



TRANSMITTED BY WEB FORM

December 17, 2019

Secretary of Agriculture Sonny Perdue
Alaska Roadless Rule
USDA Forest Service, Alaska Region, Ecosystem Planning and Budget Staff
P.O. Box 21628
Juneau, Alaska 99802-1628

Dear Secretary Perdue:

Forest Service Employees for Environmental Ethics, a 501(c)(3) conservation organization, appreciates this opportunity to comment on the draft environmental impact statement ("DEIS") prepared to evaluate the State of Alaska's proposed roadless rulemaking.

Alternative 1 (Retain the Existing Roadless Rule) Best Satisfies the Key Issues

The DEIS identifies three "key issues": 1) roadless area conservation; 2) support to local and regional socioeconomic well-being, Alaska Native culture, rural subsistence activities, and economic opportunity across multiple economic sectors; and, 3) conserve terrestrial habitat, aquatic habitat, and biological diversity. As discussed below, Alternative 1, which retains the existing roadless rule, best responds to these key issues.

In regard to roadless area conservation, the DEIS acknowledges that Alternative 1 "would protect the most acres and existing management direction would provide the highest degree of protection, with the existing general prohibitions remaining in place." DEIS at 3-12.

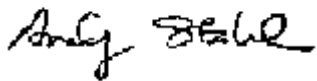
When it comes to the timber economy, the DEIS acknowledges that "overall timber harvest levels and composition (old-growth versus young-growth) are expected to remain unaffected by the final rule." DEIS at 3-44. Thus, Alternative 1 provides "230,000 acres of suitable old growth available for harvest, almost 10 times the area expected to be harvested over the next 25 years." DEIS at 3-47; *see also* DEIS at 3-49 ("The proportion of cutting activity occurring within versus outside of roadless areas would vary by alternative, but overall economic impacts are assumed to remain constant").

In regard to non-timber measures of socioeconomic well-being, Alternative 1 has the fewest adverse effects. In contrast, “impacts to existing outfitter/guide use are likely to be greatest where changes in roadless designations allow development in remote areas that are used for outfitter/guide activities dependent on high scenic integrity and undisturbed landscapes.” DEIS at 3-50. The DEIS reports that effects to the fishing industry are identical across all alternatives. Similarly, “changes in roadless management are . . . not expected to affect existing or future locatable mineral exploration or mining activities on the Forest.” DEIS at 3-51. And, while “removing roadless designations in areas under Alternatives 2 through 6 would simplify the process for projects,” doing so “would not necessarily result in an increase in the number of projects developed.” DEIS at 3-51. Finally, payments to states “would not be affected by any of the alternatives.” DEIS at 3-51.

When it comes to key issue 3 – conserving terrestrial habitat, aquatic habitat, and biological diversity – Alternative 1 is the clear winner. Under Alternative 1 “overall impacts due to fragmentation and on the Old-growth Habitat Conservation Strategy are expected to be minor and consistent with the existing Forest Plan.” DEIS at 3-62. In contrast, “harvest associated with **all** action alternatives would contribute to the cumulative reduction in POG and associated increase in fragmentation and loss of connectivity, which has the potential to reduce biological diversity.” DEIS at 3-68 (emphasis added).

In sum, and as FSEEE anticipated in our scoping comments, the DEIS does not support Alaska’s petition to amend or repeal the roadless rule.

Sincerely,

A handwritten signature in black ink, appearing to read "Andy Stahl".

Andy Stahl
Executive Director