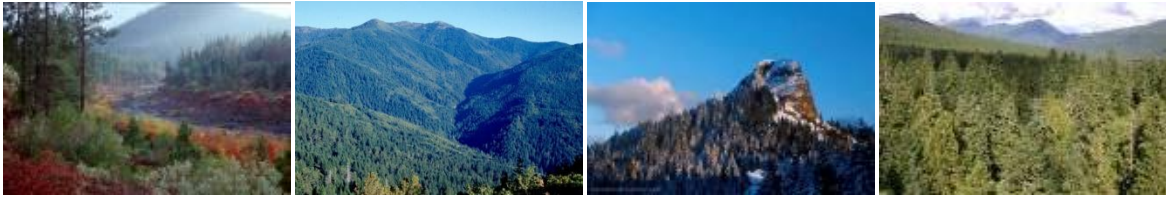


A Letter from More Than 500 Scientists Urging the President to Fully Support the 2001 Roadless Area Conservation Rule



December 14, 2009

President Barack Obama
The White House
1600 Pennsylvania Avenue
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Dear Mr. President:

As scientists working in natural resource-related disciplines, we commend your commitment to uphold and enforce the 2001 Roadless Area Conservation Rule as the best policy to protect the nation's 58.5 million acres of undeveloped national forests. Now, as your administration deliberates next steps to preserve roadless areas, we would like to stress the scientific importance of this landmark environmental policy and our concern about attempts to undermine its protections on the Tongass National Forest in Alaska and national forests in Idaho and Colorado.

Since its promulgation, we have been, and continue to be, supportive of the 2001 Roadless Rule, because it applies a consistent and scientifically based national standard that appropriately safeguards the numerous ecological benefits that roadless areas provide to the nation's citizens, fish and wildlife, while also supplying clean drinking water to millions of Americans¹. Ongoing development in concert with human-caused disruptions to the earth's climate now makes the application of a national roadless area policy even more urgent.

The 2001 Roadless Area Conservation Rule aptly noted the importance of roadless areas for watershed and ecosystem health. For example, over half of the nation's roadless areas supply water to downstream facilities that treat and distribute drinking water to the public¹. There is strong scientific evidence that roadless areas provide high-quality habitat for threatened species, contain important concentrations of old-growth forests and aquatic strongholds, and, in the

¹USFS. 2000. Forest Service Roadless Area Conservation. Draft Environmental Impact Statement. Volume 1. Washington, D.C.

absence of roads and other disturbances, provide a buffer against invasive species². Because over half the nation's roadless areas are at elevations above 7,000 feet¹, they are vital for wildlife seeking cool, moist conditions in the face of a warming climate. In contrast, the presence and human use of roads have been linked to increased wildlife mortality, fragmentation of habitat, changes in the physical and chemical environment, diminished water quality, introduction of invasive species, wildfire ignitions, and increases in landslide susceptibility³. Such ecological effects are estimated to impact nearly one-quarter of all surface areas in the conterminous United States⁴. The few remaining roadless areas, which represent only two percent of the nation's total land area, take on even greater significance when viewed in this manner.

We believe the roadless area benefits described herein are best maintained by applying the 2001 Roadless Rule consistently across the nation, as it was originally intended. In fact, one of the primary reasons for invoking the 2001 Roadless Rule was that individual national forest plans, coupled with various regulations and other outside factors, were allowing the continued erosion of roadless areas absent a national standard⁵. The 2001 Roadless Rule imparted Forest Service officials with the responsibility of considering national interests in the management of the National Forest System, and specifically, inventoried roadless areas⁶. Reverting to state level exemptions and policies would undermine this important national direction, contributing to the further loss of these national forest system lands and their important ecological functions.

