



February 20, 2026

Monique Nelson, Forest Supervisor
Tongass National Forest
8510 Mendenhall Loop Road
Juneau, AK 99801

Re: Objection to Draft Decision Notice – Herbert Glacier Cabin Project (67953)

Dear Supervisor Nelson,

Grande Portage Resources Ltd. (“Grande Portage”) appreciates the opportunity to submit this objection to the Draft Decision Notice (“DDN”), Finding of No Significant Impact (“FONSI”), and Environmental Assessment (“EA”) for the Herbert Glacier Cabin Project. As a mineral exploration company with deep roots in Southeast Alaska, we value our long-standing working relationship with the Juneau District Office and recognize the Forest Service’s mission to enhance public access and recreational opportunities along side your commitment to balancing recreation, conservation, and responsible resource development.

We also appreciate the agency’s decision not to authorize the cabin at this time due to site complexity and capacity constraints. The DDN states, “Other decisions may be authorized under this environmental analysis at a later date...” which indicates the EA and FONSI remain operative for future actions outside the scope of the Tongass National Forest Sustainable Cabin Strategy. While we trust the principles of the Strategy – careful site selection, meaningful engagement, and avoidance of conflicts among users – will continue to guide future proposals, we respectfully submit this objection to ensure that Grande Portage’s federally recognized mineral rights are fully protected in any future decisions.

Company Background and Interest in the Project Area

Grande Portage Resources Ltd. is a publicly traded mineral exploration company (TSX-V: GPG; OTCQB: GPTRF) focused on the discovery and development of high-grade gold resources in Alaska. Our principal asset is the New Amalga Gold Project (formerly the Herbert Gold Project), located approximately 13 miles north of Juneau International Airport.

Grande Portage holds a 100% interest in a series of active, unpatented Bureau of Land Management (“BLM”) federal mining claims in the Herbert Glacier area, which also encompass the site of the proposed Herbert Glacier Cabin. These claims have been maintained in good standing for over a decade and represent a significant investment in exploration, permitting, and environmental stewardship. Our ongoing activities in the area are governed by federal and state mining laws, BLM regulations, and approved Plans of Operations, all of which are designed to ensure responsible mineral development and environmental protection.

The New Amalga Project claims are not only of strategic importance to our company but also contribute to the broader economic and mineral resource objectives of the State of Alaska and the United States. The area has been the focus of substantial exploration, with recent drilling and technical studies confirming the presence of a high-grade gold deposit. Grande Portage has consistently supported responsible recreation, public access,

and the development of infrastructure that benefits local communities and visitors. Our company has a proven track record of working collaboratively with federal, state, and local agencies, as well as other relevant and interested parties, to achieve balanced outcomes that respect both public and private interests.

Our objections and comments are offered in a spirit of collaboration and clarity.

Objection: Predetermining Future Cabin Authorization

While the DDN does not authorize construction of the Herbert Glacier Cabin, it does state, “Other decisions may be authorized under this environmental analysis at a later date...” This creates a framework under which cabin authorization could occur without additional environmental review.

To ensure all interested parties retain procedural rights if the cabin is reconsidered, Grande Portage respectfully requests the final decision clarifies:

- The EA does not automatically constitute pre-approval of the Herbert Glacier Cabin construction;
- Any future cabin proposal will undergo supplemental environmental review to evaluate potential interactions with mineral exploration and development; and
- Any future cabin authorization will include direct consultation with affected mining claim holders.

This clarification would help ensure both recreation and mineral exploration can continue to coexist successfully, consistent with the multiple-use mandate for the Tongass National Forest.

Objection: Setting Precedent for Permanent Structures on Federal Mining Claims

Although the proposed cabin is not part of the Proposed Action, the EA acknowledges the project site lies within an area underlain by active federal mining claims (p. 20; Figure 5). However, the EA does not reference established BLM policies¹ governing cabins and other permanent structures on federal mining claims. The DDN potential to authorize cabin construction “...at a later date...” under the EA fails to adequately address the risk of setting a precedent that conflicts with those BLM policies.

To ensure consistent application of federal law and policy across agencies, Grande Portage respectfully requests the final decision clarifies:

- Proposed actions or any other decisions authorized under the EA must fully align with established BLM policies for structures and occupancy on mining claims.

The Herbert Glacier Cabin, as a public recreation facility, would not meet the criteria for a structure supporting mineral operations and would not be authorized under BLM policies if constructed by a private claimant such as Grande Portage. Allowing a permanent recreational cabin within an active mining claim while prohibiting similar structures by claim holders creates an inconsistency with the protection of valid existing federal rights.

For context, the Alaska Department of Natural Resources (“ADNR”)² has similar policies for generally allowed uses on state land.

