



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

June 13, 2019

Ms. Jorjena Barringer, Project Manager
BLM Anchorage Field Office
Attention – BSWI RMP
4700 BLM Road
Anchorage, Alaska 99507

Dear Ms. Barringer:

The Alaska Miners Association (AMA) offers the following comments on the Bureau of Land Management (BLM) Bering Sea – Western Interior (BSWI) Regional Management Plan (RMP) issued in March 2019.

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.

Our comments are broken down into three sections:

- Section I contains AMA's general comments on the draft plan alternatives and EIS.
- Section II contains AMA's comments on the specific resource sections of the plan and EIS. They are listed in the order in which they appear in the draft plan and EIS.
- Section III includes several additional concerns.

Section I. General Comments on Alternatives in Draft Plan

1. AMA Supports Alternative D AMA supports Alternative D as it is the alternative most consistent with the intent of the Federal Land Policy and Management Act (FLPMA), the Alaska National Interest Lands Conservation Act (ANILCA), the Alaska Land Transfer Acceleration Act (ALTAA), the Alaska Statehood Act and Alaska Native Claims Settlement Act (ANCSA). Alternative D includes the "Fewest management restrictions at the planning level and the most flexibility at the project-specific implementation level."

This alternative is also most appropriate as much of the BLM land in the planning area is currently used primarily for hunting and fishing, with limited existing resource development. Other than the current Donlin Mine development, no other major resource development projects are pending. While there is potential for additional resource development projects, these would be subject to existing rigorous

federal and state permitting requirements and the National Environmental Policy Act (NEPA). The restrictive management regime proposed in Alternatives B and C is not necessary.

The following is why Alternative D is the alternative most consistent with five federal laws that directly apply to management of BLM lands Alaska, four of which are unique to Alaska.

The Federal Land Policy and Management Act (FLPMA). FLPMA directs BLM planning and management to manage BLM lands for multiple use. Alternative D provides the greatest opportunities for potential use of BLM lands, clearly best meeting the multiple use mandate of the three “Action” alternatives. Alternative D meets the policy requirements in FLPMA Section 102, fully complies with the land use planning requirements of FLPMA Section 202, judiciously evaluates and revokes outdated and unnecessary withdrawals as called for in FLPMA Section 204, and provides for Rights-of-Way consistent with Title V of FLPMA. Specific provisions in FLPMA that are not met by other alternatives are spelled out in the discussion of Alternative B.

Alaska National Interest Lands Conservation Act (ANILCA). The introductory language in ANILCA Section 101(d), states Congress’ intent that ANILCA struck the proper balance between national conservation and resource development interests on federal lands in Alaska. ANILCA set aside large acreage of federal lands for conservation within the Bering Sea-Western Interior Planning Region, but left most BLM lands available for development as part of this balance. The only BLM lands within the planning area set-aside through ANILCA for conservation purposes are the Iditarod National Historic Trail and the Unalakleet Wild and Scenic River. The underlying assumption when ANILCA passed was for other BLM lands to be managed for multiple use. Alternative D best reflects ANILCA’s balance.

The specific language in ANILCA Section 101(d) reads:

“This Act provides sufficient protection for the national interest in the scenic, natural, cultural and environmental values on the public lands in Alaska, and at the same time provides adequate opportunity for satisfaction of the economic and social needs of the State of Alaska and its people; accordingly, the designation and disposition of the public lands in Alaska pursuant to this Act are found to represent a proper balance between the reservation of national conservation system units and those public lands necessary and appropriate for more intensive use and disposition, and thus Congress believes that the need for future legislation designating new conservation system units, new national conservation areas, or new national recreation areas, has been obviated thereby.”

The Alaska Land Transfer Acceleration Act (ALTAA). Section 207 of ALTAA specifically directed BLM to evaluate the continued need for ANCSA Section 17(d)(1) withdrawals. BLM’s June 2006 report to Congress titled Section 207 Alaska Land Transfer Acceleration Act Review of D-1 Withdrawals concluded on page 5 that most (d)(1) withdrawals had served their purpose and should be revoked. The report further proposed that evaluation and recommendations on the (d)(1) withdrawals should be made through the BLM RMP process. Alternative D best meets the conclusions contained in BLM’s 2006 report as it recognizes that most of these withdrawals are obsolete and no longer necessary. See further discussion and specific reference included in AMA’s comments on Alternative B.

The Alaska Statehood Act and Alaska Native Claims Settlement Act (ANSCA) These two federal laws conveyed land to the State of Alaska and Alaska Natives, respectively, that include lands intended for use and potentially development. BLM lands often provide critical access to and between these state and

ANCSA lands. Alternative D provides the state and ANCSA corporations with the flexibility to access, use and development their lands as was originally intended by Congress.

AMA wishes to thank the Bureau of Land Management for providing Alternative D.

2. AMA vigorously opposes Alternative B and objects to any of its components being considered in the Final RMP. Alternative B is not consistent with FLPMA, ANILCA nor ALTAA. This alternative provides a far more complex and restrictive management regime than is necessary or appropriate. Alternative B fails to consider the plans impact's on adjacent state, ANCSA and private land owners, particularly due to extreme impacts on access across BLM lands. Access restrictions in Alternative B will make it impossible to access state and ANCSA Corporation lands both within and adjacent to the planning area.

AMA is particularly concerned with the impact of Alternative B on the future construction of the Donlin Project gas line. BLM has approved the ROW in a Record of Decision issued in August 2018. Construction of the gas line will require material sites (salable minerals) and other support facilities within numerous areas where these uses are prohibited by designations in Alternative B. These would include prohibitions regarding salable minerals and other activities in the Sheefish Spawning ACEC, Big River WSR corridor, High Value Watersheds, and ROW Exclusion areas.

Alternative B imposes restrictions on virtually all development on a majority of BLM lands within the planning area. It retains, or establishes closures to mineral entry, salable minerals and mineral leasing on 9.8 million acres, or 73% of the BLM managed land in the planning area. The only uses allowed on most of this land are hunting, fishing, other subsistence harvests, and non-motorized recreation. The proposed alternative imposes these restrictions by prohibiting these uses within High Value Watersheds (as defined for Alternative B), Lands with Wilderness Characteristics, Areas of Critical Environmental Concern, the Iditarod National Historic Trail Management Corridor, and eligible Wild and Scenic River Corridors. BLM has failed to provide a rigorous analysis as to why these prohibited uses are absolutely inconsistent with other resource uses. This alternative is not consistent with FLPMA's Multiple Use Mandate.

