

U.S. House of Representatives
Committee on Natural Resources
Washington, DC 20515

May 10, 2019

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

Dear Secretary Perdue:

We write to express our concerns about the petition recently submitted by the State of Utah to create a Utah-specific roadless rule and to ask that you reject this petition. Utah's petition fails to provide any science or data in a lackluster attempt to make a case that the 2001 Roadless Rule is not working as it was intended when first enacted nearly two-decades ago. Instead, the petition relies on broad platitudes and unsupported claims to argue that a state-specific rule would somehow better preserve the roadless area values currently protected under the national rule. Furthermore, the petition fails to consider any of the pitfalls likely to result from pursuing a state-specific rule, including introducing new controversy and uncertainty to land management planning throughout the state, diversion of limited federal resources away from high-priority forest management and road maintenance needs, costs and staff time associated with the rulemaking itself,¹ and potential negative impacts to Utah's forests and the critical public health, environmental, and economic services they provide.

As you know, in 2001 the U.S. Department of Agriculture (USDA) put into place a national rule limiting road building and commercial logging in unroaded units of the National Forest System, including four million acres in the State of Utah. The 2001 Roadless Rule maintains the following important services provided by Utah's national forests: critical habitats for native plants and animals, including the protection of habitat for 74 percent of Utah's 133 "sensitive," or vulnerable, species²; clean drinking water for hundreds of thousands of Utahns; and

¹ Western Resource Advocates. (2019). *Utah's Petition to Roll Back Roadless Rule Undermines Decades of Commonsense Public Land Protections*. Retrieved from <https://westernresourceadvocates.org/blog/western-resource-advocates-utahs-petition-to-roll-back-roadless-rule-undermines-decades-of-common-sense-public-land-protections/>.

² Center for Biological Diversity. (2019). *Roadless Forests are Critical for Utah*. Retrieved from https://www.biologicaldiversity.org/programs/public_lands/forests/pdfs/UT-RR-Wildlife-Factsheet.pdf.

opportunities for hunting, fishing, hiking, biking, backcountry skiing and other forms of recreation—all of which contribute to Utah’s \$12.3 billion-dollar outdoor recreation economy.³

The State of Utah’s proposal envisions subjecting over three million acres of roadless national forest in Utah to logging and new road building. Road building significantly alters natural landscapes, fragments wildlife habitat, facilitates the spread of invasive species, reroutes water sources, and impairs drinking water quality. Considering these scientifically-supported harms associated with road building, many of which were cited in the Utah’s 2015-2025 Wildlife Action Plan, the fact that the State cites the avoidance of these harms as a rationale for a more lenient, state-specific rule is confounding.⁴ The inevitable degradation to these lands caused by increased logging and road building would also alter the land’s recreation values which are utilized by 72 percent of Utahns every year.⁵

Perhaps most disconcerting is how Utah’s petition appears to use concerns regarding wildfire management and community protection as two of the major justifications for the alleged need for a state-specific rule in Utah. Less than seven percent of inventoried roadless areas (IRAs) in Utah are at a high risk of wildfire and less than one percent of IRAs are both at a high risk of wildfires and within 0.5 miles of communities.⁶ Even more troubling, research has shown that roads lead to an increase in human-caused wildfires because they allow for the introduction of ignition sources, suggesting that increased road building might actually increase wildfire risk.⁷

In addition, Utah’s summary of stakeholder outreach and opportunities for public input appears to fall well short of any open and transparent process, and the limited feedback relied upon in the petition only raises further questions. A November 30, 2016, memo prepared by Utah’s Public Lands Policy Coordinating Office makes the State’s true intentions clear, claiming that they want to “revoke the Forest Service’s roadless rule”.⁸ The State petition also includes oil, gas, and mining among those groups the State met with, but doesn’t elaborate on any specific views communicated by these or other stakeholders. Additionally, the petition makes no mention of any efforts to communicate with tribal representatives or to consider impacts to cultural resources, which is particularly egregious considering that the petition proposes to change roadless management for areas illegally removed from the original Bear’s Ears National

³ Outdoor Industry Association. *Utah*. Retrieved from https://outdoorindustry.org/wp-content/uploads/2017/07/OIA_RecEcoState_UT.pdf.

⁴ Utah Division of Wildlife Resources. (2015). *Utah Wildlife Action Plan*. Retrieved from https://wildlife.utah.gov/wap/Utah_WAP.pdf.

⁵ Outdoor Industry Association. (n.d.). *Utah*. Retrieved from https://outdoorindustry.org/wp-content/uploads/2017/07/OIA_RecEcoState_UT.pdf.

⁶ PEW. (2019). *Challenges to ‘Roadless Rule’ Threaten Millions of Acres of Forest*. Retrieved from <https://www.pewtrusts.org/en/research-and-analysis/articles/2019/02/25/challenges-to-roadless-rule-threaten-millions-of-acres-of-forest>

⁷ Proceedings of the National Academy of Sciences of the US. (2017). *Human-started wildfires expand the fire niche across the United States*. Retrieved from https://www.biologicaldiversity.org/programs/public_land/pdfs/BalchPNAS-2017.pdf.

⁸ Pacific Standard Magazine. Oct. 12, 2018. *Inside Utah’s Anti-Public Lands Agenda* <https://psmag.com/environment/utah-anti-public-lands-agenda>

Monument boundary. While we recognize that a rulemaking, if initiated, would be subject to requirements under the National Environmental Policy Act, the process thus far makes us question the need and motivations to promulgate a Utah rule in the first place.

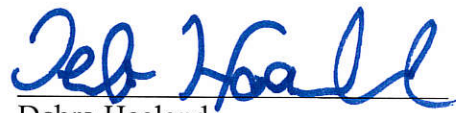
Lastly, we would point you to the fact that Utah and other states covered by the 2001 Roadless Rule already have plenty of flexibility to manage roadless national forest lands. As one example, from 2017 through 2018, the Forest Service recommended 23 road construction or timber harvest projects in Utah's Inventoried Roadless Areas, all of which were approved. Furthermore, Forest Service Chief Christiansen recently transmitted a letter to Regional Forest Supervisors delegating the decision-making authority for roadless exceptions to the regions, allowing for significant flexibility in on the ground management of these important resources. Given the existing flexibility to manage these lands, the motivations behind the Utah's petition should be thoroughly questioned before accepting the burden of a costly, contentious, and likely unnecessary rulemaking.

When viewed in the context of the ongoing Alaska rulemaking to eliminate roadless rule protections from millions of acres of ancient forests, accepting the State of Utah's petition would only further divert resources from higher priority projects, while signaling to other states that existing roadless protections are open for negotiation. Managing roadless areas on a state-by-state basis is antithetical to the original intent of the 2001 Roadless, which was to clarify the management of these areas across the National Forest System and threatens to fundamentally undermine a widely supported federal land management safeguard. Based on the numerous factors outlined here, we urge you to reject the petition from the State of Utah and to maintain national roadless protections to their fullest extent.

Sincerely,



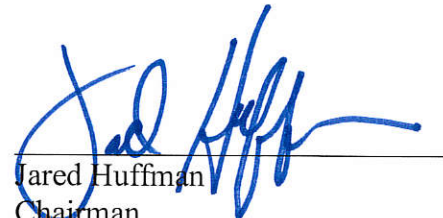
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