



February 19, 2016

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 99502

Re: Chugach National Forest, Proposed Revised Land Management Plan

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 over 8,200 Alaska Native shareholders, is the largest private landowner in Southcentral Alaska, with more than 1.3 million acres of subsurface estate and large surface estates shared between CIRI and its seven village corporations.

The CIRI surface estate includes land surrounded by the Chugach National Forest (Forest) within the Sqilantnu Archeological District – an area directly impacted by the Proposed Revised Land Management Plan (Revised Plan). 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), the Alaska Native Claims Settlement Act (ANCSA), and Executive Order 13175.

The process undertaken by the Service to revise its management plan is weakened by development of a plan prior to scoping, consideration of alternatives, and the assessment of alternatives which typically occur through the EIS process. It appears that the Phase One Assessments, including “The Assessment” and the “Need to Change” documents referenced in the Service’s “Forest Plan Revision process” are informally fulfilling the typical scoping process, without the benefit of the typical formal public processes. This runs the risk of the Service developing a plan biased to those on an “inside track” and opens the formal consideration and assessment of alternatives with a predetermined Service preferred alternative. The final result of this process is that the Service and the Public have two options under the EIS – to implement the Revised Plan or to take no action. The public deserves a broader range of alternatives to consider and support.

CIRI is concerned with the Wilderness Inventory and Evaluation (Inventory) included as a document supporting the Revised Plan. While the Revised Plan does not address Wilderness in any great detail (outside of the Nellie Juan – College Fjord Wilderness Study Area), the Service web site does state that Wilderness recommendations will be considered as part of the process. The Inventory notes that more than 99% of the Forest may be suitable as Wilderness, including approximately 97% of both the Resurrection Inventoried Area and the Kenai Lake Inventoried Area – the areas where CIRI lands may be directly affected by management decisions the Service makes related to Wilderness. Such a designation (or study area) in or around the Kenai-Russian Rivers Complex may have an adverse impact



on plans for development of, and access to, the joint visitor's center and archeological research center envisioned in the RRLA and the 14(h)(1) Selection Agreement signed by the Service in 2001. Further, Wilderness designations or study areas may have an impact on future Sterling Highway realignment projects, and impact the intent of ANCSA, ANILCA, the RRLA, and 14(h)(1) Selections made thereunder.

CIRI's proximal timber may be affected by management decisions in the Revised Plan. Notably, economies of scale and access to support industries provided by an Annual Sale Quantity (ASQ) of timber and increased mineral entries would help CIRI in the development of our own timber and mineral assets, as envisioned by ANCSA. Additionally, opening additional timber prospects within the Forest for development by Chugach Corp. (an ANCSA corporation) would have a direct impact on CIRI. The economic benefits of development on these lands are felt statewide through ANCSA 7(i) and 7(j) distributions to the other Regional Corporations, and region villages, respectively. With this in mind, CIRI requests that the Revised Plan include an ASQ of 30 – 50 million board feet (mmbf). The 2002 plan included alternatives with an ASQ from 0 to 163 mmbf annually. 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, and falls well below the average of 75 mmbf allowed prior to 2002. Again, economies, access and support industries for timber in the Forest have the added effect of easing access for the industry throughout the region.

Additionally, mining represents an important multiple use of the Forest. 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 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 and in turn closes economies of scale and support for exploration on CIRI lands.

CIRI appreciates the early outreach the Forest undertook to include us in the development of the Revised Plan. We note, however, that record of conversations relating to the plan left off with an introduction to the revision process in March of 2013 – nearly three years ago. This gap in communications occurred during critical planning times, and resulted in a paucity of consultation during the Phase One Assessments. It should be further noted that issuance of the Draft Forest Plan and Notice of Intent/Scoping activities occurred without consultation as well. This lack of communication with CIRI has impacted our ability to provide substantive comments to the Revised Plan with the depth and breadth that both the Service and CIRI may desire.

CIRI does positively note Forest Service Objective 7 (FW-OB-07), to collaborate with Alaska Native Corporations to create opportunities to connect people with nature across the forest, and we welcome the opportunity to work with the Service on this objective. We also support Objective 14 (FW-OB-14), and we look forward to working with the Service and the Russian River MOU Group in the development and implementation of the identified visitor use tool.



We would like to thank the Service, again, for the opportunity to comment on the Revised Plan, and we look forward to closer consultation as the planning process proceeds.

Sincerely,  
COOK INLET REGION, INC.

Benjamin Mohr  
Manager, Surface Estate