

**Testimony of Austin Williams
Alaska Director of Law and Policy for Trout Unlimited**

**Before the
House Natural Resources Committee
Subcommittee on National Parks, Forests, and Public Lands
Oversight Hearing – November 13, 2019**

Thank you for this opportunity to testify on the proposed Alaska Roadless Rule, which would exempt southeast Alaska’s Tongass National Forest from the 2001 Roadless Area Conservation Rule. My name is Austin Williams. I am Trout Unlimited-Alaska’s Director of Law and Policy. TU has a long history of working collaboratively with the Forest Service and other stakeholders on the Tongass in efforts to protect and restore important fish, wildlife and water resources in the region, and to help move beyond the persistent challenges and conflict that have plagued the Tongass timber program. I am very appreciative of this Committee’s role in the oversight and management of our nation’s public lands and natural resources.

I commend the Forest Service for its efforts in recent years to improve protections for sensitive fish and wildlife, enhance visitor services, and to focus on more sustainable young-growth management. These efforts help ensure the Forest Service meets the needs of the public and supports southeast Alaska’s rural communities. Unfortunately, the proposed Alaska Roadless Rule, which would take the extreme measure of repealing long-standing protections for roadless areas across the Tongass, is out of touch with the needs and desires of Alaskans and the broader public. It undermines much of the progress made in recent years, erodes public confidence in the agency, and threatens to expand destructive industrial-scale old-growth logging and road building, which would undermine the region’s largest job-producing industries of fishing and tourism, cause unnecessary and irreplaceable harm to important fish and wildlife habitat, and is an antiquated practice that would not exist if not for massive taxpayer subsidy.

The Tongass produces more salmon than all other national forests, combined, and is a popular destination for visitors from around the globe.¹ Its many productive salmon streams, important fish and wildlife habitat, and beautiful scenery are the foundation for Southeast Alaska’s local economy, beloved by the public and the forest’s many visitors, and provide irreplaceable cultural values. The Tongass is not only our largest National Forest, it is also in my opinion our greatest.

I. Fishing and Recreation are the Tongass’ most Important Forest Products.

Sport, commercial and subsistence fishing in Southeast Alaska contributes \$1 billion annually to the regional economy and accounts for 10% of Southeast Alaska’s employment.² The visitor industry,

¹ U.S. Forest Service, *Tongass Salmon Factsheet* (Mar 2017), available at https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fseprd554592.pdf.

² TCW Economics, *Economic Contributions and Impacts of Salmonid Resources in Southeast Alaska*, prepared for Trout Unlimited Alaska at 16 (July 2010), available at <http://www.tu.org/sites/www.tu.org/files/documents/EconReportFull.pdf>. The number of jobs supported by salmon

which is projected to continue growing, has added more than 2,000 year-round equivalent jobs to southeast Alaska since 2011 and now accounts for 18% of all employment in the region.³ More than 1.3 million out-of-state visitors flocked to the Tongass this year, making tourism the largest source of private-sector jobs and earnings in southeast Alaska.⁴ Together, the visitor and seafood industries provide 26% of all regional employment.⁵ These industries—which have their foundation in healthy watersheds, in-tact fish and wildlife habitat, natural scenic beauty and wild landscapes—depend heavily on the Tongass National Forest and the protections afforded to inventoried roadless areas by the 2001 Roadless Rule.

Fishing and tourism far outpace other private-sector sources of employment and earnings, and provide a steady and reliable economic base for many Southeast Alaskan communities. While logging once played a historically important role in the economy of Southeast Alaska, current timber industry employment accounts for just 0.7% of regional jobs.⁶ Despite decreases in southeast Alaska’s timber industry, the region’s population *increased* 7 percent from 2000 to 2012 and personal income *increased* by 17 percent over the same period.⁷ Per capita income for southeast Alaskans outpaces statewide and national averages while unemployment rates remain lower than statewide or national averages.⁸ Southeast Alaska’s economy is buoyed by its healthy fish and wildlife habitat, productive salmon streams, and scenic beauty. Managing the Tongass with fish, wildlife and visitor services at the forefront is the key to ensuring local communities and economies are strong and stable.

II. The Roadless Rule is Essential to the Local Economy Sound Management of the Tongass.

Two key developments in the Tongass over the past nearly two decades are responsible for the growth and strength of Southeast Alaska’s fishing and tourism industries. First, the 2001 Roadless Rule was put in place to conserve the remaining wild landscapes and unroaded portions of the Tongass, which are the core of the local fishing and tourism industries. While various unsuccessful litigation efforts have been mounted against the 2001 Roadless Rule on the Tongass, and an exemption for the Tongass was temporarily in place before the Ninth Circuit Court of Appeals ruled it unlawful, the 2001 Roadless Rule has successfully conserved inventoried roadless areas on the Tongass as the law of the land for the vast majority of the past 18 years. Because of the 2001 Roadless Rule, inventoried roadless areas remain unimpacted by industrial old-growth logging and unnecessary road construction, remain reliably productive as cornerstones of the region’s fishing and tourism industries, and remain accessible for fishing, hunting, recreation, guiding, and tourism.

fishing and its economic contribution are likely to be even greater today than was indicated since these figures were calculated using data from 2007 and the economy and salmon prices have continued to increase in recent years.

