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February 19, 2016

Ms. Terri Marceron  
Forest Supervisor  
Chugach National Forest  
161 E. 1st Avenue, Door 8  
Anchorage, AK 99501

Re: Chugach National Forest Plan Revision

Dear Ms. Marceron:

The Resource Development Council for Alaska, Inc. (RDC) appreciates the opportunity to provide comments on the Chugach National Forest Plan Revision.

RDC is a statewide non-profit business association comprised of individuals and companies from Alaska's oil and gas, mining, forest products, fisheries and tourism industries. RDC's membership also includes Alaska Native corporations, local communities, organized labor and industry-support firms. RDC's purpose is to encourage a strong, diversified private sector in Alaska and expand the state's economic base through the responsible development of our natural resources.

#### Introduction

RDC has wide ranging concerns regarding the future management of the forest. Our concerns can best be addressed through the implementation of a true multiple-use mandate, which has been a cornerstone of Forest Service policy. This mandate sets national forests apart from national parks and refuges. Our national forests were established under a working forest model. Unlike the national parks that were created for preservation, the national forests were established under the authority of the Organic Administration Act of 1897 to conserve water flows and to furnish a continuous supply of timber and other resources for the American people. The notion of the working forest has been with us for over a century.

As our nation grew and demands on our forests increased, additional acts of Congress refined but did not supersede the Organic Act. The 1960 Multiple Use Sustained Yield Act added outdoor recreation, range, fish, and wildlife to the balance of national forest uses. The 1976 National Forest Management Act (NFMA) established a framework for forest planning, however, nowhere did Congress alter the fundamental mandate to balance multiple use, including water, timber, mining, recreation, range, fish, and wildlife.

Multiple use means more than recreation, subsistence, and wildlife habitat. These uses are all important, but must and can coexist with responsible resource development. The Chugach should be managed for multiple uses, including recreation, commercial tourism, mining, timber production, and other resources, especially given the fact Alaska contains 70 percent of the nation's national park lands, 80 percent of its national wildlife refuge acreage, and 53 percent of federal Wilderness. These units, like most of Alaska, are primarily roadless and wild. The Chugach should not be managed as a national park where preservation is an overriding

management priority. RDC believes that true multiple uses as outlined above should be reflected in the plan revision if the Chugach is truly to be a land of many uses. Unfortunately, the draft forest plan revision falls well short of this mandate.

#### Timber production/harvest

Although the Organic Administration Act provides that timber production is a key statutory mission of the National Forest System, the Chugach is the largest national forest in the nation with no Allowable Sale Quantity (ASQ) and with no Forest Service timber program. This is inappropriate and unacceptable. The Chugach, the second largest national forest in the nation, provides no timber for local wood product businesses, even though it is a fully capable of doing so. The revised forest plan contains conflicting standards and guidelines that essentially prevent an ASQ. The plan does not provide for any level of timber production and considers it unsuitable across the entire forest (Table 6). RDC strongly disagrees with this assessment and considers it a glaring example of how the revised forest plan is biased and predisposed to non-development designations. Sustainable and responsible commercial timber harvesting is no more discretionary than habitat preservation, ecosystem management, watershed protection, and recreation.

There is a need for a small, viable timber program in the Chugach consistent with management of the forest prior to 2002. The increased availability of small timber sales in Southcentral Alaska in recent years has enabled small operators to expand operations. However, many of these businesses are struggling in part due to the lack of a suitable timber supply, but not due to a lack of resource.

Prior to 2002, the ASQ in the Chugach was approximately 75 million board feet (mmbf) annually with 58 mmbf coming from sawlog and 17 mmbf from utility. The 2002 plan included alternatives with an ASQ from 0 to 163 mmbf annually. RDC requests that the new plan allow for an annual ASQ to help supply local demand for timber. An annual ASQ of 30-50 mmbf would impact a very small portion of the 5.4 million acre forest over the next 100-plus years, but would provide timber for local mills, help stimulate the economy, and provide jobs for Alaskans.

The revised forest plan should allow for specific actions to restore forest health and reduce the risk of wild fire. It should include measures for ecological restoration on the Chugach, which has seen forest ecosystems convert to grass and sedge ecosystems in the wake of beetle outbreaks. The re-introduction of an ASQ would aid in restoration work and possibly support biomass production or other commercial endeavors in the region. A program of scheduled timber sales should be provided to meet a predetermined allowable sale quantity.

The revision should also provide for modern silviculture practices to encourage natural regeneration. Forested portions of the Chugach should be managed toward a varied species composition and different age classes to reduce the risk of large beetle infestations in the future and help restore long-term forest health.

#### Minerals

Mineral entry and mining is insufficiently and inconsistently addressed in the revised plan. Mining is an important multiple use of the forest, which the plan acknowledges, yet it is omitted from Table 6 in general suitability determinations for land uses within management areas. In the revised plan's description of management areas (pages 44-57), minerals management is included in guidelines for Management Areas 3, 4, 5, and 7, but not in Management Areas 1, 2, and 8. Where mining is referenced in the Management Areas section, it is usually in the form of guidelines, which lean heavily toward restrictions that are generally not consistent with the goal for minerals on page 23. Overall, the revised plan provides incomplete and inconsistent direction on mining and minerals management in the Chugach.

