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April 29, 2024

Mr. Trevor Fulton
Alaska Department of Natural Resources
550 W 7th Avenue Suite 1430
Anchorage, AK 99501
Submitted via email at dnr.carbonoffsets@alaska.gov

Re: Notice of Proposed Carbon Offset Projects on State Land Regulations

Dear Mr. Fulton:

The Alaska Miners Association (AMA) writes to provide comments on Notice of Proposed Carbon Offset Projects on State Land Regulations.

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, and major mining companies, Alaska Native Corporations, and the contracting sector that supports Alaska's mining industry.

AMA wishes to incorporate by reference comments submitted during Scoping, which may be found [here](#).

In our scoping comments, AMA, representing miners of all sizes, stressed our continuous concern with access, now and in the future, to lands with mineral potential. "Access" can include ability to access lands and cross lands, and also, the ability to secure mineral tenure on mineralized lands with development potential, often referred to as "mineral entry." Managing lands as a "carbon offset" imposes limitations on exploration and development of minerals, and even with the best of intentions, we cannot know what future mineral opportunities may coexist there.

AMA's longstanding position concerning management of State lands is to:

- *Require a thorough evaluation of mineral potential and access prior to any State land allocation which would prohibit mineral staking and leasing such as parks, preserves, or land disposals.*

Since adoption of legislation accommodating carbon offset projects, AS 38.95.410, the Commissioner has become required to adopt criteria for evaluation of a proposed carbon offset project on state land. AMA appreciates that the identification process for projects includes consultation with a wide variety of entities, including agencies, other landowners in Alaska, and the private sector. We also appreciate the flexibility that states "The Department is not required to review every unsolicited [recommendations for potential carbon offset projects] it receives," allowing for discretion to be used for the best interest of Alaska.



AMA has previously communicated a concern that evaluation of a project area include an assessment and consideration of the known mineral potential, including current claim status, within the project area. It is our hope that the regulations to inquire to agencies and the criteria outlined to identify conflicting land use, revenue and benefit to the state, and impediments to public access and resource development would include the mineral assessment.

In our scoping comments, we communicated concerns over cost benefit analysis or carbon offset projects versus development of lands be addressed by requiring a best interest finding. We appreciate the regulations incorporating this suggestion.

Thank you for the opportunity to comment on the proposed carbon offset regulations, and we look forward to working with you on this issue moving forward.

Sincerely,

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

Deantha Skibinski
Executive Director