

January 24, 2022

The Honorable Tom Vilsack  
Secretary  
U.S. Department of Agriculture  
1400 Independence Ave.  
S.E. Washington, D.C. 20250

Dear Secretary Vilsack:

We are writing on behalf of our millions of members and supporters to voice our strong support of the U.S. Department of Agriculture’s proposal, published in the Federal Register on November 23, to repeal the state-specific Alaska roadless rule and reinstate the national Roadless Area Conservation Rule (Roadless Rule) in the Tongass National Forest. We also support the other three elements of the USDA’s Southeast Alaska Sustainability Strategy announced on July 15: ending large-scale old growth logging in the Tongass, consulting with the region’s Tribes and Native corporations, and funding investment opportunities in the region that support Tribal and stakeholder priorities.

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 38 states, including more than 9 million acres in the Tongass National Forest. 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 comments on any federal rulemaking up to that time—strongly supported roadless protections.

Likewise, the vast majority of 267,000 public comments on the Alaska roadless rule Draft EIS favored keeping the Roadless Rule in place, including 96 percent of the 15,909 “unique letters” tabulated by the Forest Service. Public support for the 2001 Roadless Rule remains high among the American public, 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 one of the most important natural climate solutions at our disposal to combat climate change, as the USDA’s Federal Register notice acknowledges. Containing some of the largest remaining tracts of temperate old-growth rainforest in the world, the Tongass National Forest holds approximately 8 percent of the carbon stored by all forests in the U.S. and 20 to 25 percent of carbon stored in all 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—even when some of the wood is manufactured into long-lived products.<sup>1</sup> 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

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<sup>1</sup> Harmon, M. E., Ferrell, W. K., and Franklin, J. F.: 1990, ‘Effects on Carbon Storage of Conversion of Old-Growth Forests to Young Forests’, *Science* 247, 699–702.

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 essential for the Biden administration to protect the rich carbon stores of the Tongass National Forest as a model for other nations to help combat climate change.

The Tongass National Forest is also one of the most biologically diverse and relatively intact temperate rainforests on earth. Its large, intact roadless areas provide superlative habitat for grizzly bears, 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 National Forest 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. The previous administration's Tongass exemption set a bad precedent that could trigger a wave of additional state-specific rules elsewhere, potentially putting this valuable ecosystem service at risk for communities across the country.

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 and subsidized logging, 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, its approximately \$3.2 billion maintenance backlog, and restoration needs on the Tongass National Forest's 1.3 million developed acres—more than any other national forest up and down the West Coast. Further, roadless area logging could harm the region's robust tourism and fishing industries, which collectively contribute 26 percent of jobs and 21 percent of earnings annually. Restoring Roadless Rule protection, especially to the 2 million acres of inventoried roadless areas within Development Land Use Designations, will support these industries and the economic vitality of the region as a whole.

The previous administration consistently ignored the public during the Alaska roadless rulemaking process and failed in its obligation to consult meaningfully with the Alaska Native Tribes who live in the Tongass National Forest, have relied on its resources since time immemorial, and will benefit the most from restoration of the Roadless Rule there. The previous administration ignored the comments and in-person meeting requests of Alaska Native Tribes and pushed ahead with the rulemaking, despite the lack of any pretense of urgency. Partly because of the federal government's failure to engage meaningfully with Tribes during that, and other, rulemaking processes, several Alaska Native Tribes submitted a petition to USDA asking for a new rule—separate from the Roadless Rule and independent of the Alaska Roadless Rulemaking process—to better protect traditional homelands through more effective and cooperative engagement with Tribes. In addition to moving forward with reinstating the Roadless Rule on the Tongass, in accord with the stated desires of Alaska Native Tribes and an overwhelming majority of the public, the USDA should focus its efforts on actions that are productive and support the interests of the Southeast Alaska region, like the Tribes' request for improved, cooperative engagement and the collaborative Indigenous Guardians agreement between the Forest Service and Central Council of Tlingit & Haida Indian Tribes of Alaska.

We reiterate our strong support of reinstating the Roadless Rule in the Tongass National Forest and implementing the entirety of the USDA's Southeast Alaska Sustainability Strategy. Protecting the magnificent roadless areas and old growth forests of the Tongass National Forest from logging and road building is both environmentally and financially advantageous, safeguarding this iconic forest's incomparable ecological, economic, recreational, and cultural values. We urge you to act in accordance with the wishes of the majority of Alaskans and of the American public at large, as well as those of hundreds of scientists, by repealing the Alaska roadless rule and restoring roadless protections for the Tongass National Forest. Thank you for your consideration of our views.

Sincerely,

350Juneau

Alaska Environment

Alaska Wilderness League

Audubon Alaska

Climate Hawks Vote

Conservation Northwest

Defenders of Wildlife

Earthjustice

Environment America

Environmental Action

Environmental Protection Information Center

Fairbanks Climate Action Coalition

Friends of Plumas Wilderness

Great Old Broads for Wilderness

Greater Hells Canyon Council

High Country Conservation Advocates

John Muir Project of Earth Island Institute

Kalmiopsis Audubon Society

KEEN

Klamath Forest Alliance

National Audubon Society

Natural Resources Law

New Mexico Sportsmen

Patagonia

Rio Grande Indivisible

Southeast Alaska Conservation Council

Sierra Club

Soda Mountain Wilderness Council

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The Wilderness Society

Upper Gila Watershed Alliance

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Yaak Valley Forest Council

Yellowstone to Uintas Connection