

Alaska Interfaith Power and Light \* Alaska Wilderness League  
Alpine Lakes Protection Society \* American Bird Conservancy \* American Rivers  
Arizona Wilderness Coalition \* Audubon Society of Corvallis  
Back Country Horsemen NM NW Chapter \* Bark \* California Native Plant Society  
California Wilderness Coalition (CalWild) \* Californians for Western Wilderness  
Cascadia Wildlands \* Center for Biological Diversity  
Center for Sierra Nevada Conservation \* Central Colorado Wilderness Coalition  
Central Sierra Environmental Resource Center \* Chattooga Conservancy  
Cherokee Forest Voices \* Chichagof Conservation Council \* Christians For The Mountains  
Colorado Native Plant Society \* Conejos Clean Water \* Conservation Northwest  
Conservatives for Responsible Stewardship \* Continental Divide Trail Coalition  
Defenders of Wildlife \* Earthjustice \* Endangered Species Coalition \* Environment America  
Environmental Protection Information Center \* Foothill Conservancy \* Forest Issues Group  
Friends of Nevada Wilderness \* Friends of the Bitterroot \* Friends of the Earth US  
Friends of the Inyo \* Friends of the Kalmiopsis \* Georgia ForestWatch \* Geos Institute  
Grand Canyon Trust \* Grand Canyon Wildlands Council \* Great Old Broads for Wilderness  
High Country Conservation Advocates \* Hip Hop Caucus \* Kalmiopsis Audubon Society  
Klamath Forest Alliance \* Klamath-Siskiyou Wildlands Center \* Lane County Audubon Society  
Lassen Forest Preservation Group \* League of Conservation Voters \* Lynn Canal Conservation  
Montana Wilderness Association \* MountainTrue \* National Audubon Society  
National Parks Conservation Association \* Natural Resources Defense Council  
New Mexico Audubon Council \* New Mexico Sportsmen \* New Mexico Wilderness Alliance  
North Cascades Conservation Council \* Northcoast Environmental Center  
Northeastern Minnesotans for Wilderness \* Northern New Mexico Group of Sierra Club  
Once a Forest \* Oregon Student Public Interest Research Group \* Oregon Wild \* Pacific Rivers  
Partnership for the National Trails System \* Patagonia \* PennFuture  
Pilchuck Audubon Society \* Portland Audubon Society \* Quiet Use Coalition  
Renewable Juneau \* Rio Grande Valley Broadband of the Great Old Broads for Wilderness  
Rocky Mountain Recreation Initiative \* Rocky Mountain Wild  
Safe Alternatives for our Forest Environment \* Salem Audubon Society  
San Juan Citizens Alliance \* San Luis Valley Ecosystem Council \* Santa Fe Forest Coalition  
Sheep Mountain Alliance \* Sierra Club \* Sierra Foothills Audubon Society  
Sierra Forest Legacy \* Sitka Conservation Society \* Soda Mountain Wilderness Council  
Southeast Alaska Conservation Council \* Southern Environmental Law Center  
Southwestern New Mexico Audubon \* The Clinch Coalition \* The Lands Council  
The Mountaineers \* The Wilderness Society \* The Wyoming Wilderness Association  
Umpqua Valley Audubon Society \* Umpqua Watersheds, Inc. \* Upper Gila Watershed Alliance  
Washington Alpine Club \* Washington Wild \* West Virginians for Public Lands  
Western Environmental Law Center \* Western Watersheds Project  
White Mountain Conservation League \* Wild Connections \* Wild Utah Project  
WildEarth Guardians \* Wilderness Workshop \* Wildlands Network \* WildPlaces  
Women's Earth and Climate Action Network (WECAN) \* Yaak Valley Forest Council

October 15, 2018

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

Dear Secretary Perdue:

We are writing on behalf of our millions of members and supporters to voice our strong opposition to any exemption or exceptions to the Roadless Area Conservation Rule (Roadless Rule) in Alaska or elsewhere.

Since 2001 the Roadless Rule has established itself as a bedrock conservation protection for our national forests. Originally intended to safeguard more than 58 million acres, the Roadless Rule limits costly and environmentally damaging roadbuilding and logging, helps protect taxpayers, and preserves wild, relatively intact roadless landscapes across the National Forest System. While preserving these places, the Roadless Rule also provides noteworthy management flexibility for activities including hydropower development, connections between communities, mining access roads, mechanized recreation, wildfire response, and public safety.

By protecting high value conservation lands, the Roadless Rule provides numerous benefits including clean water, insulating nearby national parks, unmatched recreational and tourism opportunities, and wildlife habitat that supports hunting, commercial and recreational fishing, as well as many threatened, endangered, and sensitive species. Similarly, by preserving such habitat, the Roadless Rule also safeguards customary and traditional uses, particularly in Alaska. Furthermore, the Rule was explicitly designed to reduce the controversy and uncertainty that inevitably followed localized roadless planning by providing a long-term, stable, and uniform national management regime.

