



# ALASKA ROADLESS RULE CITIZEN ADVISORY COMMITTEE

Final Report to the Governor and State Forester  
State of Alaska  
November 21, 2018

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## Introduction

In early 2018, the State of Alaska submitted a petition to the US Department of Agriculture (USDA) to exempt the State of Alaska from the 2001 National Roadless Conservation Rule (Roadless Rule). In August 2018, Alaska Governor Bill Walker and Secretary of Agriculture Sonny Purdue signed a [memorandum of understanding](#) (MOU), agreeing to cooperatively undertake a state-specific roadless rulemaking process to address roadless management and access concerns on the Tongass National Forest.<sup>1</sup>

In late August 2018, the US Forest Service (USFS) released a [notice of intent](#) (NOI) to prepare an environmental impact statement and initiate a public rulemaking process to address the management of Inventoried Roadless Areas (IRAs) on the Tongass National Forest. Shortly thereafter, in September 2018, Governor Walker issued [Administrative Order 299](#) to establish the Alaska Roadless Rule Citizen Advisory Committee (the Committee) to provide an opportunity for Southeast Alaskans to advise the State of Alaska on the future management of IRAs in the Tongass National Forest. The Committee was charged with providing recommendations to assist the State in fulfilling its role as a cooperating agency under the MOU. The Committee's specific task was to present a written report on the rulemaking process to the Governor and State Forester, which may include options for a state-specific Roadless Rule for possible inclusion in the National Environmental Policy Act (NEPA) review process. These options would be in addition to the USFS alternatives of a full exemption to the Roadless Rule and a "no action" alternative that would leave the Roadless Rule in its present form.

The State of Alaska Cooperating Agency Team will consider input from the Committee in the development of information it provides to the USFS for incorporation into the environmental impact statement and public rulemaking process. The intent is to develop a state-specific Roadless Rule that establishes a land classification system designed to conserve Roadless Area characteristics in the Tongass National Forest while accommodating timber harvesting and road construction/reconstruction activities that are determined by the State to be necessary for forest management, economic development opportunities, such as recreation, tourism, energy, and mining, among others, and the exercise of valid existing rights or other non-discretionary legal authorities.

## Committee Process

Thirteen Committee members were selected by Governor Walker to represent a diversity of perspectives, including Alaska Native corporations and tribes, fishing, timber, conservation, tourism, utilities, mining, transportation, local government, and the Alaska Division of

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<sup>1</sup> The rulemaking process is referred to as the Alaska Roadless Rule, but at this time applies only to the Tongass National Forest and not the Chugach National Forest. Hereafter, the rulemaking process will be referred to as the Alaska Roadless Rule, but the Committee was charged with providing recommendations for the Tongass National Forest only.

Forestry. A USFS representative served in an *ex officio* capacity to provide technical expertise for the Committee's deliberations. The Committee was facilitated by [Meridian Institute](#), a non-profit organization that helps people solve complex and often controversial problems, make informed decisions, and implement solutions that improve lives, the economy, and the environment. A full list of Committee and staff members is included in Appendix A.

The Committee met for three in-person meetings in the fall of 2018 (October 2-3 in Juneau; October 24-26 in Ketchikan; and November 6-8 in Sitka). Meetings were open to the public and each meeting included an opportunity for public comment. Meeting agendas and summaries are available at [www.merid.org/akroadless](http://www.merid.org/akroadless). A glossary of frequently used terms and acronyms is provided in Appendix B.

Following development of the Draft Environmental Impact Statement (DEIS) in late spring/early summer 2019, the Committee will reconvene to review the components and alternatives included in the DEIS, and the outcomes of the analysis. At this point, the Committee will provide additional input to the State to consider in its feedback on to the USFS on the DEIS. The Committee may reconvene at various other points in the process to assist the State, including leading up to the release of the Final Environmental Impact Statement (FEIS) in spring 2020.

### Principles for Options Development

The Committee developed a list of key principles to frame the development of options to be considered by the State of Alaska in the rulemaking process. The list served as a set of working assumptions that do not represent full consensus of the group but do reflect the key issues they considered when drafting options. The group considered whether options reflect the following principles:

- Pragmatic;
- Flexible;
- Durable/sustainable (i.e., stand the test of time);
- Balanced between protection and access;
- Beneficial for sustainable community economic development;
- Affordable/economically feasible;
- Workable at the local decision-making level;
- Consider the Tongass as a multi-use forest;
- Provide certainty and predictability; and
- Represent options in addition to the no-action and complete exemption alternatives.

