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February 18, 2016

Ms. Terri Marceron
Forest Supervisor
Chugach National Forest
161 East 1st Street, Door 8
Anchorage, Alaska 99501

RE: Chugach National Forest Proposed Revised Management Plan Comments

Dear Ms. Marceron:

The Alaska Miners Association offers the following comments on the Chugach National Forest Proposed Revised Land Management Plan released in December 2015. The Chugach National Forest has a long history of mining that predates the 1907 establishment of the National Forest. The Chugach has many known mineral deposits and is geologically favorable for discovery of additional mineral resources. Lands within the Chugach National Forest should be available for mineral exploration and development. Development of these mineral resources will contribute to the local, state and national economies.

AMA is a non-profit membership organization established in 1939 to represent the mining industry in Alaska. We are composed of more than 1,800 members that come from seven statewide branches: Anchorage, Denali, Fairbanks, Juneau, Kenai, Ketchikan/Prince of Wales, and Nome. Our members include individual prospectors, geologists, engineers, vendors, suction dredge miners, small family mines, junior mining companies, and major mining companies. We look for and produce gold, silver, platinum, molybdenum, lead, zinc, copper, coal, limestone, sand and gravel, crushed stone, armor rock, and other materials.

General Comments. The following is a summary of the Alaska Miners Association's concerns regarding the Proposed Revised Land Management Plan. A detailed discussion of each issue follows:

1. **The Proposed Revised Land Management Plan must provide for multiple use, including mining, on Chugach National Forest lands.**
2. **The Proposed Plan must provide for multiple use, including forestry and alternative energy projects, on Chugach National Forest lands.**
3. **The Proposed Plan needs to better address minerals management; the proposed plan is vague, inconsistent, or in places altogether silent on minerals management.**
4. **The Proposed Plan is largely silent on wilderness recommendations.**
5. **The analysis of plan alternatives and Environmental Impact Statement should look at more than two alternatives.**

6. **The Proposed Revised Management Plan should not be developed prior to beginning the NEPA process.**

Let us elaborate on each of these issues:

1. **The Proposed Revised Land Management Plan must provide for multiple use, including mining, on Chugach National Forest lands.** There are many areas within the Chugach National Forest that contain valid, active mining claims, and many areas have moderate to high mineral potential (as shown on the Map titled “Chugach National Forest, Mineral Potential”, contained in the November 2014 Assessment of Ecological and Socio-Economic Conditions and Trends). Areas with known mineralization or moderate to high mineral potential should be given a minerals prescription and should remain open to mineral entry. Areas with valid mining claims should remain available for mining. It is important that access to these areas is not restricted. Moreover, no areas should be withdrawn from mineral entry unless they are in a specifically closed by ANILCA. Areas that are merely being considered for inclusion into a conservation system unit should not be closed to mineral entry. Much of the forest has yet to be adequately explored for its mineral values. Closing an area to mineral entry forecloses future exploration, potential discoveries, and future development opportunities.
2. **The Proposed Plan must provide for multiple use, including forestry and alternative energy projects, on Chugach National Forest lands.**
The Chugach has a long history of relatively small-scale timber operations that support local mills and have proven to be compatible with other uses of the Forest. The proposed plan appears to preclude any timber harvest as Table 6 shows it to be “generally unsuitable” throughout the Forest. This determination is inconsistent with “Desired Conditions for Goal 2 – Jobs and economic well-being - FW-G2-DC-03” (on page 20) that calls for making “forest products... opportunities available to communities” and Forest Products goal FW-G2-DC-16 (on page 23) that proposes “timber harvest meets multiple use goals of providing wood products for commercial and private use....”.

Similar to previous Chugach National Forest plans, the revised plan should allow for timber harvest and should set an Allowable Sale Quantity (ASQ) target for the Forest. Small scale timber harvest is essential to support small local mills and would impact a very small portion of the 5.4 million acre Chugach National Forest.

The proposed plan should also provide opportunities for renewable energy development and access to renewable energy projects, most notably hydropower. The existing hydroelectric projects within the Chugach National Forest have been operating for decades with minimal environmental impact, providing a clean and renewable energy source for communities in and adjacent to the Forest.

3. **The Proposed Plan needs to better address minerals management; the proposed plan is vague, inconsistent, or in places altogether silent on minerals management.** Mineral entry and mining are insufficiently and inconsistently treated in the document. There is a goal (page 23, Minerals FW-G2-DC-16) that recognizes that mining is an important use of the Forest, yet mining is omitted from Table 6 that describes general suitability determinations for land uses within management areas. In the description of management areas on pages 44-57, minerals management is included in guidelines for Management Areas 3, 4, 5 and 7, but not in Management Areas 1, 2 or 8. Where mentioned in management area descriptions, the guidelines are restrictions that are generally not consistent with the goal for minerals on page 23. Overall, the proposed revised management plan provides incomplete and inconsistent direction on mining and minerals management in the Forest. The plan needs to provide clear and consistent explanations as to the plan's intent regarding minerals management.

