



March 7, 2022

The Honorable Eric Werwa
Deputy Assistant Secretary for Policy & Environmental Management
U.S. Department of Interior
1849 C Street, N.W.
Washington DC 20240

RE: DOI AMERICA THE BEAUTIFUL ATLAS RFI – Comments submitted electronically:
<https://www.regulations.gov/commenton/DOI-2021-0016-0001>

Deputy Secretary Werwa,

As the organizations representing the majority of Alaska's economy, we submit the following comments in response to the Department of Interior's (Department) Request for Information to Inform Interagency Efforts to Develop the American Conservation and Stewardship Atlas.¹

The goal of the Atlas is to collect and highlight baseline information on the amount and types of lands and waters that are being managed for conservation and restoration purposes, with annual updates on the health of nature in America and on the Federal Government's efforts to support locally led conservation and restoration efforts.

In creating this Atlas, the Department must recognize that Alaska is unique. For example, to meet the Administration's "30x30" goal (30% of lands and waters conserved by 2030), Alaska would need to *reduce* its conserved lands by millions of acres over the next 8 years. Currently, nearly 40% of our state is covered by national parks, preserves, forests, monuments, wildlife refuges and other conservation designations. And many of the areas outside this – including those near cities and towns – are also well-conserved, and home to accessible wildlife and natural areas. This applies to Alaska's lands and waters alike.

¹ FR Doc. 2021–28548.

The unrivaled scope of Alaska's conserved lands was not accidental. These protections were the result of the 1980 Alaska National Interest Land Conservation Act (ANILCA) – a hard fought compromise which balanced both conservation interests and the need for economic growth. ANILCA codified protections for over 100 million acres of federal lands in Alaska – doubling the size of the country's national park and refuge system and tripling the amount of land designated as wilderness. It also included an explicit instruction to the executive branch: no more lands may be withdrawn without Congressional approval.

Following ANILCA, federal lands in conservation units encompass some 148 million acres. Our state is home to 70% of all park lands in America, 80% of all wildlife refuges, and more than 50% of all designated wilderness. More than 60% of the lands managed by the Department of Interior in Alaska have explicit conservation restrictions, compared to just **12%** nationwide (a figure already buoyed by the fact that one third of all federal lands are in Alaska).

In addition to these federal conservation lands, more than 10 million acres of state-owned lands are designated for refuges, sanctuaries, parks, critical habitat, and other special use areas. Together, these 158 million acres are more than 71 times the size of Yellowstone National Park – a park which is itself larger than Delaware and Rhode Island combined.

With regards to Alaska's waters, over 65% of marine areas in the Exclusive Economic Zone off Alaska's coast are closed to some or all fisheries to conserve habitat, sustain fisheries and coastal communities, and protect marine mammals. Over a million square miles of Alaska's coast has been selected as proposed and designated critical habitat for a variety of species listed under the Endangered Species Act. The proposed and designated critical marine habitat around Alaska is equivalent to the *combined* size of Texas, California, Montana, New Mexico, Arizona, Nevada, and Colorado.

As a result of these conservation designations, not a single community in Alaska comes anywhere close to meeting the definition of "nature deprived." However, as the Department has recognized, true conservation is not about simply "locking away" lands or waters. Rather, responsible uses of lands and waters are consistent with the long-term health of natural systems and are essential to the health and well-being of our communities.

Simply put, Alaska does not need more acreage placed into conservation units.

However, the Atlas should take the opportunity to highlight Alaska's decades-long leadership in conservation – and our state's tremendous successes, which reflect many of the "continuum of conservation" principles identified in the 2021 *Conserving and Restoring America the Beautiful* Report. These include principles such as conservation and restoration approaches that create jobs and support healthy communities; supporting locally led conservation efforts; honoring private property rights and voluntary stewardship; and building upon existing tools with an emphasis on flexibility and adaptation.

Alaska's resource development industries have demonstrated the truth of how jobs and economic growth can both co-exist with and support conservation. A prime example is Alaska's fishing industry, which is widely recognized as a global sustainability leader. Operating under

the management authority of the North Pacific Fishery Management Council, the Alaska fishing industry sustainably harvests more than 2,200,000 metric tons of groundfish every year, accounting for approximately 60 percent of the total U.S. catch. In doing so, it directly supports 62,000 jobs and makes a critical contribution to the food security of our nation—all while ensuring the health of target stocks and marine ecosystems.

