



Secretary Thomas J. Vilsack
U.S. Department of Agriculture
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September 9, 2022

Dear Secretary Vilsack,

The undersigned representing 32 communities in Southeast Alaska along with the timber, mining, and renewable energy organizations and related businesses throughout the region and the State write to express their strong support for the points made in Senator Lisa Murkowski's attached letter to you of August 4, 2022, and Alaska Commissioner of Natural Resources Corri Feige's attached letter to you of May 25, 2022.

We specifically endorse Senator Murkowski's point that

Alaskans, and all Americans, deserve to understand the full range of consequences that the reimposition of the Roadless Rule on the Tongass will have. As part of that analysis, it is critical that USDA provide an accurate, modern account of the vast mineral resources within the Tongass, as well as the current value of those resources, so that we can understand what a loss of access, or substantially higher development costs, will truly mean. We need to understand how the Roadless Rule's restrictions will impact mineral

availability and affordability, the ability to transition to electric vehicles and other technologies, and our national security.

and the State's recommendation that the USDA

fund completion of a comprehensive study of mineral resources for the entire Tongass as part of the Southeast Alaska Sustainability Strategy; effectively updating Coldwell (1990) and Brew et al. (1991). Both studies, while containing important information, could be significantly improved upon with the new technology, imagery, and data gathering available today – and with a better understanding of the demand for and value of critical minerals in the fast-evolving modern technology and manufacturing industries.

Making minerals more difficult and expensive to access on the Tongass would conflict with the President's March 31, 2022, directive to the Department of Defense to use the Defense Production Act of 1950 to fund feasibility studies for domestic production of critical minerals to combat climate change and for other purposes. Therefore, the proposed comprehensive study of Tongass mineral resources should be undertaken and completed so the Biden Administration and the public will know what minerals in what quantities will be impacted or foregone before USDA reimposes the 2001 Roadless Rule on the Tongass National Forest, which it has announced it will do in November 2022.

Finally, because of the adverse impacts of the 2001 Roadless Rule on the timber, mineral, and hydropower resources of the Tongass we continue to believe that it is in the national interest to continue to exempt the Tongass from the Roadless Rule.

Thank you for your consideration,

Kati Capozzi, President & CEO
President/General Mgr.
Alaska Chamber

Connie Hulbert,
Alaska Electric Light & Power
Company

Tessa Axelson, Executive Director
Alaska Forest Association

Deantha Skibinski,
Executive Director
Alaska Miners Association

Crystal Enkvist, Executive
Director, Alaska Power
Association

Don Habeger, Executive
Director First Things First
Alaska Foundation

Craig Dahl, Executive Director
Greater Juneau Chamber of
Commerce

Michelle O'Brien, Executive
Director, Greater Ketchikan of
Chamber of Commerce

Trey Acteson, Chief Executive
Officer
Southeast Alaska Power Agency

Robert Venables,
Executive Director
Southeast Conference

Leila Kimbrell, Executive Director
Resource Development Council for Alaska, Inc.

Randy Johnson, President
Tyler Rental

Karen Matthias, Executive Director
Council of Alaska Producers

Rebecca Logan, Executive
Director, Alaska Alliance

Jeff Boehm, President
Bobcat of Juneau and Ketchikan

Alicia Amberg
Executive Director
Alaska General Contractors

Ethan Berto, President
Survey Point Holdings, Inc.

Todd MacManus, President
Alaska Bankers Association

Neil MacKinnon, President
Hyak Mining Co., Inc.

Lance Miller, President
Red Diamond Mining Co., Inc.

The **Alaska Alliance** is a 43-year-old trade association with a mission to promote the responsible development of Alaska's oil, gas, and mineral resources. It represents 500 Alaskan businesses who employ 35,000 people in the state of Alaska.

The **Alaska Bankers Association (AKBA)** is the voice of the Alaska's banking industry, which consists of seven state and national banks: Denali State Bank, First Bank Ketchikan, First National Bank Alaska, KeyBank, Mt. McKinley Bank, Northrim Bank, and Wells Fargo Bank. Together, AKBA members employ more than 2,200 proud professionals, safeguard \$17 billion in deposits, and extend over 85 percent of non-public commercial lending in Alaska. Most AKBA member banks have had long term operations in Southeast Alaska with numerous business customers involved in mining, hydropower and other renewable energy businesses, timber harvesting and sawmilling, and related businesses such as marine transportation and road construction. AKBA member banks operating in Southeast also have numerous customers who are employees of their business customers.

AKBA member banks place great reliance on maintaining the Tongass exemption from the Roadless Rule.

The **Alaska Chamber** represents 100,000 Alaskan employees and businesses large and small. The mission of the Alaska Chamber is to promote a positive business environment and grow and foster a healthy and diverse economy in Alaska. The Chamber stands behind strong, pro-business public policy and advocates for the issues that impact Alaska businesses. A healthy business climate benefits everyone who lives and works in Alaska.

