

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,

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Washington State Senate

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⁴ DEIS, p. S-15 and p. 3-51

⁵ DEIS p. 3-44

⁶ DEIS p. 3-49

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