



2005 Market Street, Suite 1700
Philadelphia, PA 19103-7077

215.575.9050 Phone
215.575.4939 Fax

901 E Street NW, 10th Floor
Washington, DC 20004
www.pewtrusts.org

202.552.2000 Phone
202.552.2299 Fax

October 15, 2018

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

36 CFR Part 294

Re: 2018-18937

Dear Secretary Perdue,

The Pew Charitable Trusts appreciates the opportunity to comment on the U.S. Department of Agriculture's rule making on the Roadless Area Conservation Rule (Roadless Rule) and environmental impact statement process on the management of inventoried roadless areas (IRAs) on the Tongass National Forest.

Pew has been involved in the issue of managing roadless areas in the national forests since the 1990s when scientists working in and outside of the Forest Service documented the harmful impact of roads on wildlife populations, especially the silt and sediment from unmaintained roads flowing into streams and rivers. These disturbances often destroy fish habitat and degrade water quality for downstream users. By contrast, roadless portions of the national forests were found to provide clean drinking water to downstream communities, harbor the most intact wildlife habitat like that on the Tongass National Forest and afford important hunting and other recreational opportunities for Americans from coast-to-coast.

When the Roadless Rule was being considered in the late 1990s, the Forest Service had accumulated a \$4.5 billion road maintenance backlog caused by decades of publicly-subsidized road building to support industrial logging. In total, 380,000 miles of roads had been built across our national forests and surveys found that most were in serious disrepair. Pew supported the efforts of the Forest Service back then to devise a roadless area policy to address these problems in the national forest system.

It was this research that led more than 500 scientists to sign a joint letter stating that the Roadless Rule was "the most scientifically credible approach for managing and protecting our last undeveloped national forests." The rule was also supported by hundreds of faith leaders and dozens of newspaper editorial boards in the West and across the nation. Indeed, when the Forest Service invited public comment, more than one and a half million Americans attended in-person hearings or submitted written comments in favor of the initiative.

Since it was promulgated over 17 years ago, the Roadless Rule has proven to be a sound conservation measure that protects biodiversity, and is fiscally responsible by precluding the costly construction and maintenance of roads in the most remote portions of the forest system. It is also flexible. The current management of inventoried roadless areas allows for multiple uses on our national forests, affording flexibility where needed for special use permits. As of February 2016, the Forest Service reports that 46 projects have been submitted for Secretarial or Chief's review in the Tongass National Forest, and all have been approved, most within two months of submission. Included in this list are 29 mining projects, nine hydropower or intertie projects, a road realignment, and even an aerial tram. These actions demonstrate that the current rule already allows development activity that is consistent with the conservation mandate of the Forest Service.

Moreover, an amendment to the Tongass Land and Resource Management Plan (TLMP) in late 2016, that shifted the timber emphasis from old growth to second-growth forests, already provides for a transition to a more economically, socially and ecologically sustainable timber program on the Tongass. It also encourages renewable energy production. The three-year collaborative process that led up to the final TLMP involved numerous studies and extensive public involvement, including representatives of logging, fishing, and tourism interests, Alaska Native organizations, and other stakeholders.

For these reasons, Pew urges the Forest Service to keep the Roadless Rule in place and not create a state- or forest-specific carve-out for national forests in Alaska.

Sincerely,



Thomas A. Wathen
Vice President
The Pew Charitable Trusts

CC: Chris French, Associate Deputy Chief, National Forest System, U.S. Forest Service