To take another example, studies have shown that in the four decades since development began on Alaska's North Slope – a place of unmatched wonder and wilderness – life expectancy in the region increased by 13 years due to the improvements in public health, education, and sanitary services. These improvements, and the corresponding boost to the health and wellbeing of indigenous communities in the region, was made possible only through the leasing and development of oil and gas resources in the area. Far from being in opposition to conservation principles, responsible development of the North Slope's resources has allowed local communities to thrive and to continue living as responsible stewards of their lands and wildlife.

Finally, a look at the Red Dog Mine in Northwestern Alaska will show that development of the mine in 1989 prompted formation of an organized local government so that the mine could be a primary source of taxation revenue to fund the region's socioeconomic needs and has consistently employed a workforce that the majority is made up of NANA Regional Corporation (an Alaska Native Corporation) shareholders and community residents. These employees, and regional residents are empowered with oversight of local wildlife and mining practices, and for over 30 years has been a success story for Alaska.

However, despite these successes – and the diverse goals identified by the continuum of conservation principles – DOI's approach to land management has too often placed gross acreage over the interests of healthy communities, and federal land use decisions have often run directly *counter* to the advice and interests of indigenous communities. As a result, the Department's future goals for Alaska must emphasize the need for access to our lands, and the ability for local communities to make use of the resources around them, in a responsible and ecologically sound manner.

As a first step, the Department must fulfill the promises of ANILCA – to not withdraw any further lands from use or development by Alaskans, and to allow responsible development of Alaska's lands as permitted by ANILCA. This is no small matter. In exchange for withdrawing so much of Alaska, ANILCA included a broad range of commitments on Alaska's rights, to allow residents – including indigenous communities – to access to inholdings, and to provide continued use of federal lands for recreation, hunting, and economic development. This balance was carefully considered – but has been trampled by the federal government in recent years.

In addition to the 57 million acres of designated wilderness, the federal government has chosen to manage other areas as wilderness because of their "wilderness characteristics." These areas become de facto wilderness – with the agencies that manage them prohibiting multiple uses, despite the lands lacking any designation as wilderness by Congress. Such treatment of lands – which prevents their responsible use by local communities – is entirely antithetical to the

principles of local leadership and of flexible conservation approaches which support communities and create jobs. It is also antithetical to Congress's mandate in ANILCA. For example, in Southeast Alaska, millions of acres have been removed from the timber base in our national forests, contributing to the demise of a sustainable, conservation-focused industry that once employed thousands of Alaskans. On Alaska's North Slope, broad swaths of non-wilderness lands have been closed to *any* development, imperiling the economic base and success of communities in the area.

The Department must also take action to complete the transfer of lands to the state of Alaska, a task that is decades overdue. In the 1970s, following passage of the Alaska Native Claims Settlement Act, numerous Public Land Orders (PLOs) were put into place by the Department, on a temporary basis, to help facilitate claims by Alaska Native Corporations. These PLOs withdrew large areas of land from the public domain (and from state selection under the Statehood Act), to ensure that Alaska Native Corporations would have priority access to lands near their communities.

Yet, while most ANCSA corporations have completed their selection determinations and final adjudication and receipt of their lands from BLM is on-going, the federal government has not yet lifted the ANCSA PLOs – which is actively keeping the state from receiving *its* lands, more than 50 years later. These PLOs have all-too regularly been weaponized by advocacy groups to, quite literally, push Alaskans out of federal lands.

In line with the continuum of conservation principles identified in the *America the Beautiful* report, the Department cannot allow its decision-making processes for federal lands to be controlled by outside advocacy groups, with no connection to the state of Alaska. Instead, our federal government must allow itself to be guided by local leadership on questions of responsible development. Difficult decisions regarding natural resource development should not be made thousands of miles away in Washington D.C., or in a manner that fails to consider the perspectives of those who have lived on the lands for thousands of years.

Our organizations are proud to represent several industries and hardworking Alaskans who have upheld all the continuum of conservation goals identified by the administration. Our organizations have a long track record of working with local communities, creating jobs, and preserving the local environment. In creating the Atlas, we urge the Department to make clear that Alaska has long since *exceeded* the Administration's "30x30" goal, and that future goals for our state must be focused on fulfilling current law as outlined in ANILCA, respecting the rights of Alaska Native Corporations and our state government, helping to create jobs and economic opportunities for our communities, and making more of Alaska available to Alaskans.

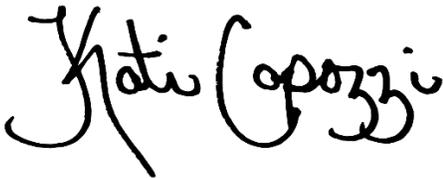
Respectfully,



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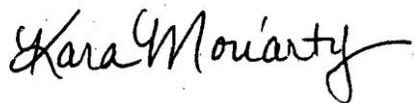
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