Alternative B's treatment of withdrawals is especially inconsistent with existing federal law. Under Alternative B, BLM proposes to retain 8.5 million acres of existing, obsolete ANCSA Section 17(d)(1) withdrawals and establish 9.8 million acres of new withdrawals under FLPMA . We recognize that there is much overlap in these figures as much of the 9.8 million acres replaces the 8.5 million acres of existing withdrawals. Regardless, the math still adds up to 73% of the planning area closed to multiple use.

This alternative fails to meet the specific requirement in FLPMA Section 102(12), Declaration of Policy: "the public lands be managed in a manner that recognizes the Nation's need for domestic sources of minerals, food, timber, and fiber from the public lands". FLPMA Section 202(e) establishes a Congressional reporting requirement whenever a BLM plan "excludes (that is, totally eliminates) one or more of the principal or major uses for two or more years with respect to a tract of land of one hundred thousand acres or more". While not a prohibition on larger acreage withdrawals, this clearly expresses Congress' intent that BLM should limit massive acreage being off limits to all mining related uses. FLPMA in Section 204 is more specific regarding limits to actual withdrawals, setting up Congressional oversight on all withdrawals over 5,000 acres.

ANILCA Section 1326(a) is far more limiting – requiring Congressional approval of any withdrawal of “more than five thousand” acres. AMA questions whether it is legal for BLM to retain the obsolete ANCSA(d)(1) withdrawals, that were established for a different purpose, until it receives Congressional approval of the 9.8 million acres it proposes to withdraw under Alternative B. AMA’s May 28, 2015 letter (copy attached) contains an extensive discussion of this issue starting on the second page, issue #1, incorporated here by reference.

Furthermore, retaining over 73% of the (d)(1) withdrawals is inconsistent with BLM’s conclusion in its June 2006 report to Congress titled Section 207 Alaska Land Transfer Acceleration Act Review of D-1 Withdrawals. BLM Concluded on Page 5:

“The ANCSA withdrawals were intended to protect resources, to prevent encumbrances that could interfere with State or Native entitlements, and to study lands for further inclusion into conservation units. In the early 1970s when the lands were withdrawn under Section 17(d)(1) and (d)(2) of the ANCSA, there were few regulations to oversee the development of the public lands and protect important natural resources. Since then Congress has passed significant legislation for the orderly development of the public lands and to protect the environment from adverse impacts. The BLM has 1) developed extensive oil and gas lease stipulations, required operating procedures (ROPs), and surface management regulations for miners, which are now in place and sufficient to assess and protect the resources in most situations, 2) the selection period is over and the BLM is completing conveyance of State and Native entitlements, and 3) more than 102,097,900 acres have been withdrawn by ANILCA and incorporated into CSUs sufficient to protect those lands.

In summary, there are more than 158,958,000 acres of d-1 withdrawals in Alaska. Many of these d-1 withdrawals have outlived their original purpose. It may be appropriate to lift many of d-1 withdrawals and the most effective and preferred means in managing this process is through BLM’s land use planning process. Approximately 152,181,400 acres or 95% of these withdrawals could be lifted consistent with the protection of the public’s interest.”

3. AMA is opposed to restrictive and ambiguous provisions in Alternative C. Alternative C contains numerous unnecessary restrictions, incomplete and conflicting policy statements, and contains ambiguous language, most specifically the frequent limitation that certain uses may be allowed “case-by-case”. “Case-by-case” is most often used in Alternative C regarding areas open to salable mineral development. AMA could not find a definition of case-by-case, and is opposed to use of this term as it creates too much uncertainty for applicants. BLM needs to define what is meant by “case-by-case” and allow additional public comment on this definition if the phrase is included in the Final Plan.

4. Under all Alternatives, the Plan is Too Complex to be Implemented. All alternatives propose a much too complicated management structure. This is especially true considering that these BLM lands are remote, have limited uses, and have limited potential for significant development. The plan will be confusing and expensive for land managers to implement. The documents are confusing and hard to read. See more extensive comments in Section III(2) titled Additional Comments - Readability and Usability of the Document.

5. The Draft Plan and EIS is based on Inadequate Mineral Resource Potential Assessment

The entire Draft Plan and Environmental Impact Statement fail to adequately address mineral resource potential. Mineral resource assessments are inadequate as they rely almost exclusively on data regarding existing known discoveries and ignore geologic information. As a result, the discussion of

mineral potential in the BSWI RMP report is outdated, inadequate, and highly misleading. See extensive discussion on this topic in the Additional Comments Section near the end of this letter.

In addition, using existing known mineral discoveries fails to consider that mineral exploration on BLM lands has been stymied by various land withdrawals that have been in place since 1968 that have precluded mineral entry on most BLM lands

6. There are Significant Inconsistencies, Errors and Misplaced (Hidden) Policies in the Document. AMA found numerous significant inconsistencies within the various sections of the document. We also found policy issues described in sections other than Chapter 2 – Alternatives. It is not reasonable to expect the public to search the entire volume for policy statements that should be in Chapter 2. Here are just a few examples, details are found in the following more detailed comments:

The BSWI ACEC Summary sheet contains a reference to management actions and geographic areas covered by these management actions but the referenced management actions could not be found in Chapter 2 or 3, and the areas they apply to could not be found on the ACEC maps (there are no ACEC maps for Alternatives C and D).

The Locatable and Salable Minerals Section of Chapter 3, Affected Environment and Environmental Consequences (Section 3.3.3) contains policies regarding use of the Statewide Bond Pool for Reclamation that do not appear anywhere in the Plan alternatives. It is totally inappropriate to include significant policies in the environmental assessment that are not part of the draft plan alternatives. In fact, AMA, whose members include those most impacted by this policy, only found this policy by chance. Our comments on this proposal appear in the following section under Locatable and Salable Minerals.

The Travel and Transportation Management Section of Chapter 3, Affected Environment and Environmental Consequences (Section 3.3.7) on page 3-120, Effects Common to All Action Alternatives states “Under all action alternatives, no construction or formal improvement of aircraft landing areas would be allowed”. This policy is not stated in Chapter 2. AMA opposes this policy as airstrips may be needed to support development such as construction and maintenance of the Donlin Project gasline. Airstrips may also need “formal improvements” for safety reasons.

Section II – Comments on Individual Resource Components presented in the Draft Plan Alternatives.

