

# OUTDOOR ALLIANCE

October 23, 2020

Secretary Sonny Perdue  
U.S. Department of Agriculture  
800 9th St. SW  
Washington, DC 20024

## Re: FEIS, Rulemaking for Alaska Roadless Areas

Dear Secretary Perdue,

On behalf of the human powered outdoor recreation community, we write to express our concerns with the recent decision remove protections under the 2001 Roadless Rule for the Tongass National Forest.

Outdoor Alliance is a coalition of ten member-based organizations representing the human powered outdoor recreation community. The coalition includes Access Fund, American Canoe Association, American Whitewater, International Mountain Bicycling Association, Winter Wildlands Alliance, The Mountaineers, the American Alpine Club, the Mazamas, Colorado Mountain Club, and Surfrider Foundation and represents the interests of the millions of Americans who climb, paddle, mountain bike, backcountry ski and snowshoe, and enjoy coastal recreation on our nation's public lands, waters, and snowscapes.

Outdoor Alliance supports Alternative #1 (No Action) to retain critical, long-standing protections for roadless areas within the Tongass National Forest. We are strongly opposed to the preferred alternative (#6) identified in the final environmental impact statement (FEIS), which would exempt the Tongass National Forest from the 2001 Roadless Area Conservation Rule.

In the past, our community has not uniformly opposed tailoring the Roadless Rule to meet the unique needs of particular states. The Colorado and Idaho Roadless Rules are evidence that tailoring can be accomplished in a way that meets state needs and continues to protect recreation and conservation values, in some places with stronger protections than the original national rule. The preferred alternative, however, radically departs from past practice in carefully crafting roadless



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protections to meet particular local needs and instead completely eliminates the rule's protections for the Tongass National Forest.

In our previous comments, including those submitted in December 2019 in response to the draft EIS, we described the immense value that the Tongass holds for outdoor recreation and the severe impact that exempting the Tongass from the Roadless Rule will have on activities such as sea kayaking, ski touring, and mountaineering. Roadless areas on the Tongass are treasured by outdoor recreationists who value old-growth forests, intact landscapes, and vast areas in which to challenge oneself. These areas are not just important for land-based recreation. The ocean areas adjacent to, and in many cases surrounding, the Tongass offer world-class sea kayaking and coastal recreation opportunities, with viewsheds, camping, water quality, and wildlife all protected through the Roadless Rule.

The FEIS downplays the significant effects that lifting Roadless protections from the Tongass will have on Southeast Alaska's outdoor recreation industry. People do not travel to southeast Alaska to kayak against a backdrop of clearcuts or hike up logging roads. They visit for outdoor recreation in superlative outdoor settings where they have the opportunity to view wildlife that are either rare or not found elsewhere in the world. Intact ecosystems are core to the Alaskan experience.

Old growth forests on the Tongass are also critical for climate stability, and protecting the Tongass's old growth is of profound importance to all Americans, both within Alaska and beyond. As correctly noted in the FEIS, the Tongass currently stores more carbon than any other forest in the United States. Much of this carbon is stored in the old growth forests that stand to be lost under Alternative 6. Exempting the Tongass from the Roadless Rule will disrupt the Tongass' climate-stabilization effects in multiple ways. Not only will it release the extensive carbon stocks currently stored within the forest's old growth, once these stands are logged, the new growth will be less effective at capturing and storing atmospheric carbon. In short, elimination of Roadless Rule protections will turn the Tongass from a globally significant carbon sink into a carbon source. This alone should be reason to maintain Roadless protections, yet the FEIS finds no difference in climate effects across Alternatives.



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The FEIS finds no difference in climate effects across Alternatives because it relies on the same faulty logic we objected to in the DEIS. Namely, the Forest Service continues to assert that all alternatives would result in the same harvest volumes because harvest volumes are set by the Forest Plan. The current Forest Plan however, is influenced by the existence of Inventoried Roadless Areas on the Forest. If the Tongass is exempted from the Roadless Rule, any Forest Plan revision is likely to open additional areas to logging, leading to a cascade of effects far beyond what is described in the FEIS.

Approximately 95% of the comments submitted in response to the draft EIS opposed lifting Roadless protections for the Tongass. Outdoor recreationists, Indigenous communities, fishermen, and more shared substantive reasons for why the Tongass must remain under the Roadless Rule. Despite this, and contrary to reasoned arguments and policy, the Forest Service appears determined to lift Roadless protections for the Tongass. We urge you to reconsider this course of action and maintain Roadless protections on the Tongass National Forest.

Best regards,



Louis Geltman  
Policy Director  
Outdoor Alliance

cc: Vicki Christiansen, Chief, USDA Forest Service  
Chris French, Deputy Chief, USDA Forest Service  
Ken Tu, Alaska Roadless Interdisciplinary Team Lead, USDA Forest Service

Adam Cramer, Executive Director, Outdoor Alliance  
Chris Winter, Executive Director, Access Fund  
Beth Spilman, Interim Executive Director, American Canoe Association  
Mark Singleton, Executive Director, American Whitewater  
Kent McNeill, CEO, International Mountain Bicycling Association  
Todd Walton, Executive Director, Winter Wildlands Alliance  
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Mitsu Iwasaki, Chief Executive Officer, American Alpine Club  
Sarah Bradham, Interim Executive Director, the Mazamas  
Keegan Young, Executive Director, Colorado Mountain Club  
Chad Nelson, Chief Executive Officer, Surfrider Foundation

