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Comments: Please see my comments which are attached below. Thank you, Jim Clark.

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To Whom It May Concern.

Please accept my Comments on draft Land Management Plan for Tongass National Forest Management Plan revision #64039:

1. The draft Land Management Planning process should be suspended for sufficient time to incorporate the policy guidance regarding the Tongass National Forest from the President of the United States. The President's policy on exempting the Tongass from the Roadless Rule is set out in Paragraph (3)(c) of the President's January 20, 2025, Executive Order [idquo]UNLEASHING ALASKA's EXTRAORDINARY RESOURCE POTENTIAL:[rdquo]

(3) (c) In addition to the actions outlined in subsection (a) of this section, the Secretary of Agriculture shall place a temporary moratorium on all activities and privileges authorized by the final rule and record of decision entitled [idquo]Special Areas; Roadless Area Conservation; National Forest System Lands in Alaska,[rdquo] 88 Fed. Reg. 5252 (January 27, 2023), in order to review such rule and record of decision in light of alleged legal deficiencies and for consideration of relevant public interests and, as appropriate, conduct a new, comprehensive analysis of such deficiencies, interests, and environmental impacts. Further, the Secretary of Agriculture shall reinstate the final rule entitled [idquo]Special Areas; Roadless Area Conservation; National Forest System Lands in Alaska,[rdquo] 85 Fed. Reg. 68688 (October 29, 2020).

In accordance with the President's direction all Inventoried Roadless Areas (IRAa) and their management requirements should be removed from the draft Land Management Plan. This is required by the final rule entitled [idquo]Special Areas; Roadless Area Conservation; National Forest System Lands in Alaska,[rdquo] 85 Fed. Reg. 68688 (October 29, 2020). However, it was not done as the Forest Service admits in 88 Fed. Reg. 5252 at 5269 (January 27, 2023).

To comply with the President's direction in his January 20, 2017 EO must remove from the draft Land Management Plan all management requirements intended "to provide lasting protection for IRA's in the context of overall multiple use Land Management" 88 Fed. Reg. 5252 at 5253 (January 27, 2023) must be removed from the draft Land Management Plan.

1. The draft fails to provide road access and remove barriers to mineral development in the Tongass. Southeast Alaska occupies a premiere copper-zinc-silver-gold-barite mineral belt which includes Greens Creek Mine (Hecla Mining), Kensington Mine (Coeur Mining) and the Canadian Windy Craggy Project. All are volcanogenic massive sulfide (VMS) mineral resources. Greens Creek is a producing, high grade, silver-zinc-gold-lead mine. Kensington is a producing gold mine. Windy Craggy is a 298 million metric ton copper-cobalt-gold deposit. The Bokan Mountain Project in southern Southeast is an established lithium rare earth prospect.

The development of these minerals would unleash tremendous monies to the region and to the Treasury. For example, the Final Environmental Impact Statement (FEIS) for the 2008 Tongass Land and Resource Management Plan pointed out that the U.S. Bureau of Mines had identified 148 locatable mineral deposits in the Tongass. Of these 52 were ranked as having the highest mineral potential. Seven were ranked as having the next highest potential and at least one "critical" and "strategic" mineral. (2008 FEIS at 3-356).

In addition to the 148 Identified Mineral Deposits the 2008 FEIS described 930 "Undiscovered Mineral Resource" tracts estimated in the 1991 USGS Report. The potential for many more high-paying mining jobs on the Tongass is enormous. A 1991 United States Geologic Survey (USGS) study estimated a value for Discovered Minerals of \$37.1 billion (expressed as 1988 dollars) and a value for Undiscovered Minerals of \$28.3 billion (expressed as 1988 dollars). The escalation in metals prices that has taken place since 1991 and 2008 has dramatically increased these numbers.

USGS has provided updated information on the Tongass's mineral resources the Forest Service. Specifically, the Forest Service has access to all the maps, all the data in the following USGS maps, and to the digital report which includes the digital prospectivity analysis for each drainage basin. This includes:

Karl, S.M., Jones, J.V., III, and Hayes, T.S., eds., 2016, GIS-based identification of areas that have resource potential for critical minerals in six selected groups of deposit types in Alaska: U.S. Geological Survey Open-File Report OF-2016[ndash]1191, 99 p., 5 appendixes, 12 plates, scale 1:10,500,000.  
<http://dx.doi.org/10.3133/ofr20161191>.

<https://doi.org/10.3133/ofr20161191>

Granitto, M., Wang, B., Shew, N.B., Karl, S.M., Labay, K.A., Werdon, M.B., Seitz, S.S., and Hoppe, J.E., 2019, Alaska Geochemical Database Version 3.0 (AGDB3) Including "best value" data compilations for rock, sediment, soil, mineral, and concentrate sample media: U.S. Geological Survey Data Series 1117, 33 p., <https://doi.org/10.3133/ds1117>

Karl, S.M., Kreiner, D.C., Case, G.N.D., Labay, K.A., Shew, N.B., Granitto, M., Wang, B., and Anderson, E.D., 2021, GIS-based identification of areas that have resource potential for lode gold in Alaska: U.S. Geological Survey Open-File Report 2021-1041, 98 p., 9 plates, <https://doi.org/10.3133/ofr20211041>.

Karl, S.M., Kreiner, D.C., Case, G.N.D., Labay, K.A., Shew, N.B., Granitto, M., Wang, B., and Anderson, E.D., 2021, Data and results for GIS-based identification of areas that have resource potential for lode gold deposits in Alaska: U.S. Geological Survey data release, <https://doi.org/10.5066/P9YVCG6U>

This updated information needs to be analyzed for the economic and strategic value of the minerals on the Tongass to Alaska and to the United States. This has not been adequately done in the draft Land Management Plan.

1. Road access to hydropower and geothermal power must be provided in the draft Land Management Plan.

The Response to Comments in the Preamble to the 2001 Roadless Rule interprets Section 294.14(d) in a way that creates uncertainty about the construction of roads to access future hydropower and support facilities in Inventoried Roadless Areas (IRAs):

Comment on Exiting Authorized Activities. Some respondents were concerned about the impact of the rule on special uses and requested clarification regarding the ability to construct or maintain roads in inventoried roadless areas to access electric power lines or telephone lines, pipelines, hydropower facilities, and reservoirs.

Response. Section 294.14(a) of the proposed rule stated that the rule would not suspend or modify any existing permit, contract, or other legal instrument authorizing the use and occupancy of the National Forest System lands. Existing authorized uses would be allowed to maintain and operate within the parameters of their current authorization, including any provisions regarding access. (66 Fed. Reg 3244, January 12, 2001, at page 3259

Because there is no mention of future hydropower projects and related facilities, application of the inclusion unus, exclusion alterus canon of construction, would mean that the 2001 Roadless Rule does not allow new roads for such development without years of delay, process and added costs that often dooms a project.

Maintaining transmission lines and existing hydro facilities by helicopter is tremendously expensive, the cost of which is added to the electric rates of every Southeast consumer. Roads paid for by federal funds would significantly reduce this cost.

The 2020 FEIS identified 19 geothermal resources in Southeast Alaska. [ldquo]Because of the potentially significant environmental impacts that road construction could cause to inventoried roadless areas[rdquo] the Final 2001 Roadless Rule denies road access to new leases for geothermal resources (along with other minerals subject to the Mineral Leasing Act of 1920).

## CONCLUSION

Road access for mineral exploration and development and to renewable energy is essential to developing and maintaining vibrant communities, strong economies, a healthy environment in Southeast Alaska, and the national security of the United States.

Thank you for considering these comments.