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December 17, 2019

Alaska Roadless Rule
USDA Forest Service, Alaska Region
Ecosystem Planning and Budget Staff
P.O. Box 21628
Juneau, Alaska 99802-1628.

Re: Comments on Draft Environmental Impact Statement (DEIS) for Alaska-specific Roadless Rule

The Alaska Miners Association (AMA) writes to comment on the Alaska-specific Roadless Rule Draft Environmental Impact Statement (DEIS).

AMA is a professional membership trade organization established in 1939 to represent the mining industry in Alaska. We are composed of more than 1,400 members that come from eight statewide branches: Anchorage, Denali, Fairbanks, Haines, Juneau, Kenai, Ketchikan/Prince of Wales, and Nome. Our members include 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 supports Alternative 6, the Preferred Alternative of the United States Department of Agriculture (USDA), which provides a full exemption from the 2001 Roadless Rule to the Tongass National Forest. Our specific comments supporting this Alternative are outlined in the attached coalition letter in which AMA joins 21 Alaska statewide and regional associations and business organizations in voicing our support for Total Exemption from the Roadless Rule. The Coalition, that includes urban and rural Alaskans, and businesses and associations having a membership composition representing tens of thousands of Alaskans, has joined the State of Alaska and Alaska's Congressional Delegation in urging USDA to Totally Exempt the Tongass from application of the Roadless Rule for the reasons given by the State in its January 19, 2018 Petition. As noted in the Coalition's Comments every Alaska Governor and Congressional Delegation member since the Roadless Rule was promulgated in 2001 has supported Total Exemption of the Tongass from the Roadless Rule.

BACKGROUND

AMA has consistently supported a full exemption of the Tongass, as it comprises 16.9 million acres of the landmass of Southeast Alaska, and is endowed with mineral wealth that supported the initial industrial developments of the Alaska territory. Early mines included the Treadwell Mine in Douglas and the Alaska Juneau Mine in Juneau, and today, mineral wealth continues to be extracted at two major operating mines near Juneau; Greens Creek and Kensington.

USDA and Congress have always treated management of the Tongass as special and different from other national forests: the Tongass Timber Act of 1947 specifically authorized commercial timber harvest on the Tongass. The Alaska Native Claims Settlement Act (ANCSA) of 1971 directed how the 50-year contracts on

the Tongass would interact with the transfer of lands on the Tongass to the ownership of Native Corporations.

In early 2019, AMA provided comments to the USDA endorsing comments made by the State of Alaska to the Secretary of Agriculture in its January 19, 2018 “Petition for USDA Rulemaking to Exempt the Tongass National Forest from the Application of the Roadless Rule and other Actions” which: 1) explained the enduring significance of USDA’s 2003 Record of Decision (ROD) that totally exempted the Tongass National Forest (Tongass) from the application of the 2001 Roadless Rule; 2) explained that after analyzing the requirements and limitations of the Alaska National Interest Lands Conservation Act (ANILCA) and the Tongass Timber Reform Act (TTRA) “the USDA concluded that the best way to implement the spirit and letter of these laws was to exempt the Tongass from the Roadless Rule;” 3) explained that USDA also concluded that exempting the Tongass was consistent with the intent of Congress, but also with sound management of the Tongass because roadless areas in the Tongass are adequately protected without adding the additional barriers of the Roadless Rule; 4) explained that even without the Roadless Rule only about four percent of the Tongass is designated as suitable for timber harvest; 5) described the litigation regarding the 2001 Roadless Rule and the 2003 Roadless Rule including the Department of Justice’s rationale for its aggressive defense of USDA’s 2003 ROD; 6) explained why the serious socioeconomic consequences to Alaskans and complying ANILCA and TTRA are as compelling today for totally exempting the Tongass from the Roadless Rule as they were when offered by USDA for that purpose in 2003; and 7) explained why the Secretary should direct the United States Forest Service (Forest Service) to commence a Tongass Land Management Plan (TLMP) revision or amendment to remove provisions of the Roadless Rule that have been incorporated into the 2016 Tongass Transition Plan.

We agree with the Coalition that Total Exemption would exchange the Roadless Rule’s inflexible national prohibitions on access and development in the Tongass, for the more flexible TLMP process. Since the goal of the 2016 Tongass Transition Plan is to foster change, it is only logical to use the more flexible land planning system to accommodate to achieve that goal. The undersigned also agrees with the State and the Coalition that the Secretary should direct the Forest Service to revise or amend TLMP to remove the provisions of the Roadless Rule that have been incorporated into the 2016 Tongass Transition Plan.

Today, local, state, and federal agencies have a host of tools to manage forests and protect the environment. In addition, 6.8 million acres of the Tongass were designated by Congress as Wilderness or other restrictive land use categories, ensuring the lands are not subject to development. Congress passed over the remaining areas so they could support local employment, including year-around timber manufacturing jobs in a region where there are minimal state or private timberlands available to the mills.

Accordingly, we believe a full exemption is fully appropriate and necessary for the Tongass. The business community, State of Alaska, and thousands of Alaskans stand in support of a total exemption, and we urge you to adopt Alternative in your final Decision.

Thank you for the opportunity to comment.

Sincerely,



Deantha Crockett
Executive Director