### Options Development Process

The Committee worked together to identify a range of options that reflect the needs of Alaskans and which included the interests represented by all Committee members, other interests not represented within the Committee, and public comment and testimony shared with the

Committee. These options were issue-driven, and responsive to the Governor's request outlined in the Administrative Order.

### **Roadless Area Exceptions Across the Forest**

The Committee developed a list of exceptions that serve as an integral part of each of the four options. While the land base options vary, the Committee members agreed to include the Roadless Area exceptions for analysis in all of the options put forward by the Committee.

The intent of the Committee is to provide these exceptions as valuable input and recommendations for the State of Alaska, the USFS, and other cooperating partners for consideration during the NEPA process, in the development of the Alaska Roadless Rule, and as possible eventual Rule components. The exceptions language developed here can guide development activities in a manner that meaningfully addresses local economic development concerns by providing access and certainty for industries in the region, while balancing roadless conservation needs.

### **Land Base Options**

When identifying potential changes to Roadless Area boundaries, the Committee considered the following geographic elements:

- "Roaded Roadless" areas;
- Land Use Designations (LUDs) designated in the 2016 Tongass National Forest Land and Resource Management Plan (TLMP); and
- The Tongass 77 (T77) watersheds and The Nature Conservancy (TNC)/Audubon conservation priority areas, both referenced in the 2016 TLMP.

From these elements, the Committee developed a range of four land base options which fall between the no action and full exemption alternatives. These represent options to consider for analysis and are not recommendations for what the Committee expects or desires to see as the final Alaska Roadless Rule.

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## **Alaska Roadless Area Characteristics**

The island archipelago and rugged landscapes that characterizes the 16.7 million-acre Tongass National Forest, which covers the majority of Southeast Alaska, makes this region unique. The Tongass is an archipelago composed of deep-water fjords dissecting a rugged mountainous mainland coastline interspersed with glaciers and extensive ice-fields. With approximately 18,000 miles of saltwater shoreline, ocean sounds, straits, and fjords separate over a thousand islands (representing 40% of the total land area), including a dozen very large mountainous islands offering numerous bays providing sheltered moorage. 94% of Southeast Alaska is federally managed lands, and, of that, 60% is set aside as Congressionally-designated Wilderness, National Parks, and National Monuments.

The lands and waters of the Tongass sustain a unique Alaskan way of life that is highly desirable to the people who live in these places—often specifically for the remote characteristics, subsistence activities, and independent lifestyles afforded by these places, or, for Alaska Natives, for the cultural and spiritual ties to this place.

However, those same characteristics also create a situation where the isolated and remote nature of these communities—which most often do not have physical road connections to other places—lead to high energy costs and unemployment rates, limited access to health care, and other social and economic hardships associated with isolated rural communities. Communities in Alaska often balance a fine line between maintaining the characteristics that they value and that make their communities unique and conserving the resources they use and depend on, while also ensuring economic development and opportunities for employment, economic activity, healthcare, safety, and connections with other communities.

The 73,000 residents spread across 34 communities in Southeast Alaska are often heavily reliant on the natural resources provided by the Tongass National Forest and surrounding lands and waters. These resources include minerals, renewable energy, salmon and other fisheries, timber, nature-based tourism, guided fishing and hunting, and residents and visitors that are in the region because of the surrounding natural environment. Preserving multi-use capacity in the Tongass is critical to sustaining the regional economy and the welfare of its residents. The Tlingit, Haida, and Tsimshian people continue to live in this place, their homeland, and rely on those same natural resources described above for their economies, social needs, cultures, and ways of life.

With this context in mind, the 2001 Roadless Conservation Area characteristics do not align with the unique characteristics found in Alaska. The unique roadless characteristics represented by the Roadless Areas in the Tongass National Forest include the following:

- *Alaska Native people who have been on this land for more than 10,000 years, and for whom this place has cultural and spiritual significance.* The use of places, sites, waters, structures, resources, and objects are historically significant in the beliefs, customs, practices, and perpetuation of the culture(s) of communities and indigenous peoples of the area. While the Alaska Native people now share this place with other residents, it is critical that they continue to have the ability to sustain their cultures and their communities through economic, social, and cultural opportunities.
- *Expansive areas where high quality intact habitat exist and ecosystems function with all of their native species and components; there are no listed or endangered species; and invasive species are generally not present.* These areas function as biological strongholds and refuges for many species, harbor a diversity of plant and animal communities, and serve as a globally significant example of a temperate rainforest ecosystem that is both utilized and conserved by the people that live within and adjacent to it. Species exist in Alaska Roadless Areas that are endangered, threatened, or reduced in other places on the continent.