AMA recognizes that BLM’s Final Plan may contain elements of any of the three Alternatives (B, C, or D). Many of these proposals close lands to mineral entry and salable minerals based on the assumption that large areas need protection from any development, and ignore existing state and federal laws that require that impacts be avoided, minimized or mitigated.

The following are AMA’s concerns regarding several of these that have significant impacts on access and mineral exploration and development. They are listed in the order in which they appear in the description of the alternatives in Section 2 and the order does not reflect the relative importance of the issue.

1. Water Resources and Fisheries - High Value Watershed (HVW) and Aquatic Resource Values (ARV) – Sections 2.7.3, 3.2.4 and 3.2.5

AMA is opposed to proposals in Alternative B that close all HVWs to mineral entry and salable mineral development as these closures of entire watersheds are not justified. These proposed closures under Alternative B include those watersheds with High, Medium High and Medium Aquatic Resource Values (ARV) scores, 8.7 million acres (65% of planning area). The use of the measure that approximately 8% of streams (757 river miles) in areas of high or medium locatable mineral potential (LMP) are designated HVW is not an accurate assessment of the impact on mineral resources as the LMP is based in inadequate recognition of geologic mineral potential (see discussion in Section III(1)).

Alternative C designates HVWs as those watersheds with High and Medium High ARV scores (5.6 million acres). These areas will be open to locatable mineral development; and salable mineral development on a case-by-case basis. BLM needs to define the very ambiguous term “case-by-case”. AMA opposes the restriction on salable minerals as case-by-case is not defined in the draft RMP. As previously stated, BLM needs to define what is meant by “case-by-case” and allow additional public comment on this definition if the phrase is included in the Final Plan.

Alternative D designates HVWs as all watersheds with High ARV scores (4.8 million acres). These areas are open to locatable and salable minerals with “restrictions”. BLM needs to elaborate on what it intends regarding restrictions that are above and beyond what are currently required.

2. Paleontological Resources Section 2.7.9 and Section 3.2.11.

Section 3.2.11 defines paleontological resources as “any fossilized remains, traces, or imprints of organisms”, and yet the monitoring and reporting systems suggested by the RMP are completely unworkable for the vast majority of fossils.

The RMP-EIS (on page 3-66) specifically recognizes that most of the fossils known in the RMP area are the result of geologic investigations related to mineral exploration (“The fossil record in the planning area is largely a byproduct of mining activity. Known locations are clustered around mining districts”) and yet comes to the conclusion for all 4 alternatives that the “Trend” for paleontological resources is “degrading” at varying rates (pages 3-71 and 3-72). This assumes that no value is added by geologic mapping or sampling (whether accomplished via mineral exploration or other surveys) since it would only identify new “resources” subject to be “degraded” – presumably by visitors or mining activities.

The BLM “potential fossil yield classification” (PFYC) shown in Table 3.2.11-1 is an untested classification system found only in an agency “instructional memorandum”, it has not been subject to peer review or publication, and gives no indication of how it was developed. If it is to be used as a justification to limit surface activities, it should be thoroughly reviewed by a broad range of paleontologists, in order to avoid such statements as found on page 2-153 of Appendix M: Class 2: “Field surveys have verified that significant paleontological resources are not present or are very rare” (you cannot verify a negative – and there are dozens, if not hundreds of cases in Alaska where a unit previously not known to contain fossils has been found to be fossiliferous); and In Class 2: “Sediments exhibit significant physical and chemical changes (i.e., diagenetic alteration) that make fossil preservation unlikely” (Metamorphosed shales and marbles up to middle greenschist facies in Alaska have preserved fossils capable of indicating both unit age and sedimentary facies).

Regarding proposed actions in Table 2-8:

“**Protective measures** minimize impacts on paleontological resources by educating mineral development permittees on identifying paleontological resources and requiring that discoveries be reported. Alternative B minimizes impacts further by requiring mineral permittees to monitor during initial investigation. Both Alternatives B and C require that permittees have a monitoring plan. Alternative D requires reporting only if paleontological resources are found. “

The above statement and the RMP overall reflect a very poor understanding of the distribution, discovery, and significance of paleontological resources. One cannot “monitor” paleontological resources in the same way one can count sheep or fish. Fossil distribution is extremely irregular both within and across stratigraphy, and the simple presence of a sedimentary unit that contains a lithology which “may” contain fossils is no indication that they can or do occur there. “Monitoring” during land use activities would require detailed geologic mapping and sampling at an impractical scale.

The report +/- monitor system seems geared toward vertebrate macrofossils (sabre-toothed tigers, dinosaurs etc.), which might have a commercial value, but makes little sense when applied to invertebrates. “Monitoring” or “reporting” of individual crinoids, gastropods, graptolites etc. is impossible and would provide little information of use to BLM in terms of land use or land management. The proposed system is particularly unworkable when considering microfossils, which are often the most important fossils in terms of defining geologic units and ages, and thus in identifying units that may be of interest in oil and gas or mineral exploration. Microfossils (spicules, foraminifera, conodonts, radiolarian etc.) are, by definition, impossible to detect with the naked eye, and to determine their presence, large bulk samples (e.g. 5kg) processed by exotic and expensive methods are required.

If the BLM’s primary concern is vertebrate macrofossils, then the RMP should explicitly state this and provide guidelines only for those. Any attempt to regulate invertebrate macro- and microfossils is completely unworkable in a State that is incompletely geologically mapped even at the 1:250,000 scale.

3. Lands with Wilderness Characteristics (Sections 2.7.11 and 3.2.13)

AMA opposes designating lands within the planning area as lands to be managed exclusively to protect wilderness characteristics. Congress when it passed ANILCA decided not to designate any BLM lands as Wilderness and none of the planning area was designated as a Wilderness Study Area in ANILCA.

The designation of any lands to be managed to protect wilderness characteristics conflicts with BLM’s policy on page 2-10 of the Draft RMP (section 2.5.1), where BLM states “A detailed analysis of lands managed to protect wilderness characteristics was not performed because provisions of ANILCA Section 1326(b) which prohibits “studies of Federal lands in the State of Alaska for the single purpose of considering establishment of a Conservation System Unit...””.

Yet Alternative B identifies 277,489 acres as lands to be managed to protect wilderness characteristics. These lands will be withdrawn from locatable mineral entry (most probably already are) and closed to salable minerals.

