Roadless Rulemaking process.

2 Chugach National Forest Land Management Plan: FEIS [ndash] Volume 1, page 35

3 Kenai Mountains Turnagain Arm NHA Management Plan [ndash] page 9

4 USDA [ndash] Alaska Roadless Rulemaking Q&A, April 2019 - [https://www.fs.usda.gov/Internet/FSE\\_DOCUMENTS/fseprd595057.pdf](https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fseprd595057.pdf)

5 State of Alaska Petition for USDA Rulemaking to Exempt the Tongass National Forest from Application of the Roadless Rule and Other Action (Jan. 19, 2018)

6 Forest Service, Notice of Intent to Prepare EIS, 83 Fed. Reg. Page 44,252

7 Forest Service, Notice of Proposed Rulemaking, 84 Fed. Reg. Pages 55,528-55,529

As a closing note, we want to make it clear that many - if not all - groups on this letter also share deep concerns regarding the impacts of this rulemaking process on the Tongass National Forest. While this letter is just focused on the troubling Chugach National Forest provisions, it doesn't mean that we accept or are neutral on the conclusions of the agency in identifying alternative 6 - a full exemption of the Tongass National Forest - as the preferred alternative. In fact, many of us have submitted other comments on the Tongass portion of this process.

Thank you for considering this comment,

Dan Oberlatz

Owner

Alaska Alpine Adventurers

Peter Denmark

President

Alaska Sea Kayakers

Carol Hoover

Executive Director

Eyak Preservation Council

Nick D'Alessio

Owner/Guide

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Andy Moderow

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Janeen Hutchins

General Manager

Alaska Wildland Adventures

Marybeth Holleman Board of Directors Prince William Sound Stewardship Foundation

[Position]

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