- ***Opportunities for economic development of visitor industry products, including remote-setting guided nature tours to view wildlife, hunt, fish, and hike.*** Alaska Roadless Areas contribute to a regional resource of undeveloped lands that are an important resource for a segment of the visitor sector – an important component of the matrix of Tongass lands that provide opportunity for medium to larger groups to go ashore in a wilderness-type setting. The intact ecological systems in these areas, with natural settings and iconic fish and wildlife, are a draw for visitors.
- ***Stands of old growth forests.*** These old growth forests are nationally and globally significant because they exist in quantities and extensions in Alaska like few other places on the planet. They support subsistence and traditional hunting and gathering, unique plant and wildlife populations, a significant volume of sequestered carbon and forest/soil processes that mitigate climate change and represent a globally significant reference landscape and intact old growth forest ecosystem.
- ***Multiple species of fish (including salmon) harvested for subsistence and personal use, commercial fisheries, and tourism and guided recreational fishing.*** Salmon, trout, char, and hooligan of the Tongass National Forest are harvested in subsistence fisheries and for personal use by local residents. Salmon and trout are also the basis of tourism and guided fisheries enjoyed by thousands of visitors, supporting hundreds of tourism and support businesses. The commercial fisheries derived from Tongass streams and rivers produce a significant proportion of the total Alaska salmon harvest, and support fishing and processing jobs for thousands of local residents and nonresidents.
- ***High-quality scenery, especially scenery with natural-appearing landscapes, is a primary quality that people value in Alaska Roadless Areas.*** Quality scenery contributes directly to the quality of life and recreation opportunities for residents, property owners, and visitors.
- ***Watersheds that are important sources of public drinking water and water sources for fish and aquatic resources, including hatcheries.*** State regulations are currently enforced and applied using the most restrictive standard for water quality criterion as listed in 18 AAC 70. Careful management of these watersheds is crucial in maintaining the flow of clean water to local communities, and to support continued production of fisheries and aquatic food webs.
- ***An important source of subsistence resources for Alaskans.*** Roadless Areas are rich in important subsistence resources, including game, fish, and foraging resources for those residents whose use and access rights are specifically recognized and guaranteed by the Alaska National Interest Lands Conservation Act (ANILCA).
- ***A major source of economic activity for Southeast Alaskans.*** The Tongass National Forest surrounds 34 communities and approximately 73,000 year-round residents. These residents heavily rely on Roadless Areas for economic activities, including mining, visitor products, ocean products, forest products, energy production, and other economic activities.

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## Alaska Roadless Area Exceptions Across the Forest

The Committee recommends the following Roadless Area exceptions be included as an integral part of each of the options to be considered by the Governor and State Forester in the rulemaking process.<sup>2</sup>

### A. Road construction and reconstruction in Inventoried Roadless Areas

Section 294.12 of the 2001 Roadless Rule identified the road construction and reconstruction prohibitions, and exemptions and exceptions to the prohibitions, as stated: “A road may not be constructed or reconstructed in inventoried roadless areas of the National Forest System, except as provided in this section. Notwithstanding this prohibition, a road may be constructed or reconstructed in an inventoried roadless area if the Responsible Official determines that one of the below circumstances exists.”

**The Committee recommends the following additional language be applied to the exceptions criteria:**

All such road construction or reconstruction will be in compliance with existing laws and regulations, including for the protection of fish and wildlife resources and habitat. Maintenance of classified roads is permissible in IRAs.

**The current exceptions in the 2001 Roadless Rule include the following, and the Committee recommends that they should remain in place in the Alaska Roadless Rule.**

1. A road is needed to protect public health and safety in cases of an imminent threat of flood, fire, or other catastrophic event that, without intervention, would cause the loss of life or property;
2. A road is needed to conduct a response action under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) or to conduct a natural resource restoration action under CERCLA, Section 311 of the Clean Water Act, or the Oil Pollution Act;
3. A road is needed pursuant to reserved or outstanding rights, or as provided for by statute or treaty<sup>3</sup>;

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<sup>2</sup> These exceptions would apply to all Roadless Areas across the Tongass National Forest. They would not apply to areas outside of designated Roadless Areas, as these would be managed through a separate Forest planning process.

