

Data Submitted (UTC 11): 12/16/2019 9:00:00 AM  
First name: Emily  
Last name: Strombom  
Organization: The Wilderness Society  
Title: Senior Government Relations Representative  
Comments: December 16, 2019

The Honorable Sonny Perdue Ms. Vicki Christiansen

Secretary Chief

U.S. Department of Agriculture U.S. Forest Service

1400 Independence Ave SW 1400 Independence Ave SW

Washington, D.C. 20250 Washington, D.C. 20250

Dear Secretary Perdue and Ms. Christiansen:

We are writing on behalf of our millions of members and supporters to voice our strong opposition to the Forest Service's selection of the "full exemption" alternative (Alternative #6) contained in the Draft Environmental Impact Statement (DEIS) for the proposed Alaska state-specific roadless rule. We instead urge you to select the "no action" alternative (Alternative #1) that would leave intact existing protections for the over 9 million acres of the Tongass National Forest currently protected by the National Roadless Area Conservation Rule, or Roadless Rule.

The Forest Service adopted the Roadless Rule in 2001 to restrict road building and commercial logging on more than 58.5 million acres of National Forest System land across 39 states. Notably, the rule provides flexibility for management activities such as road connections between communities, hydropower development, mining access roads, wildfire response, and mechanized recreation. Over 95 percent of the 1.6 million comments that the USDA received during that rulemaking process-the most extensive in history at the time-strongly supported roadless protections. Public support for the Roadless Rule remains high, as evidenced by a 2018 Pew Charitable Trusts poll which found that 75 percent of Americans support it. Given the myriad ecological, economic, cultural, and climate benefits of roadless areas, this overwhelming public support should come as no surprise.

Commonly referred to as the "crown jewel" of the National Forest System, the Tongass National Forest is the homelands of the Tlingit, Haida, and Tsimshian peoples, and is one of the most biologically diverse and relatively

intact temperate rainforests on earth. Its large, intact roadless areas provide superlative habitat for grizzly bears, wolves, Sitka black-tailed deer, bald eagles, all five species of Pacific salmon, and other species that otherwise are threatened or endangered in the lower 48. Road building and clearcutting fragment wildlife habitat, contributing to population declines at a time when one million species are facing extinction worldwide according to the Intergovernmental Panel on Biodiversity and Ecosystem Services.

Protected roadless areas in the Tongass and elsewhere safeguard clean drinking water for local communities by acting as a water filtration network that catches rainfall and regulates runoff, preventing pollutants from making their way back to waterways-a process that can be disrupted by logging and road building. The Forest Service estimates that nationwide, more than 60 million Americans get their drinking water from a source that is filtered by National Forest lands with the purest drinking water coming from headwaters originating in wilderness and roadless areas. If the administration's proposed Alaska exemption goes into effect, it could trigger a wave of additional state-specific rules, potentially putting this valuable ecosystem service at risk for communities across the country.

The Tongass is also one of the most important natural solutions at our disposal to combat climate change, a fact that the DEIS itself acknowledges. Containing some of the largest remaining tracts of temperate old-growth rainforest in the world, the Tongass holds approximately 8 percent of the carbon stored by all U.S. national forests. When forests-and in particular old-growth forests-are cut down, most of the carbon stored in the trees and soil is released into the atmosphere as a greenhouse gas pollutant. In fact, the Intergovernmental Panel on Climate Change's (IPCC) recent report on climate change found that the single biggest source of carbon emissions from the land use sector is global deforestation and forest degradation. At a time when the climate crisis and biodiversity crisis are each approaching a point of no return, and parts of Alaska are warming at twice the rate of the U.S. average, it is reckless and irresponsible for the administration to be pushing forward with a proposal that will in all likelihood exacerbate a primary cause of climate change.

Maintaining strong roadless protections is also important from an economic perspective. The Roadless Rule saves taxpayers millions of dollars by limiting expensive new road building, which has some of the highest costs in Southeast Alaska because of its remoteness and rugged terrain. Rather than fragmenting wildlife habitat with a network of new roads, the Forest Service should instead direct its limited resources toward addressing the existing 371,000-mile network of National Forest System roads and its approximately \$3.2 billion maintenance backlog. Further, any attempt to return the unsustainable practice of old-growth logging to its peak could have serious consequences for the region's robust tourism and fishing industries, which collectively contribute 26 percent of jobs and 21 percent of earnings annually. Removing Roadless Rule protection, especially from the 2 million acres of inventoried roadless areas within Development Land Use Designations, as called for by Alternative 6, could gravely threaten these industries and the economic vitality of the region as a whole.

