

December X, 2019

The Honorable Sonny Perdue
U.S. Department of Agriculture
1400 Independence Ave., S.W.
Washington, D.C. 20250

Ms. Vicki Christiansen
U.S. Forest Service
1400 Independence Ave., S.W.
Washington, D.C. 20250

Dear Secretary Perdue,

Thank you for the opportunity to comment on the Proposed Alaska Roadless Rule. The Juneau Economic Development Council's Visitor Products Cluster Working Group is a group of business representatives in the tourism sector (or "cluster") that meet regularly to collaborate with USFS staff and identify opportunities to increase business opportunities. We are writing to convey our concerns that the Proposed Rule disregards impacts to the tourism sector, introduces uncertainty and distracts the agency from addressing crucial tourism management needs. We hope that this process will not distract the Forest Service from using limited resources to address positive solutions for the region's thriving tourism sector.

When Americans come to see Alaska, they come to the Tongass National Forest. Two thirds of all visitors to the state come here and approximately 1.5 million people each year. Tourism is the biggest private-sector economic driver in Southeast Alaska, creating 8,000 jobs, supporting nearly 12,000 additional jobs and contributing more than 1 billion dollars to the region every year. Our sector is diverse, but we are united by our reliance on the Tongass for the scenery, iconic fish and wildlife, and recreation opportunities that cannot be found anywhere else. The wild setting is our competitive advantage in the global tourism market.

When your office announced that the Forest Service would undertake an Alaska-specific roadless rule, we were encouraged by the possibility of a collaborative effort to move beyond controversy, balance local economic opportunity and maintain roadless values. We are supportive of community self-determination for local development. However, the Proposed Rule misses the opportunity to move beyond controversy. This path empowers the most extreme voices while obstructing more productive and mutually beneficial pathways to the future. We hope that this will not further delay important agency action on priorities for our businesses, such as long-range recreation planning, permitting, infrastructure, and recreation program staffing.

- Forest Service acknowledges the impacts on tourism businesses from displacement caused by expanding incompatible development. According to the agency's analysis, the proposed rule will create economic losses and displace outfitters and guides. "A range of potential lost revenue to outfitter and guides (approximately \$77,000 per year) and across all recreation related industry in Southeast Alaska (\$319,000 per year, includes outfitters and guide expenditures) is estimated under the proposed rule (and Alternatives 2 through 5)."¹
 - We urge the Agency to seek a path forward that will not incur economic losses to our sector.
 - The Proposed Rule may underestimate negative economic impacts of the displacement of existing use. Land management decisions on the Forest impact

¹ Forest Service. Alaska Roadless Rulemaking Regulatory Impact Assessment and Cost-Benefit Analysis. Page 32



businesses when they're cruising the Inside Passage as well as on the Forest. The existing high-quality tourism places in the Forest are already crowded and expensive to reach. In order to provide world-class experiences, tourism companies need more places to take customers, not fewer. The Forest Service should not be shrinking the pie.²

