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First name: Tom

Last name: Uniack

Organization: Washington elected officials

Title:

Comments: Alaska Roadless Rulemaking #54511

Please receive the attached joint comment letter signed by 102 Washington elected officials. Local businesses, faith leaders and conservation and recreation organizations commenting on the proposed repeal of roadless area protections in the Tongass National Forest.

Tom Uniack

Executive Director

(He/Him)

Washington Wild

Keeping Washington green since 1979

The following text was copy/pasted from the attached letter. The system cannot display the formatting, graphics, or tables from the attached original.

December 16, 2019

Ken Tu

Interdisciplinary Team Leader

Alaska Roadless Rule

USDA Forest Service

P.O. Box 21628

Juneau, Alaska 99802-1628

Sent electronically to akroadlessrule@usda.gov

Re: Proposed exemption of the Tongass National Forest from the 2001 Roadless Area Conservation Rule Dear Mr. Tu:

As conservation, recreation and wildlife organizations, local business leaders, elected officials and faith leaders from Washington State, we are writing in opposition to the preferred alternative (#6) identified in the draft environmental impact statement (DEIS) proposing to exempt the Tongass National Forest from the 2001 Roadless Area Conservation Rule. Our organizations support Alternative #1 (No Action) to retain long-standing

and hard-fought protections for roadless areas within the Tongass National Forest.

Special Connection Between SE Alaska and Washington State

The Tongass National Forest is federal land owned by all Americans and its management matters beyond just Alaska. Here in Washington State, more than most areas, we have a direct connection to Southeast Alaska in many ways. The Tongass National Forest is approximately 500 miles from the northern border of Washington State, the same distance as Boise, ID. Washington is the closest state to Alaska and shares close business, economic and cultural connections. Alaska Airlines alone has 24 daily nonstop flights between Seattle and the Southeast Alaska communities of Sitka, Ketchikan and Juneau.

We share a rich cultural connection to salmon inspired by our local Tribes and natural history similar to our northern Alaska neighbors. The Tongass National Forest produces on average 28% of Alaska's annual commercial salmon catch, and 25% of the entire west coast annual harvest. A significant number of commercial fishing permits held in Southeast and offshore waters in Alaska have their home port in Washington State in places like Seattle's Fisherman's Terminal or Westport on the Olympic coast.

Additionally, five major cruise lines, including Celebrity, Princess, Carnival, Norwegian and Holland America, offer 80 cruises departing from Seattle to the inside passage, the Tongass National Forest and Glacier Bay National Park each summer. The Tongass National Forest and its roadless areas are a central draw and attraction to visitation from Washingtonians and other tourists from around the country and the world. The forest watersheds, wildlife habitat and scenery directly support the visitor experience to nearby national park areas. According to the Cruise Lines International Association, direct expenditures related to cruises from Seattle generated total economic impacts of 18,129 jobs and \$949 million in income throughout the Washington economy during 2016.¹

1 The Contribution of the International Cruise Industry to the U.S Economy in 2016, August 2017

The Tongass National Forest and its Roadless Areas are a National Treasure

The 17-million-acre Tongass National Forest is America's largest national forest with roughly 9.2 million acres protected under the National Roadless Rule. The pristine forests and watersheds of the Tongass produce 79% of the commercial salmon harvested from Southeast Alaska amounting to about 49 million salmon each year. Tourism and fisheries jobs based on the wildlife and scenic attributes of the Tongass provides 25% of all jobs in Southeast Alaska.

The Tongass is the world's largest remaining intact coastal temperate rainforest and stores more climate-disrupting pollution in its old growth forests and rich soils than any other national forest in the United States - earning its name, "America's Climate Forest." As much as 12% of the nation's stored carbon in National Forests is stored within the Tongass National Forest. Logging and roadbuilding release the stored carbon into the atmosphere at a time when we need to be cutting our emissions drastically to prevent full blown climate chaos.

