April 10, 2018

Sonny Perdue, Secretary of Agriculture
U.S. Department of Agriculture
1400 Independence Avenue, SW
Washington, DC 20250

Dear Secretary Perdue,

On behalf of millions of people across the country, we write to oppose the State of Alaska’s petition for rulemaking to exempt the Tongass National Forest in Alaska from the Roadless Area Conservation Rule (the Roadless Rule or the Rule). Granting the petition will mire the U.S.
Department of Agriculture (USDA) in an exhaustive and unnecessary controversy. We urge you to deny the petition and maintain the Roadless Rule’s important legacy of protecting our country’s roadless areas.

The Roadless Rule, one of our country’s most important conservation laws, was the product of three years of deliberation, more than one million public comments, and a robust administrative review of options for managing and protecting the approximately 58.5 million acres of inventoried roadless areas within the National Forest System. USDA concluded inventoried roadless areas serve numerous important functions, including providing unparalleled recreational and business opportunities, drinking water sources for millions of Americans, and habitat important to the long-term survival of innumerable fish and wildlife populations. USDA also concluded that the Rule responded to serious environmental, human safety, and fiscal concerns relating to the $8.4 billion maintenance backlog on the existing forest road system. USDA’s thoughtful and deliberate approach to the Roadless Rule has withstood decades of legal challenges and stands as a lasting contribution to our country’s conservation efforts.

In contrast, the State of Alaska’s petition perpetuates stale, tired efforts by Roadless Rule opponents to mischaracterize the Rule’s actual scope and effect. The petition ignores the fact that USDA narrowly tailored the Roadless Rule to limit only two activities in roadless areas, road construction/reconstruction and logging, because those activities pose the greatest likelihood of irretrievably altering and fragmenting roadless landscapes. The petition also ignores the Rule’s series of established exceptions that “honor existing law or address social or economic concerns.” Most importantly, for example, the State of Alaska ignores the fact that the Roadless Rule already allows for road connections between communities and other state highway projects, access to mining claims under the General Mining Law of 1872, and logging incidental to otherwise permitted activities, including utility corridors and hydropower projects.

As the U.S. Forest Service (Forest Service) itself recently noted, “[a]s of January 2018, 55 projects within roadless areas in Alaska have been submitted for Secretarial or Chief’s review and all have been approved. . . . Under the current review process, most projects are approved by the Chief of the Forest Service within a month of submission.”

The State of Alaska’s decision to ignore all of the Roadless Rule’s existing exemptions makes it clear that the real purpose of the petition is to allow logging in the roadless portions of the Tongass. This poorly-veiled effort aims to prop up an industrial-scale old-growth logging program that has only one remaining mid-sized mill and contributed less than one percent in

1 See generally Roadless Area Conservation Rule, 66 Fed. Reg. 3,244, 3,244–48 (Jan. 12, 2001).
2 Id. at 3,244.
3 Id.
4 See id. at 3,255, 3,257-58, 3,264, 3,272–73.
employment-related earnings to the southeast Alaska economy in 2016.\textsuperscript{6} The fact that the Tongass old-growth logging program is completely dependent on tens of millions of dollars in annual subsidies from U.S. taxpayers further eviscerates the petition’s purported justification.\textsuperscript{7}

For all of these reasons, the State of Alaska’s petition for rulemaking should be denied. Initiating rulemaking regarding the Roadless Rule will drain USDA resources that are already stretched precariously thin. It will mire the Forest Service in a protracted, multi-year process to overturn long-standing and well-reasoned decisions, all but ensuring years of litigation. And given the complexity of USDA’s existing administrative record, the sheer size of the Tongass in the overall National Forest System, and the unique contribution the Tongass plays in accomplishing the Roadless Rule’s established goals and objectives, the environmental review associated with any exemption rulemaking would necessitate a national process, including public meetings held throughout the country. If, despite all of these concerns, USDA seeks to revisit the decision to apply the Roadless Rule to the crown jewel of the National Forest System, then it should provide a minimum scoping comment period of 90 days to ensure sufficient opportunity for communities, tribes, and the public to engage on an issue of such enormous controversy.

Finally, the State of Alaska’s efforts to undermine the Roadless Rule by revising or amending the Tongass Land Management Plan (the Tongass Forest Plan) should also be denied. The Tongass Forest Plan reflects the unanimous recommendation of a diverse collaborative committee, including representatives from the State of Alaska and the timber industry, which unanimously recommended that the Forest Service should prohibit logging on roadless areas. The State of Alaska’s post hoc efforts to disavow its own recommendations should be rejected.

