

OUTDOOR ALLIANCE

September 18, 2018

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

Re: Request for Thirty-day Extension of Scoping Period for Alaska Roadless Rulemaking

Dear Secretary Perdue:

On behalf of the outdoor recreation community, we respectfully request at least a thirty-day extension of the public comment period for the recently published notice of intent to prepare an environmental impact statement on a proposed state-specific rule for management of inventoried roadless areas in the Tongass National Forest (83 Fed. Reg. 44252, Aug. 30, 2018).

Outdoor Alliance is a coalition of nine member-based organizations representing the human powered outdoor recreation community. The coalition includes Access Fund, American Canoe Association, American Whitewater, International Mountain Bicycling Association, Winter Wildlands Alliance, The Mountaineers, the American Alpine Club, the Mazamas, and Colorado Mountain Club and represents the interests of the millions of Americans who climb, paddle, mountain bike, and backcountry ski and snowshoe on our nation's public lands, waters, and snowscapes.

The Roadless Rule is an important conservation tool that protects many of our most valued backcountry recreation areas. Our community values these areas for the opportunities they provide for climbing, hiking, mountain biking, paddling, and backcountry skiing. While these areas are protected from new development, their management is less restrictive than Wilderness, providing important middle-ground management regimes for valued places. On the Tongass National Forest, the Roadless Rule protects popular recreation opportunities like the East Glacier Trail and Fritz Cove Road sport climbing crag outside of Juneau. Roadless areas on the Tongass are also treasured for remote and adventurous recreation opportunities, like the world-renowned mountaineering routes on the Mendenhal Towers and the Direct East Ridge of Devil's Thumb, one of the 50 classic climbs in North America. These areas are highly valued by outdoor recreationists across Alaska and the nation.

Additional time is needed to inform the public that the Forest Service is considering changes to the Roadless Rule that could significantly affect these places and other



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undeveloped lands on the Tongass. Furthermore, because rulemaking is a complex process, we need more time to conduct the research necessary to address the wide range of scoping issues upon which the Forest Service is seeking input. The scoping notice states that the Forest Service intends to “evaluate... management solutions that address infrastructure, timber, energy, mining, access, and transportation needs to further Alaska’s economic development, while still conserving roadless areas for future generations.” This is a broad suite of issues, many of which influence recreational uses.

Although the listed issues the Forest Service intends to evaluate all affect recreation, we believe it is important that the Forest Service also carefully consider the value that the Roadless Rule holds for recreation interests and Alaska’s outdoor recreation economy. We wish to provide the Forest Service with in-depth information about the identified scoping issues and to do so, we need more time to examine them appropriately.

In addition, given the nation-wide interest in the Roadless Rule and national roadless lands in Alaska, we ask the Forest Service to conduct additional public meetings outside of Alaska. Currently, the agency is planning only one meeting in the lower 48, in Washington, D.C. at a yet-to-be-determined date. The Forest Service should also consider holding meetings in major population centers with strong connections to Alaska, such as Seattle and Minneapolis. In selecting public meeting locations, the agency should consult with interested members of Congress, outdoor recreation guiding professionals, tourism associations, and other stakeholders.

We respectfully request that the public comment period be extended to a minimum of seventy-five days and that the Forest Service provide additional public meetings during the scoping process.

Best regards,



Louis Geltman
Policy Director
Outdoor Alliance

cc: Dan Jiron, Acting Deputy Under Secretary for Natural Resources and Environment, U.S. Department of Agriculture
Chris French, Associate Deputy Chief, U.S. Forest Service

Adam Cramer, Executive Director, Outdoor Alliance
Zachary Leich-Huey, Interim Executive Director, Access Fund



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Wade Blackwood, Executive Director, American Canoe Association
Mark Singleton, Executive Director, American Whitewater
Dave Wiens, Executive Director, International Mountain Bicycling Association
Mark Menlove, Executive Director, Winter Wildlands Alliance
Tom Vogl, Chief Executive Officer, The Mountaineers
Phil Powers, Chief Executive Officer, American Alpine Club
Lee Davis, Executive Director, the Mazamas
Keegan Young, Executive Director, Colorado Mountain Club