The Public Input for This Proposed Rulemaking Is Insufficient

More than one million people from across the U.S. commented in favor of protecting all 9.3 million acres of Tongass National Forest inventoried roadless areas during the rulemaking process for the Roadless Area Conservation Rule (Roadless Rule) during a two-year period from 1999 to 2001. At the time, the rulemaking process for the Roadless Rule was the largest in the history of the federal government, including 1.7 million comments and 600 public meetings throughout Alaska and the lower 48 states.

Since then, public appreciation of the roadless area values of the Tongass and roadless areas throughout the West has only grown, as evidenced by the impressive growth of the tourism, visitor use and local economies associated with Southeast Alaska and around gateway communities in other states. However, as part of the current public comment period the Forest Service has ignored requests to extend public comment to 75 or 90 days and schedule public meetings in the lower 48 states (including Seattle).

As a result, many of our organizations participated in a community public meeting held in Seattle on November 23 that provided what the Forest Service would not - an opportunity for community input here in Washington State on the importance of protections for Tongass National Forest roadless areas that are managed for all Americans.

The Impact Analysis of Changes to Roadless Protections Across Alternatives is Disingenuous

Despite the fact that the preferred alternative would eliminate the Roadless Rule's prohibitions on road building and logging on all 9.2 million acres of inventoried roadless areas on the Tongass National Forest, the Federal Register notice nonsensically states that "the proposed rule would not cause a substantial loss of roadless protection."²

Furthermore, the DEIS contends that all of the alternatives - including the proposed rule's full exemption - would have minimal environmental or economic impacts. For example, despite acknowledging that "roads pose the greatest risk to fish resources on the Tongass"³ the DEIS claims that exempting the Tongass from

² Federal Register p. 55524

³ DEIS p. 3-112

the Roadless Rule (and all other alternatives) would have "negligible" effects on fish habitat and are not expected to affect the fishing industry. ⁴

Similarly, the DEIS anticipates little if any impact on the timber industry or any other sector of the economy. According to the DEIS, "overall timber harvest levels are expected to remain unaffected by the final rule," ⁵ resulting in the same number of logging and sawmill jobs under all alternatives. ⁶

This analysis fails to accurately identify differences among the range of alternatives and minimizes the impact of even the most extractive alternative. Such an approach grossly misrepresents the impact of the preferred alternative and ignores a key requirement under the National Environmental Policy Act. The lack of impact analysis sets a dangerous precedent for future proposed rulemakings impacting our public lands, parks and forests.

We support the No Action alternative: keep the Roadless Rule in the Tongass!

Thank you for your consideration of these comments.

Sincerely,

Jesse Salomon

Senator, 32nd Legislative District

Washington State Senate

John McCoy

Senator, 38th Legislative District

Washington State Senate

Christine Rolfes

Senator, 23rd Legislative District

Washington State Senate

Joe Fitzgibbon

State Representative, 34th District

Washington State House of Representatives

Amy Wallen

State Representative, 48th District

Washington State House of Representatives

Sharon Shewmake

State Representative, 42nd District

Washington State House of Representatives

Larry Gossett

Council Member (D-2)

King County Council

4 DEIS, p. S-15 and p. 3-51

5 DEIS p. 3-44

6 DEIS p. 3-49

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Save Our wild Salmon Coalition

Sam Merrill

Chair of the Conservation Committee

Black Hills Audubon

Chris Gerston

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Backcountry Essentials (Bellingham, WA)

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President

Alpine Lakes Protection Society

Donna Osseward

President

Olympic Park Associates

Phillip Beck

President

Inland Empire Fly Fishing Club

Alex Fisher

President

Wenatchee Valley Fly Fishers

Tele Aadsen & Joel Brady-Power

Owners

Nerka Sea Frozen Salmon (Bellingham, WA)

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Spokane Falls Trout Unlimited

Rob Smith

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National Parks Conservation Association

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President

North Central Washington Audubon

Philip Fenner

President

North Cascades Conservation Council

Quin Read

NW Director

Defenders of Wildlife

Nina Bell, J.D.