¹ 43 CFR Parts 3715 (Use and Occupancy Under the Mining Laws) and 43 CFR Part 3809 (Surface Management) regulate structures and occupancy within mining claims to uses that are “reasonably incident” to prospecting, exploration, or mining. These regulations require prior authorization for any occupancy, construction, or surface disturbance that is not directly necessary for mineral operations and expressly prohibit any material interference with mining operations by non-mining uses.

² 11 AAC 96.010, 11 AAC 96.020, and 11 AAC 96.025 identify generally allowed uses on state lands, specify activities requiring authorization, and establish that permanent structures or occupancies are not permitted unless they are necessary for and directly related to mineral exploration or development and are authorized by ADNR.

Objection: Inadequate Analysis of Future Recreation Infrastructure Impacts on Lawful Mineral Exploration and Development Activities

The EA notes mining claims do not preclude recreation development, and the Forest Service must manage the surface estate in a way that accommodates both uses (pp. 17–18). To avoid future misunderstandings, Grande Portage respectfully requests the final decision clarifies:

- Mineral activities retain consideration for access, safety, and operational needs; and
- Recreation infrastructure will not be sited, expanded, or operated in a manner that restricts lawful mineral activities.

This language would reflect existing General Mining Law³ referenced in the EA (p. 17) while ensuring mutual understanding. These regulations and case law make clear that non-mining uses of the surface within active mining claims must not materially interfere with ongoing or reasonably foreseeable mining operations. BLM and the Forest Service are obligated to ensure recreational developments do not infringe upon valid existing mineral rights or create conflicts that could result in legal disputes or operational delays.

As the EA notes (p. 18), Grande Portage has not yet proposed specific exploration activities on the claims affected by the proposed action. However, these claims have been properly located, authorized, and continuously maintained for the purpose of conducting mineral activities, including future access and development based on ongoing and anticipated exploration results. The EA does not fully analyze how a permanent cabin, helipad, outhouse, and increased public presence could affect:

- Helicopter access for exploration
- Drill site placement
- Safety buffers
- Noise and timing restrictions
- Operational flexibility during seasonal wildlife windows

Additional Context and Considerations

The scoping documents and EA do not appear to have *fully* considered the presence of active federal mining claims in the project area or the potential impacts on existing mineral rights holders. ADNR, in its May 12, 2025 comment letter⁴, specifically noted the omission of this critical detail and urged the Forest Service to ensure the development of recreational cabins does not negatively impact pre-existing mining rights.

As the holder of those rights, Grande Portage is concerned the planning process did not adequately address the legal, operational, and economic implications of siting a public-use cabin within an active mining claim. Grande Portage does appreciate being included in the consultation process; to continue this positive working relationship, we request the final decision includes commitments to:

- A land assessment prior to project scoping and early notification of any future recreation proposals within or adjacent to active claims
- Direct coordination with mining claimants before any new infrastructure is considered
- Joint site visits if the cabin proposal is revisited

This approach supports transparency, reduces the risk of future conflicts, and aligns with the Forest Service’s collaborative planning practices.

³ General Mining Act of 1872, 30 U.S.C. §§ 22–54, grants qualified locators a federally protected interest in minerals and the surface use necessary for prospecting, exploration, and development and requires non-mining uses of the surface within active mining claims not materially interfere with lawful mineral operations.

⁴ ADNR, “Comments on Herbert Glacier Cabin Project,” May 12, 2025 (PDF).

It is worth noting the proposed actions to reroute the Herbert Glacier Trail and improvements at the overlook – construction of a scenic bench, fire ring, and trail to the water source - may increase the potential for impacts to recreational opportunities during exploration, construction and mining activities. Grande Portage has designed its project plans to mitigate visual and noise impacts to the existing trail alignment through the utilization of existing timber and topography for screening, however this type of mitigation is not possible for the higher-elevation vantage point of the overlook site.

If the overlook site is constructed, Grande Portage recommends the installation of interpretative signs explaining the New Amalga project and the shared use of the area. These signs would explain safety and environmentally-protective measures enforced by USFS for modern mineral exploration and development.

Conclusion

Grande Portage reiterates our support for public recreation, sustainable land management, and the multiple-use mandate of the Tongass National Forest. Our objection is submitted solely to ensure that our federally recognized mineral rights are clearly protected in the final decision and in any future actions that may rely on the EA.

We look forward to continued collaboration with the Tongass National Forest and remain committed to responsible resource development that respects the multiple-use values of the Herbert Glacier area.

Sincerely,

/s/ Ian Klassen

Ian Klassen

President & CEO

Grande Portage Resources Ltd.