

Alaska Rainforest Defenders (ARD)

A regional environmental organization established in 2011 (formerly GSACC)
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AFTERMATH.

Photo: Archipelagan

TAKE ACTION NOW – On the ROADLESS RULE

TELL THE FOREST SERVICE TO CHOOSE *THE NO ACTION ALTERNATIVE*,

**TO NOT EXEMPT ALASKA’S TONGASS NATIONAL FOREST FROM THE ROADLESS
RULE!**

In October, the Forest Service released its Tongass Roadless Exemption Draft Environmental Impact Statement with six alternatives. All but the first, No Action alternative would gut current roadless areas, but the last one is the agency's preferred alternative and intends to completely abolish the Tongass National Forest from the 2001 Roadless Rule. This alternative was at the direct behest of Governor Dunleavy, to President Trump and was enthusiastically sanctioned by Senator Murkowski.

Even a foot-in-the-door rollback of the Rule is unacceptable—but especially its complete overturn. Alaska Rainforest Defenders urges you to send the Forest Service your comments ([here](#)) in opposition to the proposed Tongass exemption and in support of the **NO ACTION** alternative.

Please also attend the upcoming public meeting and subsistence hearing (if there will be one) in your town ([schedule here](#)).

For more information, the website for the proposed exemption is [here](#) (use the “Analysis Tab” to access the DEIS)

BACKGROUND: The Roadless Rule was first adopted in January 2001. Since then, it has survived several court challenges, one all the way to the Supreme Court, which declined in 2016 to overrule the 9th Circuit’s decision to uphold it. One case is still pending in DC District Court.

The Roadless Rule, enacted in the last days of the Clinton administration after a lengthy public process, prohibits road construction in "inventoried roadless areas" greater than 5,000 acres because roads "have the greatest likelihood of altering and fragmenting landscapes, resulting in immediate, long-term loss of roadless area values and characteristics.”

In fact, over the years, the Roadless Rule was the subject of 600 public hearings, received an avalanche of strong support of over 1 million public comments, and had the backing of hundreds of natural resource

scientists¹, all of whom wanted the Tongass included in the Rule. During the latest round of public scoping for the proposed exemption of the Tongass from the Roadless Rule, “just over 144,000 entries” were received and “the majority” opposed changing the 2001 Roadless Area Conservation Rule for Alaska.”² Clearly the government is not acting for the will of the people or the good of the environment but instead is selling-out to the demands of a small but well-connected timber extraction industry, namely Viking Lumber of Klawock, AK and Alcan Forest Products (a timber exporter that is an arm of multinational Transpac Group of Vancouver ,B.C.).

Importantly, despite the Roadless Rule, it does not block all road construction in roadless areas. For example, it allows the Forest Service to approve roads necessary for hydropower and mine development and for linking communities. In fact, “some 55 projects within roadless areas in Alaska have been rapidly approved by the Forest Service”.³ Clearly, development interests’ claims that the current rule prohibits such projects from proceeding are a red herring and without merit.

COMMENT DEADLINE:

The comment deadline for the proposed Tongass Exemption from the Roadless Rule is 11:59 pm, December 17, 2019.

HOW TO COMMENT:

- Web: www.fs.usda.gov/project/?project=54511
 - Email: akroadlessrule@fs.fed.us
- US Mail: USDA Forest Service, Attn: Alaska Roadless Rule, P.O. Box 21628,
Juneau, Alaska, 99802
- Fax: 907-586-7852
 - In-person delivery to Forest Service: 709 W. 9th Street, Room 535B, Juneau, Alaska 99801

In addition to the above, here are additional points you could customize and work into your comments. “Unique” letters carry great weight:

- **The Trump/Dunleavy administrations are enablers of a destructive timber industry that is less than 1% of the regional economy** and has already caused a massive, seven decades-long drain on the public’s financial resources. According to recent report by the Taxpayer’s for Common Sense,⁴ “In total, the USFS has lost approximately \$600 million over the last twenty years or \$30 million per year on average and the USFS could end up losing more than \$180 million in the Tongass over the next four years.” Enough already for this loser industry that does great harm for minuscule benefit!
- **With this proposed exemption, the Dunleavy Administration forces the American tax payer to further subsidize round log exports to China** and elsewhere in support of the manufacturing base

¹ See scientists [letter](#) to Congress regarding Alaska Forest Riders and the Roadless Rule. Jan. 28, 2018.

