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March 6, 2026

Joshua White, Acting Director  
Ecosystem Management Coordination  
U.S. Department of Agriculture  
201 14<sup>th</sup> St SW  
Mailstop 1108  
Washington, DC 20250  
*Submitted via regulations.gov*

Re: Proposed Rule to Amend the Forest Service Objection Project-Level Predecisional Administrative Review Process regulations (91 Fed. 5,387)

Dear Mr. White:

The Alaska Miners Association (AMA) appreciates the opportunity to provide comments on the U.S. Forest Service (USFS) Proposed Rule to amend its Project-Level Predecisional Review Process.

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.

The agency's proposed rule for the Forest Service will affect all mining operations and projects nationwide. To that end, we endorse the comments of the National Mining Association and the American Exploration & Mining Association. These two organizations have provided extensive technical comments on the proposed rule on behalf of our nationwide industry. Our comments enclosed will detail the Alaska mining-specific concerns and issues.

Alaska is home to the nation's largest National Forests, the Tongass and the Chugach. Between the two forests, AMA has five statewide branches (Haines, Juneau, and Ketchikan/Price of Wales Island; and Anchorage and Kenai; respectively). AMA members actively mine and explore for large-scale and placer mining deposits across USFS lands and are widely impacted by agency policy.

As noted in the Proposed Rule, the current USFS public comment and objection process can add up to six months to the regulatory process for a simple mine expansion, let alone proposals for new exploration and mining projects. The improvements in the Proposed Rule modernize public notice requirements, clarify to stakeholders how and when to comment, and, importantly, significantly



shortens the administrative process if no substantive written comments have been received on a project. In addition, the new shortened comment and objection periods ensure the process conforms with the new National Environmental Policy Act (NEPA) regulations as well as President Trump's Executive Orders to remove impediments from mineral development. Finally, the authorization that review can be performed by the responsible official will add clarity and efficiency to the process. Too often, the addition of a "reviewing officer" to the objection process has interjected unnecessary uncertainty and delay into the process and resulted in directives that had not been considered under the exhaustive NEPA process leading up to the final decision.

We applaud the agency for the provisions in the Proposed Rule. Thank you for the opportunity to submit these comments.

Sincerely,

A handwritten signature in blue ink, appearing to read "DSK", is positioned above the typed name.

Deantha Skibinski  
Executive Director