More than 240 million people live within 100 miles of a national forest or national grassland. National forest roadless areas are especially prized for the clean water they supply to communities and their substantial contribution to growing the multi-billion-dollar U.S. outdoor recreation economy. Nationally, it is estimated that in 2017 outdoor recreation generated \$887 billion in consumer spending and 7.6 million direct jobs nationally. In Southeast Alaska, the visitor industry contributes nearly \$4 billion to the economy and provides some 7,752 jobs.

In consideration of the many benefits and flexibilities of the Roadless Rule, it received comments during a multi-year process from roughly 1.6 million people, with 95% voicing support for strong roadless area protections. At the time, this represented the most robust public engagement in the history of federal rulemaking. In the decades since, the American people continue to support strong conservation protections for our public lands and roadless national forests, including in Alaska.

Alaska contains almost 15 million of the more than 58 million acres of our country's Inventoried Roadless Areas, with more than 9 million acres in the Tongass National Forest alone. Indeed, the Final Environmental Impact Statement for the Roadless Rule explicitly identifies the Tongass as specially deserving of protection because its size and relatively intact status give it a unique role representing system-wide roadless value. The Rule is also particularly important for the Tongass given the special vulnerability of the species and natural processes in an already naturally fragmented archipelago of a thousand islands. Moreover, despite this huge complement of roadless areas, the Tongass National Forest has 1.5 million non-roadless acres, more than any other national forest on the west coast.

Given Alaska's national roadless conservation prominence, any moves to provide exemptions or weaken the Roadless Rule in Alaska would fundamentally erode the intent and scope of roadless protections nationally. Furthermore, Alaska's Tongass National Forest contains some of the largest remaining tracts of temperate old-growth rainforest in the world, helping make it the country's single most important national forest for carbon sequestration and climate change mitigation. Given that parts of Alaska are warming at roughly twice the rate of the rest of the planet, maintaining an intact Tongass ecosystem, including continued protections for roadless areas, can help provide climate change solutions for Alaska and support international climate efforts.

Maintaining strong protections for roadless areas in Alaska's national forests and elsewhere will also help save taxpayers millions of dollars on costly new road building and allow the Forest Service to focus on maintaining the more than 371,000 miles of National Forest System roads. By limiting expensive new road building into roadless areas the Forest Service can make more funding available for maintaining and managing the existing forest road network, which has an estimated maintenance backlog of \$3.2 billion. In Southeast Alaska, because of the harsh terrain and inaccessibility of many areas, roadbuilding is known to have outsized costs.

The State of Alaska's petition for a Roadless Rule exemption contains the same arguments that have been put forward by the state and refuted by multiple court rulings upholding the process and the content of the Roadless Rule. In Southeast Alaska, the Roadless Rule is working exceptionally well at protecting national forest land from roadbuilding and commercial logging while providing flexibility for numerous other activities. For instance, the Forest Service has reviewed and approved, typically within two months, dozens of projects within Alaska's roadless areas, including 29 mining projects, 9 hydro or intertie projects, a geothermal lease, and even an aerial tram. Notably, implementation of the Roadless Rule on the Tongass National Forest is guided by a court judgment that incorporates numerous exemptions and clarifications already suggested by USDA, the State, and others.

The reality of the Southeast Alaskan economy is that logging is no longer a driving force, contributing to less than 1% of regional employment and earnings. Attempts to restore industrial-scale old-growth logging to its unsustainable peak from decades ago could have significant impact on the thriving visitor and seafood industries, which collectively contribute 26% of jobs and 21% of earnings regionally. Additionally, a state-specific rulemaking itself will be costly and time consuming, driving limited Forest Service resources away from other regional priorities. Reopening this topic will also be controversial and undermine the regional and national coalitions and

stakeholders that share the long-term goal of sustaining Southeast Alaska's recreation and fishing dependent economy which is increasingly dependent on the intact, unspoiled ecosystems that make the Tongass a unique and iconic national forest.

We would like to again state our strong opposition to any changes to the Roadless Rule in Alaska or elsewhere. In consideration of the national importance of the Tongass and this proposed rulemaking, we also respectfully request additional public meetings outside Alaska, as well as an extension of the comment period.

Thank you for considering our strong opposition to any exemptions or exceptions to the Roadless Rule.

Sincerely,

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Wilderness Workshop  
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WildPlaces  
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CC:

James Hubbard, Under Secretary for Natural Resources and Environment, U.S. Department of Agriculture

Vicki Christiansen, Chief, U.S. Forest Service

Chris French, Acting Deputy Chief, National Forest System, U.S. Forest Service

Ken Tu, Interdisciplinary Team Leader, U.S. Forest Service