There are many areas within the Chugach National Forest that contain valid, active mining claims, and many more that may have moderate to high mineral potential. Areas with known mineralization or moderate to high mineral potential should be given a minerals prescription, and areas with valid mining claims should remain available for the prescribed use. It is important that access to these areas is not restricted. Moreover, no areas should be withdrawn from mineral entry unless they are statutorily closed to mining by the Alaska National Interest Lands Conservation Act (ANILCA). Areas that are merely being considered for inclusion into a conservation system unit should not be closed to mineral entry. Much of the forest has yet to be adequately explored for its mineral values. Closing an area to mineral entry forecloses future exploration and development opportunities.

## Access

Currently more than 90 percent of the Chugach is roadless. Roadless areas, as well as Wilderness and Wild and Scenic River designations, make access permits more difficult, thereby resulting in greater restrictions. Despite future needs, Wilderness designations would prevent the Forest Service from providing additional access, whether for resource extraction, forest health, recreation, or tourism. Less access to the public lands essentially means fewer multiple uses for the public and industries that provide products for consumers and jobs for local residents.

Access to timber, mining, recreation, and inholdings should not be precluded. The revised forest plan must explicitly acknowledge congressionally guaranteed rights of access to surface and subsurface lands conveyed to Alaska Native Corporations within the forest boundaries. The revised forest plan should be abundantly clear that the Alaska Native Claims Settlement Act (ANCSA) and ANILCA guarantee access to these lands to achieve the goals of ANCSA, a fair and just land settlement that addresses the real economic and social needs of Alaska Natives.

Moreover, improved access for destination tourism opportunities must be provided for in the revised forest plan. The plan should place a growing emphasis on how to accommodate a larger number of visitors, not just on how to limit or block access.

Since much of the forest is roadless, helicopter overflights and landings should be allowed in a variety of areas. Statistics show helicopter flightseeing and landings are among the most popular and highest-rated activities for Alaska visitors. Helicopters often afford the only viable access to remote areas. It is often the only way for the physically impaired, aged or a traveler on a tight time schedule to experience remote, rugged lands up close.

## Wild & Scenic Rivers and Wilderness designations

RDC opposes new Wild and Scenic River designations in the forest as they are overly restrictive and would diminish multiple use, access, and potential mining and timber production activity. These single-purpose designations are not needed and could very well be used as a tool to block economic development, including activity on Native corporation land. As noted earlier, the Chugach is a national forest with a multiple use mandate, not a national park or refuge.

RDC also opposes the designation of Wilderness in the Chugach and strongly disagrees with the Wilderness Area Inventory and Analysis determination that 99 percent of the forest is considered suitable for Wilderness designation. RDC believes strict management for Wilderness is neither appropriate or necessary. ANILCA was intended to resolve the issue of what lands in Alaska should be designated Wilderness. Beyond the Nelle Juan - College Fjord Wilderness Study Area, additional wilderness suitability studies and recommendations are not allowed in Alaska under the ANILCA Section 708(b).

As previously noted, Alaska already contains 57 million acres of federally-designated Wilderness - 53 percent of all federal Wilderness in the U.S. In addition, the state contains other vast national park and refuge lands that remain in their original state. Alaska also includes vast acreage of state parks, putting it at the top of the list for acreage preserved under state conservation units.

Further, consideration of federal conservation system units, including Wilderness and Wild and Scenic Rivers, is not consistent with ANILCA. Section 101(d) states that the need for future conservation system units in Alaska has been obviated by the ANILCA withdrawals and Section 102(4) includes Wilderness in the definition of a CSU. In addition, Congress recognized that for Alaska to "satisfy the economic and social needs of the State of Alaska and its people" access is essential. This point is acknowledged in Section 1326(a), which states that administrative closures, including the Antiquities Act, of more than 5,000 acres cannot be used in Alaska. Section 1326(b) adds emphasis to the "No More" clause in noting that federal agencies must first seek the permission of Congress before even studying lands in Alaska for Wilderness consideration.

The areas of the Chugach that are currently being managed as Wilderness should be re-evaluated and a more flexible management regime applied. Wilderness designations limit recreational and multiple use opportunities, impair access, and prohibit resource development. They would also hinder access for future generations and restrict tourism. These designations represent an economic opportunity cost.

Furthermore, no lands with existing valid mining claims, approved mining activities, and legal access routes to valid mining claims should be given a non-development management prescription. These lands are especially not suitable for Wilderness and Wild and Scenic River designations and such designations would preclude future mining and other multiple use activities that are not compatible with the Wilderness Act. All forest lands that are open to mineral location and entry under the federal mining law should not be considered suitable for Wilderness, nor should they be proposed for Wilderness designation.

Furthermore, the Forest Service should not consider existing intensive motorized recreation areas such as snow machine corridors as suitable for Wilderness. These areas have a long history of allowing motorized uses and have attracted thousands of motorized enthusiasts over the years.

The cumulative socio-economic impacts of numerous withdrawals and proposed withdrawals of land from multiple use management must be addressed in the plan. There should be a no net loss in the economic resource base. The Forest Service, in its revised forest plan, should balance increases in land withdrawals with increases in resources available for multiple use. The current draft falls well short of such a balance.

RDC fully endorses the comments of the Alaska Miners Association on the draft revised plan and appreciates the opportunity to comment on the document and share viewpoints on the future management direction of the Chugach National Forest. We look forward to more - not less - multiple use opportunities, which will help diversify the region's economy and support local communities.

Sincerely,

Carl Portman  
Deputy Director