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Alaska Roadless Rule
USDA Forest Service
P.O. Box 21628
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Via mail

Dear Forest Service,

Please notify us by mail of all actions regarding this proposed rule, in accordance with 40 C.F.R. 1506.6. If there is an email list, please add gary@friendsoftheclearwater.org and katie@friendsoftheclearwater.org to the list.

We strongly advise the Forest Service to choose the no-action alternative and leave the national roadless rule in place. We don't support a state-specific roadless rule for Alaska. We don't support exempting the Tongass National Forest from the 2001 Roadless Area Conservation Rule (2001 Roadless Rule). The Forest Service should instead manage the American public's roadless acreage as if *the American public* owns it, and not Idaho residents (for the Idaho Roadless Rule), Colorado residents (for the Colorado Roadless Rule), or Alaska residents. All Americans own the Tongass National Forest as equally as they do the Nez Perce-Clearwater National Forests in Idaho.

Research our organization conducted last year on the Forest Service's management of roadless areas illustrated the damaging degree to which the Idaho Roadless Rule is having an impact on Idaho Roadless Areas. While our research also demonstrated that the 2001 Roadless Rule is doing a poor job of protecting roadless areas in Montana because of how the Forest Service there has chosen to interpret the national rule, all alternatives presented for this new rule increase logging and roadbuilding, making the 2001 Roadless Rule the least damaging alternative. Contrary to the Forest Service's assertions, opening up the Tongass to logging interests is neither a "long-term" nor "durable" approach to managing the largest national forest that Americans own. We are including our report and appendices with this comment because they are relevant to this consideration in terms of how state-specific roadless areas play out, and issues this DEIS has not accounted for with the 2001 Roadless Rule. We are also including two spreadsheets from Region 1's NEPA roadless coordinator on logging and roadbuilding in Idaho and Montana

roadless areas since 2008. We incorporate those materials by reference into this comment because it provides a context that supports some of our below objections.

The Forest Service has oversimplified its definition of “old growth,” which in turn misleads the public and inappropriately minimizes its assessment of how many acres of intact ecosystems would be lost with the implementation of the proposed rule. In the DEIS, the Forest Service has defined “old-growth forest” as “[t]he usually late successional stage of forest development,” and “second-growth forest” or “young-growth forest” as “[t]rees that cover an area after the removal of the original stand, as by cutting or fire.” But, the Forest Service’s Pacific Northwest Research Station has recognized that the definition, which originated from foresters in days of logging and defined forests at least 150 years old, is out-of-date:

Most scientists now agree, though, that the term “old-growth forests” actually includes forests in many stages of development, and forests that differ widely in character with age, geographic location, and disturbance history.

USDA 2003. Old-growth exists in a larger context of roadless areas, where natural processes govern.

The landscape is the result of small and large disturbances, and differences in site conditions such as soil and slope. Because disturbances shape the pattern, it should be no surprise that the pattern changes over time.

USDA 2003. The important part of this equation is the undisturbed ecosystems and their landscapes.

The Forest Service represented that it anticipates harvesting 24,000 acres of “old growth” over the next 25 years based on the forest plan. DEIS Chap 3, p. 48.¹ But, discussing acres lost in terms of “old growth” and “second growth” masks the issue because it does not account for the total roadless acreage impacted by human activities and obfuscates high-quality information that the public needs for meaningful review. The agency should instead disclose how many roadless acres it would expect to impact based on the life of this forest plan over the next 10 years. Any logging in a roadless area is likely logging that will impact previously undisturbed ecosystems. And there is no account of the future landscapes that will be directly lost or indirectly impacted by fragmentation. Because we presume nature largely governs the disturbance processes in roadless areas, the agency should be discussing acreage impacted in terms of intact roadless acreage. How many roadless acres does the agency expect to log over the life of the current forest plan? How does that impact your wildlife analysis? What are the indirect impacts if logging is dispersed and fragments the land?

We are skeptical that the projections offered by the Forest Service “over the next 25 years” are reliable because forest plans should be revised every 10-15 years. In the DEIS for the preferred alternative, the Forest Service stated that it anticipated harvesting 24,000 acres of its definition of “old growth” over the next 25 years, based on the forest plan. DEIS Chap 3, p. 48. But, forest plans shouldn’t last for 25 years, and the Forest Service revised this last forest plan calculating the suitable timber base when roadless areas were off limits to include in that timber base. In the

¹ There is no discussion of disturbances, other than logging, that might eliminate what the Forest Service considers to be old growth.

next forest plan revision, will the agency recalculate the suitable timber base using roadless acreage? If the Forest Service calculates its logging based on what's available, as it presumably has in the last forest plan, the next forest plan likely will allow for an incredible increase in logging. That will render the DEIS's prediction insidious and an inaccurate underestimate. The 2001 Roadless Rule likely serves as a check on the timber harvests in forest plans, and that would be eliminated. The Forest Service needs to honestly disclose that impact to the public. And that number needs to be discussed in terms of the impacts to each of the sensitive species on the forest.

