

Attn: Alaska Roadless Rule  
USDA Forest Service  
P.O. Box 21628  
Juneau, Alaska, 99802

December 10, 2019

RE: Federal Register Docket Number FS-2019-0023

To Whom it May Concern:

The U.S. Department of Agriculture's (USDA) proposal to exempt the Tongass National Forest from the 2001 Roadless Conservation Rule would result in unacceptable damage to the U.S.'s largest remaining old growth forest, cost taxpayers millions of dollars in wasted subsidies for road building, make climate change worse, and harm the commercial fishing and outdoor recreation economy of southeastern Alaska. For these reasons, the Center for American Progress urges the U.S. Department of Agriculture to adopt Alternative 1, the No Action Alternative.

The 2001 Roadless Rule has proven to be an essential and effective tool for conserving sensitive habitats, spawning streams, and wild areas in the Tongass National Forest. With the Roadless Rule in place, the U.S. Forest Service has gradually begun to transition its management of the Tongass away from a legacy of subsidized logging toward a more sustainable approach that capitalizes on the region's globally unique ecology. By the U.S. Forest Service's own estimates, the Tongass National Forest now supplies [one quarter](#) of all commercial salmon that are caught in the U.S., and more wild salmon than all the rest of America's national forests combined. With the roadless protections in place, the Tongass has become a powerful engine for Alaska's \$2 billion tourism and fishing economy.

The USDA's proposal to eliminate roadless protections for the Tongass would cause economic harm and waste taxpayer money. The Forest Service's own budget records show old growth logging projects – the kind that would result from exempting the Tongass from the 2001 Roadless Rule – cost taxpayers millions of dollars for road-building and other subsidies. Further, the elimination of roadless protections would endanger the spawning habitat that support southeast Alaska's commercial salmon fishery and destroy the wild character that attracts visitors from around the world.

In addition to these harms, the USDA's preferred alternative would make climate change worse. The elimination of roadless protections in the Tongass National Forest threatens a carbon sink that already stores more than 400 million metric tons of carbon dioxide equivalent and sequesters an additional 5 million metric tons of carbon dioxide equivalent annually. According to Center for American Progress estimates, implementation of the USDA's preferred alternative could result in an increase of 600 million tons of greenhouse gas emissions over the next seventy years – an amount of carbon pollution that is equivalent to the emissions of 127 million passenger vehicles in one year.

For a more detailed discussion of the economic damage, taxpayer waste, environmental impacts, and climate change consequences of the USDA's preferred alternative, we are attaching two reports:

- [Fraud in the Tongass](#)
- [Trump's Energy Policies put Alaska in the Climate Crosshairs](#)

Very respectfully,

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Senior Fellow  
Center for American Progress