The DEIS consistently downplays or ignores the impacts created by the preferred alternative by failing to recognize that the environmental impacts of building new roads and clearcutting will be far greater in pristine roadless areas than in previously roaded land. Simply put, place matters - especially in this crown jewel of the National Forest System. Furthermore, the DEIS falsely claims that exempting the Tongass from the Roadless Rule will result in no more logging than was anticipated in the 2016 Tongass Forest Plan Amendment, ignoring the fact that the Plan could be easily amended again after adoption of the Tongass roadless exemption, as

Governor Dunleavy and other vocal proponents of the Tongass exemption have advocated in hopes of reviving the region's struggling timber industry.

In addition, we object to the proposed rule's broad authority to change boundaries and classifications of the 5.4 million acres of inventoried roadless areas in Alaska's Chugach National Forest. This unwarranted proposal would give the Forest Service unfettered discretion to alter boundaries or even eliminate entire roadless areas from the Roadless Rule's protections.

We would like to reiterate our strong opposition to the Forest Service's selection of Alternative #6, the DEIS's full exemption alternative. Exempting the Tongass National Forest from the Roadless Rule would be both environmentally and financially disastrous, recklessly threatening this iconic forest's incomparable ecological, economic, recreational, and cultural values. We instead urge you to act in accordance with the wishes of the majority of Alaskans, as well as those of the American public at large, and hundreds of scientists, by selecting the no action alternative, and preserving roadless protections for the Tongass.

Thank you again for your consideration of our views.

Sincerely,

Alaska Interfaith Power and Light

Alaska Wilderness League

American Bird Conservancy

Audubon Society of Corvallis

Back Country Horsemen of America, Santa Fe Chapter

California Wilderness Coalition

Cascadia Wildlands

Center for Biological Diversity

Central Colorado Wilderness Coalition

Central Sierra Environmental Resource Center

Chattooga Conservancy

Climate Hawks Vote

Conejos Clean Water

Conservation Northwest

Conservatives for Responsible Stewardship

Defenders of Wildlife

Earthjustice

Endangered Species Coalition

Environment America

Environmental Protection Information Center

Extinction Rebellion Santa Fe

Foothill Conservancy

Forest Issues Group

Friends of Bell Meadow

Friends of Plumas Wilderness

Friends of the Bitterroot

Friends of the Earth US

Friends of the Inyo

Georgia ForestWatch

Geos Institute

Great Old Broads for Wilderness

Greater Hells Canyon Council

High Country Conservation Advocates

John Muir Project

Kalmiopsis Audubon Society

Klamath Forest Alliance

Klamath-Siskiyou Wildlands Center

Lassen Forest Preservation Group

League of Conservation Voters

Montana Wilderness Association

MountainTrue

National Audubon Society

National Parks Conservation Association

Natural Resources Defense Council

New Mexico Audubon Council

New Mexico Horse Council

New Mexico Sportsmen

New Mexico Wilderness Alliance

New Mexico Wildlife Federation

North Cascades Conservation Council

Northcoast Environmental Center

Olympic Park Associates

Once a Forest

Oregon Wild

Pacific Rivers

Protect Our Winters

Public Lands Media

Quiet Use Coalition

Renewable Juneau

RESTORE: The North Woods

Rio Grande Valley Broadband of the Great Old Broads for Wilderness

Rivers & Birds

Safe Alternatives for our Forest Environment

San Juan Citizens Alliance

San Luis Valley Ecosystem Council

Santa Fe Forest Coalition

Save Our Canyons

Sierra Club

Sierra Forest Legacy

Sky Island Alliance

Snowlands Network

Soda Mountain Wilderness Council

Southeast Alaska Conservation Council

STAND

The Clinch Coalition

The Conservation Alliance

The Fire Restoration Group

The Lands Council

The Mountain Pact

The Wilderness Society

Umpqua Valley Audubon Society

Virginia Wilderness Committee

Washington Wild

Western Environmental Law Center

Western Values Project

Western Watersheds Project

White Mountain Conservation League

Wild and Scenic Rivers

Wild Connections

Wild Watershed

WildEarth Guardians

Women's Earth and Climate Action Network

Wyoming Wilderness Association

Yaak Valley Forest Council

[POSITION]