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February 8, 2022

The Honorable Tom Vilsack
Secretary
United States Department of Agriculture
1400 Independence Ave., SW
Washington, DC 20250

36 CFR Part 294

RIN 0596-AD51

Re: The Pew Charitable Trusts' Comments on the Final Rule and Record of Decision for Roadless Area Conservation in the National Forest System Lands in Alaska

Dear Secretary Vilsack:

The Pew Charitable Trusts (Pew) appreciates the opportunity to comment on the United States Department of Agriculture's (Department) Final Rule and Record of Decision (ROD) for roadless areas in the National Forest System Lands in Alaska. Pew applauds the Department for reinstating roadless protections in the Tongass National Forest, protecting the remaining old-growth forests in Alaska and investing in the regional economy through the Southeast Alaska Sustainability Strategy (SASS).

Pew's U.S. Public Lands and Rivers Conservation project seeks to safeguard ecologically and culturally significant public lands and rivers by working closely with diverse stakeholders—such as local businesses, local governments, Indigenous Tribes, the outdoor recreation industry, travel and tourism organizations, veterans, sportsmen and women—to develop collaborative proposals that protect landscapes and local communities.

Pew supports the Department's decision to select Alternative 1, which would maintain the designation of over 9.4 million acres of Inventoried Roadless Areas on the Tongass that were originally established in the 2001 Roadless Area Conservation Rule (Roadless Rule). Given the relatively minor differences between Alternatives 1 and 2, we support the Department's decision to select the former; this option would accomplish stability and predictability of the Roadless Rule, as well as best reflect the considerations of sovereign Tribal Nations that were determined throughout the consultation process.

Full reinstatement of roadless areas in the Tongass will prevent the most disruptive activities, such as industrial-scale timber harvesting and associated road building. However, the Roadless Rule allows the Regional Forester to grant special use exemptions for infrastructure development. Special use exemptions projects have been requested and approved dozens of times in the Tongass, proof that sufficient flexibility exists within the confines of the Roadless Rule to allow for economic activity.

Ensuring Southeast Alaska maintains a sustainable and productive economy is a priority for the Department, given the vast expanse of the Tongass in the region. As such, we support the Department's decision to reinstate the Roadless Rule in tandem with a substantial investment through the SASS, of which over half of the \$25 million will be granted to local Tribes and Indigenous Peoples. Pew agrees that supporting sustainable industries, such as tourism and fishing, will benefit local economies and the environment alike.

By reinstating roadless protections to the Tongass National Forest, the U.S. is helping to avert further damage to the forest, honoring Indigenous peoples, supporting local economies, facilitating more resilience to climate change impacts, and ensuring that the Tongass will serve the interests of all Americans far into the future. We sincerely applaud the Department of Agriculture for restoring protections to roadless areas of the Tongass National Forest, the crown jewel of our National Forest System.

Sincerely,



Marcia Argust
Director
U.S. Public Lands and Rivers Conservation
The Pew Charitable Trusts

CC: Randy Moore, Chief, United States Forest Service, United States Department of Agriculture

Christopher French, Deputy Chief, National Forest Service, United States Forest Service, United States Department of Agriculture

Meryl Harrell, Deputy Under Secretary, Natural Resources and Environment, United States Department of Agriculture

Joe Krueger, Interdisciplinary Team Leader, United States Department of Agriculture

Stephene Harding, Senior Director for Lands, White House Council on Environmental Quality