In addition, 200,257 acres of the 277,489 acres proposed for this classification are a tract of BLM land in the Tonzona River area that are totally surrounded by multiple use state land, making the designation of little public value from a Wilderness management perspective.

Alternatives C and D have no lands designated to be managed to protect wilderness values. But alternative C has an 8.1 million acre undefined category that says other uses are allowed with “management restrictions to reduce impacts to wilderness characteristics”. These restrictions need to be defined.

The legend for Map 2-19, depicting Alternative D, is misleading by stating “No protection areas” as most of the 13.5 million acres of BLM lands won’t be developed, defacto most BLM lands will still have wilderness characteristics for the life of the plan. Throughout the plan and EIS discussion of wilderness values, it is implied that those values are somehow at risk, which is misleading.

4. Locatable and Salable Minerals (Sections 2.7.13 and 3.3.3)

Table 2-13 titled “Locatable and Salable Mineral Actions by Alternative” primarily refers to other sections of the alternatives that impact minerals, specifically: Sections 2.7.3 - Water Resources and Fisheries; Section 2.7.5 - Wildlife; Section 2.7.11 - Lands With Wilderness Characteristics; Section 2.7.19 - ACECs; Section 2.7.20 - National Trails; and Section 2.7.21 - Wild and Scenic Rivers. This cross referencing makes it time consuming for plan reviewers as they need to look at numerous other sections of the plan to determine what is being proposed under each alternative for minerals.

AMA opposes Alternative B for locatable and salable minerals as the alternative retains existing withdrawals from mineral entry and proposes additional new withdrawals. AMA supports Alternatives C or D regarding mineral withdrawal revocations. See our previous comments under general comments for Alternative B.

AMA supports opening additional lands to salable minerals as proposed in Alternatives C and D. However, we are concerned about and opposed to the use of the term “case-by-case” used to qualify areas open to salable minerals under Alternative C.

AMA also questions why and opposes the proposal under Alternative C to close to salable minerals the Innoko Bottoms Priority Management Area. What are the unique characteristics and resources that justify this closure?

AMA opposes the inclusion of policies that impact the Statewide Bond Pool for reclamation that are described in the Locatable and Salable Minerals Section of Chapter 3, Affected Environment and Environmental Consequences (Section 3.3.3). These policies are laid out in the bottom of Table 3.3.3-2 and discussed in the Effects from Alternatives B, C, and D on pages 3-96 and 3-97. It is not appropriate to use the RMP process to modify terms for use of the Statewide Bond Pool. These provisions should be removed from the RMP.

In addition, the proposal for use of the Statewide Bond Pool under Alternative B is unworkable. The proposal in Table 3.3.3-2 and described on page 3-96 requires operators to have “a record of five or more years of successful reclamation of mined lands with no substantial compliance issues”. The bond pool is specifically to allow small operators who could not afford the high costs of individual bonding to be able to operate. Many small operations will not be able to secure bonds outside the bond pool for five years.

4.A. Comments Regarding Actions Common to All Action Alternatives for Locatable and Salable Minerals (pages 2-52 and 2-54). Many of the requirements in this section are detailed stipulations that should be

incorporated in the permitting process but should not be contained in the RMP, they should be deleted. By including these in the RMP, BLM and operators lose the flexibility to modify these requirements based on site specific considerations, changing technology, and other new information. Many of these requirements address issues that should be worked out at the permit level by people familiar with the issue and the location being permitted.

2-52-2: It is highly impractical to expect plan-level placer miners to provide an invasive plant species inventory, monitoring, and control plan. This is especially true for miners that are located in areas were access by other users (such as hunters or fisherman) who use ATV's or floatplanes to access BLM lands in the miner's claim area. The miner can't restrict access on BLM lands and they should not be liable for invasive species carried in by other users.

2-52-6: This provision should be deleted. The detailed requirements contained in this section should be incorporated in the permit process, it should not be in the RMP. In the RMP BLM should just specify that operator's permits should incorporate "Best Management Practices".

2-52-8: The BLM Alaska Resource Advisory Council (RAC) has established a reclamation sub-committee that is working on functional language to address soils and reclamation. It is pre-mature putting this language here. Again, the RMP could say "all operations will comply with BLM reclamation requirements" and not put details of those requirements in the RMP. Also, some of the requirements in #8 aren't practical. If #8 is retained in the final RMP, someone familiar with details of mining operations should be consulted.

2-53-9: Mining activities in wetlands and riparian areas are already regulated by the US Army Corps of Engineers (ACoE). The RMP should not duplicate ACoE requirements or attempt to extend BLM's jurisdiction into the ACoE's jurisdiction. This is duplicative and adds to the complexity of permitting, it should be deleted.

2-53-10: Private bonding likely will not be available for most, if not all, placer miners.

2-53-11: Again, these are details that should be in permit conditions, not in a broad based RMP. For example, why would you not be allowed to use a portable, removable, tent platform under your tent?

2-54-12: While this may be a good company policy or a special condition in a site-specific permit, it should not be in the RMP.

2-54-13: While AMA and the mining industry strongly support local hire, it is not appropriate to include this provision in a land use plan, nor is it appropriate to single out the mining industry with this provision.

5. Leasable Minerals (Sections 2.7.15 and 3.3.4)

AMA questions the logic behind the "No Surface Entry" Provisions for Leasable Minerals contained in Alternatives B and C as these provisions are unworkable when applied to such vast areas.

On page 2 – 56, No Surface Occupancy (NSO) is described as: "These are areas where it has been determined through the planning process that highly restrictive lease stipulations are necessary to

protect resources. These leases may prohibit the construction of well production and support facilities. These areas could be subject to directional drilling, if technologically and economically feasible.”

Alternative B applies these provisions to 1.6 million acres (it also closes 9.4 million acres to any leasable minerals) and Alternative C applies the NSO provision to 6.8 million acres (shown on maps 2-33 and 2-34 respectively). Because the NSO requirement applies to such vast acreages, these are essentially closures as directional drilling and other mining techniques for leasable minerals require surface facilities within reasonable distance of the NSO areas.

6. Lands and Realty (Sections 2.7.15 and 3.3.5)

6. A. ANCSA (d)(1) and FLPMA Withdrawals. These existing withdrawals largely withdraw lands from mineral entry and in some instances, withdraws lands from transfer to the state or ANCSA Corporations. 13.4 million acres of the 13.5 million acres of BLM managed lands in the planning area are covered by ANCSA(d)(1) withdrawals according to the Lands and Realty summary sheet.

