

## **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**

As scientists with expertise in conservation science, climate change, wildlife and fisheries policy, and economics, we urge the Forest Service to uphold the National Roadless Area Conservation Rule on the Tongass National Forest in southeast Alaska. The Forest Service is [proposing](#) a new Alaska-specific roadless rule that would open all 9.4 million acres of the Tongass forest's roadless areas to development. Such actions will adversely impact the region's robust recreation and fishing economy and displace traditional subsistence users who rely on verdant temperate rainforests remaining intact. At a time of unprecedented climate change and in the face of a rapidly approaching global biodiversity crisis<sup>1</sup>, protecting carbon- and wildlife-rich places like the Tongass forest has never been more urgent.

The landmark National Roadless Conservation Rule enacted in 2001 protects 58.5 million acres of the nation's most intact forest landscapes, including the Tongass forest. As the premier conservation achievement of its time, the Roadless Rule is predicated on years of careful deliberation, unprecedented numbers of public meetings, more than 1 million supportive public comments, and the backing of hundreds of scientist signatories. Overwhelming public support for roadless protections was demonstrated again in recent public meetings held by the Forest Service regarding the Alaska-specific rule change.

Alaskans and the nation are blessed with some of the wildest, most biologically prolific temperate rainforests on Earth<sup>2</sup>. Nowhere else in America is this more evident than on the Tongass, the crown jewel of the national forest system. The Tongass contains ~16% of the national roadless acreage and at least 8% of the nation's total forest carbon stores<sup>3</sup>. Free of development, Tongass roadless areas allow all five species of Pacific salmon to replenish; deer, wolves, bears and other wildlife find sanctuary in them as well<sup>2</sup>.

Alaska is experiencing the nation's fastest rate of climate change, 3-degree F warming since 1949<sup>4</sup>. This comes with severe long-term consequences already evident in melting glaciers and permafrost, coastal erosion, displaced Alaskan villages, and die-off of Alaska yellow cedar<sup>5</sup>. Roadless areas provide refuge for species experiencing more rapid climate change such as in the Alaska interior<sup>6</sup>. Opening roadless areas to development would emit much of the forest's stored carbon at a time when the world needs to drastically cut emissions<sup>3,7</sup>.

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<sup>1</sup> <https://www.ipbes.net/news/how-did-ipbes-estimate-1-million-species-risk-extinction-globalassessment-report>

<sup>2</sup> DellaSala, D.A. 2011. Temperate and boreal rainforests of the world: ecology and conservation. Island Press: DC.

<sup>3</sup> Leighty, W. et al. 2006. Effects of Management on Carbon Sequestration in Forest Biomass in Southeast Alaska. *Ecosystems* 9: 1051–1065.

<sup>4</sup> Alaska Climate Res. Center. <http://climate.gi.alaska.edu/ClimTrends/Change/TempChange.html>

<sup>5</sup> Hennon, 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 2

<sup>6</sup> DellaSala, D.A. et al. 2018. Climate Change May Trigger Broad Shifts in North America's Pacific Coastal Rainforests. In: D. A. DellaSala, and M. I. Goldstein (eds.) *The Encyclopedia of the Anthropocene*, vol. 2, p. 233-244. Oxford: Elsevier

<sup>7</sup> Griscom, B.W. et al. 2017. Natural climate solutions. *PNAS* 114:11645-11650. Also, see IPCC 2017 - <https://www.ipcc.ch/>.

Building roads into an intact forest jump starts a death-by-thousand cuts scenario. Roads fragment wildlife habitat into small, isolated parcels that contribute to declining wildlife populations<sup>8</sup>, as is evident for wolf and deer populations on nearby Prince of Wales Island. Roads and associated landslides have pervasive and lasting deleterious impacts on streams and fish habitats.

Wild places, like those protected by the Roadless Rule, also are the backbone of the southeast Alaska economy. According to Forest Service, many of Alaska's nearly 2 million annual visitors come to the Tongass to hunt, fish and recreate, while spending over \$350 million. The Tongass produces ~40% of Alaska's commercial salmon fishery that was worth an estimated \$414 million in 2015. The visitor industry alone contributes nearly 8000 jobs to the regional economy, while logging jobs (currently about 60) on the Tongass forest pale by comparison<sup>9</sup>.

Logging in the Tongass is completely dependent on annual subsidies because Forest Service expenditures typically exceed timber revenues by over \$20 million. Road construction costs at \$250,000 per mile make it especially difficult to find timber sales that have positive appraisal values. The Forest Service goes so far as requiring taxpayers to pay for roads, rather than the timber companies; even then, the agency allows companies to export up to 100% of logs.

Although the Roadless Rule protects intact areas greater than 5,000 acres in extent, 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. As of September 2019, the Forest Service reviewed and approved all 67 projects proposed within Alaska roadless areas, typically within a month of proposal submission.

Additionally, 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 in 2016 that the Forest Service should protect roadless areas<sup>10</sup>. They also agreed that the agency should transition timber management out of old-growth logging and into previously logged, younger forests.

In closing, the Forest Service must recognize that efforts to undermine the Roadless Rule 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 globally important rainforest that is under enormous pressures from unprecedented climate change and the ever-expansive human ecological footprint.

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<sup>8</sup>Ibisch, P.L., et al. 2017. A global map of roadless areas and their conservation status. *Science* 354:1423-1427.

<sup>9</sup>Employment coefficients and direct income for SE Alaska timber industry updated CY2017 – USDA Forest Service and Central Tongass DEIS Table 95.

<sup>10</sup>Tongass Advisory Committee Final Recommendations at 13, 6 (Dec. 2015), [http://merid.org/~media/Files/Projects/tongass/December%202015%20Meeting/Tongass%20Advisory%20Committee%20Final%20Recommendations\\_Dec%202015.pdf](http://merid.org/~media/Files/Projects/tongass/December%202015%20Meeting/Tongass%20Advisory%20Committee%20Final%20Recommendations_Dec%202015.pdf).

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