



United States Department of Agriculture

Office of the Secretary
Washington, D.C. 20250

MAR 15 2019

Mr. Austin Williams
Director of Law and Policy
Trout Unlimited
1777 North Kent Street
Suite 100
Anchorage, Alaska 99502

Dear Mr. Williams:

Thank you for your letter of December 4, 2018, to Governor Mike Dunleavy and me, regarding roadless area management in the Tongass National Forest. I apologize for the delayed response.

Your letter provides specific ideas that build on the options submitted by the Alaska Citizens Advisory Committee for roadless area management on Southeast Alaska's Tongass National Forest. I share your interest that the public rulemaking process being conducted by the U.S. Department of Agriculture's Forest Service results in a long-term, durable approach to roadless area management that accommodates the unique biological, social, and economic situation in and around the Tongass National Forest. I am glad to hear the time and effort invested to date have provided meaningful opportunities for the people of Southeast Alaska to express their points of view. Constructive comments such as those contained in your letter, supported by a range of businesses and organizations, contribute to a robust range of alternatives to be analyzed in developing an environmental impact statement.

I am committed to meeting economic, social, and natural resource needs for Alaskans and all Americans. Throughout its work on the Alaska Roadless Rule, the Forest Service will uphold its mission to sustain the health, diversity, and productivity of our Nation's forests and grasslands to meet the needs of future and present generations. An Alaska Roadless Rule is an important part of doing that.

Thank you for your support. Please share this response with the colleagues listed in your letter.

Sincerely,

A handwritten signature in blue ink that reads "Sonny Perdue". The signature is fluid and cursive, written over a light blue rectangular background.

Sonny Perdue
Secretary



December 4, 2018

The Honorable Sonny Perdue
 U.S. Department of Agriculture
 1400 Independence Ave., S.W.
 Washington, DC 20250

The Honorable Mike Dunleavy
 Office of the Governor
 P.O. Box 110001
 Juneau, AK 99811

Dear Secretary Perdue and Governor Dunleavy,

We are business owners, sportsmen organizations, and conservation groups that employ hundreds of southeast Alaskans and have tens-of-thousands of Alaskan supporters. Thank you for the time and effort you and your staff are putting toward roadless area management in the Tongass National Forest. We have been especially impressed with the numerous public meetings, the outpouring of public comment, and the progress the Alaska Citizens Advisory Committee made to arrive at a set of options for roadless management under such immense time constraints. We hope that this process leads to a lasting and durable outcome that meaningfully conserves important roadless area values while allowing for appropriate infrastructure and development activities. We are writing this letter to build on the

work of the Committee with additional insight that is based on our many years of living and working in and around the Tongass.

While we believe that the existing 2001 Roadless Area Conservation Rule should remain in place in Alaska, we recognize—as discussed by the Committee—that there is a desire to see some additional Alaska-specific needs clarified through a state-specific rule. We also believe any state-specific rule, if one is promulgated, should build on the conservation underpinnings of the roadless rule while providing prudent accommodations for Alaska’s unique needs. Any reductions in conservation in some areas should be offset by increased conservation measures in other areas. This approach would allow for robust communities and a diverse and stable economic base that includes fishing, hunting, tourism, timber, mining and energy. It would also increase the breadth of support for the new rule, which is necessary for ensuring its long-term durability and ultimate success.

Significant strides have been made in recent years to overcome the persistent conflict that has too often characterized the Tongass. This progress is the result of diverse interests from throughout the region finding agreement around a vision for forest management that transitions the Tongass toward young-growth forest management while also conserving the unique fish and wildlife habitat that underpins southeast Alaska’s robust fishing and tourism industries. As alternatives for a potential Alaska-specific roadless rule are developed and considered, it is important not to lose sight of this vision and the good will and social capital it has created. An Alaska-specific roadless rule that goes too far in exempting the Tongass from responsible conservation would unnecessarily undermine this trust and likely invite more conflict, uncertainty, and litigation.