<sup>3</sup> This includes all rights codified in ANILCA, including R.S. 2477, the right to access inholdings.



4. Road realignment is needed to prevent irreparable resource damage that arises from the design, location, use, or deterioration of a classified road and that cannot be mitigated by road maintenance. Road realignment may occur under this paragraph only if the road is deemed essential for public or private access, natural resource management, or public health and safety;
5. Road reconstruction is needed to implement a road safety improvement project on a classified road determined to be hazardous on the basis of accident experience or accident potential on that road;
6. The Secretary of Agriculture determines that a Federal Aid Highway project, authorized pursuant to Title 23 of the United States Code, is in the public interest or is consistent with the purposes for which the land was reserved or acquired, and no other reasonable and prudent alternative exists; or
7. A road is needed in conjunction with the continuation, extension, or renewal of a mineral lease on lands that are under lease by the Secretary of the Interior as of January 12, 2001 or for a new lease issued immediately upon expiration of an existing lease. Roads constructed or reconstructed pursuant to this paragraph must be obliterated when no longer needed for the purposes of the lease or upon termination or expiration of the lease, whichever is sooner.

**The Committee recommends that the following exceptions be added to 36 C.F.R. § 294.12 for inclusion in an Alaska Roadless Rule:**

8. Roads in Transportation Utility System (TUS) corridors identified in the Southeast Alaska Transportation Plan (SATP) for development and/or essential for reservation for the connection of communities and development of the regional transportation system shall be permitted. Adjustment of these TUS corridors shall be allowed outside of the corridor or easement if it provides a lower cost alternative or provides an alignment that is the Least Environmentally Damaging Practicable Alternative (LEDPA).
9. Roads in all Section 4407 Easements as Congress enacted in August 2005 in the Safe, Accountable, Flexible, Efficient Transportation Equity Act – A Legacy for Users (SAFETEA-LU; Public Law 109-59) shall be permitted. Adjustment of these Easements shall be allowed outside of the corridor or easement if it provides a lower cost alternative or provides an alignment that is the LEDPA.
10. A road to access Congressionally-authorized Southeastern Alaska Intertie System Plan Routes (PL 106-511, February 1, 2001) as identified in report #97-01 of the Southeast Conference shall be permitted.
11. A road to access mineral operations authorized by the United States mining laws (30 U.S.C. § 22 et seq.) shall be permitted in IRAs if it meets the criteria of 36 C.F.R. Part 228 in the same way as if the application for the road to access such mineral operations were being permitted on non-IRA National Forest lands.

12. A road to access leasable minerals in IRAs shall be permitted if it meets the criteria of 36 C.F.R. Part 228 in the same way as if the application for the road to access such mineral operations were being permitted on non-IRA National Forest lands.
13. A road to access hydropower and renewable energy projects and their transmission infrastructure, including their maintenance, shall be permitted in the same way as if the application for the road to access such projects were being permitted on non-IRA National Forest lands. Renewable energy includes energy that is collected from renewable resources, which are naturally replenished on a human timescale, such as sunlight, wind, rain, tides, waves, geothermal heat, biomass, or other forms of energy.
14. A road included in a community, municipal, or tribal government plan to provide access and development of water resources, renewable energy resources, sanitary landfills, connecting isolated road networks, and subsistence resources, including maintenance of such roads and these facilities, shall be an allowed use.
15. A road for transportation, communication, and utility infrastructure and maintenance shall be permitted.
16. A road to access an authorized facility or location for fishery research, management, enhancement, and rehabilitation activities, fishways, fish weirs, fish ladders, fish hatcheries, spawning channels, stream clearance, egg planting, and other permitted aquaculture facilities or activities, including mariculture, shall be permitted.

