



Alaska Roadless Rule Citizen Advisory Committee: Draft Meeting Summary

November 6 - 8, 2018, Sitka, Alaska

The Alaska Roadless Rule Citizen Advisory Committee (the Committee) held its third meeting on November 6 - 8, 2018 in Sitka, Alaska. The objectives of this meeting were to draft a set of options for the Roadless Rulemaking process for consideration by the State cooperating agency team; offer the opportunity for public comment and discuss comments received to date; and identify next steps to finalize the options and deliver a report to the Governor's office by November 30th. For a copy of the agenda and meeting materials, visit www.merid.org/akroadless. A copy of the participant list is included in Appendix A.

Approach to Developing Options for Consideration

The Committee discussed their approach to developing a final report with options for consideration for the State in their status as a cooperating agency in the Alaska Roadless Rule development process. This discussion included:

- **Cooperating agency status:** State Forester Chris Maisch confirmed that the State will serve as a cooperating agency for both the National Environmental Protection Act (NEPA) process and the subsequent rulemaking process for the Alaska-specific Roadless Rule.
- **Group support and decision-making:** The Committee discussed the best way to describe the varying levels of support for each option put forth in the final report. Although they recognized some value in communicating that the full group supported certain options (i.e., consensus recommendations), they ultimately decided not to include any metric of support from the group in their presentation of the options. Chris Maisch confirmed that such a metric of support would not be helpful to inform the State cooperating agency team, and the group agreed to focus on sharing a suite of options in which each member could see themselves reflected in at least one of the options, regardless of their relative support for the others.
- **Options:** The Committee discussed the best way to move forward in developing options. Some members felt that to put forward options for consideration, they should ensure that these options were alternatives they and the State could ultimately support as the final Alaska Roadless Rule. Others felt that it was more important to ensure a solid NEPA process with a range of alternatives that clearly represents the most important issues at stake. Since the State continues to support

a full exemption, the Committee moved forward with the understanding that everyone would “see themselves” reflected in at least one option presented in the final report. This would ensure that the diverse perspectives represented by the Committee were represented throughout the final report and options for analysis, as opposed to representing consensus or a recommendation endorsing any specific option as the final Rule.

Options Development

The Committee discussed components to include in the final options development. At the conclusion of the [meeting in Ketchikan](#), the Committee had considered three options:

1. Lifting development land use designations (LUDs) out of inventoried roadless areas (IRAs) while maintaining the Roadless Rule on some key conservation areas within development LUDs.
2. Lifting only roaded Roadless Areas out of IRAs.
3. Making specific geographic boundary changes to the Roadless Rule.

The Committee ultimately decided against making specific geographic boundary changes to the Roadless Rule, because of the limited timeframe for their task, and the inability to identify specific locations for current and/or future timber harvest, mining and renewable energy projects, and tourism sites of interest, among others. Several expressed concern about identifying locations based on current opportunities and inadvertently restricting future opportunities. They instead decided to use the land use designations (LUDs) identified in the 2016 Tongass Land and Resource Management Plan (TLMP) as a basis for any geographic changes.

The Committee discussed the following other key components for consideration in their options development:

- **Roaded Roadless Areas.** Since these areas already do not fit the Roadless Area characteristics from the 2001 Rule, the Committee concluded they were an obvious choice to exclude from IRAs in the options.
- **LUD 2.** Committee members discussed that the LUD 2 wilderness designation ensures no roads or development is permitted in LUD 2 lands, so including these areas in IRAs would maintain the intent of the TLMP and add an additional protection to land already set aside for wilderness.
- **Mineral overlay LUDs.** The Committee considered removing these from IRAs to ensure access to mineral-rich areas in the Tongass. However, some expressed concern that removing them from IRAs could override the underlying LUD. (They confirmed that the lands under mineral overlay LUDs are managed as the

underlying LUD until the time that a mineral project is proposed. At that point, the mineral overlay takes effect.)

- **Transportation corridors.** The Committee discussed challenges associated with inflexibility in Congressionally-mandated Section 4407 transportation easements, as well as the lack of precision with how these easements had been drawn on the map when they were initially instated. They discussed various ways to address this lack of precision, for example, by offering a 10,000 foot buffer around the easement in which the corridor could be located; however, they recognized that this could ultimately reduce flexibility rather than ensure it.
- **Future changes to the Rule.** The Committee considered how to incorporate flexibility and durability into the options while addressing the possibility of changing IRA boundaries in the future. Since the Committee's land base options rely on the LUDs from the TLMP, they suggested that IRA boundaries should be amended as LUD boundaries change in future Plan amendments or revisions. Some Committee members were concerned that limiting the ability to change IRA boundaries would limit the flexibility and durability of the new Rule, while others felt that a stringent process for IRA boundary changes was necessary to ensure long-term access to the Forest.
- **Community considerations.** The Committee expressed the strong need for community-level planning around any new project in the Tongass. Community-level needs were one of the driving factors behind consideration of a geographic-specific option. Since they lacked the key information needed to develop such an option, they discussed how to incorporate similar considerations at the planning level rather than the rulemaking level. Some specific community considerations they discussed included:
 - The need for an economically viable timber harvest around communities that works in combination with Native Corporation timber harvest lands to create a larger, more sustainable base.
 - The need for understanding a community's wants and needs before approaching a permitting process to ensure the community supports the project.
 - The need for cooperation and long-term planning across different land ownerships and types of forest plans.

