



November 1, 2018

Ms. Terri Marceron, Forest Supervisor  
US Dept. of Agriculture, US Forest Service, Chugach National Forest  
161 East 1<sup>st</sup> Avenue, Door 8  
Anchorage, AK 99501

Re: Chugach National Forest, Draft Land Management Plan and EIS

Dear Ms. Marceron:

The following comments are submitted on behalf of Cook Inlet Region, Inc. (CIRI), an Alaska Native Regional Corporation formed under the Alaska Native Claims Settlement Act of 1971 (ANCSA) to benefit Alaska Natives with ties to the Cook Inlet region. CIRI, which is comprised of approximately 9,000 Alaska Native shareholders, is the largest private landowner in Southcentral Alaska, with more than 1.6 million acres of subsurface estate and large surface estates shared between CIRI and its seven village corporations.

The CIRI surface estate includes land immediately adjacent to, and at times surrounded by, the Chugach National Forest. As the US Forest Service (Service) is aware, CIRI also holds special interest in the Forest in the greater Kenai-Russian Rivers Complex as noted in the Sqilantnu Archeological District Memorandum of Understanding, as affirmed by the Russian River Land Act (RRLA), and with other rights established under the Alaska National Interest Lands Conservation Act (ANILCA), and ANCSA.

As the Draft Plan is finalized, CIRI once again would like to express support for an Alaska-specific exemption from the 2001 Roadless Rule. We note with disappointment that the Chugach is not currently under consideration for exemption. As the Service is aware, the Chugach is the second-largest Forest in the nation. However, present policies including the Roadless Rule and a zero Allowable Sale Quantity (ASQ) of timber under the Draft Plan make development of resources on these lands nearly impossible. Consequently, adjacent landowners like CIRI are precluded from enjoying the economies and support infrastructure of scale which would otherwise arise from multiple-use management of these public lands. The roadless rule limits access to, and across, CIRI lands and minimizes opportunities in timber, mining, renewable energy, and other industries. We request that the Service provide a process to exempt the Chugach from the 2001 Roadless Rule, similar to the one presently underway for the Tongass.

Timber production is a statutory mission of the National Forest System, and the Chugach is the largest national forest in the nation with no ASQ and with no Forest Service timber program. This is unacceptable and inappropriate. The Chugach provides no timber for local wood product businesses, even though it is a fully capable of doing so. The lands CIRI selected to benefit its shareholders are therefore of decreased economic value. CIRI would like to urge the Service to reconsider, as it requested during its formal consultation, implementing an ASQ that would provide economies of scale for the responsible development of CIRI's lands. Further, as the Service recently closed its comment period for



improving management of mineral, oil, and gas resources within national forests, CIRI would like to request that the Service incorporate associated changes that would positively encourage responsible development of natural resources within the Chugach into the final Plan.

In conclusion, CIRI would like to express support for the comments provided to the Service by Chugach Alaska Corporation and the Resource Development Council. We appreciate the opportunity to provide feedback during this important process.

Sincerely,  
COOK INLET REGION, INC.

A handwritten signature in blue ink, appearing to read "Jason Brune", written over a faint, illegible printed name.

Jason Brune  
Senior Director, Land and Resources