

Alaska Roadless Rule Citizen Advisory Committee

Summary of Feedback on the Alaska Roadless Rule Draft Environmental Impact Statement

Over the course of two weeks, the Alaska Roadless Rule Citizen Advisory Committee (CAC) members shared high-level feedback on the Alaska-specific Roadless Rule Draft Environmental Impact Statement (DEIS) in a series of short one-on-one interviews with Meridian Institute. CAC members were requested to provide input specifically on how the Committee’s recommendations were reflected (or not) in the DEIS, and what advice they had for the State of Alaska in its Cooperating Agency Status with the U.S. Forest Service (USFS).

This document reflects a summary of comments received from Committee members. It does **not** represent consensus among members nor agreement about the options presented in the DEIS or the preferred alternative. It is intended to provide input to the State of Alaska, and does not exclude Committee members from providing comments as private citizens or on behalf of their organizations or industries directly to the USFS. Please find the list of Committee members in Appendix A, and a list of interview questions in Appendix B.

DEIS Preferred Alternative

When asked about the preferred alternative proposed in the DEIS, Committee members were split in their responses. 50 percent of members polled expressed opposition to the preferred alternative, sharing that they would preferred an alternative that represented something “in the middle,” rather than one of the “bookends” of no action or a full exemption. The other half of members supported the preferred alternative of a full exemption, because they believed it represented the only alternative that would allow for development for multiple uses through local decision-making authority.

Of those that expressed opposition to the preferred alternative, they cited the following reasons:

- **Ongoing divisiveness.** Because the preferred alternative is the ‘most extreme’ of possible options, Committee members expressed concern that it ensures divisiveness and limits space for compromise in Southeast Alaskan land management. Some members discussed frustration that the CAC’s charge to identify middle-ground alternatives that fell between a full exemption or a no-action alternative were not reflected in the preferred alternative.
- **Durability.** One of the Committee’s original guiding principles for developing recommendations for a state-specific Roadless Rule was to prioritize a durable solution that could limit future legal challenges regarding management in the Tongass. Several Committee members expressed concern that the preferred alternative, should it be implemented, would be litigated and prevent future projects in the region for years to come. Some expressed uncertainty that the Rule would reach the implementation stage given likely legal challenges.

- **Public perception.** A preferred alternative that abolishes the Roadless Rule in the Tongass has turned the rulemaking process into national headline news. With this level of media attention, some members expressed that environmental groups and other advocates have now launched – and will continue to launch – large, well-funded, well-coordinated campaigns to litigate the decision and turn public perception against ongoing cooperation, development, and joint land management in the Tongass. Even some members that were supportive of the full exemption agreed that public perception and communication is a significant issue, particularly with regard to a misunderstanding of the way that the Tongass Land & Resource Management Plan is implemented.

Committee members expressing their approval for the preferred alternative of a full exemption shared a variety of reasons, including:

- **Development.** Some Committee members felt that a full exemption is the only alternative in the DEIS that grants adequate development allowances for Southeast Alaskan needs, particularly to ensure renewable energy development, road building, and mining. They recognized that the current Roadless Rule has exceptions for these uses, but without changes to how these exceptions are administered – which is currently left to subjective interpretation, and a complicated, expensive, slow-moving and ineffective process – they are insufficient.
- **Exceptions.** None of the options included the CAC’s exceptions language, which would have guaranteed an easier, more streamlined process for granting permission for a range of resource uses, including mining, cultural timber usage, roadbuilding, and renewable energy development. Without those exceptions, some Committee members could not support anything less than a full exemption, stating that the full exemption was the only alternative that would address the needs outlined in these exceptions.
- **Local authority.** Several Committee members expressed support for bringing increased authority back to the local level, rather than deferring management decisions to a Rule that supersedes the Forest Plan.
- **Support for the State’s position.** A few Committee members expressed alignment with the State’s position, which is a full exemption, expressing that this position best supports the future of communities and the health and wellbeing of the citizens of Southeast Alaska.

CAC Recommendations in the DEIS

The CAC’s final recommendations report consisted of three elements:

- Recommendations for how to amend Roadless Area Characteristics to be Alaska-specific (these represented consensus from all members);
- Exceptions language for consideration for incorporation in any option presented in the DEIS for specific resource uses (these represented consensus from all members); and
- Four options with specific acreage and geographic considerations to be analyzed as potential areas to remove and retain as Roadless in the Tongass.

