



August 30, 2022

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National Forest System  
USDA Forest Service

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Comments submitted online at <https://cara.fs2c.usda.gov/Public/CommentInput?project=NP-3239>

Re: Request for Information on Federal Old-Growth and Mature Forests

To Whom It May concern:

The Alaska National Interest Lands Conservation Act (ANILCA) Program, in coordination with the Alaska Departments of Natural Resources and Fish and Game, reviewed the Request for Information (Federal Register volume 87, number 135, pages 42493 – 42494) published by the Department of Interior (DOI), Bureau of Land Management (BLM) and the Department of Agriculture (USDA), Forest Service seeking input on the development of a definition for old-growth and mature forests on federal land. The following information is submitted on behalf of the State of Alaska (State).

The State reminds the USDA that an inventory of the Tongass National Forest has been completed, and restrictions were put in place via the Tongass Timber Reform Act (TTRA). The Chugach National Forest was determined to be unsuitable for timber production<sup>1</sup> and has not been inventoried for old growth or mature wood products. Wilderness areas have been designated in both National Forests in Alaska, with management guidelines specific to Alaska.

Alaska boreal forests are found widely on Department of Interior lands, which are often interspersed with rural communities and Native allotments. These lands experience a dynamic fire regime which may complicate an attempt to classify undeveloped forests as “mature” or “old growth”. The BLM, in conjunction with the State, has extensive experience dealing with these remote fires, and the protection efforts required to protect the communities and Native allotments, which is required of the federal government under Section 22(e) of the Alaska Native Claims Settlement Act.

#### *ANILCA Context*

Timber harvest and use in the Tongass National Forest was specifically allowed in the compromise struck via ANILCA. ANILCA provided for the protection of vast swaths of land in National Parks, National Wildlife Refuges, Conservation System Units, and National Forests. To balance the restrictions, ANILCA also allowed for opportunities “for satisfaction of the economic and social needs

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<sup>1</sup> Chugach National Forest Land Management Plan, R10-MB-828f, 2020

of the State of Alaska and its people”.<sup>2</sup> These opportunities include fishing, mining and mineral leasing, and logging as outlined in ANILCA Section 705, as amended by the TTRA. It is important to the State that timber harvest remain an opportunity within forested federal lands in Alaska. The federal government should not stop old growth timber harvesting as they wait for young growth timber stands to mature. Specific to the Tongass National Forest, the USDA, Forest Service must seek to provide a supply of timber from the Tongass National Forest which (1) meets the annual market demand for timber from such forest and (2) meets the market demand from such forest for each planning cycle, per TTRA.

Though the State supports establishing a clear definition of old-growth and mature forest relevant to forests found in Alaska, and collecting information about the same, it is critical that such definitions not be used to create or expand conservation units without the authorization of the Congress, which would violate ANILCA. Specifically, Section 708(b)(4) clearly states:

...unless expressly authorized by Congress the Department of Agriculture shall not conduct any further statewide roadless area review and evaluation of National Forest System Lands in the State of Alaska for the purpose of determining their suitability for inclusion in the National Wilderness Preservation System.

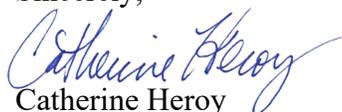
Section 1326(b) of ANILCA also states:

No further studies of Federal lands in the State of Alaska for the single purpose of considering the establishment of a conservation system unit, national recreation area, national conservation area, or for related or similar purposes shall be conducted unless authorized by this Act or further Act of Congress.

Additionally, many BLM forest lands surround rural communities who utilize timber resources to offset their disproportionately high diesel fuel costs. This personal use of timber is essential and is a traditional use of resources protected under ANILCA Sections 801 and 803. When considering the implications of any designations or inventory listings of forested federal lands in Alaska, it is essential to include allowances for traditional uses in compliance with ANILCA.

Thank you for the opportunity to comment. Please feel free to contact me if you have any questions.

Sincerely,



Catherine Heroy  
ANILCA Program Coordinator

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<sup>2</sup> ANILCA 101(d)