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Title:

Comments: REI Co-op Comments: Tongass Roadless Rule DEIS

Please see our attached REI Co-op's comments in response to the Alaska Roadless Rulemaking #54511.

Taldi Harrison | Manager, Government & Community Affairs

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December 16, 2019

The Honorable Sonny Perdue  
U.S. Department of Agriculture  
1400 Independence Ave., S.W.  
Washington, D.C. 20250

RE: Alaska Roadless Notice of Proposed Rulemaking

Dear Secretary Perdue:

On behalf of our 18 million members, REI Co-op strongly opposes recent proposals to exempt Alaska's Tongass National Forest from the Roadless Area Conservation Rule. National Forest roadless areas provide some of the finest outdoor recreation opportunities in the United States. Our National Forest roadless areas—including the 9.3 million acres in the Tongass—are where millions of people enjoy hiking, biking, camping, hunting, fishing, and other recreational activities each year.

REI supports Alternative #1 (No Action) to retain critical, long-standing protections for roadless areas within the Tongass National Forest. For nearly two decades, the federal Roadless Rule has prohibited additional road-building and logging in the Tongass National Forest, which is part of the largest remaining temperate rainforest on Earth.

In addition to the intrinsic and experiential values of roadless areas, the values protected by the Roadless Rule support the quality of life and economic vitality of nearby communities. Roadless lands are integral to the outdoor recreation economy around the country, including in Alaska where outdoor recreation directly employs 72,000 people, drives \$7.3 billion in consumer spending, supports \$2.3 billion in wages, and contributes \$337 million in state and local tax revenue.<sup>1</sup>

Roadless areas offer the right combination of beautiful scenery, wild landscapes, fish and wildlife, and access that the outdoor recreation and tourism industry thrives on. According to analysts, tourism is the fastest growing industry in Southeast Alaska; in 2015 tourism accounted for 16% of all employment in the region and 23% of all the private sector jobs, with a strong outlook into the future.<sup>2</sup> Outdoor recreation in Alaska supports four times as many jobs in the state as oil and gas production, mining, and logging combined.<sup>3</sup> The only industry with more economic significance in Southeast Alaska is the

1 Outdoor Industry Association, Alaska (2018), available at

[https://outdoorindustry.org/wp-content/uploads/2017/07/OIA\\_RecEcoState\\_AK.pdf](https://outdoorindustry.org/wp-content/uploads/2017/07/OIA_RecEcoState_AK.pdf)

2 Southeast Conference, Southeast Alaska by the Numbers 2016 (September 2016), at 7.

3 Outdoor Industry Association, Alaska (2018), available at

[https://outdoorindustry.org/wp-content/uploads/2017/07/OIA\\_RecEcoState\\_AK.pdf](https://outdoorindustry.org/wp-content/uploads/2017/07/OIA_RecEcoState_AK.pdf)

fisheries industry. Here, too, the Roadless Rule has been essential to a sustainable economy. The pristine forests and watersheds of the Tongass support almost 80% of the commercial salmon harvested annually from Southeast Alaska. In 2016 the seafood industry sector in southeast accounted for 10% of all employment earnings, over 3800 individuals employed, over \$200 million in earnings, and \$2.7 million in shared fish taxes.<sup>4</sup> Combined, fishing, tourism and outdoor recreation account for 26% of regional employment.

Southeast Alaska's tourism and fishing industries depend on the thriving wildlife of the Tongass National Forest. The Roadless Rule helps protect old-growth habitat for birds like the Prince of Wales Spruce Grouse and Northern Goshawk, as well as for mammals like wolves and deer. Opening roadless areas to more logging and roads will fragment the forest and eliminate more of the big old trees that these animals and the entire ecosystem rely on. Furthermore, intact, ancient forests are strongholds of climate resilience, and the Tongass is one of world's largest.

We strongly endorse Alternative #1 (no action) to support upholding the national roadless rule in Alaska. The Tongass National Forest is an outdoor recreation and ecological paradise—not just for Alaskans, but for all Americans. Roadless areas in the Tongass contain much of the region's most productive wildlife habitat, quality salmon habitat, carbon sequestration and recreation opportunities. Given the drastic consequences of missteps—for the landscape itself, the communities and industries that depend on an ecologically and aesthetically sound forest, and for the climate—it is essential that the Forest Service retain the Roadless Rule.

Sincerely,

Taldi Harrison

Government & Community Affairs Manager, REI Co-op

4 Southeast Conference, Southeast Alaska by the Numbers 2016 (September 2016), at 3.

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