

OUTDOOR ALLIANCE

January 21, 2022

Joe Krueger, ID Team Leader
Alaska Roadless Rule
USDA Forest Service
P.O. Box 21628
Juneau, Alaska 99802-1628

Submitted via email to sm.fs.akrdlessrule@usda.gov

Re: Alaska Roadless Rule, RIN 0596-AD51, Special Areas; Roadless Area Conservation; National Forest System Lands in Alaska

Dear Mr. Krueger,

Thank you for the opportunity to comment on the USDA's proposal to restore Roadless Rule protections to 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. We commented throughout the development of the 2020 Alaska Roadless Rule and have consistently opposed removing Roadless protections from the Tongass. We are strongly supportive of restoring Roadless Rule protections.

The Roadless Rule is crucial to protecting the opportunities and experiences that define the quality of life for residents of Southeast Alaska and attract visitors to the Tongass from across Alaska and around the globe. Roadless areas on the Tongass are treasured for remote and adventurous recreation opportunities like the world-renowned mountaineering routes on the Mendenhall Towers and the Direct East Ridge of Devil's Thumb, one of the 50 classic climbs of North America. Meanwhile, the East Glacier Trail and Fritz Cove Road sport climbing crag, both near Juneau, provide relatively close-to-home outdoor recreation for many people. Additionally,



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ocean areas adjacent to, and in many cases surrounding, Tongass National Forest areas offer world-class sea kayaking and coastal recreation opportunities, with viewshed, camping, water quality, and wildlife all protected through the Roadless Rule.

As an example of the importance of the Tongass to recreationists, a devoted community of backcountry skiers value hiking to the top of Southeast Alaska's beautiful, massive, glaciated peaks. But before getting to the top, before even getting to a ridgeline to gain elevation, skiers hike through the dense, moss-covered forests. This is part of what makes the backcountry ski experience in Southeast Alaska so unique, and the Roadless Rule protects this experience. Likewise, sea kayakers plying the ocean waters bordering the Tongass travel to Southeast Alaska as much for the forested surroundings as for the water itself. The ocean is vast, as are opportunities for sea kayaking, but paddling along the rugged, forested coastlines of the Tongass is unique. If these forests were to be logged, the recreational value, and the reason many visitors come to Southeast Alaska, would be diminished or lost.

In Alaska, outdoor recreation comprises 3.2% of the state's GDP, directly employing 17,773 people and supporting \$900 million in wages.¹ A 2020 Bureau of Economic Analysis report shows that the percentage of Alaska's GDP driven by outdoor recreation is among the highest in the nation.² As noted in the November 22, 2021 Federal Register Notice announcing the new proposed rule (FS-2021-0007-0006), nature-based tourism (including outdoor recreation) generates substantial revenues in Southeast Alaska. Protecting roadless lands on the Tongass helps to support the quality of life and economic vitality of nearby communities.

While protecting roadless forests on the Tongass benefits outdoor recreation and the economy, even more importantly, protecting these forests is critical to maintaining a livable planet. Temperate rainforests are the world's most effective carbon storage systems, and, as the world's largest remaining intact coastal temperate rainforest, the Tongass is a critical carbon sink. If the 2020 Alaska Rule were to stand, hundreds of millions of tons of carbon stored within roadless lands

¹ Bureau of Economic Analysis Outdoor Recreation Satellite Account, Alaska 2020. Available at <https://outdoorindustry.org/wp-content/uploads/2015/03/ORSA-Alaska.pdf>

² See <https://www.bea.gov/data/special-topics/outdoor-recreation>



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on the Tongass could be released via logging and road building, posing a risk to global climate. Without Roadless Rule protections, the Tongass has the potential to shift from a globally-significant carbon sink to a significant carbon source. This would affect ecosystems, economies, and outdoor recreation far from Alaska. The Biden Administration has prioritized protecting the environment and confronting the climate crisis. We cannot achieve these goals without re-instating Roadless protections for the Tongass.

The 2020 Rule exempting the Tongass from the Roadless Rule ignored strong public and Tribal opposition and was backed by an EIS that relied on faulty assumptions. In the 2020 EIS, the Forest Service asserted that all alternatives would result in the same harvest volumes because harvest volumes are set by the Forest Plan. Of course, the current Forest Plan was written when the Roadless Rule was in place on the Tongass and was influenced by the existence of Inventoried Roadless Areas on the Forest. By exempting the Tongass from the Roadless Rule, the 2020 Rule opened the door to forest plan revisions that would increase the suitable timber base. This is not mere speculation—the State of Alaska’s 2018 petition to USDA requested not only an exemption to the Roadless Rule, but also a forest plan revision. While USDA did not grant the state’s 2018 request for forest plan revision, eventually the Tongass forest plan will be revised. Without Roadless protections, there is no reason to expect that the suitable timber base would not be expanded in the next forest plan. This in turn would create a cascade of effects far beyond what was described or accounted for in the EIS. In contrast to the flawed approach reflected in the prior rulemaking, the November 2021 Federal Register clearly articulates the extraordinary ecological, cultural, and social values of roadless lands on the Tongass and provides strong legal rationale for restoring Roadless Rule protections.

Please reverse the Alaska Rule and fully restore 2001 Roadless Rule protections on the Tongass National Forest.



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Best regards,



Louis Geltman
Policy Director
Outdoor Alliance

cc: Adam Cramer, Chief Executive Officer, Outdoor Alliance
Chris Winter, Executive Director, Access Fund
Beth Spilman, 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
Tom Vogl, Chief Executive Officer, The Mountaineers
Jamie Logan, Interim Director, American Alpine Club
Kaleen Deatheridge, Interim Executive Director, the Mazamas
Keegan Young, Executive Director, Colorado Mountain Club
Chad Nelson, Chief Executive Officer, Surfrider Foundation

