

January 24, 2022

Alaska Roadless Rule
USDA Forest Service
709 W 9th Street
Juneau, AK 99802



RE: U.S. Forest Service Proposed Rule, “Special Areas; Roadless Area Conservation; National Forest System Lands in Alaska”

Dear Forest Service Rulemaking Team,

Thank you for the opportunity to provide public comment on the proposed rule, “Special Areas, Roadless Area Conservation: National Forest System Lands in Alaska” (RIN: 0596-AD51), published on November 23, 2021. Taxpayers for Common Sense (TCS) is a national nonpartisan budget watchdog organization that has tracked government waste issues and the management of natural resources on federal lands for 26 years.

Given the long history of below-cost timber sales in the Tongass National Forest and the economics of timber harvest in inventoried roadless areas, TCS opposed exempting the Tongass from the 2001 Roadless Rule, the final rule published on October 29, 2020 (85 FR 68688) – herein the “2020 Alaska Roadless Rule” – because it would cost American taxpayers tens of millions of dollars in increased timber and road subsidies. With the repeal of the 2020 Alaska Roadless Rule and restoration of roadless protections in the Tongass, the Forest Service would prevent expansion of the heavily subsidized and money-losing timber sale program in the Tongass. Furthermore, TCS believes the proposed rule will better align the Forest Service’s management priorities with the needs of the indigenous communities, the fishing industry, outdoor recreation, and tourism interests.

Below-Cost Timber Sales in the Tongass

The Forest Service has and continues to administer timber sales in the Tongass that generate net losses for the agency. The problem has been rampant for decades, as the costs to administer the federal timber sales program regularly exceed receipts.

The 2020 Alaska Roadless Rule would have enabled increased timber harvest in the Tongass. This was made clear in materials accompanying the 2020 rule which indicated repeal of roadless protections would not materially impact the ability to carry out energy, mining, communications, and infrastructure projects throughout the forest, even in inventoried areas.¹ Insofar as the Forest Service articulated any, the clearest justification for the rule seemed to be that,

“...more acres of suitable old-growth land would allow the Forest Service greater flexibility in the selection of **future timber sale areas**, as well as the potential for more flexibility in sale design, depending on the project areas selected.” (FEIS, p. 3-51)

Over the last two decades, TCS has published several studies documenting money-losing timber sales in the Tongass National Forest. In comments on the 2019 draft Alaska Roadless Rule,² we reported that

¹ USFS, Alaska 2020 Roadless Rule Draft Environmental Impact Statement, page 3-51

² U.S. Department of Agriculture, Proposed Rule, “Special Areas, Roadless Area Conservation: National Forest System Lands in Alaska,” October 17 2019. (84 FR 55522)

“Tongass timber sales have cost taxpayers more than \$850 million dollars” using budget data for 26 of the last 33 years. Since then, TCS has published a report expanding on that analysis. We found that over the 40 fiscal years from FY1980 to FY2019, the Forest Service lost more than \$1.7 billion selling timber in the Tongass.³

By opening up new areas to logging, the 2020 Alaska Roadless Rule would have exacerbated the problem and led to additional losses for taxpayers. By repealing that rule, as proposed, the Forest Service would be taking a strong step toward limiting losses from the Tongass timber program.

Importance of Recognizing Non-Logging Interests

Allowing sales and harvest of more old-growth acres to potentially help the timber industry, however, would have negatively impacted the fishing, outdoor recreation, and tourism industries that are significantly more important to the economy of Southeast Alaska.

In 2019, the visitor and seafood industries employed 26 percent of all workers in Southeast Alaska, compared to the less than one percent employed by the timber industry.⁴ The Forest Service calculated the cost of implementing the 2020 Alaska Roadless Rule to outfitters and guided tour providers at between \$146,000-\$304,000 per year.⁵ The agency did not anticipate any effects on the fishing industry because, it claimed, the standards for protecting the watersheds salmon populations rely on would not change.⁶ Those standards, however, have not prevented damage to Tongass watersheds from logging activities. In 2019, the Forest Service found that 1,120 stream crossings in the Tongass did not meet state and federal standards and therefore failed to provide adequate access to streams critical to local fish populations.⁷ It’s reasonable to assume that allowing loggers access to new parts of the Tongass will lead to more stream crossings that impact salmon populations. By reinstituting roadless protections, the proposed rule would prevent revenue losses for outfitters and impacts to watersheds crucial to the Southeast Alaska fishing industry.

Restoring roadless protections in the Tongass, would also recognize the perspective of indigenous populations that live in, and depend on, the forest. Twelve local tribes now endorse the positions outlined in a 2020 petition, including that: “Our customary and traditional uses cannot be protected when road construction, logging, mining, and other large-scale industrial development, which has already devastated large expanses of the forest, is permitted to spread even farther into new and previously unimpacted corners of the Tongass.”⁸ Repealing the 2020 Alaska Roadless Rule is a necessary first step to creating a process that involves native peoples in land management policymaking as requested by the petition.

Conclusion

At nearly 17 million acres, the Tongass National Forest in Southeast Alaska is the largest in the United States and is an important resource and natural place for the entire country. Tourism and fishing are the foundation of the region’s economy, but historically money-losing timber sales and costly logging roads

³ TCS, “Cutting Our Losses after 40 Years of Money-Losing Timber Sales in the Tongass,” Sept 2020 – <https://www.taxpayer.net/energy-natural-resources/cutting-our-losses-tongass-timber-2/>

⁴ Southeast Conference, “Southeast Alaska: By the Numbers 2020,” Sept 2020.

⁵ USFS, “Regulatory Impact Assessment and Cost-Benefit Assessment,” accompanying the final 2020 Alaska Roadless Rule, p. 51

⁶ Id., p. 45

⁷ USFS, “Tongass National Forest Fish Passage at Road-Stream Crossings Status,” March 3, 2020 – http://www.americansalmonforest.org/uploads/3/9/0/1/39018435/fish_passage_at_road_stream_crossings_briefing_03022020.pdf

⁸ “Petition For USDA Rulemaking To Create A Traditional Homelands Conservation Rule,”

too often take priority in the Tongass threatening wildlife and indigenous communities. The implementation of the 2001 Roadless Rule helped limit these reckless sales, decreasing taxpayer losses and costly maintenance liabilities from roadbuilding. Furthermore, the Roadless Rule's flexibility allowed for other non-logging projects to move forward, eliminating the need to repeal or amend it to pursue other purposes.

TCS believes that exempting the Tongass National Forest from the 2001 Roadless Rule will result in adverse economic and associated environmental impacts. As discussed above, Tongass timber sales return a few pennies on each dollar expended. To protect the interests of taxpayers, Taxpayers for Common Sense urges the U.S. Forest Service to finalize its proposed repeal of the 2020 Alaska Roadless Rule. Implementing the proposed rule would limit heavily subsidized timber sales and taxpayer losses at a time of exploding national debt.