

SCIENTISTS CALL ON THE FOREST SERVICE TO UPHOLD THE NATIONAL ROADLESS AREA RULE THAT PROTECTS OVER 9 MILLION ACRES ON THE TONGASS NATIONAL FOREST, ONE OF THE WORLD'S LAST INTACT TEMPERATE RAINFORESTS

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As scientists with expertise in natural resources science and policy, we urge the Forest Service to uphold the National Roadless Area Conservation Rule on the Tongass National Forest in southeast Alaska. Rolling back the Roadless Rule protections on the Tongass could open up millions of acres to logging and road-based developments, while adversely impacting a robust outdoor recreation and fishing economy that relies on the region's unparalleled temperate rainforests remaining intact.

The Roadless Rule protects over 50 million acres of the nation's most intact forest landscapes. As the premier conservation achievement of its time, the Roadless Rule is predicated on years of careful deliberation, an unprecedented number of public meetings, more than 1 million supportive public comments, and the repeat backing of hundreds of scientists, all of whom emphasized that the Tongass should be included in national protections.

Alaskans in fact are blessed with some of the wildest, most biologically prolific forests on Earth. Nowhere else is this more evident than on the Tongass rainforest, the crown jewel of the national forest system with over 9 million roadless acres. Over half the Tongass is in roadless condition, which represents ~19% of the national roadless acreage total.

Free of development, Tongass roadless areas allow all five species of Pacific salmon to replenish populations; deer, wolves, bears and other wildlife find sanctuary in them as well. Roadless areas help to ameliorate Alaska's rapidly changing climate. For instance, Tongass intact forests store more atmospheric carbon than any forest in the nation.¹ Cutting them down would release most of the stored carbon as global warming pollution.² Alaska is already experiencing the nation's biggest temperature increases, a 3-degree F warming since 1949.³ This comes with severe long-term consequences already evident in melting glaciers, coastal erosion, and a die-off of Alaska yellow cedar.⁴

¹DellaSala, D.A. 2011. Temperate and boreal rainforests of the world: ecology and conservation. Island Press: Washington, D.C.

²Leighty, W. et al. 2006. Effects of Management on Carbon Sequestration in Forest Biomass in Southeast Alaska. *Ecosystems* 9: 1051–1065

³Alaska Climate Res. Center. <http://climate.gi.alaska.edu/ClimTrends/Change/TempChange.html>

⁴Hennon, P.E. et al. 2012. Shifting Climate, Altered Niche, and a Dynamic Conservation Strategy for Yellow-Cedar in the North Pacific Coastal Rainforest. *Bioscience* Vol. 62:147-158

Building roads into an intact forest jump starts a death-by-thousand cuts. Roads fragment wildlife habitat into small, isolated parcels that then contribute to declining wildlife populations, as is evident for wolf and deer populations on the densely roaded Prince of Wales Island. Roads and associated landslides have pervasive and lasting impacts on streams and fish habitats.

Wild places, like those protected by the Roadless Rule, are also the backbone of the southeast Alaska economy. According to Forest Service economic data, many of Alaska's nearly 2 million annual visitors come to the Tongass to hunt, fish and recreate, while spending over \$350 million annually. The Tongass specifically produces around 40 percent of Alaska's commercial salmon fishery worth an estimated \$414 million in 2015. Importantly, the visitor industry alone contributes some 7,752 jobs to the regional economy while logging jobs (~277) on the Tongass pale by comparison and logging degrades the very forests that tourism, recreation, and fishing depend upon.

Logging in the Tongass also is completely dependent on annual subsidies paid by taxpayers that unknowingly bankroll controversial old-growth logging timber sales. Timber road construction on the Tongass costs about \$250,000 per mile, making it especially difficult to find timber sale projects that can result in a positive appraisal. The Forest Service goes so far as requiring taxpayers to pay for the logging roads, rather than the timber companies. And even then, the agency allows the companies to export up to 100 percent of logs out of Alaska. For all of the reasons, it is nonsensical to remove Roadless Rule protections to allow logging.

Although the Roadless Rule protects intact areas larger than 5,000 acres from most development, it has numerous allowances to include road connections between communities and other state highway projects, access to mining claims under the Mining Law of 1872, utility corridors, and hydropower projects. According to the Forest Service, as of January 2018, the agency reviewed and approved all 55 projects proposed within Alaska roadless areas, typically within a month of their submission. The Roadless Rule is working in Alaska and plans to gut it are misguided.

Additionally, in 2016, the Tongass Advisory Committee, made up of representatives of the State of Alaska, timber industry, conservation groups, and the regional Alaska Native corporation, unanimously agreed that the Forest Service should protect roadless areas on the Tongass from logging.⁵ They also agreed that the agency should transition the Tongass out of old-growth logging and into previously logged young forests soon to be ready to sustain the timber industry. Overturning the Roadless Rule would undermine years of collaborative progress.

In closing, the Forest Service must recognize that efforts to undermine the Roadless Rule protections on the Tongass will only prove divisive and unnecessary. The Roadless Rule is working for Alaskans by supporting the regional economy, allowing the kinds of development that local people want, and holding together a verdant rainforest that is unique globally and under increasing pressures from logging, road-based development, and climate change.

⁵Tongass Advisory Committee Final Recommendations at 13, 6 (Dec. 2015), *available at* http://merid.org/~media/Files/Projects/tongass/December%202015%20Meeting/Tongass%20Advisory%20Committee%20Final%20Recommendations_Dec%202015.pdf.

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