² USDA Forest Service. Alaska Roadless Rule Scoping Period: Written Public Comment Summary June 20, 2019. https://www.fs.usda.gov/nfs/11558/www/nepa/109834_FSPLT3_4631713.pdf

³ Juneau Empire. Keep the Tongass wild and roadless. Dominick DellaSala, John Schoen, John Talbert. August 17, 2018. <https://www.juneauempire.com/opinion/keep-the-tongass-wild-and-roadless/>

⁴ Cutting Our Losses: 20 Years of Money-Losing Timber Sales in the Tongass. Cutting Our Losses: 20 Years of Money-Losing Timber Sales in the Tongass. October 2019. <https://www.taxpayer.net/wp-content/uploads/2019/09/TCS-Cutting-Our-Losses-2019-.pdf>

there—not Alaska’s. In fact, the 2016 Tongass Forest Plan makes clear the Forest Service's intent is to authorize the export as unprocessed logs of about two-thirds of the timber cut on the Tongass.⁵ Enactment of this undoing of the Roadless Rule would continue the trend of managing Tongass public lands as a subsidized timber colony for the exclusive benefit of Alcan/Transpac Group and Viking Lumber. Viking is also a large-scale raw log exporter.

- **ARD sets the record straight: Through the years, public support for the Roadless Rule in SE Alaska has been overwhelming**, including during the latest go ‘round. According to the Forest Service, since 2017 “in total, 17 public scoping meetings were conducted in 16 locations with nearly half (44%) of all Southeast Alaska communities serving as venue for a public scoping meeting...The majority of public meetings affirmed support for the 2001 Roadless Area Conservation Rule, highlighted mistrust for the State of Alaska, questioned the relationship between the State of Alaska and Forest Service. In Southeast Alaska, only two of fourteen communities (e.g., Thorne Bay, Wrangell) were largely receptive to Alaska roadless rulemaking – both of which seemingly preferred a full exemption of the 2001 Roadless Rule.”

- **Most recently, the sovereign Tribes’ of Alaska’s Southeast** (16 tribal entities) and the City of Skagway, AK endorsed the Roadless No Action Alternative.

- **Industrial logging of the roadless areas will degrade other important regional economic drivers** like the commercial and sport fishing industries, wildlife populations—including species like deer which are important for subsistence uses, scenic resources and recreation, and tourism. The Roadless Rule protects many of the world-class, old-growth forest environments that fish and wildlife depend on, American people treasure and Alaskans rely on for their collective livelihoods and quality of life.

- **“Seven decades of high-grading** has dramatically depleted the Tongass Forest’s largest (4-10 feet in diameter) old-growth trees. And those rare, old-growth stands provide some of the most valuable fish and wildlife habitats on the Tongass.”⁶

- **The Tongass is North America’s largest carbon sink**, and sequesters 8% of all greenhouse warming gases of national forests in the US. Logging these forests will have severe long-term environmental and economic consequences.

- **After nearly two decades of upheaval**, Governor Dunleavy is forcing Alaskans to endure a seemingly perpetual controversy.

- **The well-founded and multitude of reasons for supporting the Roadless Rule on the Tongass are seemingly endless and are in the interest of all.** The reason for supporting the Exemption is for one purpose—to prop up an antiquated, harmful, and tiny sector of Alaska’s economy-at great harm to all other sectors.

~THANK YOU FOR SUPPORTING THE ROADLESS RULE IN ITS ENTIRETY.

ASK FOR THE “NO ACTION ALTERNATIVE”~

⁵ 2016 LRMP FEIS at 3-492-3-493, Tables 3.22-8, 3.22-9

⁶ Schoen and Kirchhoff. Exempting the Tongass from the Roadless Rule would be a mistake.
https://www.adn.com/opinions/2019/10/26/exempting-the-tongass-from-the-roadless-rule-would-be-a-mistake/#_