AMA supports proposals in Alternatives C and D that recommend revoking all ANCSA 17(d)(1) withdrawals but opposes new withdrawals for possible wild and scenic river corridors.

AMA opposes Alternative B as it keeps obsolete and outdated ANCSA Section 17(d)(1) withdrawals in place for 1) High Value Watersheds; 2) areas proposed for management of wilderness characteristics as a priority; and 3) Iditarod National Historic Trail (INHT) “treadway”. These withdrawals appear to be retained primarily to “Maintain abundance of subsistence resources” (see Land and Realty Summary sheet). BLM has not established how these subsistence resources are at risk if the withdrawals are removed. Alternative B also appears to maintain (d)(1) withdrawals within ACECs, although this is not clearly stated in this Section (Section 2.7.15) or Section 2.7.19 (ACECs). See preceding comments on these withdrawals in General Comment #2.

6.B. Right of Way Exclusion and Avoidance Areas. AMA strongly objects to ROW Exclusion Areas and the widespread use of ROW Avoidance Areas.

AMA’s primary concern regarding these designations is that they have a tremendous negative impact on access to and use of state, ANCSA and other private lands both within the planning area and areas adjacent to the planning area. The designations as proposed in the draft plan make no mention of, and appear to ignore, management plans for state lands and state transportation plans. In fact, the references in Appendix D indicate that BLM did not even look at the state DNR’s Kuskokwim Area Plan or any state transportation planning documents. This indicates that BLM gave little to no consideration of how these ROW designations impact access to adjacent non-federal lands.

AMA specifically objects to ROW Exclusion zones proposed in Alternative B because they make it impossible to develop any meaningful transportation or utility system within the planning area. If one overlays the prohibition of any new ROWs across the Exclusion Areas under Alternative B shown in Table 2-15 (the Innoko Bottoms Priority Wildlife Area, the 18 recommended suitable Wild and Scenic River Corridors, The North and South Connectivity Corridors, the Iditarod National Historic Trail Management Corridor (INHT-NTMC), and Permafrost areas), there is virtually no way to cross through or connect non-federal lands within the planning area.

The inclusion of “permafrost area” under Exclusion areas on Table 2-15 (page 2-64) is especially troubling as Map 2-1 depicts virtually the entire planning area as “permafrost”, and therefore a ROW Exclusion Area under Alternative B. Map 2-40 fails to depict the Permafrost exclusion area, unless the table is in error.

The broad use of Exclusion Areas in Alternative B is inconsistent with federal law. Outright exclusion of ROWs on nearly 1.5 million acres of BLM lands ignores the intent of ANILCA Section 1101 where Congress concluded “Alaska’s transportation and utility network is largely undeveloped and the future needs for transportation and utility systems in Alaska would best be identified and provided for through an orderly, continuous decision-making process involving the State and Federal Governments and the Public”. The BLM’s unilateral determination to exclude any ROWs is contrary to this intent. The Exclusion areas also make it impossible for BLM to fulfill requirements of ANILCA Section 1323(b), access to non-federal lands.

This is also inconsistent with Congressional intent in FLPMA Section 201(e)(2) that BLM should generally not “exclude (that is, totally eliminate) one or more of the principal or major uses for two or more years with respect to a tract of land of one hundred thousand acres or more”.

Furthermore, establishing a ROW exclusion area along the Unalakleet Wild and Scenic River corridor and along the Iditarod Trail (both Conservation System Units under ANILCA) ignores the extensive process for transportation and utility systems established by Congress in ANILCA Sections 1102-1108.

Finally, exclusion areas ignore potential RS 2477 ROWs that the state asserts within the exclusion areas. At a minimum, the ROW exclusion and avoidance areas need to be “subject to existing rights” and the RMP should acknowledge that the state has RS 2477 assertions within these areas.

Regarding proposed ROW Avoidance Areas that appear in Alternatives 2, 3, and 4, they are so extensive to be essentially meaningless because no ROW of any length could avoid avoidance areas. For example, on the western side of the planning area, under all alternatives, anyone proposing a ROW would need to avoid an area that runs from the Selawik NWR in the North to the Yukon Delta NWR in the South, making it impossible to “avoid” these areas for any East-West ROW.

Furthermore, some of the criteria for avoidance areas are redundant of reasonable site specific engineering and design factors.

7. Areas of Critical Environmental Concern (ACECs) – (Sections 2.7.19 and 3.4.1)

AMA continues to have significant concerns with BLM’s abuse of and arbitrary application of Areas of Critical Environmental Concern (ACEC), particularly as applied in Alternative B. Surely it was not the intention of the drafters of FLPMA Section 202(c)(3) (43U.S.C.1712) that almost 4 million acres of the 13.5 acre planning area (30%) needs such restrictive management as called for in Alternative B.

AMA is concerned that our previous comments contained in letters dated August 29, 2014 and May 28, 2015 have been largely ignored. We offered both general comments on ACECs and comments on specific proposed ACECs. BLM’s September 2018 Version 3 of the ACEC report summarizes AMA’s previous comments on page 7-8, but contains no response to these comments. We are troubled that BLM has made no discernable change to its approach regarding ACECs in response to these comments. We find it necessary to repeat or summarize these concerns, and we have also attached our two previous letters.

7.A. General Concerns about ACEC designations include:

1. BLM's approach to ACEC designation in Alaska RMP's has been inconsistent and arbitrary. ACECs were judiciously applied in earlier plans, such as Bay Area RMP and Eastern Alaska RMP. The most recently adopted Eastern Interior RMP broadly used the ACEC designations, as have proposals for the BSWI RMP and proposals for the Central Yukon RMP.
2. BLM has failed to justify, and has not responded to our previous comments, as to why existing federal (including BLM) and state authorities are inadequate to protect the resources that purport to justify the ACEC designations. Of particular concern are designations for fish habitat protection, as existing state authority under Alaska Statutes 16 provides adequate protection for fish habitat.
3. Related to point #2, BLM has proposed ACECs that encompass entire watersheds to protect fisheries, but fails to substantiate how properly regulated activities such as ROWs or gravel sales will negatively impact these fisheries values. Such activities can easily be located away from streams to minimize impacts, existing state and federal water quality standards regulate runoff or any discharges, and if necessary mitigation measures can be required.
4. BLM has failed to address the issue of Congressional approval of withdrawals that exceed 5,000 acres, as required under ANILCA Section 1326(a). The extremely restrictive management of most ACECs as called for in Alternative B clearly removes BLM lands from multiple use. Essentially no development activities are allowed to occur in the 3.9 million acres of ACECs proposed in Alternative B. See AMA's extensive discussion of this issue in our May 28, 2015 letter, the relevant discussion is under #1 starting on page 2 (copy of letter attached and included in these comments by reference).
5. It is often confusing and misleading how BLM describes how ACECs have morphed from the existing plans and various ACEC reports to what is in Alternative B. Some of these descriptions mislead readers to thinking not a lot has changed from previous plans, as there is only one more ACEC than in previous plans. However, the acreage of ACECs has more than doubled, from 1,884,376 acres under Alternative A, to 3,912,698 acres under Alternative B. BLM has combined ACECs, changed boundaries, added areas and deleted a few areas. Six existing ACECs go away but three of the six appear to be added to other enlarged ACECs. So there is a net of seven new ACECs encompassing significantly more acreage. BLM has failed to justify such an enormous increase in areas that require ACEC designation and the related proposed restrictive management.

