



December 16, 2019

Alaska Roadless Rule
USDA Forest Service, Alaska Region
Ecosystem Planning and Budget Staff
P.O. Box 21628
Juneau, Alaska 99802-1628

Southeast Conference is the State's regional development organization for Southeast Alaska and the U.S. EDA-designated Economic Development District for the region. Our membership is comprised of both government and business leaders who support a mission of healthy communities, strong economies and a quality environment in southeast Alaska.

We have been disappointed to see the lack of clarity in communicating the impacts of the Alaska Specific Roadless Rule by the Forest Service. As this process continues, there is a need to better articulate the facts so that USFS statements like, "Inventoried roadless areas covered by the 2001 Roadless Rule comprise 9.2 million acres (55 percent) of the Tongass National Forest" are not interpreted and echoed as such headlines across the country: "the rule would open all 9.2 million acres of roadless area in the nearly 17-million-acre Tongass to potential logging."

Also, Southeast Conference was a member of the Citizens Advisory Committee (CAC) and worked 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.

In order to provide a more accurate and comprehensive range of alternatives within the DEIS, Southeast Conference urges the Forest Service to include the Citizens Advisory Committee's exception language, as written, in alternatives 2-5 and to correspondingly make increased efforts to more accurately convey to the public and media the impacts of the Alaska Specific Roadless Rule.

Sincerely,

Executive Director
Southeast Conference