Many Committee members felt that the CAC’s recommendations were not carefully considered nor reflected in the DEIS, particularly the exceptions language that the Committee had agreed should be applied to any option or alternative put forward. This was the primary point of criticism from most Committee members, whether

supportive of the preferred alternative or not. These exceptions considered specific resource uses that the CAC saw as critical for community livelihoods and socioeconomic wellbeing in the Tongass. Several members felt the omission of these exceptions made all of the DEIS alternatives less viable as long-term, durable solutions that reflect community needs.

Other members raised concerns that the USFS did not alter the definition of Roadless Areas or consider implementing an Alaska-specific definition of Roadless Areas, even though Roadless Areas in Alaska have specific, unique characteristics that set them apart from Roadless Areas in the lower 48.

Despite these omissions, some members felt that the geographic component of alternatives 2-5 (i.e., how many acres to add or remove from Roadless areas, and in what regions) had considered and incorporated the Committee's four options, specifically because of the consideration they granted Tongass 77 (T77) and The Nature Conservancy/Audubon Conservation Areas and community priority areas around specific municipalities.

Other Comments for the State

Committee members shared additional comments for the State's consideration in its Cooperating Agency status with the USFS, including:

- **Look to the middle.** Some Committee members urged the State to look for a middle-ground alternative – even slightly to the left of a full exemption – to avoid bitter future litigation in the courts and provide greater stability and durability to projects on the Tongass in the coming years. Some requested that the CAC be reconvened to help identify such a middle ground option.
- **Public comments.** A few Committee members asked that the State more seriously consider the weight of public comments in the USFS process and in USFS and State consultative meetings, which have overwhelmingly represented opposition to a full exemption and the preferred alternative.
- **Cooperating Agency status.** A few Committee members flagged concerns regarding the incorporation of Cooperating Agencies input, particularly tribal entities who had Cooperating Agency status with the USFS. They felt that this input was not equally or fairly reflected in the DEIS compared to the State's input.
- **Improved public communication.** Several Committee members suggested that a major shortcoming throughout the Rulemaking process – both from the State and the USFS – has been poor public communication leading to media and organizational campaigns that do not accurately reflect the actual potential changes to the Tongass under a full exemption. Specifically, they expressed concern that public perception was that a full exemption would open all Roadless acres for timber harvest, when in fact only a small portion of those acres will be eligible for harvest under the existing Forest Plan. This issue was brought up by members regardless of whether they were supportive of the full exemption alternative or not. They recommended improved public communications to counteract national headlines and negative public sentiment and focusing on the need for a greater level of local input and control, rather than framing a conversation around timber.
- **Validity of the Committee.** Several Committee members raised concerns that the CAC process was not useful for the State or could not be fully considered as part of the State's Cooperating Agency status because of the State's position to push for a full exemption, so they felt their comments were not important either way. The question was also raised regarding the utility/validity of the

Committee given the change in gubernatorial administration, and one member requested that the State request guidance from Governor Dunleavy regarding the best format and usage of the CAC's input.

- **A Forest in transition.** A few Committee members wished to remind the State to keep in mind the context of the transition to young growth forest management. They noted that any changes to management, particularly changes that have implications for timber harvest, must consider the implications for young growth management. Specifically, one member urged the State to consider the backlog of forest management activities on existing young growth acres, and the future management needs represented by continued old growth harvest.

Appendix A. Citizen Advisory Committee Members

* denotes those who did *not* provide input for this document.

Trey Acteson

Southeast Alaska Power Agency

Bert Burkhart

Alaska Forest Association

Nicole Grewe*

Ex Officio Member

US Forest Service, Region 10

Brian Holst*

Juneau Economic Development Council

Andy Hughes

Alaska Department of Transportation & Public Facilities (retired)

Michael Kampnich

The Nature Conservancy

Jaeleen Kookesh

Sealaska Corporation

Chris Maisch

Alaska Division of Forestry

Eric Nichols

Alcan Forest Products

Andrew Thoms

Sitka Conservation Society

Jan Trigg

Coeur Alaska Kensington Mine

Robert Venables

Southeast Conference

Mark Vinsel

United Fishermen of Alaska

Ralph Wolfe

Central Council Tlingit & Haida Indian Tribes of Alaska

Appendix B. Interview Questions

1. Have you had a chance to review any information about the DEIS? Regardless of level of detail you were able to digest, what are your general reactions to what is included in the DEIS and what was chosen as the preferred alternative?
2. In looking at the crosswalk document and/or DEIS, in what ways were you satisfied with how the recommendations appeared, and what areas illustrated important omissions or misinterpretations?
3. Do you have any ideas, concerns, or suggestions regarding the development of the FEIS and into implementation?
4. Please share any additional information that you would like the State to keep in mind in its Cooperating Agency role with the US Forest Service in this process.