



CITY AND BOROUGH OF WRANGELL

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October 15, 2018

Mr. Ken Tu, Interdisciplinary Team Leader
Alaska Roadless Rule
USDA Forest Service, Alaska Region
Ecosystem Planning and Budget Staff
P.O. Box 21628
Juneau, Alaska 99802-1628.

Re: Scoping comments on proposed rulemaking for Alaska-specific Roadless Rule

Dear Mr. Tu.

The City and Borough of Wrangell offer the following initial comments:

- 1) The City and Borough of Wrangell supports the State's efforts to revisit the Roadless Rule to review its applicability and economic impacts to the Southeast Alaska communities.
- 2) The 2001 Roadless Rule was using out of date inventory analysis when it went into effect. Basically there are numerous roaded areas designated as roadless and timber LUD areas that should be considered for potential economic opportunity for communities. The inventoried roadless areas needs to be updated to accurate information, for current and decommissioned roads, roads to resources, and to community infrastructure such as drinking water sources or potential hydro.
- 3) The Borough is concerned that if the Roadless Rule should be exempted or modified for Alaska, the recently adopted Tongass Management Plan would have to be rewritten which then adds another multi-year process prior to seeing any economic benefit or resulting action enforcing the change. Accordingly, changes to the 2001 Roadless Rule made in Alaska-specific rulemaking should automatically amend the 2016 Tongass Plan just as the reinstatement of the 2001 Roadless Rule automatically amended the 2008 Amended Tongass Land Management Plan.

Thank you for this opportunity to comment.

Sincerely,

Lisa Von Barga
Borough Manager