



United States Department of Agriculture

Office of the Secretary
Washington, D.C. 20250

NOV 12 2019

Ms. Sharon Buccino
Senior Director
Nature Program
Natural Resources Defense Council
1152 15th Street, NW
Washington, D.C. 20005

Dear Ms. Buccino:

Thank you for your letter of September 24, 2019, requesting a 120-day comment period on the Draft Environmental Impact Statement and proposed Alaska Roadless Rule.

In response to a petition from the State of Alaska, I instructed the U.S. Department of Agriculture's (USDA) Forest Service to initiate a timely, efficient rulemaking process and engage the public in revision of this regulation to address roadless area management concerns on the Tongass National Forest.

USDA and the State of Alaska have agreed the economic, environmental, and social issues surrounding management of roadless areas on the Tongass National Forest warrant State-specific rulemaking. USDA is committed to conducting this rulemaking as expeditiously as possible, and we will continue to provide multiple opportunities for Tribal consultation and public involvement throughout the process. Our goal for this process is a State-specific rule that addresses economic development, conservation, and other needs for this and future generations.

Publication of the Draft Environmental Impact Statement this fall began a 60-day public comment period, and the Forest Service will host community meetings across Alaska and Washington, D.C., to provide information and answer questions. Written comments will be accepted by mail, email, and through online portals.

I encourage you to continue to participate in this process by providing your comments.

Sincerely,

A handwritten signature in blue ink that reads "Sonny Perdue". The signature is written in a cursive, flowing style.

Sonny Perdue
Secretary



September 24, 2019

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

Dear Secretary Perdue:

On behalf of our 3 million members and activists nationwide, the Natural Resources Defense Council (NRDC) requests that you provide a 120-day comment period for the draft Environmental Impact Statement (DEIS) on the proposed rewrite of the Roadless Area Conservation Rule (Roadless Rule) for Alaska. A minimum of 120 days for the DEIS comment period is necessary because of the sensitivity of the resources involved and the broad range of stakeholders whose interests stand to be adversely affected.

The Roadless Rule protects 9.3 million acres of untouched National Forest System lands in the Tongass National Forest in southeast Alaska, limiting costly and environmentally-damaging roadbuilding and logging, helping to protect taxpayers, and preserving wild, high conservation value lands. A rewrite the Roadless Rule directly threatens one of the world's largest tracts of temperate old-growth rainforest and our country's single most important national forest for carbon sequestration and climate change mitigation. The Tongass also holds special and irreplaceable importance for customary and traditional uses by Alaska Natives.

Allowing the public at least 120 days to review, analyze, and comment on the proposal is necessary for the following reasons. First, the proposed rule could drastically impact the livelihoods of the nearly one-quarter of southeast Alaska residents who make a living in the tourism and fishing industries as well as numerous others who have moved to or decided to stay in the region in part for its extraordinary natural values. It is critical that these stakeholders have an opportunity to comment on the proposal. The variety of time constraints they operate under, including differing periods of peak employment, cultural activities, and other commitments, combined with the remote location of some of the most seriously affected individuals, mean that no single 60-day period will realistically provide for input from all of them. Thus, for instance, the Organized Village of Kake has requested a 120-day public comment period because "the public review and comment period will fall in the middle of the busiest time of year for Tribal citizens involved in traditional gathering, hunting, and fishing activities."

The impacts of proposed rule are not limited to Alaskans; by allowing increased costly roadbuilding for logging in the Tongass National Forest, the proposed changes to the Roadless Rule would affect taxpayers nationwide. Indeed, those concerns recently led the House of Representatives to pass with bipartisan support an amendment to the FY2020 Interior

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appropriations bill prohibiting the Forest Service from using funds to plan, design, study or construct logging roads in the Tongass. Americans expressed overwhelming opposition to removing protection of the Tongass roadless areas during the recent scoping process for the Alaska rulemaking, and they deserve adequate time to understand and communicate how their interests would be adversely affected by the proposed rule.

Further, the rulemaking raises complex issues about impacts to the conservation of the many old growth associated and/or disturbance averse species found in the world's largest remaining temperate rainforest at a time when the United Nations has called for immediate, transformative action to address catastrophic species loss and deforestation. In the same vein, the Intergovernmental Panel on Climate Change report released in August showed that the single biggest source of carbon emissions from land use is deforestation and concluded that any pathway to internationally-adopted greenhouse emission limits must address forest degradation. Particularly given this new evidence, the public, including NRDC staff and members will require significant time to analyze how this proposal will affect those concerns both directly and through impact on America's credibility in working with, and advocating for urgently needed reforms from, other nations.

Considering the complex nature of and widespread local and national interests likely to be adversely affect by this proposal, 120 days for the public to comment is strongly indicated.

Sincerely,

Sharon Buccino
Senior Director, Nature Program
Natural Resources Defense Council

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