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March 20, 2026

Tongass National Forest
United States Department of Agriculture, United States Forest Service
648 Mission St, Ste 110
Ketchikan, AK 99901
Submitted via online portal

Re: Tongass National Forest Land Management Plan Revision

To Whom It May Concern:

The Alaska Miners Association (AMA) appreciates the opportunity to provide comments on the notice of initiation of the development of a proposed plan revision and notice of intent to prepare an environmental impact statement for the Tongass Land Management Plan (TLMP).

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.

AMA has consistently participated in policy discussions regarding the Tongass, as it comprises 16.9 million acres of the landmass of Southeast Alaska, and is endowed with mineral wealth that has 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, the Dawson Mine on Prince of Wales Island, and dozens of exploration projects throughout the forest. AMA has maintained that the Tongass, which has long been considered in the narrow context of timber harvesting, also has potential to be a Mining District and therefore the multiple use mandate and management should be considered in future plans. We recommend USFS review the 1991 Brewer Report to more thoroughly consider Mining District potential for the Tongass.

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 Tongass Timber Reform Act amended the Alaska National Interest lands Conservation Act (ANILCA) to add additional environmental requirements throughout the forest. Aside

from legislation, countless policy changes throughout the years have governed and managed the Tongass distinctly.

For the future plan, AMA recommends the following:

The existing Minerals Overlay Land Use Designation (LUD) comprises only 249,570 acres, or less than 1.5% of the Tongass. If you remove Wilderness and monument areas, this LUD only comprises 2.31% of the Tongass. This significantly underestimates the mineral potential on USFS lands in SE Alaska and artificially constrains mineral development to a few isolated areas. The Minerals LUD Overlay, which moving forward is referred to as a management area, should either be expanded to include all lands not withdrawn from mineral entry or removed altogether, and mineral development should be recognized as a potential viable use on all USFS lands. Due to the roadless rule and other impediments to mineral exploration, the Tongass is significantly underexplored and the full mineral potential of the forest remains unknown.

The USFS should review all existing mineral withdrawals in the Tongass and rescind all public lands orders where the current surface use no longer requires a mineral withdrawal.

The current TLMP management prescriptions for the various LUD's include recommendations for withdrawal of the area from mineral entry due to perceived conflicts with other uses. Modern mining in Southeast Alaska has proven that mining can coexist with other uses of the lands, including fishing, recreation, and tourism. All recommendations for mineral withdrawals should be removed for lands otherwise open to mineral entry. The full potential for the Tongass to provide a domestic supply of a variety of critical minerals is still unknown and land management plans should not pre-emptively recommend that lands be removed from mineral entry. No mineral withdrawal should occur on any lands in the Tongass until a full economic geologic assessment has been made.

Thank you for the opportunity to submit these comments.

Sincerely,



Deantha Skibinski
Executive Director