³ Rain Coast Data, *Southeast Alaska by the Numbers 2019*, prepared for Southeast Conference at 7 (Sep 2017). available at

<http://www.seconference.org/sites/default/files/FINAL%20Southeast%20by%20the%20Numbers%202019.pdf>.

⁴ *Id.*

⁵ *Id.* at 5.

⁶ *Id.*

⁷ USDA, *Tongass Land and Resource Management Plan Final Environmental Impact Statement Plan Amendment*, R10-MB-769e at 3-478 (June 2016).

⁸ *Id.* at 3-478 to 479.

Second, through the collaborative efforts and hard compromise of the Tongass Advisory Committee and the 2016 amendment to the Tongass Land Management Plan, the Forest Service has a roadmap for aligning its management of the Tongass with the public interest and the economic realities of the region. Successfully implementing this collaborative vision would allow the Forest Service to align the Tongass with the public's needs, support a sustainable young-growth forest products industry, and protect the best remaining fish and wildlife habitat on the forest—including roadless areas, the Tongass 77, and TNC/Audubon Conservation Priority Areas.

Timber planning, including the current proposal to repeal protections for roadless areas on the Tongass, too often comes at the expense of the region's strong economic base of fisheries and tourism. Once-productive salmon streams no longer support abundant salmon runs and ample wildlife populations when clearcut logging disrupts the recruitment of large-woody debris, erosion overburdens nearby streambeds, roads cross streams and cut off salmon migration to important spawning or rearing habitat, or second-growth stands become so overgrown they fail to provide meaningful winter habitat for wildlife. Tourists and recreationists don't travel to the Tongass to see and hike through large swaths of clearcut lands; they come to take in its scenic beauty and in-tact landscapes. Each of these factors contributed to why the Forest Service adopted the original 2001 Roadless Rule and remain true today.⁹

The past 60 years of industrial logging on the Tongass has targeted the rarest and most productive stands of large-tree old-growth forest. High-grading has reduced the highest-volume contiguous old growth forest on the Tongass by 66 percent.¹⁰ On Prince of Wales Island, where industrial old-growth logging has been most concentrated, 94 percent of the contiguous large-tree old-growth stands have been logged since 1954.¹¹ This large-tree old-growth forest, which historically covers less than five percent of the Tongass, is among the most valuable habitat for fish and wildlife. Past logging and road building has left a legacy on the Tongass where, according to Forest Service estimates, roughly 65 salmon streams are in need of significant restoration with an estimated cost of more than \$100 million.¹² The backlog of road maintenance needs on Alaska's National Forests amounts to \$68 million, begging the question of why we would compound these problems through expanded road construction in new areas.¹³ Approximately a third of all instances on the Tongass where roads intersect streams fail to meet applicable standards for salmon migration.

⁹ See Special Areas; Roadless Area Conservation, 66 Fed. Reg. 3244, 3245-47 (Jan. 12, 2001).

¹⁰ Albert, D. M., and J. W. Schoen, *Use of Historic Logging Patterns to Identify Disproportionately Logged Ecosystems within Temperate Rainforests of Southeastern Alaska*, 27 Conservation Biology 4 at 779-780 (2013); Albert, D. M., and J. W. Schoen, *A conservation assessment for the coastal forests and mountains ecoregion of southeastern Alaska and the Tongass National Forest* In A Conservation Assessment and Resource Synthesis for the Coastal Forests & Mountains Ecoregion in Southeastern Alaska and the Tongass National Forest. eds J. W. Schoen, and E. Dovichin. Audubon Alaska and The Nature Conservancy (2007), available at <https://www.conservaiongateway.org/ConservationByGeography/NorthAmerica/UnitedStates/alaska/seak/era/cfm/Pages/CA-AKCFM.aspx>.

¹¹ *Id.*

¹² USDA, *Investment Strategy in Support of Rural Communities in Southeast Alaska 2011-2013*, R10-MB-734 at 11 (Nov. 2011).

¹³ U.S. Forest Service, *Questions for Mr. Quigley* at 1 (June 2018).

