



THE STATE
of ALASKA

GOVERNOR MICHAEL J. DUNLEAVY

Department of Natural Resources

OFFICE OF PROJECT MANAGEMENT & PERMITTING

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March 1, 2019

Ken Tu
1617 Cole Boulevard, Building 17
Lakewood, CO 80401
Submitted via email to kktu@fs.fed.us

Re: State of Alaska cooperating agency comments in response to Alaska Roadless Rule Preliminary Draft Environmental Impact Statement.

Dear Mr. ~~Tu~~: *Ken*,

The State of Alaska (State), consistent with our Memorandum of Understanding with the U.S. Department of Agriculture (USDA) Forest Service, reviewed the Rulemaking for Alaska Roadless Areas Preliminary Draft Environmental Impact Statement (PDEIS; February 2019).

Specific comments and proposed edits are provided in the enclosed document for your consideration. The State finds the PDEIS deficient in the following areas:

- 1) The Purpose and Need statement in the PDEIS is truncated compared to the published NOI; omitting important context regarding the State's position related to management of roadless areas on the Tongass National Forest. 
- 2) The PDEIS fails to
 - a. adopt by reference or fully consider the 2003 Record of Decision, Tongass Exemption Rule and the reasoning the USDA Forest Service last relied on for determining adequate management of roadless areas in the Tongass National Forest; 
 - b. adequately evaluate and describe in a comparative manner the potential changes to the availability of old growth resources for harvest from the Tongass National Forest; 
 - c. thoroughly consider the contributions to roadless area values on the Tongass National Forest from Conservation System Units established by Congress; and 
 - d. discuss the Roadless Area Values presented in the State's scoping comments, based on input from the Citizen Advisory Committee and the collaborative public process facilitated by the State. 
- 3) The PDEIS relies on a qualitative comparison of potential impacts from the range of alternatives without properly defining the qualitative categories (e.g. slightly, very slightly, less, more, substantially, etc.) or the criteria used to evaluate activities and assign them to the various qualitative categories. This suggests that the metrics used to

evaluate the range of alternatives and compare their relative impacts to the human environment is not based on an empirical method, but rather personal preference or opinion. 

- 4) The PDEIS is written in a manner that consistently understates
 - a. the regional application and impact of the current 2001 Roadless Rule, or alternatives to it proposed under the Alaska Roadless Rule, in Southeast Alaska; often narrowing its focus to just a few rural communities;
 - b. the importance and potential of road projects to contribute to developing mineral and renewable energy sources, such as geothermal, wind, hydropower, and tidal power, in Southeast Alaska; and
 - c. the economic contributions of a regional transportation system. 

Thank you for the opportunity to review the PDEIS. I look forward to working with you to resolve the items summarized above prior to the USDA, Forest Service publishing the Rulemaking for Alaska Roadless Areas Draft Environmental Impact Statement.

Sincerely,



Kyle Moselle
Associate Director

Enclosure: State of Alaska comments and proposed edits to the PDEIS

Email cc: Chris Maisch, State Forester