7.B. ACEC's in Alternative C – The Alternatives described in Chapter 2 (Section 2.7.19, including Table 2-18) specify that there are no ACECs identified in Alternatives C and D. AMA supports no ACEC designations under these two alternatives, but is opposed to ambiguous language regarding management actions proposed for ACEC areas in Alternative C.

The BSWI ACEC Summary sheet and Chapter 3 (Affected Environment and Environmental Consequences, page 3-135) contain references to management actions and geographic areas covered by these management actions but the management actions and the areas they apply to could not be found Chapter 2, Chapter 3 or ACEC maps. None of this language appears in the alternatives section (Section 2.7.19).

The following language is contained on page 3-135, and similar to language in the BSWI ACEC summary sheet:

“Effects from Alternative C

Alternative C does not include the designation of ACECs. However, there would be some management actions that would minimize impacts on identified cultural and fisheries R&Is in undesignated potential ACECs. The acreage covered by those management actions would include fewer acres than Alternative B in two cases: the Kateel River (52 percent of potential ACEC) and the Sheefish Spawning area (28 percent of potential ACEC).

Management actions that would apply to these areas under Alternative C would be less restrictive than Alternative B in the following ways:

- Areas would be NSO leasable, open to locatable minerals, and open to salable mineral development on a case-by-case basis. “

AMA opposes this language as the plan does not say what additional management actions are proposed nor does it show the acreage covered by the non-existent guidelines (the reference to “fewer acres for Kateel River and the Sheefish Spawning area”, there is no map).

7.C. Comments Regarding Specific ACEC designations

Sheefish Spawning ACEC (696,901 acres). AMA opposes the inclusion of the Sheefish Spawning ACEC. We have several concerns:

- 1) The ACEC as proposed in Alternative B would preclude development of gravel sources essential to the construction of the Donlin gas line pipeline. The ROW crosses the very upper portion of the BLM lands within the watershed, far from known spawning areas. BLM has already issued the ROW to Donlin and BLM should not propose an alternative that would now potentially prevent development of a pipeline in a ROW they issued.
- 2) The analysis fails to explain why existing state (Alaska Statutes Title 16) and federal authorities (Clean Water Act, BLM permit or lease stipulations) do not adequately protect sheefish spawning areas.
- 3) If additional protections are warranted, there is no justification provided for restricting uses and restricting development on all BLM lands in the entire watershed. Any restrictions should only be applied on BLM land near the actual spawning areas. BLM’s 2018 ACEC Report on page 41 states: “Sheefish spawn in relatively small and specific locations, and a 20 KM section of the Big River located south of McGrath has been identified as a well-known spawning area for sheefish.” The Relevant Value section on page 42 of the 2018 ACEC report says “80 percent of the sheefish spawning in the Kuskokwim River spawn in a 15.5 mile section of the Big River”.

This proposal seems even more dubious, when one looks at the map in Figure 4 of the 2015 ACEC report (copy of map attached). Virtually all of the mapped, documented sheefish spawning areas shown on this map are downriver from BLM lands, it appears that barely two miles of documented sheefish spawning occurs in waters adjacent to BLM lands. Even more questionable is the inclusion of over 200,000 acres of BLM land in the Northeastern portion of the proposed ACEC that shows NO documented sheefish spawning in the Sullivan Creek, Bear Creek and Pitka Fork drainages whatsoever. BLM cannot justify a 1,091 square mile ACEC based upon a resource that is primarily concentrated along 15.5 miles of the Big

River, most of which is not BLM land. We also find it dubious to include in the rationale that “on one day in July 1968, seven plane loads of fishermen were fishing at the mouth of the Holitna River,” as that information (page 42 of ACEC report) is dated by 51 years!

We also note that the 2018 ACEC Report map depicting the Sheefish Spawning ACEC (Map 4) omits both the mapped sheefish spawning areas and Donlin pipeline corridor that were depicted on the 2015 map. We question why BLM has chosen to omit this relevant and important information from the newer maps.

ACECs Proposed Exclusively for Fisheries Protection (numerous). AMA opposes the following ACEC proposals as BLM has failed to explain why mineral entry and salable mineral sales are incompatible with these large acreage withdrawals. As noted above in our general ACEC comments #2 and #3, and our letter of May 28, 2015, AMA specifically requested that BLM explain “why existing protections do not adequately protect these areas and why their fisheries resources are particularly unique.” These existing authorities include state and federal regulations of waters under the Clean Water Act, State Fish and Game regulation under Alaska Statutes Title 16, and stipulations BLM can already place on permits, leases and ROWs without the need for an ACEC designation. In this draft RMP and EIS and previous planning documents BLM has not addressed either the issue of inadequacy of existing regulations nor why on either a state or national level, the fisheries resources in these watersheds require or justify a restrictive land use designation. We note that fisheries are the ONLY reason used to justify many ACEC designations. AMA also questions why entire watersheds are designated ACECs to protect spawning and rearing habitats that are found in only portions of streams in the much larger watersheds. Based on this concern, AMA opposes the designation of the following areas as ACECs:

- Anvik River Watershed ACEC (248,867 acres)
- Giassa River ACEC (278,241 acres)
- Inglutalik River ACEC (70,888 acres)
- Kateel River ACEC (692,659 acres)
- Nulato River ACEC (344,182 acres)
- Shaktoolik River ACEC (191,067 acres)
- Swift River Whitefish Spawning ACEC (220,032 acres)
- Ungalik River ACEC (113,454 acres)

8. Iditarod National Historic Trail (INHT) – (Sections 2.7.20 and 3.4.2)

AMA opposes closing the entire INHT National Trail Management Area (NTMA) to locatable, salable and leasable mineral development as proposed in Alternative B.

