Data Submitted (UTC 11): 12/2/2019 9:00:00 AM
First name: Neil
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Organization:
Title:
Comments: Roadless comments

Attached please find my comments Re Alaska Roadless Rule. Hard copy to follow.

Neil MacKinnon

The following text was copy/pasted from an attached letter. The system cannot display the formatting, graphics, or tables from the attached original.

Neil MacKinnon

Juneau, Alaska 99801

USDA Forest Service

Attn: Alaska Roadless Rule

P.O. Box 21628

Juneau, Alaska 99802

November 25, 2019

Re: Alaska Roadless Rule akroadlessrule@fs.fed.us

I am Neil MacKinnon, and my family has lived, worked and recreated in the Tongass for over 4 generations. I was born and raised in Juneau, Alaska and graduated from the University of Alaska Fairbanks with a degree in Mining Engineering. I am the founder and President of Hyak Mining Company the owner of the Jualin Mine.

Hyak has been involved in permitting and constructing over 10 miles of road in the Tongass over the last thirty years. In 1988 I surveyed and began permitting the 5.5 mile Jualin Mine Road the road from tidewater in Berners Bay to our claims at the site of the former Jualin Mine. Less than one year later the road reached Jualin. The cost of this road was recovered the next year in savings on helicopter transport to support the ongoing drilling program. That road still serves us as the Kensington access thirty years after first constructed.

The last road I was involved with took over five years, just to permit a 700 foot access across the Tongass to a former mine, now, private land that we are exploring for minerals. This was in an inventoried "Roaded Area"- an unacceptable delay because of the "cloud" of Roadless over the Tongass.

Any mining activity above basic prospecting, will need roads to efficiently and safely proceed. We must cut and remove some trees for safety at the very least. Should a helicopter encounter a tree on taking off, landing or hovering with a sling load, the consequences will be dire and loss of life possibly large.

The Roadless rule although theoretically allowing road building and tree cutting for mining, mineral exploration and other multiple uses makes any such use practically impossible due to bureaucratic permitting delays. Roadless as applied to the Tongass effectively makes use of the Tongass practically impossible for anything other than viewing the wilderness from a cruise boat.

I was also privileged to have been a member of the Board of Directors for Alaska Electric Light and Power Company for over thirty years. There, I was Involved with building the Lake Dorothy hydroelectric plant and the rebuilding of the Snettisham transmission line after a section was destroyed by a snow slide. It takes roads to build and maintain Hydro plants. Efficient, safe construction and maintenance of transmission lines requires roads or a lot of additional capital to build and maintain. Additional capital effectively making these renewable, reliable, and safe projects unaffordable to Tongass residents.

We need roads to connect our communities with each other, and the rest of the continent. The ferry system as it is now constituted, is not sustainable. It will not have a hope of sustainability until Southeast Alaska develops a system that uses short ferry links between roads from our communities to

those ferry terminals. It works very well for Norway, and it will work in the Tongass too. Any alternative chosen must allow for roads and utility corridors so the residents of Southeast Alaska can have a chance to enjoy the benefits of a transportation system that the rest of the nation enjoys.

The Roadless Rule effectively eliminates multiple use management from the Tongass. It is just one more layer of prohibition on any use of the Tongass (except to view it from a vessel traveling navigable waters). Congress set aside 5.5 million acres of the Tongass as Wilderness in the Alaska National Interest Lands Conservation Act of 1980 (ANILCA) and the Tongass Timber Reform Act of 1990 (TTRA). Then, in 2001 the Clinton Administration through promulgation of the Roadless Rule designated another 9.4 million acres of the Tongass as Roadless in violation of the "No More" section of ANILCA by withdrawing more than 5,000 acres of national forest lands within the State of Alaska without complying with ANILCA's statutory requirements. How does anything less than a total exemption from Roadless for the Tongass (and the Chugach Forest for that matter) meet the requirements of ANILCA?

I further restate, and support the comments of The Alaska Miners Association, First Things First Alaska Foundation, and the Resource Development Council.

For the previous reasons, I support a full exemption from the Roadless Rule for the Tongass or Alternative 6 the Preferred Alternative.

Sincerely,

E. Neil MacKinnon

[Position]