

STATE OF ALASKA

CITIZENS' ADVISORY COMMISSION ON FEDERAL AREAS

SEAN PARNELL,
Governor

3700 AIRPORT WAY
FAIRBANKS, ALASKA 99709

PHONE: (907) 374-3737

FAX: (907) 451-2751

July 2, 2012

Forrest Cole, Forest Supervisor, Tongass National Forest
C/O Ketchikan-Misty Fiord National Monument
Attn: Bell Island Geothermal
3031 Tongass Avenue
Ketchikan, Alaska 99901

Dear Mr. Cole;

The Citizens' Advisory Commission on Federal Areas (CACFA) has reviewed the *Bell Island Geothermal Leases Draft Supplemental Environmental Impact Statement (DSEIS)*. We offer the following comments for your consideration in reaching a decision on whether or not to consent to the leases in question being issued by the Bureau of Land Management (BLM).

As we stated in our June 24, 2011 scoping comments, the Commission is sensitive to the needs of rural Alaska and the growing expense of providing electrical power to Alaskan communities. We also stated our support for the development of alternative energy sources in Alaska, including geothermal, but took no position on the Bell Island lease proposal.

We do note that our previous concerns regarding the loss of public use of the Bell Island Hot Springs were unfounded, as the springs are not currently open for public use and the lease applicant is also the owner of the springs.

Based upon our review of the DSEIS, information in the *Final Programmatic EIS for Geothermal Leasing in the Western United States (PEIS)* and provisions in the 2008 *Tongass National Forest Land and Resources Management Plan (Forest Plan)* the Commission supports Alternative B, the proposed action, under which the Forest Service would consent to the pending lease applications on Bell Island.

Approval of the leases would be consistent with the forest-wide standards and guidelines in the Forest Plan which encourage the exploration, development and extraction of locatable and leasable minerals and energy resources. In addition, approval of the leases is consistent with the goals of the Energy Policy Act of 2005 and the PEIS, both of which also promote the development of renewable energy resources.

The Commission understands that any Forest Service consent to issuance of the leases by BLM is not the final step in the lease approval process. Additional site-specific National Environmental Policy Act (NEPA) analyses would be necessary once a plan of operations is submitted for exploration and development of the lease areas.

Because the proposed lease areas are located in the North Cleveland Inventoried Roadless Area (IRA), the recent decision which makes National Forest lands in Alaska subject to the Roadless Rule means that any affirmative consent determination will require final authorization by the Secretary of Agriculture.

However, the proposed lease acreage encompasses only 7.3 percent of the IRA, with development of the geothermal plant likely occurring on the private land on Bell Island. The Swan Lake to Tyee Lake Electrical Intertie is also located in the IRA in close proximity to the pending lease areas. As described in the SEIS, any additional impacts to the IRA resulting from the exploration, drilling and utilization of geothermal resources would be minimal and should not preclude the Secretary from authorizing the consent determination.

The Commission appreciates the opportunity to comment on this proposed action and encourage the Forest Service and the Secretary of Agriculture to consent to approval of the lease applications. Please maintain our contact information for future notifications. Please contact our office if there are questions about our comments.

Sincerely,



Stan Leaphart
Executive Director

Cc: Governor Sean Parnell
Senator Lisa Murkowski
Senator Mark Begich
Congressman Don Young
Secretary of Agriculture Tom Vilsack
Regional Forester Beth Pendleton