

OUTDOOR ALLIANCE

October 15, 2018

Ken Tu
Interdisciplinary Team Leader
USDA Forest Service, Alaska Region Ecosystem Planning and Budget Staff
PO Box 21628
Juneau, AK 99802

Re: Alaska roadless areas, notice of intent to prepare an EIS

Dear Mr. Tu:

Outdoor Alliance is a coalition of nine member-based organizations representing the human powered outdoor recreation community. The coalition includes Access Fund, American Canoe Association, American Whitewater, International Mountain Bicycling Association, Winter Wildlands Alliance, The Mountaineers, the American Alpine Club, the Mazamas, and Colorado Mountain Club and represents the interests of the millions of Americans who climb, paddle, mountain bike, and backcountry ski and snowshoe on our nation's public lands, waters, and snowscapes.

Our organizations' collective membership recreates on landscapes protected under the Roadless Rule in Alaska and across the country. We believe it essential that the Roadless Rule's benefits for outdoor recreation—including the protection of wild landscapes, wildlife, and air and water quality—be maintained or expanded as the Forest Service considers whether to tailor the Roadless Rule for the particular needs of National Forests in Alaska. While our experience supports the continued application of the 2001 Roadless Rule through the no-action alternative, we see precedent in the Colorado Roadless Rule for the development of a state-specific rule that responds to the individual circumstances of that state, while nevertheless, in many respects, exceeding the conservation standards set by the national rule. We strongly oppose the consideration of an alternative to exempt the Tongass National Forest from the rule in its entirety.

The Roadless Rule is an important conservation tool that protects many of our most valued backcountry recreation experiences. Our community values Roadless areas for the opportunities they provide for climbing, hiking, mountain biking, paddling, and backcountry skiing, among other activities. The settings in which these activities occur—and in many ways, the experiences themselves—are protected by the Roadless Rule in a manner that could not occur under other management regimes. While Roadless areas are protected from new development, their management is less restrictive than Wilderness, providing important middle-ground management for valued places.



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On the Tongass, the Roadless Rule protects popular recreation opportunities like the East Glacier Trail and Fritz Cove Road sport climbing crag outside of Juneau. Roadless areas on the Tongass are also treasured for remote and adventurous recreation opportunities, like the world-renowned mountaineering routes on the Mendenhall Towers and the Direct East Ridge of Devil's Thumb, one of the 50 classic climbs of North America. Additionally, ocean areas adjacent to, and in many cases surrounding, Tongass National Forest areas offer world-class sea kayaking opportunities, with viewshed, camping, water quality, and wildlife all protected through the Roadless Rule.

Our community sees great value in the Roadless Rule because it helps to preserve wild lands across the National Forest System while providing opportunities for recreational activities like mountain biking and winter trail grooming that are not allowed within more restrictive conservation designations. The Roadless Rule also provides significant management flexibility for a variety of types of other multiple use activities. The one activity the Roadless Rule fundamentally prohibits is the extensive road building associated with intensive commercial logging, which is in many instances incompatible with the protection of the myriad other values afforded by Alaska National Forests.

In addition to the intrinsic and experiential values of Roadless Areas, the values protected by the Roadless Rule support the quality of life and economic vitality of nearby communities. Roadless lands are integral to the outdoor recreation economy around the country, including in Alaska where outdoor recreation directly employs 72,000 people, drives \$7.3 billion in consumer spending, supports \$2.3 billion in wages, and contributes \$337 million in state and local tax revenue.¹ Outdoor recreation in Alaska supports four times as many jobs in the state as oil and gas production, mining, and logging *combined*.² As the Forest Service considers changes to the Roadless Rule's application in Alaska, it is essential that the agency consider throughout that the scale of the benefits sustainably derived from outdoor recreation; the benefits for clean air, water, and wildlife habitat; and the intrinsic value of a landscape of national and international significance are likely to heavily outweigh the value of changes made for a short-term benefit to timber production.

Finally, the outdoor recreation community is concerned that the Forest Service considers input on potential changes to the management of Roadless areas in Alaska from a full diversity of public lands stakeholders. While it is of critical importance to consider input from Alaskans, National Forests in Alaska belong to all Americans in common, not just to state residents or the Alaska state government. We are troubled that the Forest Service is holding just one public meeting during the scoping period

¹ OUTDOOR INDUSTRY ASSOCIATION, ALASKA (2018), available at https://outdoorindustry.org/wp-content/uploads/2017/07/OIA_RecEcoState_AK.pdf.

² *Id.*



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outside of the state compared with 12 in Alaska. At minimum, the Forest Service should hold public meetings in the Pacific Northwest, outside of solely Alaska, as the rulemaking process proceeds, and we are hopeful that this scheduling decision does not evince an intention to disregard the input of more geographically dispersed stakeholders.

Moving forward, we believe it essential that the Forest Service approach potential changes to the application of the Roadless Rule in a way that will ensure conservation and recreation values are maintained or enhanced, not degraded for the sake of potential short-term benefits. We believe that following on the example of the Colorado Roadless Rule, this may be possible. We look forward to working with the Forest Service to ensure that Roadless Areas in Alaska continue to be protected to the benefit of Alaskans and public lands owners across the country.

Best regards,



Louis Geltman
Policy Director
Outdoor Alliance

cc: Chris French, Acting Deputy Chief, USDA Forest Service

Adam Cramer, Executive Director, Outdoor Alliance
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Mark Menlove, Executive Director, Winter Wildlands Alliance
Tom Vogl, Chief Executive Officer, The Mountaineers
Phil Powers, Chief Executive Officer, American Alpine Club
Lee Davis, Executive Director, the Mazamas
Keegan Young, Executive Director, Colorado Mountain Club