Perhaps there is no better example of the scientific justification for full restoration of the 2001 Roadless Area Conservation Rule than the Tongass National Forest in Alaska. When the 2001 Roadless Rule was being developed, many scientists from across the country noted that to best conserve its wildlife and other ecological values the Tongass should be included in any measure to protect national forest roadless areas⁷. Because of a temporary exemption promulgated in 2003, the Tongass is the only national forest on the Pacific Coast unprotected by the 2001 Rule. This is unfortunate, as it holds approximately 30% of the planet's largest remaining coastal temperate rainforests. It also represents one of North America's largest carbon sinks and most biologically productive ecosystems⁸. The Tongass exemption left more than two

²Strittholt, J.R., and D.A. DellaSala. 2001. Importance of roadless areas in biodiversity conservation in forested ecosystems: a case study – Klamath-Siskiyou ecoregion, U.S.A. *Conservation Biology* Vol. 15(6):1742-1754.
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Gelbardi, J.L., and S. Harrison. 2005. Invasibility of roadless grasslands: an experimental study of yellow starthistle. *Ecological Applications* 15(5):1570–1580.

³Trombulak, S. and C. Frissell. 2000. Review of ecological effects of roads on terrestrial and aquatic communities. *Conservation Biology* 14:18-30.

⁴Forman, R.T.T. 2000. Estimate of the area affected ecologically by the road system in the United States. *Conservation Biology* 14:31-35.

⁵USFS. 2000. Roadless Area Conservation Final Environmental Impact Statement. Volume 1:3-12.

⁶66 Fed Reg. Notice 3246, January 12, 2001.

⁷December 20, 1999 letter sent to President Clinton.

⁸Schoen, J., and D. Albert. 2007. Southeastern Alaska conservation strategy: a conceptual approach. Chapter 10 in The coastal forests and mountain ecoregion of southeastern Alaska and the Tongass National Forest: a conservation assessment and resource synthesis, eds. J. Schoen and E. Dovichin. Audubon Alaska and The Nature Conservancy, Anchorage, Alaska.

million acres of roadless areas – including many old-growth forests – open to development, placing at risk high-quality habitat for many valued wildlife species as well as contributing to the release of dangerous greenhouse gas pollutants from logging activities.

We are also concerned about efforts by two other states, where rule changes have weakened the 2001 rule (Idaho) or are proposed to bypass many important protections of the 2001 roadless rule (Colorado). Idaho contains the largest intact national forest ecosystem in the lower 48 states, and a new state roadless policy was developed by the previous administration that would place many national forest acres at risk. This includes opening up more than 5,700 acres of roadless areas in the Caribou Targhee National Forest to phosphate mining, which poses a significant risk to terrestrial and aquatic species and water quality⁹, while also being potentially risky to human health and safety. In Colorado, which contains over 4 million acres of inventoried roadless areas, proposed exemptions in their draft rule would impact at least 246,000 acres¹⁰ of inventoried roadless areas by removing them from the national inventory or degrading them by eliminating many restrictions on logging and road building. This would allow approximately 100 oil and gas leases in prime hunting and fishing areas, additional coal mining and exploration, expansion of ski areas, and many other provisions that could have long-term negative consequences to these vital landscapes. Fossil fuel development in these areas also contributes to the build up of greenhouse gas pollutants.

In closing, we thank you for your pledge to restore scientific integrity to policy development and specifically to decisions impacting the environment – including the conservation of our public lands. As scientists, we believe that the 2001 Roadless Rule remains the most scientifically credible approach for managing and protecting our last undeveloped national forests, and we urge your continued support for it.

Thank you for considering our views on this matter of vital importance to America's ecological health. Please do not hesitate to contact us for further information or input.

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⁹Hamilton, S.J., Buhl, K.J. and P.J Lamothe. 2004. Selenium and other trace elements in water, sediment, aquatic plants, aquatic invertebrates, and fish from streams in SE Idaho near phosphate mining. *Life Cycle of the Phosphoria Formation: From Deposition to Post-Mining Environment*, Chapter 18. J. R. Hein, ed.

¹⁰4.43 million acres of inventoried roadless areas are currently protected by the 2001 rule vs. the state's July 28, 2009 proposal that includes 4.184 million acres. This difference is likely conservative due to cumulative impacts from multiple activities proposed.

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