The **Alaska General Contractors (AGC)** is the largest construction trade association representing more than 640 Alaskan contractors, specialty contractors, suppliers, manufacturers, and businesses in Alaska. Within our membership is much of Alaska's construction industry, and we build Alaska. We do it efficiently, professionally, and environmentally sound. Our members abide by the best practices in the industry, and they take pride in their work to support vital infrastructure and connect Alaska.

We're not a mining organization. We're not fisheries. Not timber. Not tourism. Not oil & gas. At AGC, we don't represent any specific resource industry. We advocate instead for a healthy economy, responsible environmental/developmental partnerships, and proper, legal, and well-established permitting and review processes. We advocate for these things because when the economy is healthy, so is the construction industry.

The **Alaska Electric Light & Power Company (AEL&P)** provides retail electric service for approximately 17,000 customers, including the Greens Creek Mine, in the City and Borough of Juneau. The oldest regulated electric utility in Alaska, AEL&P began more than a century of service in 1893 with a simple water wheel.

The **Alaska Forest Association (AFA)** is a forest trade association representing an array of members with an interest in the forest products industry in Alaska. AFA members include, but are not limited to, timber operators, contractors, equipment suppliers, fuel distributors, tribal organizations, forest product vendors, sawmills, other affiliated industry associations and private citizens. AFA's activities are directly related to the viability of the forest products industry in Alaska. AFA is committed to advancing the restoration, promotion and maintenance of a healthy, viable forest products industry, contributing to economic and ecological health in Alaska's forests and communities.

The **Alaska Miners Association (AMA)** is a non-profit professional membership organization established in 1939 to represent the mining industry throughout Alaska. The AMA has a diverse membership composed of more than 1,800 individual and corporate members that come from eight statewide branches: Anchorage, Denali, Fairbanks, Juneau, Kenai, Ketchikan/Prince of Wales, Haines 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 members explore for and produce gold, silver, platinum, molybdenum, lead, zinc, copper, coal, limestone, sand and gravel, crushed stone, armor rock, and other materials.

The **Alaska Power Association (APA)** is the statewide association for electric utilities in Alaska. APA members provide power to a majority of Alaskans from Utqiagvik to Unalaska, through the Interior and Southcentral, and down the Inside Passage. Affordable electricity is the cornerstone of economic development and is essential to building sustainable communities. The Roadless Rule continues to be a setback to further carbon reduction and the future affordability of electricity in the Southeast region. Electric utilities must be able to reasonably access existing generation assets and new generation sites to continue providing safe, reliable, and affordable energy to Alaskans. Under the 2001 Roadless Rule, many electric utilities in Southeast Alaska were subject to costly requirements to access their own facilities. These increased costs not only impact Alaska ratepayers, but also significantly limit the ability to construct new, carbon-free hydroelectric power and conduct necessary utility work for routine maintenance.

Bobcat of Juneau and Ketchikan are full line sales and rental equipment companies. Specializing in sales to commercial mining, forestry, marine and government projects. Bobcat also supplies equipment to a wide range of small contractors and homeowners. Bobcat is owned by the Boehm family and has been based in Juneau Alaska since 2007. Bobcat employs several people, prides itself as a family business and sells across Alaska, Hawaii and the Pacific Northwest.

The Council of Alaska Producers (CAP) is a non-profit trade association that has represented the interests of Alaska's large metal mines and several advanced

projects since 1992. CAP advocates for economic opportunity, science-based policy, and environmentally sound mining practices.

First Things First Alaska Foundation (FTF) is dedicated to preserving the economic viability and future of Alaska through education. There is a clear need to educate the public on the benefits of responsible economic development and natural resource management.

The **Greater Ketchikan Chamber of Commerce** is a diverse community-based organization comprised of over 250 members, including private sector businesses, non-profit organizations, and local governments. Our member-businesses include some of the largest employers in Southeast Alaska, as well as the State of Alaska, which provide family-wage jobs to thousands of Alaskans. The Ketchikan Chamber brings businesses, investors, and customers together to work toward the common goal of encouraging a sustainable economy which can preserve the socioeconomic well-being of our community, and the families who call it home.

Hyak Mining Co., Inc. is owned by the MacKinnon family. The MacKinnon family has been involved in mining exploration in the Juneau area since the 1890s – before there was a Tongass National Forest. Hyak Mining Co., Inc. has continued the family’s involvement in mineral exploration and development on the Tongass since 1978. As the underlying owner of the Jualin Mine in Berners Bay, Hyak was instrumental in the planning, design, construction, operation and maintenance of a 5.5-mile road from tidewater to the Jualin Mine. The Jualin Mine is now part of the Kensington Project. Hyak also owns patented mining claims in U.S. Mineral Survey 1527A at Maybeso Creek on Prince of Wales Island near Hollis, Alaska, which is now part of the Dawson Mine Project. Hyak can thus attest that the 1980s and 1990s USGS and the Bureau of Mines Studies were right in reporting that there are billions of dollars of discovered and undiscovered mineral wealth on the Tongass. The USGS and Bureau of Mines Reports should be updated so that Alaskans and the whole country knows what is being given up to reinstate the 2001 Roadless Rule.