## B. Timber cutting, sale, or removal in Inventoried Roadless Areas

Section 294.13 of the 2001 Roadless Rule identified the timber cutting, sale, or removal prohibitions in IRAs, and exemptions and exceptions to the prohibitions. **The Committee recommends the following be included as additional exceptions to 36 C.F.R. § 294.13 in an Alaska Roadless Rule.**

1. **Mining Exploration and Development.** While “reasonable access” is technically permitted in IRAs, cutting and removal of trees associated with mining exploration and development does not appear to be allowed. 36 C.F.R. § 294.13(b)(2) authorizes the cutting or removal of trees “incidental to implementation of a management activity not otherwise prohibited by this subpart.” The necessary level of exploration to develop a mine on the Tongass National Forest requires the cutting and removal of trees. Mine development would typically require even more cutting and removal of trees.

However, there is no mention of mining in the examples provided in the 2001 Rule of what this section authorizes.<sup>4</sup> Moreover, in describing this section the 2001 Rule states: “Such management activities are expected to be rare and to focus on small diameter trees.”<sup>5</sup>

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<sup>4</sup> 2001 Roadless Rule., at page 3258.

<sup>5</sup> 2001 Roadless Rule., at page 3257.

Accordingly, a new exception for Alaska-specific rulemaking be added to 36 C.F.R. § 294.13(b):

The cutting and removal of trees in connection with mineral exploration and mine development is authorized and shall be permitted as if the mineral exploration or mine development were being permitted on non-IRA National Forest land. Cutting and removal of trees may be sold and/or utilized on the project.

2. **Hydroelectric and Other Renewable Energy Infrastructure and Transmission Infrastructure Development.** The Committee recommends that the following new exception for hydroelectric and other renewable energy projects and related infrastructure be added to 36 C.F.R. § 294.13:

The cutting and removal of trees incidental to the construction and maintenance of hydroelectric and other renewable energy projects and related infrastructure, including transmission, is authorized. Such trees may be sold and/or utilized on the project.

3. **Forest Health.** The Committee recommends that the following new exception for Forest Health be added to 36 C.F.R. § 294.13:

The cutting and removal of trees incidental to fire prevention, removal of hazard trees that reduce risk to the public, blowdown/windfall management, and/or insect and disease management, is authorized. Such trees may be sold and/or utilized on the project.

4. **Alaska Native Culture.** The Committee recommends that the following new exception for Alaska Native Culture be added to 36 C.F.R. § 294.13:

The cutting and removal of trees in connection with Alaska Native custom and traditional uses is authorized.

5. **Fish and Wildlife Habitat Improvement.** The Committee recommends that the following new exception for fish and wildlife habitat be added to 36 C.F.R. § 294.13:

The cutting and removal of trees for fish and wildlife habitat improvement is authorized. Such trees may be sold and/or utilized on the project.

6. **Road Building.** The Committee recommends that the following new exception for road building be added to 36 C.F.R. § 294.13:

The cutting and removal of trees for permitted road building (as described in 36 C.F.R. § 294.12) is authorized. Such trees may be sold and/or utilized on the project.

7. **Biofuels.** The Committee recommends that the following new exception for biofuels be added to 36 C.F.R. § 294.13(b):

The cutting and removal of trees for biofuel for Southeast Alaska residential and municipal needs is authorized and will comply with current standards and regulations for harvest.

8. **Municipal Watersheds.** The Committee recommends that the following new exception for municipal watersheds be added to 36 C.F.R. § 294.13:

The cutting and removal of trees for municipal watershed construction and management is authorized and such trees may be sold and/or utilized on the project.

### C. Geography-specific Exemptions

**The Committee recommends that the following geography-specific exemptions be added to an Alaska Roadless Rule:**

1. An exemption to the Alaska Roadless Rule is allowed in the experimental forest LUD for projects and activities prioritized, defined, and undertaken for forest research goals and activities for those specific forests.
2. The boundaries of the T77 areas shall be modified to conform to the watershed boundaries of the fish-bearing waters of each T77 area, recognizing that some T77 areas may contain multiple fish-bearing watersheds.<sup>6</sup> Lands outside of the modified T77 boundaries that are within development LUDs shall be exempted from the Alaska Roadless Rule and evaluated for stewardship and restoration opportunity at the project-level.<sup>7,8</sup>

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### Approval Process

**The Committee recommends the following changes to the approval process for an Alaska Roadless Rule:**

Vest authority for approving projects in roadless areas with a “responsible local official,” and define “responsible local official” as the Forest Supervisor.

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<sup>6</sup> Changes to T77 boundaries may be modified on a project-specific basis, when proposed projects are adjacent to or within the boundaries of the T77 area(s), or the modifications may be undertaken as a full planning process that assesses and modifies all T77 boundaries during the same process.

