

Alaska Rainforest Defenders - Alaska Wilderness League - Audubon Alaska  
Center for Biological Diversity - Defenders of Wildlife - Earthjustice  
Environment America - Greenpeace USA - Natural Resources Defense Council  
Patagonia - Sierra Club - Southeast Alaska Conservation Council  
The Wilderness Society - Wild Heritage - Women's Earth and Climate Action Network

October 19, 2022

The Honorable Meryl Harrell  
Deputy Under Secretary, Natural Resources and Environment  
U.S. Department of Agriculture  
1400 Independence Ave., S.W.  
Washington, DC 20250

Dear Deputy Under Secretary Harrell,

We write today one month before expected reinstatement<sup>1</sup> of the Alaska Roadless Rule to thank the Department in advance for following through on this critical element of the Southeast Alaska Sustainability Strategy (SASS). As USDA recognized in the notice of rulemaking, intact forests are central to the culture and ways-of-life of the Alaska Native peoples who have lived in and stewarded the lands of Southeast Alaska for centuries. The Tongass contains the greatest concentration of old-growth forests in the nation, 16% of all inventoried roadless areas, and 20% of all the carbon on the entire national forest system. On top of traditional cultural values, Tongass intact forests provide necessary support to the region's major economic drivers—fishing, tourism, and recreation. Restoring the Roadless Rule, coupled with helping the region transition through the SASS, has brought long-term, genuinely sustainable land management back to the forefront of Southeast Alaska planning.

The Roadless Rule is sensible policy for Alaska and our nation alike, because of the biodiversity, climate, and sustainable local uses that the rule protects. Past logging roads and construction have fragmented wildlife habitat in certain areas of Southeast Alaska, especially on Prince of Wales Island, leaving behind centuries of impacts as corporations chased short-term profits from industrial-scale old growth clear cutting. This has created the need for numerous restoration projects, as old roads fall into disrepair thus impeding salmon passage and harming water quality. Action to reinstate the Roadless Rule recognizes that these highly impactful extractive practices of the past do not define a positive future for Southeast Alaska. The region's economy has already transitioned away from industrial-scale logging, in favor of more sustainable industries like tourism, recreation, and fishing. This sustainable economy, along with cultures that have been built around clean water, abundant wildlife populations, and intact forests, makes restoring the Roadless Rule essential for securing a better future for Southeast Alaska.

The Roadless Rule also makes sense for Southeast Alaska because it allows exemptions for certain essential activities via the permitting process, while maintaining the conservation intent of the rule. The Forest Service has demonstrated the flexibility of the tool and a willingness to work with local communities over the years by approving a variety of road construction projects – including renewable energy projects, power transmission interties, and even mining roads – within inventoried roadless

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<sup>1</sup> Tongass National Forest Schedule of Proposed Actions, as released October 2022

areas. As of January 2018, 57 projects have been submitted for review, and all were approved, generally within one month.<sup>2</sup> The Roadless Rule is a solution that stops large-scale logging and road impacts, while leaving flexibility for other essential infrastructure projects that provide community value.

We encourage you to finalize the reinstatement of the Roadless Rule in November, consistent with the Department's legal obligations and commitment to meaningful engagement with Alaskan Tribes during this process. Thank you again for your work to begin restoring a sustainable approach to the Tongass National Forest.

Sincerely,

Andy Moderow  
*State Director*  
Alaska Wilderness League

Larry Edwards  
*President*  
Alaska Rainforest Defenders

David Krause  
*Interim Executive Director*  
Audubon Alaska

Edward B. Zukoski  
*Senior Attorney*  
Center for Biological Diversity

Pat Lavin, J.D.  
*Alaska Policy Advisor*  
Defenders of Wildlife

Kate Glover  
*Senior Attorney*  
Earthjustice

Ellen Montgomery  
*Public Lands Campaign Director*  
Environment America

Amy Moas, Ph.D.  
*Senior Campaigner*  
Greenpeace USA

Garett Rose  
*Staff Attorney*  
Natural Resources Defense Council

Keith Shattenkirk  
*Program Officer*  
Patagonia

Alex Craven  
*Senior Campaign Representative*  
Sierra Club

Maranda Hamme  
*Tongass Forest Program Manager*  
Southeast Alaska Conservation Council

Josh Hicks  
*Senior Campaign Manager*  
The Wilderness Society

Dr. Dominick A. DellaSala  
*Chief Scientist*  
Wild Heritage

Osprey Orielle Lake  
*Executive Director*  
Women's Earth and Climate Action Network

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<sup>2</sup> Frequently Asked Questions Regarding Inventoried Roadless Areas, US Forest Service Alaska Region, September 2018