

STATE OF ALASKA

SEAN PARNELL, GOVERNOR

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DEPARTMENT OF NATURAL RESOURCES
OFFICE OF THE COMMISSIONER

May 16, 2011

Forest Service Planning DEIS
c/o Bear West Company
132 East 500 South
Bountiful, UT 84010

Re: Planning Rule – Proposal and Draft Environmental Impact Statement

Dear Planning Rule Team,

The Governor of the State of Alaska is charged by the State Constitution with protecting and promoting the general welfare of the people of Alaska. As the Governor's Commissioner of Natural Resources, I have land and resource management responsibilities throughout the State.

The people and communities of Southeast Alaska have, for decades, depended heavily on the resources of the Tongass National Forest for their economic well-being. Unfortunately, the centerpiece of this well-being, the Tongass timber sale program, has failed to meet the needs of traditional timber harvesting businesses, communities, and Alaskans and their families. Thousands of Alaskans lost family wage supporting type jobs that were directly or indirectly related to traditional timber harvests. The Chugach National Forest also plays an important role in the social well-being of the people living near Prince William Sound. Management of that forest also has an impact on the citizens of Alaska.

The two national forests in Alaska are the two largest forests in the National Forest System, and together comprise approximately 22 million acres. Large amounts of state land either border these national forests or are within the boundaries of the national forests. The State of Alaska has a very strong stake in the national forest planning process, which determines how these vast acreages will be used over the coming decades.

Over the years, the State has reviewed and performed significant amounts of forestry planning and implementation work on state lands and assisted or provided comments to the United States Forest Service on management of federal forests, including timber sales. During the most recent rewrite of the Tongass Land and Resource Management Plan, the State participated as a Cooperating Agency. Given the experience of state personnel in forestry management it is my sincere hope the planning team will give thoughtful review to Alaska's comments.

While the State of Alaska will continue to submit comments and try to work with the United States Forest Service to ensure the new Proposed Rule will be reasonable and effective, I have serious concerns about the current content of the Proposed Rule. The Proposed Rule focuses on a single type of use or lack of use, protecting forest lands from development, and ignores certain provisions of federal law specific to management of national forests in Alaska, namely, the Tongass Timber Reform Act (TTRA) which requires the USFS to manage national forests in a manner that honestly

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and reasonably seeks to meet the demand for traditional timber harvests. This could result in further restrictions and difficulties associated with rebuilding the damaged economy of the Southeast region of Alaska. Additional concerns are set out in the attached comments.

In closing, I urge the USFS to include alternatives for study in the EIS that address our comments and concerns. I would also note that every alternative in the EIS should contain provisions clearly implementing the statutory requirement to allow for various uses of the national forest which include range and timber (16 U.S.C. Section 1604(e)(1)). Each alternative must also contain adequate procedures for the USFS to develop, maintain, and revise land and resource management plans for individual National Forests in a manner that coordinates closely with the land and resource management processes and decisions of State and local governments (16 U.S.C. 1604(a)).

I look forward to hearing from you. If you should have further questions, please contact our office at 907-269-8431.

Sincerely,

A handwritten signature in blue ink, appearing to read "Daniel S. Sullivan", with a long horizontal flourish extending to the right.

Daniel S. Sullivan
Commissioner

Enclosure

cc: US Senator Lisa Murkowski
US Senator Mark Begich
Governor Sean Parnell
Randy Ruaro, Office of the Governor
John Katz, Office of the Governor
Ed Fogels, Deputy Commissioner Natural Resources
Chris Maisch, Director, DNR Division of Forestry
Andrew Levi; Department of Fish and Game