<sup>7</sup> As noted in the land base options denoted on page 8, some options include these geographic-based exemptions while others do not. This is for consideration during NEPA analysis.

<sup>8</sup> The boundaries of the T77 areas are currently identified by value comparison units (VCUs), which can differ from the geographic boundaries of the physical watersheds.

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## Land Base Options

Based on detailed Committee discussion and the wide range of public input received, the Committee developed a range of four potential land base options for consideration. These represent options to consider for analysis, not recommendations for what the Committee expects or desires to see as the final Alaska Roadless Rule. The exceptions language as presented in this report are integral to each option below. The Committee intends that options A-D be analyzed, including the exceptions outlined above as components of each option.

While the exceptions language provides for opportunities for access for specific activities, the land base options revise the geographic boundaries of the Roadless Areas, thereby allowing for increased access and activities in areas that fall outside of the newly determined geographic boundaries. When discussing options for timber harvest and increasing the land base for timber production, the Committee focused on changes to the geographic boundaries of Roadless Areas (i.e., removing lands from Roadless), as opposed to including specific exceptions for commercial timber harvest. In each option, where lands are removed from Roadless Areas, the management prescriptions of the underlying LUD as outlined in the 2016 TLMP would take effect.

The descriptions below provide an overview of proposed revisions, additions, and adjustments to existing IRAs in the Tongass National Forest. Table 1 on page 13 provides a side-by-side comparison of all options. The “no action” alternative and “full exemption” alternative are shown for demonstrative purposes only and were not considered by the Committee.

### Option A

Option A maintains IRA boundaries as defined in the 2001 Roadless Rule with the exception of roaded Roadless areas.

The following currently designated Roadless Areas will be *removed* from IRAs in Option A:

- Roaded Roadless areas.

The following currently designated Roadless areas will be *retained* (remain) in IRAs in Option A:

- All existing Roadless Areas in timber production, scenic viewshed, and modified landscape LUDs that are *not* in roaded Roadless areas.
- All TNC/Audubon areas and T77 watersheds in existing IRAs. (Note that Option A does not incorporate the full geographic exemptions language. This option excludes Geographic Exemption 2 that details modifications to T77 boundaries.)
- Current Roadless Areas covered by the mineral overlay LUD (unless located in roaded Roadless areas).
- All IRAs in non-development LUDs.

The following areas that are not currently designated as Roadless will be *added* to IRAs in Option A:

- All LUD II areas not currently located in IRAs.

## Option B

Option B removes a greater land base from IRAs than Option A.

The following currently designated Roadless Areas will be *removed* from IRAs in Option B:

- Roaded Roadless areas,
- Timber production LUD.
- Modified landscape LUD.

The following currently designated Roadless Areas will be *retained* (remain) in IRAs in Option B:

- Scenic viewsheds.
- All roadless TNC/Audubon areas and the T77, even if they are in timber production or modified landscape LUDs.
- Roadless Areas covered by the mineral overlay LUD (unless located in roaded Roadless areas).
- All IRAs in non-development LUDs.

The following areas that are not currently designated as Roadless will be *added* to IRAs in Option B:

- All LUD II areas not currently located in IRAs.

## Option C

Option C removes additional acreage from IRAs.

The following currently designated Roadless Areas will be *removed* from IRAs in Option C:

- Roaded Roadless Areas,
- Timber production LUD,
- Modified landscape LUD.
- TNC/Audubon areas in timber production and modified landscape LUDs.

Option C also removes mineral overlay LUDs from IRAs on a project-specific basis when mineral development opportunities are identified.

The following currently designated Roadless Areas will be *retained* (remain) in IRAs in Option C:

- Scenic viewsheds
- All roadless T77, even if they are in timber production or modified landscape LUDs.
- All IRAs in non-development LUDs.

The following areas that are not currently designated as Roadless will be *added* to IRAs in Option C:

- All LUD II areas not currently located in IRAs.

## Option D

Option D removes the most acreage from IRAs of all of the options.

The following currently designated Roadless Areas will be *removed* from IRAs in Option D:

- Roded Roadless Areas.
- Timber production LUD.
- Modified landscape LUD.
- Scenic viewshed LUD.
- Mineral Overlay LUD.