The **Juneau Chamber of Commerce** is a member organization representing just under 400 businesses in Juneau. As is typical to all chambers, our overriding mission is to promote and protect the economic environment in which our business members operate; in fact every business in our market benefits from our efforts – members or not. We must be diligent to monitor, local, state and federal issues that directly or indirectly improve or impair the business climate. Our membership

represents virtually every type of business organization that operates in this market, from the smallest retailer to two world-class silver and gold mines, the cruise ship industry, fish processors and a variety of marine related businesses. Long missing from our membership is anyone involved directly in timber, but we clearly need to ensure that the existing and under-exploration mines in this region have guaranteed access to mineral deposits, and the utilization of existing road systems needs to be preserved. We do not pretend to be experts in all aspects of this issue, but we believe that the economic health and longevity of this region would be strengthened if the Tongass were to be removed from the roadless rules, and managed as originally envisioned. We believe that tourism, fishing, mining, and a renewed timber industry can coexist to the benefit of all in the region.

Red Diamond Mining Co., Inc. (RDMC) was formed in 2000. RDMC's board is comprised of long-time mineral industry veterans with Alaska and global experience. The RDMC team has assembled numerous property packages in Southeast Alaska. The Crackerjack Property, is its core holding because of its strong potential to host a multi-million-ounce gold and silver deposit.

Although access to, permitting, and developing high-quality deposits, is more challenging than ever, Sundance Mining LLC has proven that streamlined and small-scale operations can be successful. Sundance is actively mining and milling on the neighboring Dawson property with active production from adjacent Crackerjack claims leased from RDMC (2015). Gold and silver were recovered from milling of ore from the property in only 4 years after Sundance first acquired the lease. Sundance Mining Corp employs locals from Prince of Wales and Southeast Alaska.

The **Resource Development Council for Alaska, Inc. (RDC)** is an Alaskan business association comprised of individuals and companies from Alaska's oil and gas, mining, forest products, tourism and fisheries industries. RDC's membership includes Alaska Native Corporations, local communities, organized labor, and industry support firms. RDC's purpose is to encourage a strong, diversified private sector in Alaska and expand the state's economic base through the responsible development of our natural resources.

The **Southeast Alaska Power Agency (SEAPA)** is a Joint Action Agency of the State of Alaska, formed as a public corporation existing under Alaska Statutes §§42.45.300-.320. SEAPA owns two hydroelectric projects in Southeast Alaska (Swan Lake and the Tyee Lake Hydroelectric Facilities) and associated transmission facilities that provide economical, renewable, non-carbon-based electric power to SEAPA's three member public utilities located in Wrangell, Petersburg, and Ketchikan. SEAPA has a vital interest in the management of the Tongass because

application of the Roadless Rule to the Tongass adversely affects its ability to generate affordable renewable electric power in rural Southeast Alaska as an alternative to diesel and other fossil fuels. With rare exceptions, communities in Southeast Alaska are not connected by road or to the North American electrical grid and rely on either renewable hydroelectric power or non-renewable and polluting diesel generation for their electricity needs.

The Southeast Conference is comprised of more than 200 members who are concerned about the future of Southeast Alaska and who share a collective desire to build and support strong economies and a quality environment in Southeast Alaska. Its history dates back to 1958 when an association of communities joined to advocate for the establishment of the Alaska Marine Highway System. Over the ensuing decades, the Southeast Conference's mission and membership broadened to the point that it now works to advance the collective interests of the people, communities, Native organizations and businesses throughout Southeast Alaska. Among other roles, the Southeast Conference is the state-designated Alaska Regional Development Organization and the federally-designated Economic Development District for southeast Alaska. Among its members are communities located in and around the Tongass National Forest, Alaska chambers of commerce, Native organizations, nonprofit and community organizations, independent power authorities, public utilities, and private individuals and companies, including companies having ties to regionally important industries like the Southeast Alaska tourism, fisheries, mariculture, timber, hydroelectric, mining and transportation industries.

Survey Point Holdings, Inc. (SPH) is an Alaska-based company with its head offices in Ketchikan, Alaska. SPH is the corporate parent to long-time local companies including Southeast Stevedoring (SES), Cruise Line Agencies of Alaska (CLAA), Amak Towing and TEMSCO Helicopters. The company was founded in Ketchikan in 1952 when businessman Cliff Taro moved his family to town to provide stevedoring services to the burgeoning timber industry. Since then, the company has been providing marine, stevedoring, agency and terminal services and solutions for the industries and customers working throughout the State of Alaska.

Tyler Rental Inc. is a full line rental equipment company serving the Construction, Forestry, Maritime and Mining industries from six locations in Alaska and Washington State. Tyler Rental has provided a broad range of specialized rental equipment for contractors and do-it-yourselfers since 1989. In 2018, Tyler employed over 100 employees with total assets in excess of \$90 million.

cc: U.S. Senator Lisa Murkowski
U.S. Senator Dan Sullivan
Congressman Don Young's Office
Governor Michael J. Dunleavy
Chief of the Forest Service Randy Moore
Deputy Chief of the Forest Service Chris French
Regional Forester Dave Schmid