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First name: Robert

Last name: Venables

Organization:

Title:

Comments: Roadless Rule comments - Venables

Please find attached my comments regarding the Alaska Specific Roadless Rule.

Thank you.

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

Alaska Roadless Rule

USDA Forest Service, Alaska Region

Ecosystem Planning and Budget Staff

P.O. Box 21628

Juneau, Alaska 99802-1628

As a citizen of Southeast Alaska surrounded by the Tongass National Forest, it is important to me to see the forest managed in a way that benefits communities and commerce in the region. I believe it is in the nation's best interest to have healthy communities and a quality environment. Unfortunately, inflexible "cookie-cutter" policies, such as the Roadless Rule too often have negative impacts, even if well-intentioned.

I was a member of the Citizens Advisory Committee (CAC) and worked with my colleagues to develop exceptions to the Roadless Rule that should be included in each alternative (2 - 5) in the DEIS (other than the "No Action" alternative). The list of exceptions serves as an integral part of each of the four options. While the land base options vary, the Committee members unanimously agreed to include the Roadless Area exceptions for analysis in all of the options put forward by the Committee.

However, the CAC exception language that the State provided to the USDA along with the exceptions listed was not included in any alternative. (See Appendix G, alternatives 2 - 5). Each road exception is preceded by the words "if the Responsible Official determines that ... a road is needed," thereby leaving it up to the Forest Service to make the determination about whether a road is needed without any criteria for doing so. This is the existing situation already covered by the "No Action" alternative. It is exactly the situation to which the CAC recommendations were intended to provide regulatory certainty and predictability. Accordingly, the relief from the Roadless Rule access prohibitions that the CAC exceptions listed were intended to provide for communities, renewable energy, and mining is only provided by the Total Exemption alternative.

If ever there is to be restored trust in government and a DEIS/EIS product that is responsive to the input provided by citizens AND the State of Alaska, please include the Citizens Advisory Committee's exception language, as written, in alternatives 2-5 (or at least some of the alternatives).

Thank you for the opportunity to comment.

Robert Venables  
Haines, AK 99827

[Position]