
Alaska Roadless Rule

Draft Environmental Impact Statement Public Comment Summary

This summary provides a brief overview of written public comments received during the 60-day public comment period spanning Oct. 18– Dec. 17, 2019 on the proposed Alaska Roadless Rule and associated *Draft Environmental Impact Statement*. In total, approximately 267,000 comments letters and 117,000 petition signatures were received during the public comment period.

Written public comments submitted by mail, email, and through the Online portal were reviewed and aggregated by common theme. Comments were considered in the development of the *Final Environmental Impact Statement* and will be used to inform the final decision. Forest Service responses to select substantive comments will be presented in the *Final Environmental Impact Statement* expected during summer 2020.

The wide majority of submitted comments (approximately 96%) advocate for retaining the 2001 Roadless Rule on the Tongass National Forest. Most of comments generally reflect the following themes:

Outreach and Involvement

Commenters providing input regarding outreach and involvement question the project's timing, cooperating agency involvement, due consideration of public concerns, full disclosure related to administrative changes, responsiveness to scoping comments, responsiveness to public hearing requests, and whether the quantity and distribution of public meetings was sufficient.

Purpose and Need for Action

Commenters question the *Purpose and Need* statement's lack of clarity and transparency in disclosing the rationale and motivation for developing an Alaska Roadless Rule. They also question whether the proposed Alaska Roadless Rule's inclusion of the Chugach National Forest was sufficiently noticed and analyzed. Furthermore, commenters questioned the need for any action at all given the flexibility already provided through 2001 Roadless Rule exceptions.

Alternatives

Commenters express both support and opposition for the range of alternatives as presented by the *Draft Environmental Impact Statement* with the large majority of written comments supporting Alternative 1 – the no action alternative. Notably, the majority of public comments were polarized as evidenced by supporting either Alternative 1 (no exemption) or Alternative 6 (full exemption) with few explicitly supporting Alternatives 2 through 5.

- **Alternative 1** – The majority of comments (approximately 96%) support Alternative 1 referencing human health, ecological health, resource extraction opposition, socioeconomic considerations, wildlife, subsistence values, climate change concerns, potential development impacts, and flexibility already provided through 2001 Roadless Rule exceptions. Commenters also believe Alternative 1 is most responsive



to the Purpose and Need statement and key issues as analyzed in the *Draft Environmental Impact Statement*.

- **Alternative 2** – Supportive comments reference protection of current roadless areas while balancing timber harvest, forest conservation, and forest management goals.
- **Alternative 3** – Supportive comments recommend amending inventoried roadless area designations to better reflect prior development and timber harvest activities. Commenters were supportive of limited extraction to provide small-scale economic opportunities for local communities.
- **Alternative 4** – Supportive comments recommend balancing economic development with conservation of roadless area characteristics.
- **Alternative 5** – No comments were received explicitly supporting Alternative 5.
- **Alternative 6** – A small minority (approximately 1%) support Alternative 6 indicating a belief that it best addresses socioeconomic considerations, improves fire response, reduces timber harvest restrictions, provides for local decision making, reduces project costs for renewable energy and utility lines, and eliminates regulatory uncertainty for permitted hydropower or intertie (utility interconnections) development. Commenters also believe roadless area characteristics will be sufficiently protected without the 2001 Roadless Rule.

Some commenters propose altogether new alternatives or suggest modifying current alternatives. There was also concern regarding the overall range of alternatives with commenters recommending an alternative that expands protections for roadless areas not previously included in the 2001 Roadless Rule inventory.

Analyses

Comments regarding the *Draft Environmental Impact Statement* analyses question the adequacy of data, methods, and whether the best available scientific information had been utilized. Additionally, some commenters recommend improved utilization of indigenous and traditional knowledge throughout the analyses.

Comments question project assumptions and methodology including temporal scale, cost-benefit analyses, and significant reliance on forest plan analyses. Commenters request additional analyses of effects for activities that may occur following a change to the roadless rule including road development, timber harvest, and additional development activities.

Compliance with Laws, Policies, and Regulations

Commenters question compliance with applicable laws, regulations, and policies including the Federal Advisory Committee Act, Endangered Species Act, Alaska National Interest Lands Conservation Act, National Historic Preservation Act, and the 2016 Tongass National Forest Land and Resource Management Plan.



Editorial Changes

Commenters provided editorial input related to improved maps and expansion of alternative comparative summaries.

Forest Management

Commenters also mentioned additional forest management topics that were not specific to the proposed Alaska Roadless Rule including delegating National Forest System land management authority to the state of Alaska, applying additional protections for National Forest System lands, advocacy for improved forest restoration, changes to timber sale management, and reinstating the Transportation Utility System Land Use Designation.

