



THE STATE

Of *ALASKA*

GOVERNOR MIKE DUNLEAVY

Citizens' Advisory Commission on Federal Areas

July 31, 2026

Michael Boren
Office of the Under Secretary
Natural Resources and Environment
U.S. Department of Agriculture
1400 Independence Ave, SW
Washington, DC 20250-0108

Subject: Proposed Forest Service Directive Modernization (RIN 0596-AD74)

Dear Mr. Boren,

The Citizens' Advisory Commission on Federal Areas (CACFA) submits this letter to express significant concern regarding the reduced opportunities for public involvement associated with the U.S. Forest Service's proposed Directive Modernization rule. As established under Alaska Statute 41.37, CACFA is the entity charged with reviewing federal land-management actions for consistency with congressional intent and protecting Alaskans' rights under the Alaska National Interest Lands Conservation Act (ANILCA). It is also the only state body authorized to submit formal comments on behalf of the general public.

For more than four decades, ANILCA has provided essential protections ensuring that Alaskans can access federal lands for traditional activities, transportation needs, recreation, and economic development. Central to ANILCA is the expectation of meaningful public participation, especially when federal agencies propose changes that affect access routes, customary and traditional uses, cabin permits, subsistence opportunities, and other rights explicitly preserved by Congress. Federal land-management agencies have historically relied on transparent notice-and-comment procedures to ensure Alaskans can respond to proposals with real, on-the-ground implications.

The Forest Service's proposed rule would redefine the Forest Service Manual as the exclusive source of binding policy while designating the Forest Service Handbooks as advisory documents that may be revised or removed without public notice. It would also allow required notices to be made solely through online platforms, eliminating the current expectation of broad public dissemination. Many directive changes that may affect ANILCA-protected uses could therefore proceed without sufficient opportunity for Alaskans to review or comment on them.

Because large portions of Alaska lack reliable broadband access and federal directives often directly affect subsistence hunting, fishing, trapping, cabin access, and other ANILCA-protected activities, limiting notice-and-comment avenues disproportionately affects rural communities. These reduced opportunities conflict with ANILCA's explicit intent to safeguard Alaskans' ability to participate fully and equitably in federal land-management decisions.

To uphold ANILCA's protections and congressional intent, CACFA respectfully requests the following:

1. Ensure all major directives, proposed rules, and land-use decisions receive adequate, accessible, and well-publicized comment periods, whether contained in Manuals or Handbooks.
2. Provide in-person outreach and public meetings in rural Alaska, where communities depend on ANILCA protections and may lack online access.
3. Maintain consistent and early communication with CACFA, recognizing its statutory role as the public's representative in federal land-management reviews.
4. Avoid administrative mechanisms that reduce, bypass, or compress public comment opportunities on matters directly affecting ANILCA rights.
5. Coordinate closely with Alaska state agencies so Alaskans are fully informed of federal actions with implications for access, subsistence, transportation, customary practices, and property rights under ANILCA.

Additionally, Title V of ANILCA affirms Congress's intent that management of National Forest System lands in Alaska—particularly within the expanded Chugach and Tongass National Forests—must prioritize the conservation of fish and wildlife, maintain access for traditional and customary uses, and ensure that Alaskans have meaningful involvement in federal decision-making. Title V also directs the Forest Service to engage in cooperative planning with State and local entities, recognizing that decisions involving fisheries, access routes, and resource use have direct and significant implications for rural communities. Any modernization of Forest Service directives must therefore maintain transparent notice-and-comment procedures and uphold the participatory framework envisioned in ANILCA, ensuring Alaskans' rights and access are not diminished through administrative restructuring.

CACFA urges the Forest Service to ensure that any restructuring of its Directive System continues to reflect ANILCA's foundational principles of public access, subsistence, transparency, and participation in Alaska. Preserving meaningful comment opportunities is essential to maintaining public trust and ensuring that federal decisions reflect the needs and experiences of the Alaskans who depend upon these lands.

Thank you for your attention to this matter. CACFA looks forward to continued communication and to ensuring that ANILCA protections remain central to federal decision-making affecting Alaska.

Sincerely,


Kim Griffith

Executive Director

Citizens' Advisory Commission on Federal Areas (CACFA)