Additional Points for Consideration

The Committee discussed a suite of information needs and long-term planning items that are beyond the scope of the Roadless Rule, but relate closely and which they felt the USFS should consider in the Rulemaking process and in future Tongass management decisions. Although they agreed that these components do not fit neatly under the options they developed for the final report, they felt these points were important pieces

for consideration by the State to transmit to the USFS as priority items for Tongass forest management.

- **Additional review of the Tongass 77 and TNC/Audubon Conservation Areas.** Some Committee members felt that the USFS should conduct its own analysis, or contract out for an independent analysis, of the T77 and TNC/Audubon Conservation areas to ensure they are using the best available science to identify priority conservation areas. Others expressed that this may prompt the need for a detailed, unified conservation strategy across the Forest, to update the current (potentially outdated) conservation strategy.
- **Special use permit map.** The Committee highlighted the importance of the USFS developing more comprehensive information on where they have issued special use permits across the Forest, particularly for the tourism industry, since that was a critical information gap during their deliberations.
- **Old growth inventory and long-term modeling.** Some Committee members felt that there is still not a clear understanding of available old growth inventory in the Tongass and expressed the need to see a more detailed inventory in order to make long-term timber management decisions. They also expressed the need for long-term timber modeling to better and more accurately plan for the timber transition.
- **Salmon inventory.** Other Committee members expressed the need for a detailed Forest-wide salmon inventory for Southeast Alaska.
- **Community-specific considerations in planning processes.** The Committee expressed the need for unified adoption of community-level consultations and considerations during planning processes.

Final Report

The Committee spent the second day of the meeting developing and refining forest-wide exceptions language for the final report. This exceptions language represents a range of activity-specific exceptions that would allow either or both road-building and tree-cutting, such as new hydroelectric and other renewable energy projects, mining projects, and transportation and utility corridor development, for permitted projects in inventoried Roadless Areas. The Committee intended this exceptions language to be included in every land base option for consideration for analysis in the draft Environmental Impact Statement (DEIS).

The third and final day of the meeting consisted of the Committee developing and refining the language around the land-base or geographic options for the final report, using [this summary table](#) for guidance. The summary table includes estimated acres that would be removed from IRAs for each option. (Note that these figures are estimates only and are meant to offer an order of magnitude for comparison, but not exact acreage.)

The options presented in the Committee's final report represent the range of perspectives among Committee members and incorporate perspectives from those not at the table, including other interest groups and perspectives shared with the Committee through public comment. The Committee recommends that the State ask the USFS to consider putting these options in the DEIS for NEPA analysis, but they do not necessarily think any single option will or should be the final Alaska Roadless Rule.

The final report can be found [here](#).

Public Comment

31 members of the public shared comment at the meeting, both in person and over the phone. Out of those who spoke, 30 expressed support for increasing protections on the Tongass, leaving the Roadless Rule in place, and/or prioritizing conservation values and the needs of the fishing and tourism industries when discussing making changes to the Rule. One spoke in favor of ensuring roadbuilding allowances in the Tongass, specifically for the needs of the seafood industry. The specific issues they discussed included:

- **Thriving communities.** Several commenters challenged the idea that 'thriving communities' require extractive industries, specifically the timber industry, and encouraged the Committee to consider the potential detriment that changes to the Roadless Rule could have on communities' ability to thrive.
- **Creative solutions.** Several commenters encouraged the Committee to consider more creative solutions to economic longevity and viability for communities in the Tongass than the timber industry. Some cited the entrepreneurial younger generation, which relies on forest resources, but not in the form of extractive economies. Others suggested missing or underrepresented key topics for consideration in the Tongass' future, such as regional food security and hydropower.
- **Prince of Wales.** Two commenters spoke specifically about Prince of Wales island, urging the Committee to consider the effects of their options on the island, which one referred to as a "sacrificial lamb" and another as a "whipping post" for the timber industry in Southeast Alaska. One commenter described the stem exclusion forests of Prince of Wales, and both urged the Committee to preserve Prince of Wales from additional timber harvest.
- **Existing rule.** One commenter shared that they feel the current Roadless Rule already has the necessary mechanisms in place for road construction for important projects like mining and transmission lines, and therefore no changes or additional allowances are needed.
- **Economy of roadbuilding.** Several commenters raised questions about the economics of building new roads in the Tongass. One urged that only

economically self-sustaining new roads should be permitted. Another criticized past economic losses that the Forest Service took to build roads in the Forest. Several raised concerns that they feel existing roads are not maintained, and rather than allowing new roads, funding should be allocated to maintain what already exists.

