

SOUTHEAST ALASKA POWER AGENCY

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Director, Ecosystem Management Coordination
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USDA Forest Service | Notice of Intent to Prepare EIS [3411-15-P]
Re: Land Management Plan Direction for Old-Growth Forest Conditions Across the
National Forest System

Southeast Alaska Power Agency (SEAPA)
Comprehensive Comments on the Preliminary Proposed Action

Dear Director:

The Southeast Alaska Power Agency (SEAPA) is a Joint Action Agency of the State of Alaska, a public corporation formed and existing under Alaska Statutes §§ 42.45.300-.320. SEAPA owns two hydroelectric projects in Southeast Alaska providing economical, renewable, non-carbon-based electric power to three member public utilities in Ketchikan, Wrangell, and Petersburg, Alaska.

There are 34 communities located in SE Alaska. Expensive and carbon-emitting diesel generators are still the primary power source for 14 of them and hydro is the primary power source for the remaining 20. Any cost impact due to implemented measures that increase the operational costs of hydrogeneration and transmission facilities could further escalate the cost of power, placing an additional burden on consumers, and causing our small communities to bear a disproportionate share of the burden.

SEAPA's transmission lines are entirely within the temperate rainforest and are not at risk of wildfires. A determination that inventoried mature and old-growth forests in the Tongass National Forest (TNF) in SE Alaska are threatened by wildfires is not warranted.

SEAPA has a vital interest in the proposed amendment to all land management plans for units of the National Forest System. It is our understanding that the intent of this amendment is to include consistent direction to conserve and steward existing and recruit future old-growth forest conditions and to monitor their condition across planning areas of the National Forest System.

We acknowledge the Department's commitment to conserving and stewarding old-growth forest conditions. However, as the owner and operator of hydrogeneration and overhead transmission facilities within the TNF, SEAPA believes it is crucial to highlight the unique challenges posed by the preliminary proposed action.

Our specific concerns and recommendations are as follows:

1. **Request for Exclusion of Hydrogeneration and Transmission Land Management Activities:** The preliminary proposed action, as outlined in the NOI, enumerates standards for management actions within old-growth forest conditions. Given the mutually exclusive nature of vegetation management for old-growth forest conditions and the operation of hydrogeneration and transmission facilities, SEAPA respectfully requests the exclusion of land management activities associated with these facilities from the proposed action.
2. **Challenges for Transmission Lines and Right-of-Ways:** Unique challenges for transmission lines within the TNF include geographical difficulty and the high cost associated with line clearing. The expense of helicopter operations due to the lack of roads exacerbates the challenges. Considering these obstacles, SEAPA proposes that existing and future right-of-ways for transmission lines and hydro should be exempt from the proposed land management activities.
3. **Complementary Relationship and Carbon Displacement:** SEAPA emphasizes the complimentary relationship between hydrogeneration and transmission facilities and the proposed action. The hydrogeneration facilities play a crucial role in reducing carbon discharges from existing diesel generators, contributing to a reduction in carbon storage demand. SEAPA urges the consideration of this relationship to prevent unintended consequences that may hinder the progress towards clean, green energy in the TNF.
4. **Impact on Power Costs in Alaska:** It is crucial to consider the existing economic landscape in Alaska. The cost of power in our state is already significantly higher than in the lower 48. Implementing additional measures that increase the operational costs of hydrogeneration and transmission facilities could further escalate the cost of power.
5. **Local Forest Service Management and Forest Health:** Removing management decisions from local Forest Service offices, where staff are intimately familiar with Alaska's unique conditions and forest health, and centralizing these decisions in Washington DC, could lead to a disconnect between decision-makers and the realities of Alaska's diverse ecosystems. Local expertise is crucial in ensuring effective and context-specific land management.
6. **The Carbon Sequestration Potential of Younger Forests:** Recent findings, as highlighted by the World Resources Institute [source: <https://www.wri.org/insights/young-forests-capture-carbon-quicker-previously-thought>], suggest that younger forests have a greater capacity to capture carbon than previously thought. This information underscores the importance of considering the carbon sequestration potential of younger forests in the context of land management decisions.
7. **Concerns Regarding the Approach on "Future Old-Growth Forest Conditions":** The inclusion of the term "future old-growth forest" in the NOI raises concerns as it seems to apply to all forests, everywhere, potentially placing all forests in a category regulated by this land management plan. Such broad applicability may overlook the unique characteristics and needs of different forest ecosystems. In April 2011, a USDA Forest Service Issue paper written by Barbara Stanley, Regional Energy Coordinator for the Alaska Region, stated:

Forest Service policy is to encourage hydropower production where it is compatible with National Forest System (NFS) purposes and to ensure that the planning, construction, and operation of hydropower projects protect and effectively utilize NFS lands and resources. The Alaska Region actively participates in the Federal Energy Regulatory Commission (FERC) licensing process and cooperates with other federal agencies, state, local government, and other organizations in responding to proposed projects and in preparing license clauses and conditions. The Alaska Region tries

to balance the many, and sometimes competing, internal and external resource management issues while being mindful of our responsibilities to foster the economic well being of the many people, industries, and communities that are dependent on these hydropower projects. Many of the smaller communities in the Alaska Region are dependent upon diesel-generated electricity and are now actively pursuing hydroelectric projects.

Inclusion of the term "future old-growth forest" in the NOI may contradict the Forest Service's policy to encourage hydropower production to displace communities dependent on diesel-generated electricity.

8. **Challenges and Recommendations for a Productive Approach:** Recognizing potential challenges in shaping the preliminary proposed action, SEAPA proposes a focused approach to address concerns related to hydrogeneration and transmission facilities. While acknowledging the exemption for "public health and safety," SEAPA believes a more nuanced consideration is necessary to avoid unnecessary work and uncertainties.

We appreciate the opportunity to provide these comments during the scoping period. It is our intent that SEAPA's insights contribute to the development of a balanced and effective land management plan that ensures the preservation of old-growth forest conditions while accommodating the unique needs and challenges of hydrogeneration and transmission facilities.

Thank you for your consideration.

Sincerely,



Robert Siedman, P.E., CEO
Southeast Alaska Power Agency

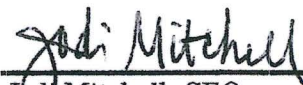
The undersigned support the Southeast Alaska Power Agency's comprehensive comments in this letter regarding the USDA's Notice of Intent to prepare an Environmental Impact Statement for Land Management Plan Direction for Old-Growth Forest Conditions across the National Forest System:



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