Permanently loosening a preservation rule releases a logging floodgate from which the public has little recourse when these representations unfold to more greatly benefit resource extraction. For example, as highlighted in our Roadless Report, the Forest Service expected only 15,000 acres of roadless to be harvested in the first 15 years of the Idaho Roadless Rule. The Forest Service claimed that "[t]he rule does not authorize the building of a single road or the cutting of a single tree,"² and proclaimed, much like this DEIS, a commitment to roadless while allowing local management. "Local management" is logging. But, as of last year, a decade into Idaho's Roadless Rule, the Forest Service had a preliminary accounting of 18,000 acres harvested in Idaho Inventoried Roadless areas, and our organization confirmed 15,000 of those acres with the information to which we had access.³ So, minimally, the Forest Service achieved selling off timber in roadless areas in 2/3 of that projected time, but the Forest Service may likely have surpassed that number. And now the Idaho Roadless Rule has had a greater impact than predicted, to the benefit of those who benefit from logging. This course is not reversible, and it is not easily correctable. Below is some on-the-ground monitoring our organization has done in one such logging project in Idaho's West Fork Crooked River Inventoried Roadless Area:



² 73 Fed. Reg. 61456, 61456 (Oct. 16, 2008).

³ See Completed Idaho RR projects from Region 1 NEPA-roadless coordinator 8-24-17.

Yes, the agency still technically categorizes the acres in this picture as part of an “inventoried roadless area,” which highlights the inaccuracies with the agency’s cumulative effects analysis in this DEIS.

We have no confidence that the agency has an accurate, national accounting of roadless areas that still have roadless characteristics. Without this baseline, any cumulative impacts analysis will be completely inaccurate. The Forest Service itself acknowledges that not all roadless areas have roadless characteristics. In Alternative 2, the agency proposed removing “approximately 113,000 acres from roadless designation that have been substantially altered as identified by known prior road construction or timber harvest including both development and non-development of LUDs.” *See* DEIS Executive Summary p. 7.

There are several reasons why counting all inventoried roadless acreage as acreage with roadless characteristics overestimates the remaining roadless acreage on our national forests. These reasons are described in our Roadless Report, but we highlight a few here. First, the 2001 Roadless Rule used the Roadless Area Review Evaluation (RARE II) for its base. After the 1970s RARE II but before the 2001 Roadless Rule, roadless areas were open for logging so long as the Forest Service conducted a proper environmental impact analysis. This is why the 2001 Roadless Rule makes an exception for logging in a roadless area if the area had already been logged prior to the effective date of the rule.⁴ So there are some areas technically classified as “roadless” that do not have roadless characteristics because they have been logged and roaded. Second, the Idaho Roadless Rule only allows the Chief of the Forest Service to modify substantially altered portions of roadless areas. So, portions of Idaho roadless areas that have been logged are still categorized as “Idaho inventoried roadless areas,” whether or not they actually have roadless characteristics, until modified by the head of the Forest Service. And, as you can see above, some or many of these projects have likely destroyed roadless characteristics, and the Forest Service has not recognized that, much less accounted for it.

Finally, as we found with our investigation into Montana, the Forest Service has utilized 2001 Roadless Rule exceptions such as cutting trees for “habitat improvement” to log roadless areas, over 30,000 acres to be precise.⁵ And this was just in Montana. While we investigated Idaho and Montana, we did not look into the Colorado Roadless Rule or the Forest Service’s management of any other U.S. state, so there is uncertainty with the roadless bases elsewhere. But, from what we found on the national forests in Montana, the 2001 Roadless Rule may not be as protective as anyone believes it to be. More importantly for this rule proposal, our research demonstrates that the Forest Service does not have an updated national inventory of roadless areas that have roadless characteristics. Without that inventory, the Forest Service’s cumulative impacts for removing over nine million acres from the nation’s roadless base will have likely greater cumulative impacts than reckoned.

⁴ *See* 66 Fed. Reg. 3244, 3273 (section 294.13(b)(4)). Even the Idaho Roadless Rule may not have started with an accurate accounting because it, too, makes exceptions for further logging in roadless areas under the Backcountry Restoration Theme (which is the designation for most Idaho roadless areas) with substantially altered characteristics from logging prior to the date the Idaho Roadless Rule was passed. These exceptions are designed to address out-of-date, on-the-ground realities.

⁵ *See* spreadsheet “MT Projects in IRAs_2001_without graphs 2008 to present_R1 NEPA roadless coordinator.” While the spreadsheet reported approximately 24,000 acres, we confirmed over 30,000 acres through NEPA documents accessible online.

By removing so many acres of roadless, this rule would create a dangerous precedent. The agency's DEIS already acknowledged other states are considering this, too—if the Forest Service can remove the Tongass for Alaska, what happens when other states come forward with their own rules that allow logging in roadless? Why wouldn't Utah then be allowed to remove its roadless base? Or Wyoming? Or any other state with roadless areas to be exploited by logging that are smaller than the Tongass National Forest? What is to stop all of the other states from following suit and for the United States to lose its entire roadless acreage?

For the reasons above, of the options analyzed, we only support the no-action alternative and leaving the 2001 Roadless Rule in place in Alaska.

Sincerely,



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Works cited

Bilodeau, K. and Macfarlane, G. 2019. The Roadless Report: Analyzing the Impacts of Two Roadless Rules on Forested Wildlands, Appendices A, B, and C.

USDA, Forest Service 2003. New Findings About Old-growth Forests. Pacific Northwest Research Station, Issue 4 (June 2003).