

File Code: 5400 (8562398)

Date: NOV 14 2019

Mr. Josh Hicks
Roadless Defense Campaign Manager
The Wilderness Society
1660 Wynkoop Street, Suite 850
Denver, Colorado 80202

Dear Mr. Hicks:

Thank you for your letter of July 15, 2019, along with your colleagues, to U.S. Department of Agriculture Secretary Sonny Perdue concerning the Alaska state-specific roadless rulemaking process currently being conducted by the Forest Service. Secretary Perdue has asked the Forest Service to respond to you. I apologize for the delayed response.

I share your appreciation of the significant ways residents and visitors alike connect with the Tongass National Forest.

We continue to expect the publication of the Draft Environmental Impact Statement this fall, with a 60-day public comment period, will meet the spirit and letter of applicable regulations governing public engagement. The Forest Service will again host community meetings across Alaska and in Washington, D.C., to provide information and answer questions. Written comments will be accepted by mail, email and through online portals. This approach to rulemaking aims to build and maintain the broad coalition of support necessary to achieve a long-term, durable approach to roadless area management that accommodates the unique biological, social, and economic situation in and around the Tongass National Forest. I encourage you to continue to participate in this process by providing your comments.

The Forest Service will continue to contribute to the resilience of forests and communities in Alaska and across the country by investing in sound forest stewardship in partnership with States, tribes, local governments and stakeholders. In meeting these needs, the Forest Service will uphold its mission to sustain the health, diversity and productivity of our nation's forests and grasslands to meet the needs of future and present generations.

Thank you for your interest in the management of the Tongass National Forest. I appreciate your participation in this process. We encourage you to share this response with your colleagues.

Sincerely,


VICTORIA CHRISTIANSEN
Chief



SM.OSEC.AGSEC.OES

From: Josh Hicks <josh_hicks@tw.s.org>
Sent: Monday, July 15, 2019 6:16 PM
To: SM.OSEC.AGSEC.OES
Cc: French, Chris -FS; Dawe, Christine -FS
Subject: Request for 120-day Comment Period for Alaska Roadless Rulemaking DEIS
Attachments: Alaska roadless rule DEIS extension 7-15-19.pdf

Dear Honorable Secretary Perdue:

On behalf of several organizations, I respectfully submit the attached letter requesting at least a 120-day public comment period for the forthcoming draft environmental impact statement (DEIS) on a proposed state-specific rule for management of inventoried roadless areas on the Tongass National Forest. We also request that the Forest Service provide additional public hearings during the DEIS review and commenting process. Thank you for considering this request.

With Regards,

Joshua Hicks
Roadless Defense Campaign Manager
The Wilderness Society | The Wilderness Society Action Fund
ph 303-650-1148 | cell 720-984-8544



July 15, 2019

Honorable Sonny Perdue
Secretary of Agriculture
U.S. Department of Agriculture
1400 Independence Ave., S.W.
Washington, DC 20250

Re: Request for 120-day Comment Period for Alaska Roadless Rulemaking DEIS

Dear Secretary Perdue:

The undersigned organizations request at least a 120-day public comment period for the forthcoming draft environmental impact statement (DEIS) on a proposed state-specific rule for management of inventoried roadless areas on the Tongass National Forest.

The Tongass National Forest is regionally cherished and globally renowned for its extraordinary temperate rainforests, stunning scenery, abundant salmon populations, and superlative wildlands. We strongly support fully protecting all of the 9.3 million acres of inventoried Tongass roadless areas as provided by the national Roadless Area Conservation Rule of 2001. During the recent scoping process for the Alaska roadless rulemaking, members of the public expressed overwhelming opposition to removing protection of the Tongass roadless areas, and the scientific community has repeatedly supported including the Tongass in the nation's roadless area conservation commitments.

We are deeply concerned that the public will not have an adequate opportunity to examine and comment on the DEIS if the Forest Service follows through on its plan to publish the DEIS in mid-summer and allow just 60 days for public comment. Additional time is needed to review, analyze, and inform the public about the Forest Service's proposed changes to the Roadless Rule. The proposed rule could drastically impact some of the nation's greatest forests and wildlands, subsistence values, indigenous communities, and the thriving recreation and tourism economy. The Forest Service has provided 120-day comment periods for forest planning processes covering much less national forest land than the Tongass roadless areas, such as the DEIS for the Flathead National Forest plan revision in Montana. In Alaska, the U.S. Army Corps of Engineers recently extended to 120 days the comment period on the DEIS for the Pebble Mine.

Providing more time to comment on the DEIS is especially important for many critical stakeholders in southeast Alaska who are very busy in late summer and early fall and will likely have little time to respond to a proposal that may profoundly impact their livelihoods. This is especially a concern for those who make a living in the tourism and fishing industries, which employ nearly one-quarter of all southeast Alaska residents. Summer and fall are when these workers typically make most of their income, and they often do not have adequate spare time to participate in meetings or even have access to phone or internet service. Similarly, the Organized Village of Kake has requested a 120-day public comment period because "the public review and comment period will fall in the middle of the busiest time of year for Tribal citizens involved in traditional gathering, hunting, and fishing activities." Therefore, it would be

unrealistic and unfair to expect these key stakeholders to be able to engage meaningfully in a 60-day DEIS review and public commenting process in late summer and early fall as currently planned.

Given the keen local, regional, and long-standing national and intergovernmental interests in the Roadless Rule and the Tongass National Forest, we strongly urge the Forest Service to conduct additional public meetings both inside and outside of Alaska. The Forest Service should record oral comments during all public meetings and make those comments available to the public via a web-based portal. During the scoping process, the agency refused to accept oral comments and held only one meeting in the lower 48 states – in Washington DC. The Forest Service should also hold meetings in major population centers like Seattle, Los Angeles, and Minneapolis where public interest is strongest. In selecting public meeting locations, the agency should consult with interested members of Congress, tourism associations, and other stakeholders.

Accordingly, we respectfully request that the public comment period be extended to a minimum of 120 days and that the Forest Service provide additional public hearings during the DEIS review and commenting process.

Sincerely,

Southeast Alaska Conservation Council
Alaska Wilderness League
Audubon – Alaska
Salmon State
Women's Earth and Climate Action Network (WECAN)
The Conservation Alliance
The Wilderness Society
Pew Charitable Trusts
Geos Institute
Earthjustice
Center for Biological Diversity
Defenders of Wildlife

Cc: Chris French, deputy chief, USDA Forest Service