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May 6, 2026

Ms. Monique Nelson  
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 #64039; preliminary draft content

Dear Ms. Nelson,

The Alaska Miners Association (AMA) appreciates the opportunity to comment on the Tongass National Forest Land Management Plan Revision #64039 and would like to provide several issues to consider for preliminary draft content.

AMA is a professional membership trade organization established in 1939 to represent the mining industry in Alaska. AMA's more than 1,400 members include individual prospectors, geologists, engineers, small family mines, junior and major mining companies, Alaska Native Corporations, and contractors supporting responsible mineral development across the state.

The Tongass National Forest comprises 16.9 million acres of Southeast Alaska and contains significant, yet underexplored, mineral potential. While historically managed primarily for timber, the Tongass also supports modern mining operations such as Dawson, Greens Creek, and Kensington, along with numerous exploration projects.

AMA believes the Tongass should be managed consistent with its multiple-use mandate, including recognition of its potential to function as a modern mining district contributing to domestic mineral supply chains.

#### REGULATORY STABILITY AND THE ROADLESS RULE

A primary barrier to responsible mineral investment in the Tongass is long-term regulatory instability associated with the Roadless Rule. Over time, repeated reversals have created uncertainty that discourages capital investment.

Additionally, prior forest plans have incorporated Roadless Rule provisions without fully reconciling subsequent policy changes, creating a "double lock" effect where restrictions may persist even if the Rule is modified.

AMA recommends that the revised TLMP clearly establish that:

- The Forest Plan and Roadless Rule are separate and independent
- The revised Plan does not embed Roadless restrictions beyond current law

Providing clarity is essential to ensuring regulatory certainty and enabling long-term development.

#### MINERAL RESOURCE POTENTIAL AND DATA GAPS

The Tongass remains underexplored, and existing federal mineral assessments are outdated. Foundational U.S. Geological Survey and Bureau of Mines studies identified significant known deposits and extensive undiscovered mineral potential.

Given current demand for critical minerals, AMA recommends that the Forest Service coordinate with USGS to update mineral resource assessments before finalizing land use decisions. Of note, page 46 of the document outlines mineral resources occurring within the boundaries of the Tongass, but does not recognize that copper, lead, and silver have recently been added to the latest USGS Critical Minerals list. Without updated data, decisions risk being made without full understanding of the Tongass's contribution to domestic supply chains.

#### LAND USE DESIGNATIONS AND ACCESS

The existing Minerals Overlay Land Use Designation comprises less than 1.5% of the Tongass, artificially constraining development. Modern mining in the Tongass has demonstrated compatibility with fisheries, recreation, and tourism and mineral development should not be constrained in the forest.

AMA recommends:

- Expanding the Minerals LUD to all lands not withdrawn from mineral entry, or
- Eliminating the overlay and recognizing mineral development as a potential use across applicable lands

Additionally:

- Review and rescind outdated mineral withdrawals
- Remove recommendations for future withdrawals

#### REASONABLE ACCESS

Access remains a critical constraint. While the 1872 Mining Law provides for reasonable access, unclear standards create uncertainty.

AMA recommends:

- Recognizing road access as a reasonable and necessary form of access where environmentally appropriate
- Establishing clear, objective criteria consistent with 36 C.F.R. Part 228



Predictable access standards are essential for exploration and development.

#### SOCIOECONOMIC CONSIDERATIONS

Many Southeast Alaska communities lack road connections and face limited economic opportunities. Mining provides high-paying, year-round employment and supports regional stability. Modern mining has a small physical footprint and operates under stringent environmental standards. The revised TLMP should fully consider the socioeconomic benefits of responsible mineral development.

#### CONCLUSION

The Tongass represents a nationally significant resource. Its management should reflect its full potential as a contributor to domestic mineral supply and economic development.

AMA respectfully recommends that the revised TLMP:

- Recognize mining as a key component of multiple-use management
- Ensure regulatory clarity and stability
- Update mineral resource data
- Expand access to lands open to mineral entry
- Provide clear and predictable access standards

Thank you for the opportunity to provide these comments.

A handwritten signature in blue ink, appearing to read "Deantha Skibinski".

Deantha Skibinski  
Executive Director  
Alaska Miners Association