Option D also removes all T77 and TNC/Audubon Conservation Areas from IRAs if currently in IRAs that fall within timber production, modified landscape, and scenic viewshed LUDs.

The following currently designated Roadless Areas will be *retained* (remain) in IRAs in Option D:

- All IRAs in non-development LUDs.

No new areas will be *added* to IRAs in Option D.





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## Appendix A: Alaska Roadless Rule Citizen Advisory Committee Members

Trey Acteson  
Southeast Alaska Power Agency

Bert Burkhart  
Alaska Forest Association

Nicole Grewe  
*Ex Officio* Member  
US Forest Service, Region 10

Brian Holst  
Juneau Economic Development Council

Andy Hughes  
Alaska Department of Transportation &  
Public Facilities (retired)

Michael Kampnich  
The Nature Conservancy

Jaeleen Kookesh  
Sealaska Corporation

Chris Maisch  
Alaska Division of Forestry

Eric Nichols  
Alcan Forest Products

Andrew Thoms  
Sitka Conservation Society

Jan Trigg  
Coeur Alaska Kensington Mine

Robert Venables  
Southeast Conference

Mark Vinsel  
United Fishermen of Alaska

Ralph Wolfe  
Central Council Tlingit & Haida Indian  
Tribes of Alaska

### **Facilitation Staff**

Liz Duxbury  
Meridian Institute

Cassidy Gasteiger  
Meridian Institute

Connie Lewis  
Meridian Institute

Diana Portner  
Meridian Institute

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## Appendix B: Glossary

**Development LUD** – Land use designations that permit commercial timber harvest and other commercial activities (including timber production, modified landscape, scenic viewshed, and experimental forest LUDs) and convert some of the old-growth forest to early-to mid-successional, regulated forests.

**Experimental forest** – Experimental forest is a development LUD that aims to provide for long-term opportunities for forest research and demonstration essential to managing forest resources. Each experimental forest is managed for the purposes for which it was established. Non-research types of activities and uses may be compatible with, and do not interfere with, research or demonstration objectives.<sup>9</sup>

**Inventoried Roadless Areas (IRAs)** – Inventoried Roadless Areas are inventoried tracts of National Forest System land characterized as having an undeveloped character. They were initially identified during the Roadless Area Resource Evaluation of 1972 (RARE I) and the RARE II of 1979.<sup>10</sup>

**Land use designations (LUDs)** – LUDs are designated by the USFS in the 2016 Tongass National Forest Land and Resource Management Plan (TLMP). The Tongass is subdivided and “zoned” into LUDs, which is how the USFS accommodates multiple uses across one land base to meet social, economic, and ecological needs. The designations allow various resource activities to occur in specifically designated areas across the forest. For a complete list of LUDs in the Tongass, please see the [2016 TLMP](#).

**LUD II** – The desired condition for LUD II is described in the TLMP: “Areas in this LUD are characterized by extensive, generally unmodified natural environments, and retain their wildland character. Ecological processes and natural conditions are only minimally affected by past or current human uses or activities. Users have the opportunity to experience a high-to-moderate degree of independence, closeness to nature, solitude, and remoteness, and may pursue activities requiring self-reliance, challenge, and risk. Interactions between users are infrequent. Recreational facilities and structures are primitive.”<sup>11</sup> LUD II is defined and managed similarly to Congressionally-designated Wilderness areas.

**Mineral overlay LUD** – The mineral overlay LUD aims to encourage the prospecting, exploration, development, mining, and processing of locatable and leasable minerals in areas with the highest potential for minerals development, by overriding the underlying LUD managing that land base to authorize road development to, and mining-related timber harvest in, such locatable and leasable prospecting, exploration, development, mining and processing

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<sup>9</sup> [2016 TLMP](#).

<sup>10</sup> [USFS, Inventoried Roadless Areas](#).

<sup>11</sup> [2016 TLMP](#).

sites that meet the criteria of 36 C.F.R. Section 228. During the period before approval of a specific Minerals Plan of Operations, the underlying LUD(s) continue to apply to the project area.

