

Data Submitted (UTC 11): 10/31/2018 8:00:00 AM

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Comments: Homer Electric Association Comments on the Draft Land Management Plan

for the Chugach National Forest

1. Multiple Use - The USFS defines its internal multiple-use mandate as a requirement to, "manage forest resources so they are used in a combination that best meeting the need of the American people". In the specific case of the State of Alaska, an abundance of water resources exist that have the potential to offset the state's current reliance on fossil fuel generation. The Kenai Peninsula specifically, contains numerous small watersheds which if explored responsibly and prioritized with respect to limiting the amount of impact related to hydroelectric development, could significantly offset reliance on fossil fuel generation and further promote Alaska's mandate of having 50% of its energy use come from renewable sources by 2025. Homer Electric Association (HEA) believes strongly that responsible hydroelectric development should be emphasized in the Chugach Forest Land Management Plan (Plan) as a primary multiple-use consideration.

2. Hydroelectric Designations - Many areas within the Chugach National Forest have been identified as potential hydroelectric development locations. As utilities and cooperatives around the region become more invested in responsible hydro development, the likelihood for other sites within the Forest becoming identified as viable developmental locations increases. HEA urges the USFS to incorporate a process into their Plan that allows for independent reviews of hydroelectric sites identified as having potential viability and an efficient mechanism by which the Plan can be modified to account for these sites within their multiple-use mandate.

Further, initial effort by the USFS should be placed on evaluating locations on USFS land that have the potential to support renewable energy projects. Areas deemed as having high potential should be identified and documented based on a number of variables including:

- o Limited impact and/or potential for improved habitat within the natural environment as a result of renewable energy development.

- o The need for renewable energy near the documented areas or ability to integrate and transmit to larger areas efficiently.

- o The sites ability to annually produce a consistent amount of power to the region based upon site specific data that has either been collected or would need to be collected in advance of development.

A section should be incorporated into the plan recognizing the value of renewable energy projects on Forest Service Land and acknowledging that in areas where suitable conditions exist for their development and/or persistence, they will be considered a priority. This priority status should include provisions for accessing the general site and permitting responsible construction, utilization and maintenance of project infrastructure, access roads and transmission line corridors on Forest Service Land.

3. Chugach and Tongass Plan Synchronization - To the extent possible, the Chugach and Tongass National Forest Plans should parallel one another with respect to the aforementioned considerations applied to responsible hydroelectric development. A prime example of this are the renewable energy provisions incorporated into the Land and Resource Management Plan for the Tongass National Forest (see attached excerpt). While the regional locations of the forests are different and certain considerations should be applied independently, the entire State of Alaska possesses enormous potential for renewable energy development and this should be recognized consistently in both plans

4. Acknowledgement of the Value of Responsible Hydroelectric Development and Operation - HEA would appreciate the Forest Service's recognition and acknowledgement that renewable forms of power provide a net benefit to the population in Alaska as long as they are developed using a collaborative approach with state and federal agencies, Tribes and the public and subsequently constructed in a responsible manner that minimizes impact to the natural environment. Projects developed in this fashion provide a multitude of benefits locally and state-wide including:

- o Job creation
- o Lower long-term power prices; locally and state-wide
- o Reduced need for fossil fuels
- o Improved economic conditions as a result of the aforementioned variables

attachment: tongass plan excerpt

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