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March 26, 2019

The Honorable Sonny Perdue
Secretary of Agriculture
U.S. Department of Agriculture
1400 Independence Ave S.W.
Washington, DC 20250

Re: Alaska Roadless Rulemaking in Tongass National Forest

Dear Secretary Perdue:

The Alaska Miners Association writes to urge that you select full exemption of the Tongass National Forest from the 2001 Roadless Rule as the Preferred Alternative in the Draft Environmental Impact Statement (DEIS) on the Alaska Roadless Rulemaking process.

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.

In 2003 and again in 2010, the U.S. Department of Agriculture (USDA) made the policy determination that a broad roadless rule for our nation's forests simply did not suit the unique realities of Alaska, and chose to exempt the Tongass from the Rule. Selection of a total exemption Preferred Alternative in the DEIS maintains this policy and can help to reverse the extensive damage caused to the Southeast Alaska economy and communities by the broad application of the Rule.

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.



The Alaska National Interest Lands Conservation Act of 1980 (ANILCA) and the Tongass Timber Reform Act of 1990 (TTRA) were specific Acts of Congress that directed how the Tongass would be managed.

Clearly, Alaska is unique, and the USDA acknowledged this when it exempted the Tongass from the 2001 Rule. The Tongass was the only national forest for which there was an individual consideration of impacts and a separate ROD in the Rule.

Today, local, state, and federal agencies have a host of tools to manage forests and protect the environment. In addition, 6.6 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 Preferred Alternative with full exemption is fully appropriate and necessary for the Tongass. The mining industry, timber industry, State of Alaska, and six bipartisan Alaska governors stand in support of a total exemption, and we urge you to select it as the Preferred Alternative in the DEIS.

Sincerely,

A handwritten signature in blue ink, appearing to read "D. Crockett", is written over a light blue horizontal line.

Deantha Crockett
Executive Director

cc: Senator Lisa Murkowski
Senator Dan Sullivan
Congressman Don Young
Governor Michael Dunleavy
Chief Vicki Christiansen
Kyle Moselle