

Advocacy Comments on Forest Service’s Proposal to Repeal 2020 Alaska Roadless Rule

On November 23, 2021, the U.S. Department of Agriculture published a notice of proposed rulemaking to repeal the 2020 final Alaska Roadless Rule. The 2020 final rule exempted the Tongass National Forest from the requirements of the 2001 Roadless Rule. On January 24, 2022, the Office of Advocacy (Advocacy) submitted the following comments:

- Advocacy conducted individual outreach and held a small business roundtable on January 18, 2022, to hear directly from small entities impacted by this rulemaking. Among the many industries represented, Advocacy heard from representatives in mining and prospecting, fisheries, logging and forestry, and the tourism industry.
- Small businesses in the mining and prospecting industries stated that Forest Service should exempt these industries from the roadless rule. They described safety challenges in using helicopters to conduct mining operations and stated that ingress and egress roads are necessary for these operations, but that they are not a permanent disruption to the forest.
- Small fisheries spoke about the need to protect forest resources, because a disruption to estuaries and culverts can affect fish populations that spawn in these areas.
- One small tour operator highlighted the demand for “untouched” natural areas by tourists. She described a network of small businesses that are supported by these visitors, including small lodging facilities, restaurants, grocery stores, and various gear and guide shops.
- Logging and forestry representatives indicated that removing roadless prohibitions would not automatically open the Tongass to new activities as logging activities are already outlined in the 2016 forest plan.
- Advocacy requested that Forest Service consider comments of small businesses, which make up the predominate number of firms in the affected Alaskan industries. Forest Service should balance the impacts of all affected small businesses and decide on an approach that meets stated conservation goals while minimizing these impacts.
- Forest Service should make the language within the regulatory text consistent with the findings presented in its initial Regulatory Flexibility Act analysis. They should also seek comment on regulatory approaches that will minimize the impact on small businesses while still accomplishing the statutory objective.

For more information visit Advocacy’s web page at advocacy.sba.gov, or contact Prianka Sharma at (202) 205-6938 or prianka.sharma@sba.gov.

