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Organization: Alaska Forest Association

Title: Exec. Director

Comments: February 24, 2016

Ms. Terri Marceron, Forest Supervisor

Chugach National Forest

161 East 1st Street, Door 8

Anchorage, Alaska 99501

RE: Chugach National Forest Proposed Revised Management Plan Comments

Dear Ms. Marceron:

The Alaska Forest Association (AFA) is a non-profit business association that was formed in 1957 to represent the interests of the timber industry in Alaska. The AFA currently manages a pension program, a group health insurance program, a scholarship program for deserving students whose parents work in the timber industry and also sponsors the Sustainable Forestry Initiative program for Alaska. Our members businesses and their employee's lives are dependent upon a reliable supply of timber.

Prior to 2002, the Allowable Sale Quantity (ASQ) for timber from the Chugach was about 75 million board feet (mmbf) annually (58 mmbf sawlog and 17 mmbf of utility). The 2002 EIS included alternatives with an ASQ from 0 to 163 mmbf annually. In order to better supply the current local demand for timber, we request that the Forest Service allow about 30 mmbf of commercial timber sales annually from the Chugach. That would impact at most, two to three percent of the 5.4 million acre national forest over the next 100+ years, but would provide a much needed supply of timber for the mills and other wood product business in the region.

Alaska's economy is currently supported primarily by the oil and gas industry. In order to better diversify our economy we need to expand our other resource industries, including timber. Timber harvesting and manufacturing can provide year-around jobs and, according to the recent Chugach Assessment, "There are an estimated 105 Alaska-owned wood product businesses in areas and communities surrounding the Chugach National Forest, with a majority (63) in the Municipality of Anchorage (Alaska Timber Jobs Taskforce, 2012). Current timber industry activity in the Kenai Peninsula Borough includes the exportation of woodchips from the southern peninsula and one sawmill with value added timber operations. The increase in availability of small timber sales in recent years has enabled small operators to expand their operations." Only some of these businesses are members of our Association, but many of these businesses are struggling in part because of a lack of suitable timber. The Chugach Forest, the second largest in nation, currently provides no suitable for local wood product businesses.

Making firewood and biomass sales available is mentioned repeatedly in the Assessment, but the timber manufacturers need a more reliable supply of larger, higher quality logs. During the early 1990s, one of the pulp mills in Southeast Alaska harvested low quality timber in the South-Central region. The pulp mills would barge that timber to Southeast Alaska and then backhaul higher quality logs for one of the local mills in Anchorage. This worked well for a short time, but that opportunity is gone now because of the zero Annual Sale Quantity under the current Chugach Forest Plan and the local mills must rely on very meager local timber supplies.

In 1960 Congress enacted the Multiple-Use Sustained-Yield Act (MUSYA) "To authorize and direct that the national forests be managed under principles of multiple use and to produce a sustained yield of products and services, and for other purposes." These uses include clean water, recreation, fishing and hunting opportunities,

and fish and wildlife habitat. These additional amenities don't provide much direct revenue, but they are important values from the forest. In addition, MUSYA made crystal clear that the additional uses of the forest are "supplemental to, but not in derogation of, the purposes for which the national forests were established as set forth in the Act of June 4, 1897." That Act provides that timber production is a key statutory mission of the National Forest System.

The 30 mmbf of timber that we are seeking for the local timber industry is less than 20% of what the Forest Service asserted was achievable prior to 2002 and refusal to provide the opportunity for such a small amount of timber would be a violation of the multiple-use mandate. The 2001 Roadless Rule and any other conflicting Administrative actions cannot overrule the laws.

In 1980, Congress enacted the Alaska National Interest Lands Conservation Act (ANILCA). As part of that legislation, Congress asserted that by establishing more than 100 million acres of wilderness, monuments, etc., it had met the needs for such set-asides and further stated "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." It is improper for the Forest Service to use its planning rules to avoid compliance with ANILCA. Reasonable access to resources and other multiple-uses of the national forest must be maintained.

The AFA agrees with other groups such as the Alaska Miners Association and the Resource Development Council which also oppose designation of conservation system units including Wilderness, Wild and Scenic Rivers and other similar management regimes. Additionally, areas with active mining claims and other multiple uses should not be designated in any category which does not permit full multiple use and access. To do otherwise is counter and in violation of ANILCA as described above.

The Chugach National Forest is the largest forest in the nation with no Annual Sale Quantity and with no US Forest Service timber program. There is a demonstrable need for a small, viable timber program in the Chugach consistent with management of the Forest prior 2002. The Alaska Forest Association urges the Forest Service to establish an Annual Sale Quantity of 30 million board feet from the Chugach and to offer timber sales to meet this ASQ in the new Chugach Forest Plan.

We further urge the Forest Service to continue to permit mining, energy development and financially reasonable access to development projects within the Chugach.

Sincerely,

Owen Graham
Executive Director
Alaska Forest Association