**Modified landscape** – Modified landscape is a development LUD that aims to provide a sustained yield of timber and a mix of resource activities while minimizing the visibility of developments in the foreground distance zone. In areas managed under the Modified Landscape LUD, forest visitors, recreationists, and others using popular Travel Routes and Use Areas will view a somewhat modified landscape. Management activities in the visual foreground will be subordinate to the characteristic landscape but may dominate the landscape in the middle and backgrounds. Within the foreground, timber harvest units are typically small and affect only a small percentage of the seen area at any one point in time. Roads, facilities, and other structures are also subordinate to the foreground landscape. Recreation opportunities associated with natural-appearing to modified settings are available. A variety of successional stages provide a range of wildlife habitat conditions. Timber is produced.<sup>12</sup>

**Non-development LUDs** – Land use designations that do not permit commercial timber harvest. Wilderness and natural setting LUDs make up the non-development LUDs. These include:

|                                  |                       |
|----------------------------------|-----------------------|
| Wilderness                       | Municipal watershed   |
| Wilderness national monument     | Research natural area |
| Non-wilderness national monument | Special interest area |
| LUD II                           | Wild river            |
| Remote recreation                | Scenic river          |
| Semi-remote recreation           | Recreational river    |
| Old-growth habitat               |                       |

**Roaded Roadless Areas** – Roaded Roadless Areas constitute approximately 80,000 acres in the Tongass National Forest and represent places that are included on the list of IRAs, but do not meet the criteria for Roadless Areas. These discrepancies are primarily due to the period from 2003–2008 when the Tongass was exempt from the National Rule, with some discrepancy coming from the period following the implementation of the 2001 Rule, when projects that were permitted before the Rule was implemented were allowed to proceed.

**Scenic viewshed** – Scenic viewshed is a development LUD that seeks “to provide a sustained yield of timber and a mix of resource activities while minimizing the visibility of developments as seen from Visual Priority Travel Routes and Use Areas.” It recognizes the scenic values of suitable forest lands viewed from selected popular roads, trails, water travel routes, recreation sites, bays, and anchorages, and to modify timber practices accordingly, while simultaneously

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<sup>12</sup> [2016 TLMP](#).

providing a supply of timber from the Tongass National Forest that meets the annual and planning-cycle market demand.<sup>13</sup>

**The Nature Conservancy/Audubon Conservation Priority Areas** – The TNC/Audubon Conservation Priority Areas were identified by a group of scientists as the parts of the Tongass National Forest with the highest ecological value in terms of wildlife habitat and high-producing stands. Both organizations have adopted these places as priority areas for protection from additional development.

**Timber production LUD** – Timber production is a development LUD that aims to maintain and promote wood production from forest lands that are suitable for timber production, providing a continuous supply of wood to meet society’s needs, and to manage these lands for sustained long-term timber yield. Suitable forest lands are managed for the production of sawtimber and other wood products on an even-flow, long-term sustained yield basis. An extensive road system provides access for timber management activities, recreation uses, hunting and fishing, and other public and administrative uses; some roads may be closed, either seasonally or year-long, to address resource concerns. Management activities will generally dominate most seen areas. Tree stands are healthy and with a mix of age classes from young stands to trees of harvestable age, often in 40- to 100-acre stands. Recreation opportunities, associated with roaded settings from Semi-Primitive to Roaded Modified, are available. A variety of wildlife habitats, predominantly in the early and middle successional stages, are present.<sup>14</sup>

**Tongass 77 (T77) Watersheds** – The Tongass 77 watersheds are key watersheds in Southeast Alaska for salmon habitat, identified based on a scientific assessment of Southeast Alaska’s Coastal Forests and Mountains Ecoregion (Schoen and Dovichin 2007). The watersheds include the top-ranking watersheds within all 14 biogeographic provinces in Southeast Alaska not under permanent protection, based on values for all five salmon species and steelhead trout, the top-ranking watersheds for each individual species, and watersheds which capture other key ecosystem values or which rank in the top 10% of salmon-producing watersheds in the Tongass.<sup>15</sup>

**Value Comparison Units (VCUs)** – VCUs provide a means for dividing the landscape into manageable sets of watersheds that typically share similar geomorphic characteristics. A VCU combines several watersheds with similar elevations, terrain, stream types, and habitat areas. They generally follow watershed boundaries, although in some cases the boundaries are different. USFS uses VCUs rather than watershed boundaries in the TLMP, for example, when delineating protections for the T77 watersheds. In some cases, this means the boundaries that are protected by the TLMP are different than those delineated in the original watershed analysis.

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<sup>13</sup> [2016 TLMP.](#)

<sup>14</sup> *Ibid.*

<sup>15</sup> [Melanie Smith, Tongass 77 Watersheds.](#)