We agree that these uses can be accommodated as proposed in Alternative C and D – provided they do not have direct and cumulative impact on the nature and purpose of the INHT.

9. Wild and Scenic Rivers – (Sections 2.7.21 and 3.4.3)

The Unalakleet River is the only designated Wild and Scenic River within the BLM planning area. A previous BLM study identified 18 “eligible” segments as possible additions to the WSR system.

AMA does not support Alternative B's proposal that recommends these 18 river corridors be considered eligible for Wild and Scenic River designation and managed as potential Wild and Scenic Rivers. These Wild and Scenic Rivers would become Conservation System Units under ANILCA. ANILCA Sections 601-603 designated 25 Wild and Scenic Rivers in Alaska and Section 604 identified another 12 rivers as WSR Study Rivers. None of the 18 "eligible" rivers listed in Alternative B are on this list of study rivers. Congress stated in ANILCA Section 101(d) that ANILCA is "a proper balance between the reservation of national conservation system units and those public lands necessary and appropriate for more intensive use and disposition, and this Congress believes that the need for future ... new conservations units ... has been obviated thereby."

AMA is opposed to mineral entry withdrawals of Wild and Scenic River corridors under Alternatives C and D. Alternatives C and D do not recognize these 18 river segments as eligible, BUT on page 2-84 "Actions Common to All Action Alternatives for Wild and Scenic Rivers and Table 2-20, the plan maintains existing withdrawals from mineral entry within the WSR corridors. There is no mention of salable minerals in Section 2.7.21.

There is an inconsistency between the Alternatives text (Chapter 2) and the table and text in Chapter 3 regarding whether or not these WSR Corridors are open to locatable mineral entry and salable mineral development under Alternatives C and D. Table 2-20 (Page 2-86) for Alternative C reads: "All proposed management described above under Actions Common to All Action Alternatives would apply to this acreage". Alternative D reads "Same as Alternative C. The second bullet under "Actions Common to All Action Alternatives" on page 2-84 reads: "Maintain the withdrawal from mineral entry within the WSR corridors, subject to valid existing rights". However, the acreages listed in Table 3.4.3-3 indicates and the narrative on page 3-150 states that under Alternative C these areas are "open to locatable mineral entry and salable mineral development on a case-by-case basis" and Alternative D according to Table 3.4.3-3 and page 3-151 is open to both.

10. Social and Economic Features – Support for BSWI Communities – Affected Environment and Environmental Consequences – Section 3.5.1.

Several statements in the Affected Environment and Environmental Consequences – Social and Economic Features – support the desire and need for more economic development in the planning area and also point out the potential importance of mineral resource development. These statements tend to support the need to encourage, and not restrict, potential mineral exploration and development, rather than a restrictive RMP as proposed in Alternative B.

Some examples from Chapter 3:

From Table 3.5.1-1 (page 3-155) – Summary of Effects to Social and Economic Conditions by Management Action:

"Opportunities for jobs and income are scarce in bush communities so there is community desire for BLM management to facilitate or at least not impede economic development opportunities."

Page 3-156: "There is support for more jobs in the planning area, as was demonstrated through the public comment in support of the Donlin Gold Project, but communities also do not want to see subsistence resources and access damaged by the mine and associated development, including the natural gas pipeline corridor that will bring energy to the Donlin operation"

Page 3-159: “Alternative C would revoke all 17(d)(1) withdrawals on locatable minerals, providing a greater level of support for locatable mineral development than Alternative A”

Page 3-161: “Opportunities such as the Donlin Gold Project would be expected to have a greater effect on jobs than any of the actions contained in the alternatives.”

Section III. Additional Comments

1. Continued Inadequacy of Mineral Resource Potential Assessment Used for Plan Development and Environmental Assessment.

The entire Draft Plan and Environmental Impact Statement fail to adequately address mineral resource potential. Mineral resource assessments are inadequate as they rely almost exclusively on data regarding existing known discoveries and ignores geologic information. As a result, the discussion of mineral potential in the BSWI RMP and EIS report is outdated, inadequate, and highly misleading.

The primary problem throughout the document is a fundamental misunderstanding of the term Locatable Mineral Potential (LMP) (used 265 times in the document) and the continual misrepresentation of the polygons identified as “medium-to-high LMP”. The third paragraph of Section 3.3.3 states “Areas of high and medium LMP have been identified within the planning area (Appendix N; Map 3.3.3-3).” This statement is later attributed to Kurtak and others, 2017.

However, the Kurtak and others, 2017, BLM Technical Report evaluates “mineral **development**” potential, NOT mineral potential. “Development” potential is an interpretation of where it is most likely that KNOWN deposits will be developed into advanced exploration projects or possibly, into mines. The “mineral” potential of an area is a natural condition independent of the state of current exploration. “Mineral potential” is the likelihood of a region to host deposits of any specific geologic type, and the conditions required for mineral potential vary widely between deposit types. To evaluate mineral potential, regional (and detailed, if known) geologic characteristics, geochemistry and geophysical characteristics are weighted versus the critical features required for any specific mineral deposit type (e.g. sediment-hosted Pb-Zn-Ag like at Red Dog, versus intrusion-hosted gold like at Fort Knox).

Continual use of the “medium to high LMP” that tracts throughout this document completely misstates and significantly downplays the actual mineral potential of the RMP area and severely underestimates the potential impact of various proposed management actions on potential mineral exploration and discoveries in the 4 proposed Alternatives. For example, throughout the document, the various assessments of mining restrictions are repeatedly compared to percent of RMP impacted.

Assessment of mineral potential is the responsibility of the USGS, the science agency for the Department of Interior. Yet, no USGS mineral potential reports are cited, despite the history of USGS products directly related to mineral resources, land management, and the region.

A USGS analysis of undiscovered locatable mineral potential, similar to that requested by the BLM and produced for the Bay RMP area by the Mineral Resources Program (Schmidt and others, 2007, USGS SIR

2007-5039; <https://pubs.usgs.gov/sir/2007/5039/index.html>) could have been requested for the BSWI area.