- We're concerned that removing the Roadless Rule introduces significant management uncertainty and that it will result in activity that is incompatible with our existing business activity. Roadless Development LUDs are a good resource, offering the right combination of commercial access and natural landscapes to meet our customer's high expectations. Roadless areas preserve scenic viewsheds for all visitors cruising Alaska and offer opportunities for businesses to take large groups onto public land. One cruise company estimates that 95% of the places they visit are Roadless areas.
- If the Proposed Rule does expand development into Roadless Areas, it may disrupt private sector efforts to address crowding in remote anchorages. Expedition-style cruise companies, professional bear hunting guides and the Forest Service have collectively invested tens of thousands of dollars and hundreds of hours into cooperative planning and communications that keep us from accidentally overlapping with each other while operating in the backcountry. The DEIS and Cost-Benefit Analysis predict degradation of tourism business opportunities in Roadless areas that is likely to cause displacement. This will increase conflict and crowding and compromise the collaborative efforts supported by the Forest Service.
- The expedition-style cruises and outfitters and guides that rely on Roadless Areas are more likely than large-scale tourism to provide economic opportunity and growth to small, remote communities.
- We are concerned that Agency analysis and representations of the Proposed Rule are inconsistent when explaining how the Proposed Alternative will impact specific places. The Impact Assessment underestimates the impacts to scenery and viewsheds and then acknowledges that "Roadless areas are viewed from a variety of vantage points, including the communities of Southeast Alaska, the Alaska Marine Highway ferry route, cruise ship routes, existing road systems, popular small boat routes and anchorages, small aircraft, and hiking trails. Road construction and timber harvest can have varying degrees of adverse effects on the scenic integrity of a landscape. In most studied viewsheds, the highest effects on scenery would be associated with Alternatives 5 and the proposed rule."³ These areas also have value for their contiguousness. The scenic value of these areas could be compromised by visible development.
- The DEIS relies on limits in the 2016 Tongass Land Management Plan (TLMP) to limit negative impacts to the Tourism sector from a full repeal, despite the acknowledgement from Forest Service officials that this repeal would likely

² The Agency's Impact Assessment proposes that displacement may result in tourism operators finding alternative sites that are "closer," or less remote. Businesses are already going as far as economically and logistically possible to find suitable locations, using closer locations will decrease the value of tourism products and increase conflict with local recreation use.

³ Forest Service. Alaska Roadless Rulemaking Regulatory Impact Assessment and Cost-Benefit Analysis. Page 20

undo the 2016 TLMP Amendment.⁴ This circular rationale and piecemeal change of the Agency's management may obscure greater impacts and introduces more uncertainty.

- The Proposed Rule and DEIS fail to meaningfully capture the input of tourism businesses Visitor Products Cluster Working Group during the scoping and State of Alaska advisory committee. The Visitor Products Cluster Working Group participated in the State's Advisory Committee process to help provided the USFS with information about locations and the context of visitor needs and expectations that were discarded in the Proposed Rule. In our scoping comments and input to the state committee, many operators urged the Forest Service to collaborate with permitted users and the Marine Exchange to analyze the broader impacts on viewsheds and cruising routes. Agency staff acknowledged that they felt they had insufficient information to analyze visitor industry impacts at the time. Has this changed?
- The Proposed Rule fails to support a management environment in which the Forest Service can deliver increased commercial access for tourism companies.
 - Tourism is frequently cited as a marquee economic opportunity on public lands. However, the agency has failed to support the tourism sector. Funding for long-range recreation planning, permitting, infrastructure, and recreation program staffing continues to decrease.
 - The Roadless Rulemaking introduces extensive process and significant uncertainty about future process that monopolizes private sector and agency resources and distracts from proactive tourism planning.
 - The USFS approach to full-scale Roadless Rule repeal ignores ecosystem values and planning processes that promote tourism and recreation. With so few dollars and staff resources available for recreation priorities on the Tongass, a full repeal will likely continue to pull resources away from tourism and recreation programs.

We are supportive of the diverse economic opportunities that make our communities unique and supportive of community self-determination. However, as a National Forest, we also recognize the increasingly rare qualities and characteristics that the Roadless Rule has protected here.

Any durable and long-lasting solution to the persistent land-management challenges on the Tongass must be based on collaboration and care for the unique opportunities that make it unique among our public lands. We encourage you to focus on positive solutions such as long-range recreation planning, special-use permitting, recreation infrastructure, and recreation program staffing.

Sincerely,

Dan Kirkwood
Visitor Products Cluster Working Group

⁴ Alaska Public Media. "Forest Service Proposes Roadless Rule Exemption for Tongass. 10/15/2019. "According to Chris French, a top Forest Service official, this could change how the Tongass is federally managed and [undo a 2016 plan amendment.](https://www.alaskapublic.org/2019/10/15/forest-service-proposes-roadless-rule-exemption-for-tongass/)" <https://www.alaskapublic.org/2019/10/15/forest-service-proposes-roadless-rule-exemption-for-tongass/>