We urge you to maintain the Roadless Rule and its vital protections for the National Forest System and the Tongass.

Respectfully,

Richard A. Jahnke
President
ADMIRALTY AUDUBON SOCIETY

Andy Moderow
Alaska Director
ALASKA WILDERNESS LEAGUE

Larry Edwards
President
ALASKA RAINFOREST DEFENDERS

Maria Povec
Policy Director
AMERICAN ALPINE CLUB

\textsuperscript{6} See Southeast Conference, Southeast Alaska by the Numbers at 4 (Sept. 2017), http://www.seconference.org/sites/default/files/Southeast%20Alaska%20by%20the%20numbers%202017%20FINAL.pdf.

<table>
<thead>
<tr>
<th>Name</th>
<th>Title/Position</th>
<th>Organization</th>
</tr>
</thead>
<tbody>
<tr>
<td>Susan Culliney</td>
<td>Policy Director</td>
<td>AUDUBON ALASKA</td>
</tr>
<tr>
<td>Sam Merrill</td>
<td>Chair, Conservation Committee</td>
<td>BLACK HILLS AUDUBON</td>
</tr>
<tr>
<td>Linda Castro</td>
<td>Assistant Policy Director</td>
<td>CALIFORNIA WILDERNESS COALITION</td>
</tr>
<tr>
<td>Nicole Budine</td>
<td>Policy and Campaign Manager</td>
<td>CASCADE FOREST CONSERVANCY</td>
</tr>
<tr>
<td>Randi Spivak</td>
<td>Director Public Lands Program</td>
<td>CENTER FOR BIOLOGICAL DIVERSITY</td>
</tr>
<tr>
<td>Karen Schambach</td>
<td>President</td>
<td>CENTER FOR SIERRA NEVADA CONSERVATION</td>
</tr>
<tr>
<td>Nicole Hayler</td>
<td>Executive Director</td>
<td>CHATTOOGA CONSERVANCY</td>
</tr>
<tr>
<td>Allen Johnson</td>
<td>Coordinator</td>
<td>CHRISTIANS FOR THE MOUNTAINS</td>
</tr>
<tr>
<td>John Bohrnsen</td>
<td>President</td>
<td>CLARK-SKAMANIA FLYFISHERS</td>
</tr>
<tr>
<td>Greg Shimek</td>
<td>Executive Director</td>
<td>COASTAL CUTTHROAT COALITION</td>
</tr>
<tr>
<td>Dave Werntz</td>
<td>Science and Conservation Director</td>
<td>CONSERVATION NORTHWEST</td>
</tr>
<tr>
<td>Peter Nelson</td>
<td>Director of Federal Lands</td>
<td>DEFENDERS OF WILDLIFE</td>
</tr>
<tr>
<td>Christy Sherr</td>
<td>Outreach Coordinator</td>
<td>EARTH ISLAND INSTITUTE’S JOHN MUIR PROJECT</td>
</tr>
<tr>
<td>Holly Harris</td>
<td>Staff Attorney</td>
<td>EARTHJUSTICE</td>
</tr>
<tr>
<td>Steve Blackledge</td>
<td>Senior Director, Conservation America Campaign</td>
<td>ENVIRONMENT AMERICA</td>
</tr>
<tr>
<td>Thomas Wheeler</td>
<td>Executive Director</td>
<td>ENVIRONMENTAL PROTECTION INFORMATION CENTER</td>
</tr>
<tr>
<td>Don Rivenes</td>
<td>Executive Director</td>
<td>FOREST ISSUES GROUP</td>
</tr>
<tr>
<td>Ann Darlington</td>
<td>President of the Board of Directors</td>
<td>FRIENDS OF HEYBROOK RIDGE</td>
</tr>
<tr>
<td>Darrel Jury</td>
<td>President</td>
<td>FRIENDS OF PLUMAS WILDERNESS</td>
</tr>
<tr>
<td>Jim Miller</td>
<td>President</td>
<td>FRIENDS OF THE BITTERROOT</td>
</tr>
<tr>
<td>Jora Fogg</td>
<td>Policy Director</td>
<td>FRIENDS OF THE INYO</td>
</tr>
<tr>
<td>Mike Town</td>
<td>President</td>
<td>FRIENDS OF WILD SKY</td>
</tr>
</tbody>
</table>
Mary A. Topa, Ph.D.
Executive Director
GEORGIA FORESTWATCH