With this in mind, and building off the Citizens Advisory Committee’s “Option A,” we suggest the Forest Service include the following components as part of a preferred alternative in its Environmental Impact Statement:

- Timber – We would support an alternative to allow commercial logging and road construction within “roaded roadless” areas in the Tongass that are outside the Tongass 77 and TNC/Audubon Conservation Priority Areas, if offset by the conservation measures discussed below, and with consideration given to avoid impacts to the fish, wildlife and recreation values that support robust and growing fishing and tourism industries. The timber volume within the “roaded roadless” should be sufficient to meet the current levels of demand, which, when added to the timber already available in the timber LUDs, would allow for increased flexibility for old-growth bridge timber harvest consistent with the Tongass transition strategy. This exception could be created

through an update to the map of inventoried roadless areas on the Tongass and by modifying the language used in Section 294.12 and 294.13 of the 2001 Roadless Rule in an Alaska-specific rule.

- Conservation – To compensate for making the “roaded roadless” acres available for timber harvest, we suggest that the Forest Service take two actions: update the map of inventoried roadless areas of the Tongass to include all areas identified in the 2003 Supplemental Environmental Impact Statement; and create new conservation protections for all lands within the Tongass 77 and TNC/Audubon Conservation Priority Areas, including the roaded portions of the Tongass 77 and TNC/Audubon Conservation Priority Areas in development LUDs. These areas include critical salmon-bearing streams, important winter habitat for deer, prime black and brown bear habitat, and some of the most productive and valuable areas for the region’s fishing and tourism businesses, which generate \$2 billion in economic activity and account for 26% of local employment. More than 7,200 Alaskans—3,600 of which are from southeast—and hundreds of local businesses voiced support for protecting these areas in the recent 2016 forest plan amendment. By adding new conservation protections that limit road construction and timber harvest in these areas, this alternative could strengthen both economic and ecologic values on the Tongass.
- Essential Infrastructure – The alternative could include an exception to allow road construction and reconstruction in inventoried roadless areas of the Tongass, outside of the Tongass 77 and TNC/Audubon Conservation Priority Areas, where necessary for infrastructure essential to Southeast Alaska communities—such as municipal waste water treatment facilities, port and airport facilities, or other infrastructure the Responsible Official determines is essential to Southeast Alaska communities. These infrastructure projects often enjoy broad support and are essential to the economic development and sustainability of Southeast Alaska Communities. Infrastructure located more than two miles from local communities, such as remote communications towers, should be constructed and operated without roads. This exception could be included by modifying the language used in Section 294.12 of the 2001 Roadless Rule for an Alaska-specific rule.
- Energy – The alternative could include an exception to allow road construction and reconstruction in inventoried roadless areas of the Tongass outside the Tongass 77 and TNC/Audubon Conservation Priority Areas to access hydropower, wind, tidal, or geothermal facilities generating renewable energy for Southeast Alaska communities. Timber harvest to fuel biomass generation should not be included within the exception.

Affordable and readily-available renewable energy is important to local communities and, when appropriately designed and constructed, enjoys broad support. This exception could be included by modifying the language used in Section 294.12 of the 2001 Roadless Rule for an Alaska-specific rule.

- Mining – The alternative could allow reasonable access for mining activities as required by existing law and regulation. This exception could be included by modifying the language used in Section 294.12 of the 2001 Roadless Rule for an Alaska-specific rule.
- Transportation – The alternative could include an exception to explicitly allow road construction and reconstruction in “Section 4407” transportation corridors, as established by Public Law 109-59. These transportation corridors are Congressionally authorized and should be included among the various transportation-related allowances already within the 2001 Roadless Rule. This exception could be included by modifying the language in Section 294.12 of the 2001 Roadless Rule for an Alaska-specific rule.

An alternative that includes the above components would meet the purpose and need, respond to the unique values and needs of southeast Alaska, and appropriately balance the desire for economic development while also conserving critical fish and wildlife habitat. Importantly, it would also maintain the progress of the Tongass transition and avoid unnecessary disruption to the 2016 Tongass Land Management Plan.

We are available to discuss these ideas at your convenience. We would also be happy to work with your staff to provide maps of the Tongass 77 and TNC/Audubon areas or any other information needed for alternative development. Thank you again for your efforts to include stakeholders in this process and to recognize the many values and interests that are supported through management of the Tongass National Forest. Thank you for your consideration.

Sincerely,

Dan Blanchard, Owner
UnCruise Adventures
Juneau, Alaska

Gordon Chew, Owner
Tenakee Logging Company
Tenakee, Alaska

Keegan McCarthy, Owner
Coastal Alaska Adventures
Custom Alaska Cruises
Douglas, Alaska

Kayla Roys, President
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