THE STATE of ALASKA
GOVERNOR MIKE DUNLEAVY

Department of Natural Resources
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April 30, 2020

RECEIVED
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Regional Forester's Office

USDA - USFS Regional Office, Alaska Region
ATTN: Regional Forester, Dave Schmid
P.O. Box 21628
Juneau, AK 99802-1628

USDA - USFS Tongass National Forest
ATTN: Forest Supervisor, Earl Stewart
648 Mission Street
Ketchikan, AK 99901-6591
Alaska Roadless Rule

USDA – USFS Regional Office, Rocky Mountain Region
ATTN: Ken Tu (Alaska Roadless Rule Team Lead)
1617 Cole Blvd. Building 17
Lakewood, CO 80401

RE: Alaska Roadless Rulemaking

Dear Mr. Schmid, Mr. Stewart, and Mr. Tu:

I wanted to reach out to each of you to thank you for your collective efforts on the Alaska Roadless Rulemaking process over the past two-and-a-half years and to urge you to take the necessary steps to complete the Final Rule on schedule this July.

In January 2018, the State of Alaska (State) petitioned U.S. Department of Agriculture (USDA) Secretary Sonny Perdue for rulemaking to exempt the Tongass National Forest from the 2001 Roadless Area Conservation Rule (Roadless Rule) in the interest of the socioeconomic well-being of its residents. Following acceptance of the State's petition, the State and the USDA entered a Memorandum of Understanding (MOU), in which the State agreed to assist the USDA, as a cooperating agency, in developing an Environmental Impact Statement (EIS) in accordance with the National environmental Policy Act (NEPA).

The State has fully met its obligations as a cooperating agency and remains committed to assisting the USDA in completing the process to finalize the Alaska Roadless Rulemaking. We strongly encourage you to adhere to your defined NEPA schedule. With economic impacts felt by Americans at the national, state, and local levels from COVID-19 and the currently low oil prices affecting Alaska, we should be doing everything in our authority and ability to keep projects of statewide importance moving forward.

The proposed Alaska Roadless Rulemaking would once again exempt the Tongass National Forest from the unnecessary restrictions of the 2001 Roadless Rule, which has contributed to socioeconomic impacts to rural communities of Southeast Alaska. The congressionally designated Wilderness and LUD II areas established and expanded through the Alaska National Interest Lands Conservation Act (ANILCA), the Tongass Timber Reform Act (TTRA), and the Carl Levin and Howard P. "Buck" McKeon National Defense Authorization Act for Fiscal Year 2015 (FFY 2015 Defense Authorization Act) protect the wilderness and roadless character of 6.8 million acres of the Tongass National Forest. These statutory protections, along with the 2016 Forest Plan management prescriptions[1], provide the balance sought by Congress and allow for multiple use, sustained yield management to occur on the Tongass National Forest. Application of the 2001 Roadless Rule, an administrative action, conflicts with and unnecessarily complicates the management regime established by Congress for the Tongass; it has stifled forest-level decision making processes; and it has significantly impacted the timber, mining, electric utility, and transportation sectors in the region by limiting access in and through remote areas of the Tongass National Forest and increasing uncertainty, cost, and delay in the permitting processes.

Considering the USDA has completed the required public notice and commenting periods, held subsistence hearings, government-to-government consultations, and convened numerous meetings and a technical workshop with cooperating agencies for the Alaska Roadless Rulemaking, we believe the USDA has acquired and analyzed ample information on which to base its Record of Decision and Final Rule.

I recognize that everyone is adjusting their daily lives as we all learn more about COVID-19. At DNR we have also had to adjust our business processes and use widely available technologies to remain connected to our staff and stakeholders during the current preparedness and response period. However, we are now starting to shift into the next phase of response, which is reopening sectors of Alaska's economy and adapting certain restrictions to keep Alaskans safe as they return to work.

It is precisely due to our current and evolving response to COVID-19 that it is imperative for us to stay on task and on schedule with the Alaska Roadless Rule. When we emerge from the other side of this pandemic, our nation and state will need to be prepared to reenergize our economy, workforce, and revenue streams. Keeping the Alaska Roadless Rule on time will be a huge step in that direction, benefitting our statewide economy and Southeast Alaska communities surrounded by the Tongass National Forest. As a Cooperating Agency, we look forward to continuing to work with you towards a timely completion.

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[1] In its Petition, the State also requested that the Secretary of Agriculture direct the U.S. Forest Service to commence a revision or amendment of the 2016 Forest Plan to remove provisions of the 2001 Roadless Rule that were incorporated in the previous amendment and to reconsider the State's objections to the 2016 Forest Plan that were not addressed in the previous amendment.

Sincerely,

Corri Feige, Commissioner
Department of Natural Resources