Dominick A. DellaSala, Ph.D
President, Chief Scientist
GEOS INSTITUTE

Mary O’Brien
Utah Forests Program Director
GRAND CANYON TRUST

Darcie Warden
Montana Conservation Coordinator
GREATER YELLOWSTONE COALITION

Shelley Silbert
Executive Director
GREAT OLD BROADS FOR WILDERNESS

Mark Magaña
President
GREENLATINOS

Matt Reed
Public Lands Director
HIGH COUNTRY CONSERvation ADVOCATES

Virginia Wolff
Support Team Committee member
INDIVISIBLE SKAGIT

Jim Athearn
President
INLAND EMPIRE FLY FISHING CLUB

John Sherwin
President
issaquah Alps Trails Club

Jim Scheff
Director
KENTUCKY HEARTWOOD

Timothy Coleman
Executive Director
KETTLE RANGE CONSERVATION GROUP

Judy E Hallisey
President
KITITAS AUDUBON SOCIETY

Kimberly Baker
Executive Director
KLAMATH FOREST ALLIANCE

Joseph Vaile
Executive Director
KLAMATH-SISKIYOU WILDLANDS CENTER

Olivia Holderman
President
KLICKITAT CHAPTER OF TROUT UNLIMITED

Patricia Puterbaugh
Lassen Forest Presentation Group

Arian Rubio
Legislative Associate, Lands
LEAGUE OF CONSERVATION VOTERS

Duane A. Bolser
Retired/Owner
Leavenworth Outfitters Inc.

Dana Carl Ward
Conservation Chair
LOWER COLUMBIA BASIN AUDUBON SOCIETY

Terry Frost
President
LOWER COLUMBIA FLYFISHERS
Sarah Greenberger  
Senior Vice President, Conservation Policy  
NATIONAL AUDUBON SOCIETY

Niel Lawrence  
Alaska Director and Senior Attorney  
NATURAL RESOURCES DEFENSE COUNCIL

Thomas Jervis, Ph.D.  
President  
NEW MEXICO AUDUBON COUNCIL

Oscar Simpson  
State Chair  
NEW MEXICO SPORTSMEN

Mark Allison  
Executive Director  
NEW MEXICO WILDERNESS ALLIANCE

Pam Borso  
President  
NORTH CASCADES AUDUBON

Tom Hammond  
President  
NORTH CASCADES CONSERVATION COUNCIL

Art Campbell  
President  
NORTH CENTRAL WASHINGTON AUDUBON SOCIETY

Dan Sealy  
Vice President of the Board  
NORTHCOAST ENVIRONMENTAL CENTER

Peter Bahl  
Executive Director  
NORTHWEST WATERSHED INSTITUTE

David Kliegman  
Executive Director  
OKANOGAN HIGHLANDS ALLIANCE

Donna Osseward  
President  
OLYMPIC PARK ASSOCIATES

Steve Pedery  
Conservation Director  
OREGON WILD

Greg Haller  
Conservation Director  
PACIFIC RIVERS

Cindy Easterson  
President  
PILCHUCK AUDUBON SOCIETY

Annie Cubberly  
Polly Dyer Cascadia Broad Band  
GREAT OLD BROADS FOR WILDERNESS

Greg Shimek  
President  
PUGET SOUND FLYFISHERS

Heather Gibson  
President  
RAINIER AUDUBON

Susan Ostlie  
Linda Starr  
Co-Leaders  
RIO GRANDE VALLEY BROADBAND  
GREAT OLD BROADS FOR WILDERNESS

Jimbo Buickerood  
Lands and Forest Protection Program Manager  
SAN JUAN CITIZENS ALLIANCE
Rich Simms  
Founder/Board member  
WILD STEELHEAD COALITION

Marlies Wierenga  
Pacific Northwest Conservation Manager  
WILDEARTH GUARDIANS

Will Roush  
Conservation Director  
WILDERNESS WORKSHOP

Lance Reif  
Owner  
WILDWATER RIVER GUIDES

Hilary Eisen  
Policy Director  
WINTER WILDLANDS ALLIANCE

Osprey Orielle Lake  
Founder/Executive Director  
WOMEN’S EARTH AND CLIMATE ACTION NETWORK

Donna Broers  
President  
YAKIMA CHAPTER OF TROUT UNLIMITED