- **Carbon sequestration.** One commenter urged the Committee to consider the economic and planet-wide benefits of carbon sequestration from old growth forest against the profit from any other type of economic activities that might disturb that forest.
- **Tourism industry.** Many commenters cited the tourism industry as a primary economic driver of Southeast Alaska's economy, and encouraged the Committee to consider its needs and prospects as a top priority in their deliberations. Several commenters also cited what they feel is Alaska's valuable, unique position and global "brand" as one of the last remaining places in North America with large, undisturbed swatches of virgin temperate rainforest.
- **Timber transition.** Several commenters supported the Tongass Advisory Committee process and the 2016 Forest Plan Amendment, and encouraged the Committee to consider options that would move toward an effective young growth transition plan.
- **Tongass 77 and TNC/Audubon Conservation Areas.** Several commenters urged the Committee to preserve roadless area protections on these regions, citing their economic importance to the tourism and fishing industries, as well as their ecological importance.
- **Fishing industry.** Many commenters discussed the importance of preserving the fishing industry, citing its value to Southeast Alaska's economy. Several made a direct link to the timber industry, saying they felt timber harvest had the potential to harm fish populations and the fishing industry. One encouraged the Committee to ensure that future roads could be developed for aquaculture programs.
- **Climate change.** One commenter urged the Committee to present options that would result in the least amount of net carbon emissions from IRAs, particularly in light of the recent Intergovernmental Panel on Climate Change (IPCC) report. Others cited their view that carbon sequestration from intact forests should be a Committee priority, and that protecting natural land surface is vital to combatting the negative effects of climate change.
- **Public process.** One commenter criticized what they feel is a rushed public process, saying there is key missing information and the process is misnamed, as it is not an Alaska-specific Rule but a Tongass-specific Rule.

The Committee reflected on and discussed the public comment. They expressed appreciation for all the people who had come to share their views.

Next Steps

The Committee concluded by agreeing to review the draft of the final report developed and reviewed by the full Committee at the conclusion of the Sitka meeting. Because the substance of the report received approval from the full Committee at the meeting, substantive changes to the options were not allowed after the meeting concluded. The Committee would make any final editorial changes to the report via e-mail and would not re-convene and/or continue any further deliberations about the report content.

The final report, finalized on November 21, 2018, can be found [here](#).

Following development of the DEIS in late spring/early summer 2019, the Committee may reconvene to review the components and alternatives included in the DEIS, and the outcomes of the analysis. At this point, the Committee may 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, if requested, including leading up to the release of the Final Environmental Impact Statement (FEIS) in spring 2020.

Appendix A: Participant List

Committee members:

- Trey Acteson, Southeast Alaska Power Agency
- Bert Burkhart, Alaska Forest Association
- Brian Holst, Juneau Economic Development Council
- Andrew Hughes, Alaska DOT&PF (retired)
- Michael Kamprich, The Nature Conservancy
- Jaeleen Kookesh, Sealaska Corporation (*In-person, then via teleconference on 11/8*)
- 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
- Nicole Grewe, USFS Region 10 (*ex officio*)

Facilitation staff:

- Connie Lewis, Meridian Institute
- Cassidy Gasteiger, Meridian Institute
- Diana Portner, Meridian Institute

Public attendees:¹

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| • Marian Allen* | • Bethany Goodrich* |
| • Jeff Arndt* | • Ellie Handler* |
| • Larry Calvin* | • Joel Hanson* |
| • Jed DeLong* | • Angela Hessenius |
| • Matt Donohue* | • Lorraine Inez Lil* |
| • Cheryl Fecko* | • Matthew Jackson |
| • Ellen Frankenstein* | • Clare Johnson* |
| • Gerald Gangle | • Jeff Kelly* |

¹ This list includes everyone who signed in or announced themselves during the public comment period and may not represent a comprehensive list of everyone who attended the meeting. An asterisk (*) denotes that they shared a public comment during the comment period.

- Tad Kisaka*
- Connie LaPerriere*
- Maia Mares*
- Connie McKenzie
- Bart Meyer*
- Keith Nyitray*
- Channer O'Connell
- Doug Osborne*
- Keith Perkins
- Katherine Pnussian*
- Debra Pohlman*
- Steve Reifentuhl*
- Doug Rhodes*
- Katie Riley*
- Claire Sanchez*
- Elsa Sebastian*
- Spencer Severson*
- Don Surgeon
- Stacey Wayne*
- John Weisenberg*
- Kurt Whitehead*
- Jarrod Yellen