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Northwest Environmental Advocates

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Forest Practices Chair

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Jeff Osmundson

President

Skagit Audubon Society (Mount Vernon, WA)

Rev. Mike Denton

Conference Minister of Pacific Northwest Conference

The United Church of Christ

The Rev. Leland Seese

Pastor

Mount Baker Park Presbyterian Church

Rev. Anne Hall

Former Pastor

Lutheran Church in the San Juans

Mark Boyar

President

MidFORC Coalition

John McGlenn

President

Washington Wildlife Federation

Inessa Pearce

President

Skykomish Valley Environmental & Economic Alliance

William Wheeler

President

Washington State Council Fly Fishers International

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Congregational Church on Mercer Island (UCC)

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American Rivers

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Okanogan Highlands Alliance (Tonasket, WA)

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Eastside Audubon

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The Wilderness Society

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Spokane Mountaineers

LeeAnne Beres
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Earth Ministry

Richard Jahnke

President

Admiralty Audubon (Port Townsend, WA)

Peter Bahls

Executive Director

Northwest Watershed Institute (Port Townsend, WA)

Larry Brandt

Conservation Chair
Willapa Hills Audubon

Dave Wertz

Science and Conservation Director

Conservation Northwest

Ann Darlington

President BOD

Friends of Heybrook Ridge (Index, WA)

Michael Davis

President

Mount Baker Club (Bellingham, WA)

Matt Perkins

C0-Founder

Washington Climbers Coalition

John & Olivia Race

Owners

Northwest Mountain School (Leavenworth, WA)

Greg Friedrichs & Amy Grondin

Owners

Duna Fisheries, LLC (Port Townsend, WA)

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Seattle Audubon

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Wild Steelhead Coalition

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Wenatchee Outdoors

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Audubon Washington

Gene Bullock

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Lindsay Frickle

Executive Director

Issaquah Alps Trails Club

Judith White

President

Olympic Peninsula Audubon Society

Andrea Matzke

President

Washington Wild Rivers

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Executive Director

Olympic Forest Coalition (Quilcene, WA)

Jasmine Minbashian

Executive Director

Methow Valley Citizens Council (Twisp, WA)

Kim McDonald, PhD

Founder

Fish Not Gold

Jill Silver

Executive Director

10,000 Years Institute (Port Townsend, WA)

Chuck Chesire

President

Vancouver Wildlife League

Greg Haller

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Pacific Rivers

Judy Hallisey

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Kittitas Audubon (Ellensburg, WA)

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Great Old Broads for Wilderness

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Mountains to Sound Greenway Trust

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Palouse Audubon Society

Lance Reif

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Wild Water River Guides

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Wild Fish Conservancy

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Northwest Regional Director

Access Fund

Eddie Espinosa

Northwest Regional Representative

American Alpine Club

R.D. Grunbaum

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Friends of Grays Harbor (Westport, WA)

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Fall Creek Fish Co.

Longview, WA

Arden Hagen

President

Vancouver Audubon Society

Larry Lober

President

Greater Bellingham Running Club

Michael Foster

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NOLS Pacific Northwest

Andrea Imler

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Washington Trails Association

Molly Whitney

Executive Director

Cascade Forest Conservancy

Gus Bekker

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El Sendero Backcountry Ski and Snowshoe Club

Dana Ward

Co-Chair, Tri-Cities, Washington Chapter

Lower Columbia Basin Audubon Society (Richland, WA)

Dan Streiffert

Conservation Chair

Rainier Audubon Society (Auburn, WA)

Martin Gowdy
Owner/operator
F/V Charity

CC: U.S. Senator Patty Murray
U.S. Senator Maria Cantwell
WA Governor Jay Inslee

[Position]