



April 30, 2019

The Honorable Sonny Perdue, Secretary of Agriculture  
 U.S. Department of Agriculture  
 Washington, D.C.

Dear Secretary Perdue:

The undersigned representing 32 communities in Southeast Alaska along with the timber, mining, and renewable energy and related businesses throughout the region request that you select Total Exemption from the federal 2001 Roadless Area Conservation Rule as your Preferred Alternative in the Draft Environmental Impact Statement on an Alaska-specific Roadless Rule. The U.S. Department of Agriculture identified total exemption of the Tongass as the best alternative during the 2003 Rulemaking because:

“The Department has concluded that the social and economic hardships to Southeast Alaska outweigh the potential long-term ecological benefits because the Tongass Forest plan adequately provides for the ecological sustainability of the Tongass. Every facet of Southeast Alaska’s economy is important and the potential adverse impacts from application of the roadless rule are not warranted, given the abundance of roadless areas and protections already afforded in the Tongass Forest Plan.”

This **policy** determination has not been changed by the Department of Agriculture or overturned by a Court. Total Exemption remains the best option today as it did in 2003. Thank you for your consideration.

Sincerely,

Kati Capozzi, President & CEO  
 Alaska Chamber

Constance Hulbert, President/General Mgr.  
 Alaska Electric Light & Power Company

Owen Graham, Executive Director  
 Alaska Forest Association

Deantha Crockett, Executive Director  
 Alaska Miners Association

Jason Custer, Vice President, Business Development  
 Alaska Power & Telephone Company

Neal MacKinnon, President  
 First Things First Alaska Foundation

Craig Dahl, Executive Director  
 Greater Juneau Chamber of Commerce

Carrie Starkey, Executive Director  
 Greater Ketchikan Chamber of Commerce

Marleanna Hall, Executive Director  
 Resource Development Council for Alaska, Inc.

Trey Acteson, Chief Executive Officer  
 Southeast Alaska Power Agency

Robert Venables, Executive Director  
 Southeast Conference

Randy Johnson, President  
 Tyler Rental

cc: U.S. Senator Lisa Murkowski  
U.S. Senator Dan Sullivan  
Congressman Don Young  
Governor Michael J. Dunleavy

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 Electric Light & Power Company** 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** is an industry trade association where its members hold in common general business interests in the timber industry of Alaska. 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** is a non-profit 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. Our members include individual prospectors, geologists, engineers, vendors, suction dredge miners, small family mines, junior mining companies, and major mining companies. AMA members look 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 & Telephone Company** provides energy and communication services to 40 communities stretching from the Arctic Circle to the southernmost tip of Southeast Alaska.

**First Things First Alaska Foundation** 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 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.

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.

The **Resource Development Council for Alaska, Inc.** 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** 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 Tye 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.

**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.

**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.