Absent such a probabilistic analysis, there is recent published USGS work that analyzes mineral resource potential statewide that should have been used in this report. These recent studies are watershed based, cover the entire state of Alaska, are peer-reviewed, published, and easily available online. For every watershed, they indicate both levels of mineral potential (high, medium, low) and level of certainty of conclusions based on the types and level of coverage of data in all areas. Published reports to date cover critical commodities as well as more common base-metal and precious-metal resources, and, being GIS-based, are easily integrated into other GIS-based analyses.

The methodology of the spatial mineral occurrence analysis is described in lay terms in:

Karl, S.K., and Labay, Keith, 2017, USGS Fact Sheet 2017-3012.

<https://pubs.usgs.gov/fs/2017/3012/fs20173012.pdf>

GIS based analyses published to date are:

Karl, S.M., Jones III, J.V., and Hayes, T.S., eds, 2016, GIS-based identification of areas that have resource potential for critical minerals in six selected groups of deposit types in Alaska, USGS Open-File Report 2016-1191.

<https://pubs.er.usgs.gov/publication/ofr20161191>

A specific subset of this GIS-based analysis was provided to the BLM at their request for the Central Yukon (CYSA) RMP planning area in 2015:

Jones III, J.V., and others, 2015, GIS-based identification of areas with Mineral Resource Potential for Six Selected Deposit Groups, Bureau of Land Management Central Yukon Planning Area, Alaska, USGS Open File Report 2015-1021.

<https://pubs.usgs.gov/of/2015/1021/>

A cursory examination of these reports clearly indicates medium- and high- mineral potential for several of the commodities already considered, underlying much larger portions of the BSWI RMP area than are indicated anywhere in Draft Plan and EIS. An analysis of locatable mineral potential for the BSWI area (like the CYSA area) SHOULD have been requested of, and produced by, the USGS for the BSWI area. Additional deposit model analyses are underway within the USGS and could easily have been provided for BLM use in the planning process.

Failure to use this data renders the “conclusions” about the effects of Alternatives on locatable mineral potential meaningless, since only very small areas of potential development have been mistaken for actual locatable mineral potential.

Mineral Occurrences.

The second paragraph of Section 3.3.3. states “The planning area contains 453 documented mineral occurrences and 2,480 mining claims, with 207 of those under federal management.”, yet neither this statement nor Map 3.3.3-1 which purports to show “mineral occurrence deposit types” are referenced to any data source.

Later in the document some mineral occurrence data is referenced to USGS, 2008 – the Alaska Resource Data File (ARDF). The ARDF, which is peer-reviewed is continually revised.

The most recent update (version 1.7, March 2018) should have been cited. It is at https://www.usgs.gov/centers/asc/science/alaska-resource-data-file?qt-science_center_objects=0#qt-science_center_objects with data available in .csv, kml, and Filemaker Pro formats; locality descriptions are also available as pdfs.

Other information on site-specific resources that occur in the BSWI area is available in the Alaska Geochemical Database (v. 2.0) (Granitto, Matthew, and others, 2013, USGS Data Series 759) which includes mineral, stream sediment (bulk and panned concentrate), rock, and soil geochemistry as well as information on ore minerals (cassiterite, gold, galena) identified in mineralogic separates.

<https://pubs.er.usgs.gov/publication/ds759>

https://pubs.usgs.gov/ds/759/contents/DS759_pamphlet.pdf

2. Readability and Usability of the Document. The entire 4 volume Draft Plan and EIS with voluminous appendices and reports is very difficult to use. This combined with the excessive complexity of the plan itself make it difficult for the general public to comprehend what the plan actually does. The following attempts to summarize some of our reviewers concerns with the document.

Confusing Organization and Inaccurate Cross References. We found numerous inaccurate and confusing cross references between Chapter 2 and 3, and similar inconsistencies between the first part of the document and the appendices. This may be due to authors of certain sections not understanding the draft plan alternatives and their actual impacts and inadequate editing. Some maps are so crowded that they are nearly illegible (e.g. Map 1-3). Map legends do not indicate the source of any individual data layer, polygon, or feature, making the maps useless as stand alone, self-explanatory documents requiring frequent cross referencing back to the text in Chapters 2 and 3 which are separate documents.

Lack of References – Maps. Most of the references on the maps are not found in Appendix D (the reference list) nor in any other part of the document. Examples from Map 1-3, for example, are DGGS 1983, Merrett and Hawley, 1986, and INEEL 2003, none of which can be located via a text search of the entire document. The reader might locate these through separate research but “Data Sources” such as “BLM GIS 2016, 2017, 2018”, cited on most maps, are not helpful as the reader has no access to past GIS database archives and no idea what might have been stored there or downloaded for any particular map.

Lack of Documentation to Justify Decisions. This RMP provides very little documentation of the scientific basis for many of the decisions proposed. The scientific interpretations in the RMP (e.g. “visual resources”, “high value” watersheds, “potential fossil yield classification”, 2060 temperature projections, etc.) are referenced only to internal BLM documents. Virtually none of the references are to peer-reviewed sources; most are not published anywhere in the scientific literature. Neither the RMP itself nor the internal BLM documents cited indicate the qualifications, background, or professional experience of any of the authors.

Lack of Professional Input from Outside BLM. The list of preparers (Appendix C) indicate that most authors are BLM staff. BLM does not appear to have consulted with scientists and past work of the Department of Interior’s science agency, the US Geological Survey (USGS), whose mission is specifically to provide scientific analyses to sister agencies, particularly for hydrologic, biologic, geographic or geologic issues confronted in the BSWI and other planning areas.

The theories, models and science behind BLM's "conclusions" therefore, have not been subject to normal scientific scrutiny via public discussion or peer review, and should not be the sole basis for regulation and significant land management decisions. This lack of transparency and documentation undercuts the validity of many of the proposed "actions" suggested in the 4 alternatives.

Thank you for the opportunity to offer these comments.

Sincerely,



Deantha Crockett
Executive Director, Alaska Miners Association

Attachments:

- AMA Letter August 29, 2014 – comments on Areas of Critical Environmental Concern
- AMA Letter May 28, 2015 – comments on Preliminary Outreach Alternatives
- Figure 4 from BLM's 2014 ACEC Report - Map of Sheefish Spawning ACEC

Cc: Chad Padgett, BLM Alaska State Director
Joe Balash, Assistant Secretary for Lands and Minerals Management
The Honorable Senator Lisa Murkowski
The Honorable Senator Dan Sullivan
The Honorable Congressman Don Young