



121 W. FIREWEED SUITE 120 | ANCHORAGE, ALASKA | 99503 | 907.563.9229 | ALASKAMINERS.ORG

September 20, 2024

U.S. Department of Agriculture
Ecosystem Management Coordination
201 14th Street SW
Mailstop 1108
Washington, DC 20250-1124

Attn: Jennifer McCrae, Team Leader

Submitted electronically via <https://cara.fs2c.usda.gov/Public//CommentInput?Project=65356>

Re: Draft Environmental Impact Statement for U.S. Forest Service Land Management Plan Direction for Old-Growth Forest Conditions Across the National Forest System

Dear Ms. McCrae:

The Alaska Miners Association (AMA) appreciates the opportunity to submit comments on the U.S. Forest Service's (Service) Draft Environmental Impact Statement (DEIS) for its Land Management Plan Direction for Old-Growth Forest Conditions Across the National Forest System.

AMA is a professional membership trade organization established in 1939 to represent the mining industry in Alaska. AMA's more than 1,400 members come from eight statewide branches: Anchorage, Denali, Fairbanks, Haines, Juneau, Kenai, Ketchikan/Prince of Wales, and Nome. Alaska's miners are individual prospectors, geologists, engineers, suction dredge miners, small family mines, junior mining companies, major mining companies, Alaska Native Corporations, and the contracting sector that supports Alaska's mining industry.

AMA members conduct business across Alaska, including in the nation's two largest National Forests, the Tongass and Chugach. Activities including access to lands and the ability to explore for, mine, and transport minerals stands to be impacted by the proposed management direction.

The DEIS comes following an Advanced Notice of Proposed Rulemaking and then a Notice of Intent, in which AMA commented, and we wish to incorporate those comments by reference. They can also be viewed by clicking [here](#). In the comments, we note that the proposed management direction would violate several existing federal laws, such as the Organic Act (1897), the Multiple Use – Sustained Yield Act (1960), the National Forest Management Act (1976) and the 2012 National Planning Rule that govern how the USFS manages the national forest system. In Region 10, this proposed action as proposed will also violate the Alaska National Interests Lands Conservation Act (ANILCA) and the Tongass Timber Reform Act (TTRA). And on, it violates the Organic Administration Act (OAA) 16 U.S.C. § 475 and the Multiple Use Sustained Yield Act (MUSYA). 16 U.S.C. §§ 528, 529, and 53 authorize the Secretary to exercise limited and defined discretion to establish rules regulating access to, and use of,



national forests consistent with Congressional policy described in the National Forest Management Act of 1976 (NFMA) as narrowed by legislation specific to the Tongass from ANILCA and the TTRA.

All of these laws have guided forest management for years, ensuring that multiple use of lands is balanced and there is not a heavier emphasis on one use over another. The DEIS is a sharp departure from multiple use; it prioritizes conservation over all other use.

With multiple violations of law, the USFS should discontinue the EIS process to amend all forest plans for the National Forest system units. If the USFS insists moving forward with the EIS process, then it should select Alternative #1, the No-Action alternative. If another alternative is selected as the preferred alternative, Region 10 must be exempted from inclusion within the chosen alternative. There is no shortage of old-growth forests within Region 10, and existing forest plans for the Chugach and Tongass National forests protect the majority of old growth lands within each forest. The Chugach has no allowable timber harvest, and the Roadless Rule prohibits development and access of 95% of the forest. The Tongass, managed under a Forest Plan, allows for timber harvest in 0.01% of the 16.8 million acre forest. There is zero merit to further revising land plans to Alaska's forests where access and development are strictly limited and almost totally banned.

From a nationwide perspective, national forest lands are an important source of mineral and energy resources that are fundamental to our economic and national security. Mineral demand is poised to grow between 500 and 1,000 percent in the coming decades, and already the United States faces severe mineral supply chain challenges and increasing energy reliability issues. Our import reliance is undeniable and has become exacerbated by the pandemic, geopolitical unrest, and the electrification of our economy.

In revising its land management plans, the USFS needs to ensure it does not impede access to our mineral resources, and not violate existing laws that have been successfully managing Forest Service lands for decades.

In addition to these comments, AMA wishes to wholeheartedly support and endorse the comments by the National Mining Association, the American Exploration & Mining Association, and the Alaska Forest Association.

Thank you for the opportunity to comment.

Sincerely,

A handwritten signature in blue ink, appearing to read "D Skibinski".

Deantha Skibinski
Executive Director