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Comments: NOLS public comments

NOLS Alaska

Palmer, AK 99645

December 17th, 2019

RE: Special Areas; Roadless Area Conservation; National Forest System Lands in Alaska

Dear Forest Service Land Managers,

Thank you for hearing NOLS public comments on the Draft Environmental Impact Statement (EIS) on the proposed rulemaking impacting the Tongass and Chugach National Forests. NOLS recognizes and appreciates the hard work of the Forest Service (F.S.) to serve the diverse needs of Alaska residents while maintaining high environmental protection for the resources its charged to manage. NOLS values the long-standing positive relationship that we have maintained with the Forest Service and look forward to that continuing into the future.

NOLS is a non-profit that offers services in expeditions, risk management, wilderness medicine, and custom education. In fiscal year 2018 we educated approximately 29,000 students globally with over 17,000 user days in Alaska. The Tongass and Chugach have functioned as important operating areas for the school where our students learn outdoor skills, leave no trace ethics, leadership, and environmental studies. Countless times these individuals also report a strong connection to place and positive life transformation.

The NOLS business model, like that of many guides and outfitters, is linked to providing an authentic wilderness experience. Many of our clientele inhabit places where it is impossible to escape the sounds, smells and noises of an urban environment which factors into their enrollment decision and expectations to see abundant wildlife and tracks of lands without significant human impact. Further, in an era marred by climate change, NOLS places high value on intact ecosystems for both their intrinsic value and the vast amount of ecosystem services they provide. NOLS maintains reservations that changing or removing outright the Roadless Rule as it applies to the Chugach and Tongass National Forests prioritizes the normative values for state control over the numerous benefits in conservation, outdoor recreation and tourism, and the long-term viability of these pristine Alaska landscapes, as is presently enjoyed by current statute.

First, NOLS is concerned with the ambiguity presented in the administrative correction and modification of inventoried roadless areas (IRAs) on the Chugach National Forest, and we request significant modification and or the complete removal of this provision. NOLS is less concerned for the proposed remedy for clerical errors, mapping errors, etc, as this could increase efficiency and further enable the Forest Service to best manage the National Forest. However, there is considerable administrative discretion granted to the Regional Forester granting him/her/them the ability to make administrative modifications to the classifications and boundaries of IRAS in the Chugach, as written.

The DEIS described the rationale as to, "align with other states that have state-specific roadless rules (Idaho and Colorado)". Regardless of perceived similarity to the practice of other states, this section as written could result in considerable environmental impact in the Chugach, at the discretion of the regional forester. The DEIS has failed thus far to be properly analyze those impacts. NOLS values the bottom-up management style of the Forest

Service, and believes this managerial method yields positive outcomes, but neither Colorado nor Idaho granted complete administrative modification discretion to their Regional Foresters without seriously considering its impacts as outlined in the National Environmental Policy Act. Likewise, Idaho granted deference to the Chief of the Forest Service rather than the Regional Forester (36 C.F.R. [sect]294.27).

Second, NOLS opposes the preferred alternative as written in the DEIS, as it opens up the Tongass to significantly more development, industry, and road development. The preferred alternative completely removes 9.2 million acres of IRAs from consideration in the Tongass. Thus, the existing land management plan is meant to be the primary tool for Forest Management and conservation; however, the preferred action opens 185,000 acres to industry immediately. This vastly exceeds the efforts of other states. For instance, Idaho created new designations based on different management "themes": Primitive, Wild-Land Recreation, Special Areas of Historic or Tribal Significance and so forth (36 C.F.R. [sect] 294.23), instead of simply removing the rule from having any application. Thus, they did not violate the substantial intent of the Roadless Area Conservation Final Rule; instead, they created an Idaho specific rule that modified how forests were categorized to better serve the State's unique needs.

NOLS hopes that the Land Managers at the Forest Service seriously reconsider moving forward with the proposed rulemaking as written. The action needlessly removes protections that provides significant long-term benefits for the economy, the natural environment, and the people of Alaska. As written, the preferred action vastly exceeds the efforts of other states and violates the original intention of the Roadless Area Conservation Rule. NOLS interests would be better served by continuing with the status quo, or engaging in various categories of IRAs that are more nuanced than a complete removal. Thank you for your serious consideration of these comments.

Sincerely,

Chris Brauneis

NOLS Alaska Program Director

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JONATHAN WILLIAMS "J.W."

ENVIRONMENTAL STEWARDSHIP COORDINATOR

HE/HIM/HIS

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