October XX, 2018

The Honorable Sonny Perdue

Secretary

U.S. Department of Agriculture

1400 Independence Ave S.E.

Washington, D.C. 20250

Dear Secretary Perdue,

We are writing on behalf of our millions of members and supporters to voice our strong opposition to any exemption or exceptions to the Roadless Area Conservation Rule (Roadless Rule) in Alaska or elsewhere.

Over the last two decades the Roadless Rule has established itself as the nation’s bedrock conservation protection for more than 58 million acres of our national forests. At its core, the Roadless Rule is about limiting costly and environmentally damaging roadbuilding and logging to help protect taxpayers and preserve wild, relatively intact roadless landscapes across the National Forest System. While preserving these places, the Roadless Rule also provides significant management flexibility for activities including mechanized recreation, connections between communities, hydropower development, mining access roads, wildfire response, and public safety.

By protecting high value conservation lands, the Roadless Rule provides numerous benefits including clean water, unmatched recreational and tourism opportunities, and wildlife habitat that supports hunting, commercial and recreational fishing, as well as many threatened, endangered, and sensitive species. Similarly, by preserving such habitat, the Roadless Rule also safeguards customary and traditional uses, particularly in Alaska. Furthermore, the Rule was explicitly designed to reduce the controversy and uncertainty that inevitably followed localized roadless planning by providing a long-term, stable, and uniform national management regime.

With more than 240 million people living within 100 miles of a national forest or national grassland, national forest roadless areas are prized for the clean water they supply to communities and their substantial contribution to growing the multi-billion dollar U.S. outdoor recreation economy. Nationally, it is estimated that in 2017 outdoor recreation generated $887 billion in consumer spending and 7.6 million direct jobs nationally. In Southeast Alaska, the visitor industry contributes nearly $4 billion to the economy and provides some 7,752 jobs.

Because of the many benefits and flexibilities of the Roadless Rule, it received comments during a multi-year process from roughly 1.6 million people, with 95% voicing support for strong roadless area protections. At the time, this represented the most robust public engagement in the history of federal rulemaking. In the decades since, the American people continue to support strong conservation protections for our public lands and roadless national forests, including in Alaska.

Alaska contains almost 15 million of the more than 58 million acres of our country’s Inventoried Roadless Areas, with more than 9 million acres in the Tongass National Forest alone. Indeed, the Final Environmental Impact Statement for the Roadless Rule explicitly identifies the Tongass as specially deserving of protection because its size and relatively intact status give it a unique role representing system-wide roadless value. The Rule is also particularly important for the Tongass given the special vulnerability of the species and natural processes in an already naturally fragmented archipelago of a thousand islands. Moreover, despite this huge complement of roadless areas, the Tongass National Forest has 1.5 million non-roadless acres, more than any other national forest on the west coast.

Given Alaska’s national roadless conservation prominence, any moves to provide exemptions or weaken the Roadless Rule in Alaska would fundamentally erode the intent and scope of roadless protections nationally. Furthermore, Alaska’s Tongass National Forest contains some of the largest remaining tracts of temperate old-growth rainforest in the world, helping make it the country’s single most important national forest for carbon sequestration and climate change mitigation. Given that parts of Alaska are warming at roughly twice the rate of the rest of the planet, maintaining an intact Tongass ecosystem, including continued protections for roadless areas, can help provide climate change solutions for Alaska and support international climate efforts.

Strong, continued protections for roadless areas in Alaska and elsewhere will also help save taxpayers millions of dollars by limiting costly new road building and allowing the Forest Service to focus on maintaining the more than 371,000 miles of national forest system roads. By limiting expensive new road building into roadless areas the Forest Service can make more funding available for maintaining and managing the existing forest road network, which has an estimated maintenance backlog of $3.2 billion. In Southeast Alaska, because of the harsh terrain and inaccessibility of many areas, roadbuilding is known to have outsized costs.

The State of Alaska’s petition for a Roadless Rule exemption contains the same arguments that have been put forward by the state and refuted by multiple court rulings upholding the process and the content of the Roadless Rule. In Southeast Alaska, the Roadless Rule is working exceptionally well at protecting national forest land from roadbuilding and commercial logging while providing flexibility for numerous other activities. For instance, the Forest Service has reviewed and approved, typically within two months, dozens of projects within Alaska’s roadless areas, including 29 mining projects, 9 hydro or intertie projects, a geothermal lease, and even an aerial tram. Notably, implementation of the Roadless Rule on the Tongass National Forest is guided by a court judgment that incorporates numerous exemptions and clarifications already suggested by USDA, the State, and others.

The reality of the Southeast Alaskan economy is that logging is no longer a driving force, contributing to less than 1% of regional employment and earnings. Attempts to restore industrial-scale old-growth logging to its unsustainable peak from decades ago could have significant impact on the thriving visitor and seafood industries, which collectively contribute 26% of jobs and 21% of earnings regionally. Additionally, a state-specific rulemaking itself will be costly and time consuming, driving limited Forest Service resources away from other regional priorities. Reopening this topic will also be controversial and undermine the regional and national coalitions and stakeholders that share the long-term goal of sustaining SE Alaska’s recreation and fishing dependent economy which is increasingly dependent on the intact, unspoiled ecosystems that make the Tongass a unique and iconic national forest.

We would like to again state our strong opposition to any exemptions or exceptions to the Roadless Rule in Alaska or elsewhere. In consideration of the national importance of the Tongass and this proposed rulemaking, we also respectfully request additional public meetings outside Alaska, as well as an extension of the comment period.

Thank you for considering our strong opposition to any changes to the Roadless Rule.

Sincerely,

CC: Chris French, Associate Deputy Chief, National Forest System, U.S. Forest Service