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First name: Peter

Last name: Boyer

Organization: State of Alaska Department of Natural Resources

Title: Natural Resource Specialist III

Comments: State of Alaska Department of Natural Resources comments attached. Thank you.

February 19, 2016

Terri Marceron

Forest Supervisor, Chugach National Forest

161 East 1st Avenue, Door 8

Anchorage, Alaska 99501

Re: Chugach National Forest Plan Revision

Dear Ms. Marceron,

Thank you for the opportunity to provide comments at this early stage of the proposed revision of the Chugach National Forest Land Management Plan / Environmental Impact Statement. We are appreciative of the meetings we have had to date, and we look forward to working with you and other members of the Chugach National Forest team during the proceeding stages of the plan revision / environmental impact statement process. Please note that at this time, other State agencies will be providing comments independently.

The Alaska Department of Natural Resources will be providing more detailed comments as alternatives are developed, however at this time we have some very general comments pertaining to issues that we believe warrant more emphasis than what we've seen in the documents currently available for review. We have made comments on some of these matters in previous meetings and in written comments, and we ask that those comments be reconsidered, especially those pertaining to ANILCA and the ability to conduct wilderness and wild and scenic river reviews.

At this early stage of the plan revision we suggest that the USFS give more emphasis to the following items. Many of these comments are the result of your decision to take travel and access management out of consideration for this revised plan, and to make them part of a standalone document at a later time.

*Recreational and commercial motorized and non-motorized use and access throughout the planning area

o In these hard economic times we believe that there is an increased need to provide easy access to popular recreation opportunities - especially to areas accessible along the road system

* Recognition of all trails and right-of-ways in the planning area, opportunities for new trails, and opportunities for upgrades to existing trails (please see the attached map for reference)

* Recognition of existing valid mining claims, approved mining activities, and legal access routes to valid mining claims, and discussion concerning how they are considered during wilderness and wild and scenic river assessments

* Evaluation of the direct and indirect effects that management decisions will have on access to and development of locatable, leasable, and salable mineral deposits, and renewable energy resources

* More emphasis on the significance of mining in the planning area from a cultural and economic perspective

* Enhanced cooperative management of coastal lands under the spirit of the memorandum of agreement between the USFS and DNR

* The Division of Forestry supports an allowable cut for forest management activities including restoration work for both forest health (beetle kill) and hazard fuel mitigation for wildland fire risk in the CNF. The CNF, as the nation's second largest national forest, needs to have an active timber management program

- * Allowing for salvage timber harvest for timber damaged by wildfire, beetle-kill, etc.
- * NEPA requirements for timber sales should include the removal of merchantable biomass (slash, pre-commercial thinning, non-merchantable trees, etc.) provided that this removal does not harm the soil layer
- * Timber sales could require yum-yarding of material to landings to make it accessible to firewood cutters and future biomass removal

As noted in our previous discussions, there are many Alaska State Area and State Park Plans within and adjacent to the Chugach National Forest. We will be happy to work with you in considering them, and we ask that they be referenced and cited as alternatives are developed. They include:

- * Management Plan for State Marine Parks: Prince William Sound and Resurrection Bay (1995)
- * Kenai Area Plan (2000)
- * Kenai River Comprehensive Plan (1998)
- * Chugach State Park Management Plan (1981, revised plan to be adopted in 2016)
- * Prince William Sound Area Plan (1988, amended 2007)
- * Division of Parks and Recreation Ten-Year Strategic Plan
- * Statewide Comprehensive Outdoor Recreation Plan
- * Copper River Basin Area Plan (1986 - currently under revision)

We ask that any management decisions made on USFS land be consistent with these Alaska State Plans, and that such decisions consider the impacts that actions may have to the use of adjacent state lands. Please also consider that recreational opportunities on state land are not limited to State Park and Park Units. Other recreational opportunities occur on general state lands and waters, particularly in Prince William Sound, on the Kenai Peninsula, Cannon Creek-Six Mile confluence, Ingram Creek and around Cordova. In addition, much of the state land in the planning area is governed by the State's Generally Allowed Uses. A fact sheet identifying the Generally Allowed Uses on State Land is attached.

Several parcels of state land are located within the external boundary of the Forest, including parcels where the DNR holds a property interest such as an Exxon Valdez Oil Spill Trustee Council Habitat Protection Program conservation easement. We request that the plan identify all of these parcels, reference the relevant state area plans for information concerning how these state lands are managed and if protective covenants prohibit specific types of land use through the conservation easements. A copy of the Exxon Valdez Oil Spill Restoration Habitat Protection and Acquisition Catalog can be found here:
http://dnr.alaska.gov/commis/opmp/evos/pdfs/habitat_catalog.pdf

In addition, there are a number of working agreements between the USFS and DNR. We suggest that this plan revision process provides a good opportunity to identify all of them, and we would look forward to working cooperatively on this.

Page Specific Comments, Proposed Revised Land Management Plan (December 2015)

Page 12, Aquatic Ecosystems: In the second sentence of the first paragraph, please note that many Alaska agency permits have conditions and mitigation measures that minimize these risks.

Page 13, Social and Cultural Systems: There are a number of important challenges brought up in this section, and we look forward to working with the USFS to address them.

Page 17, Water, FW-G1-DC-03: Per the Alaska Water Use Act, it would be beneficial if it was noted that the USFS will work within the State system.

Page 18, Water, FW-G1-DC-04: Per the Alaska Water Use Act, it would be beneficial if it was noted that the USFS will work within the State system.

Page 27, Land Ownership: There a number of important objectives brought up in this section, and we look forward to working with the USFS to complete them.

Page 27, Sustainable Infrastructure: We would appreciate more discussion on cabin construction and management.

Page 33, Minerals, Guideline FW-G2-GL-03: Clarification is required as to what is being stated and required in this sentence.

Page 37, Special uses (recreation), Standard FW-G2-ST-09: This statement is problematic. We believe that this is something that should be made available for discussion and comment among the alternatives in the EIS. There are uplifted tidelands owned by the state in this area, and management of them in this way is not consistent with how the state would manage these lands.

We look forward to enhanced cooperative management under the spirit of the memorandum of agreement between our two agencies on this matter.

Page 39, Seward Highway All-American Road Standard FW-G2-ST-13 and Guideline FW-G2-GL-22: We would appreciate a complete list of any other plans that manage activities within and adjacent to highway corridors within the planning area.

In closing, we welcome the continued opportunity for cooperative planning between DNR and the USFS, and we ask that you please provide alternatives in the draft environmental impact statement that offer a wide range of multiple use options for the public to consider and provide comments on.

Sincerely,

Peter Boyer
Alaska Department of Natural Resources

Attachments:

Generalized Land Status and Access Map

Generally Allowed Uses on State Land Fact Sheet