

December 16, 2019

USDA Forest Service  
Attn: Alaska Roadless Rule  
P.O. Box 21628  
Juneau, AK 99802  
Submitted via email to: [akroadless@fs.fed.us](mailto:akroadless@fs.fed.us)  
Submitted via public participation portal to:

RE: Proposed Rule, Special Areas, Roadless Area Conservation, National Forest Systems Land in Alaska (84 Fed. Reg. 201, October 17, 2019).

Dear Secretary Perdue:

As director of the Rural Voices for Conservation Coalition (RVCC), and on behalf of several of our Leadership Team members, I offer the Forest Service the following comments on the agency's proposal to exempt National Forest System Lands in Alaska from the Roadless Rule. We appreciate this opportunity to comment on the proposal.

RVCC promotes healthy landscapes and vibrant rural communities throughout the American West. Our participants come from all western states and include diverse representatives from regional and national organizations; community-based natural resource advocates; conservationists; business owners; contractors; elected county officials; and landowners, among others. We believe that the health of rural communities and landscapes are interdependent – policy solutions need not sacrifice one to advance the other. Our work centers on promoting healthy ecosystems, social equity and economic prosperity.

Since our inception in 2001, RVCC has been deeply committed to collaborative, solution-oriented approaches to public land management - approaches that move the public beyond bitter disputes over how natural resources should be managed, toward mutually beneficial outcomes. It is with these values in mind that we offer our comments on the proposed exemption.

The proposal to repeal the Roadless Rule in Alaska ignores community driven, collaboratively developed solutions; promotes approaches to rural economic development that don't match current economic trends; and utilizes time and resources that would be better spent on implementing projects on the ground that provide ecological and community benefit. Beyond the local context and implications, we are also concerned that the decision to disregard previously developed collaborative solutions signals a worrying trend of the Forest Service moving away from a commitment to collaborative approaches to national forest management.

### ***Community Driven, Collaboratively Developed Solutions***

The Tongass National Forest has been a contested landscape for decades, prompting sharp disagreement between various interested parties over how natural resources should be managed and used. Over the last ten years, however, there has been an impressive shift toward common ground approaches that promise mutually beneficial solutions to those willing collaborate, and balance ecological, economic and social interests. Community leaders, industry representatives, tribal governments, ANCSA Corporations, environmental groups, and state and federal agencies have invested substantial time, money, and social capital developing new and creative solutions to longstanding problems.

In 2015 the Tongass Advisory Committee (TAC), a 15-member Secretarially appointed Federal Advisory Committee with diverse representation, provided consensus recommendations for an amendment to the Tongass Land Management Plan. Committee members took personal and professional risks, were forward-looking, and spent considerable time analyzing multiple options. Importantly, the TAC recommendations looked beyond planning, and included detailed recommendations on project implementation strategies.

In 2018, another multi-stakeholder collaborative effort, the State of Alaska's Roadless Rule Citizen's Advisory Committee, provided recommendations and durable solutions to the Governor and State Forester, including a range of reasonable alternatives for the implementing the Roadless Rule in Alaska.

Tribal governments were asked to consult before the start of this formal planning process, as befits tribal government-to-government status in discussions with federal agencies. Participating tribal governments asked for additional time during the consultation process, requests that were denied. Tribes then dedicated considerable organizational resources to review impacts and opportunities presented by each of the alternatives being considered by the Forest Service. However, these comments, along with the recommendations of the Governor's advisory committee, appear to have had little impact on the selected alternative.

Unfortunately, the agency's proposal walks away from these bipartisan, collaboratively developed solutions and ignores tribal interests. It also runs counter to the Forest Service's commitment to shared stewardship, which recognizes the need to work more closely (not less) with state, tribal *and* community partners to prioritize work in the right places at the right scale. In fact, the preferred alternative runs counter to the Forest Service's own vision for the region, which calls for a more comprehensive approach to local economic development and land management<sup>1</sup>. We are concerned that the proposal undermines the agency's credibility and ability to work in partnership, through shared stewardship, and with communities.

### ***Rural Economic Development***

RVCC has always recognized the inextricable link between the health of the land and the well-being of rural communities. There are few landscapes where this integral connection is truer than in Southeast Alaska. While timber historically played an important role in the economy of the region, the economic landscape has fundamentally changed in the past 25 years; in most places, timber production no longer drives community well-being<sup>2</sup>. Communities, tribes, businesses, local governments and partners have been calling for investments in the activities that support the economic drivers that have the greatest potential for growth in the Tongass— fishing, recreation, and tourism. The preferred alternative fails to recognize these diversified and growing economic drivers in the region, as well as the shifting social landscape. The diverse and sustained pushback on the proposal makes clear that community interests, and their vision for the future, have changed.

### ***Costs and Trade-offs***

By its own admission, the Forest Service has limited budgets, staff capacity, and resources to accomplish its mission – one of the driving reasons to lean more heavily on partners to get work done through shared stewardship. The agency regularly relies on partners to fill in gaps, such as

---

<sup>1</sup> Tongass Land Management Plan, Record of Decision, December 9, 2016

<sup>2</sup> Southeast Alaska by the Numbers, 2019.

implementing restoration projects across the Tongass. Yet the same partners the Forest Service relies on to achieve its mission are some of the ones it is now choosing to disregard in this proposal.

The proposal has generated significant conflict, rather than goodwill, and ensures that the Forest Service, its partners and Southeast communities will spend years fighting old battles, likely mired in litigation. The agency will end up wasting valuable taxpayer time and resources – resources that could be better spent on activities that improve the health of the land and well-being of communities. As a partner of the Forest Service, we are concerned about the long-term impact to the agency’s credibility and standing in the region. Shared stewardship requires trusting relationships and shared investments, and this proposal endangers the success of both.

***Collaboration and National Forest Management***

The preferred alternative for the Alaska Roadless Rule, like the recent proposal to “streamline” regulations governing the National Environmental Policy Act planning process, indicates a troubling trend in limiting public input, and devaluing locally led, collaboratively developed solutions to complex land management decisions.

The proposal to repeal the Roadless Rule in Alaska missed an outstanding opportunity to utilize existing collaborative solutions – the roadmap was there. The Forest Service and its numerous partners have made substantial progress in working together, finding common ground and getting work done both on the Tongass, and nationally. We sincerely hope that reverting to proposals that disregard collaboratively developed, mutually beneficial solutions does not become a common trend – whether in the final decision making, or during project planning.

We urge the Forest Service to reconsider its approach, and instead support an Alaskan version of the Roadless Rule that empowers to communities to play a significant role in local applications of the Rule.

Sincerely,



Karen Hardigg  
RVCC Director

Ecosystem Workforce Program  
The Forest Stewards Guild  
Heart of the Rockies  
Mt. Adams Resource Stewards  
Salmon Valley Stewardship

SEAWEAD  
Siuslaw Institute  
Sustainable Northwest  
Wallowa Resources  
Watershed Research & Training Center