III. Efforts to Repeal the Roadless Rule are out of Touch with the Needs of the Public.

The overwhelming weight of public input recognizes the extraordinary value of roadless areas on the Tongass and a desire to keep the 2001 Roadless Rule's important protections in place. Public comment at the on-going public meetings for the proposed exemption overwhelmingly favor retaining the 2001 Roadless Rule. In some communities, 100% of the public comment supports protecting roadless areas. Recent polling shows 79% of Alaskans and a comparable number of southeast Alaskans want to retain protections for roadless areas and their important fish and wildlife.¹⁴ Similarly, the majority of public comments to the Forest Service during the scoping period opposed changing the 2001 Roadless Rule for Alaska.¹⁵ The scientific community also recognizes the importance of the 2001 Roadless Rule and the extraordinary value of the remaining big-tree old-growth, and has repeatedly called on the Forest Service to end its old-growth timber sale program.¹⁶

When evaluating the benefits from the Tongass to society, the Forest Service and the State of Alaska are placing far too much emphasis on traditional extractive resources while largely ignoring benefits from fish, wildlife, subsistence, recreation and water resources. By far the most valuable activities occurring on the Tongass are derived from intact fish and wildlife habitat and wild scenery. This is true throughout the National Forest System, but is especially relevant in Southeast Alaska where the Tongass comprises such a large portion of the land base and where the forest's roadless qualities play such an integral role in southeast Alaska's businesses, economy and lifestyle. Maximizing the benefits from the Tongass to the public requires the Forest Service to manage the Tongass in a way that prioritizes the many contributions of fish, wildlife and visitor services—all of which primarily derive from inventoried roadless areas.

In addition to safeguarding important fish, wildlife, subsistence, and recreational resources throughout roadless areas in the Tongass, the 2001 Roadless Rule also provides reasonable accommodation to community development and infrastructure needs. The 2001 Roadless Rule provides access for mining, energy, and community infrastructure projects. It allows forest health, recreation, and cultural activities. The Kake-Petersburg Intertie, which opponents of the 2001 Roadless Rule often cite as being obstructed by the rule, is explicitly allowed by court order along with a variety of other

¹⁴ See Tulchin Research, *Poll Findings: Alaska's Tongass National Forest* (May 2019), available at <http://www.americansalmonforest.org/blog/press-release-new-statewide-poll-shows-alaska-voters-support-conserving-critical-salmon-streams-roadless-areas-on-the-tongass-national-forest>.

¹⁵ U.S. Forest Service, *Alaska Roadless Rule Scoping Period: Written Public Comment Summary* at 2 (Feb. 2019) available at https://www.fs.usda.gov/nfs/11558/www/nepa/109834_FSPLT3_4616651.pdf.

¹⁶ See Jack Ward Thomas and Mike Dombeck, Seattle Times Op Ed, Declare harvest of old-growth off-limits and move on (Aug 23, 2003); Letter to the President by 78 North American Scientists (lead signatories were Jack Ward Thomas and Mike Dombeck) calling for a national old growth policy to protect the remaining old growth on national forest lands throughout the US (June 25, 2014); Letter to Secretary Vilsack from 200+ North American Scientists urging a quick transition out of old-growth logging on the Tongass National Forest (October 15, 2014); Joint Society letter to Secretary Vilsack from American Fisheries Society (AK Chapter), American Ornithologist's Union, American Society of Mammalogists, Ecological Society of America, Pacific Seabird Group, Society for Conservation Biology, The Wildlife Society (January 20, 2015).

high-profile projects.¹⁷ As of June, 2019, all 58 applications submitted for projects in roadless areas in Alaska had been approved, most gaining approval within a month.¹⁸ The majority of these applications pertain to surface exploration of potential mining and hydropower projects, but they also include road realignment and reconstruction projects, an aerial tram, a geothermal project, personal use of timber, and a variety of other projects. In October, 2018, the process for approving these projects was further streamlined when Forest Service Chief Christiansen delegated authority to approve project requests to the Regional Foresters.¹⁹

IV. Conclusion.

The proposed Alaska Roadless Rule, which would fully exempt the Tongass, is a huge leap backward and risks undoing much of the progress gained through compromise and collaboration in recent years. It turns its back to the region's economic strengths, fishing, tourism and outdoor recreation, which now account for 26% of regional employment and \$2 billion to the local economy. It also short changes the values that make the Tongass so unique and valuable to local residents and visitors alike.

Roadless areas on the Tongass are some of the best and most valuable lands on the forest. Many of the most important salmon streams are in roadless areas. Increasingly scarce winter deer range and prime bear habitat is often found in low elevation roadless areas. Roadless areas offer the right combination of beautiful scenery, wild landscapes, fish and wildlife, and access that local residents and the growing tourism and recreation industry demands. The Tongass is a paradise—not just for Alaskans, but for all Americans. The Forest Service should abandon its proposed exemption and, instead, continue long-standing protections for roadless areas.

Thank you for the opportunity to provide input into this important process.

¹⁷ See U.S. District Court, District of Alaska, Judgement, *Organized Village of Kake v. USDA*, 1:09-cv-00023-JWS at 2-3 (May 24, 2011).

¹⁸ U.S. Forest Service, *Frequently Asked Questions Regarding Inventoried Roadless Areas* 6 (Jan. 2018); U.S. Forest Service, *Questions for Mr. Quigley* at 1 (June 2018).

¹⁹ U.S. Forest Service, *Questions for Mr. Quigley* at 1 (June 2018).