As noted above, AMA requests that all Chugach National Forest Lands not closed by ANILCA should remain open to mineral entry under the Federal mining laws, the plan should allow for mining and allow for access to potential mining areas.

4. **The Proposed Revised Plan is largely silent on wilderness recommendations.** The Wilderness Area Inventory and Analysis that was released in 2015 has not been used in developing this Revised Management Plan. The “Proposed Plan Question and Answers” document on the web site says that Wilderness recommendations will be considered as part of the alternatives process. We question why the Forest Service has released a Proposed Plan that fails to address this issue.

AMA is opposed to any recommendations for new wilderness proposals, as expressed in our letter dated June 12, 2015. In that letter, AMA expressed opposition to the determination that virtually the entire Forest was considered suitable for wilderness designation, and also questioned the legal authority to conduct wilderness reviews outside the Nellie Juan – College Fiord Wilderness Study area established by ANILCA Section 704. We are concerned, however, that in one planning document virtually the entire National Forest was found to be suitable for wilderness, but the issue is not addressed at all in this proposed management plan.

5. **The analysis of plan alternatives and Environmental Impact Statement should look at more than two alternatives.** The detailed planning process flow chart on the web site states “Based on what is learned from Scoping, the Forest Service will draft alternative versions of the Forest Plan to respond to public comment. There might be only two alternatives: the Draft Chugach Forest Plan and a “no action” alternative that keeps the 2002 Plan.” This is not an acceptable range of alternatives because the Forest Service has already pre-determined that the 2002 plan needs to be revised; otherwise it would not be undertaking this revision process.
6. **The Proposed Revised Management Plan should not be developed prior to beginning the NEPA process.** The planning process is flawed as the proposed plan has been developed prior to scoping, consideration of the alternatives, and the assessment of alternatives that occurs through the EIS process. The process chart shows that the current step is “Draft Forest Plan – Forest Service develops plan components to reflect the items that need to change in the current forest plan.” According to the process diagram on the Chugach Forest planning web site, this will be followed by development of draft alternatives, draft and final EIS, and the Final Forest Plan.

By releasing a Proposed Land Management Plan prior to scoping, alternatives development or an environmental assessment of the draft Forest Plan, the remainder of the process appears to be biased as the Forest Service has already indicated its preferred alternative – that being the document released in December.

Specific Comments

Page 23 – under Goal 2: Contribute to Social and Economic Sustainability:

Minerals Policy – FW-G2-DC-16 (for the entire Forest). We support the goal for minerals, repeated below. We hope that the planning team considers this goal when developing alternatives and provides for the continued exploration and development of the known and prospective mineral resources that occur within the Chugach National Forest.

Minerals – FW-G2-DC-16: Development of mineral resources contributes to local, regional, or national markets for valuable commodities and adds social and economic benefits to local communities. Mineral development is managed in a manner that minimizes adverse impacts to groundwater, natural, cultural, and scenic resources and meets legal mandates. Past and present mine facilities are sufficiently reclaimed to prevent or control on-site and off-site impacts to the environment and national forest surface resources.

Comments on Table 6 (page 42) and Management Areas Descriptions:

Page 42 – Table 6 - Mining and Mineral entry. We are concerned about the exclusion of mineral exploration, mineral entry and mining in Table 6. Mineral exploration should be allowed on all National Forest lands, and mineral entry and mining should be allowed in all areas not specifically closed by federal law, including MA 1 – Wilderness Study Area, MA 4 - Backcountry Area, MA 5 - ANILCA 501(b) Areas (excluding the Copper River addition which is closed under ANILCA Section 502) and MA 8 –Front Country.

Page 42 – Table 6 - Timber Production - We are concerned (and opposed to) the blanket determination that “Timber Production”, according to Table 6, has been designated as “generally unsuitable” throughout the entire Chugach National Forest.

Page 42, Table 6 - Saleable Minerals – we support allowing saleable minerals in the 3 areas where it is designated as “generally suitable” in Table 6.

Page 44, Wilderness Study Area (MA1) – This area should remain open to mineral entry and allow for access to mining claims until such time as Congress acts on any Wilderness recommendation. The “Proposed Plan Question and Answers” document on the Chugach planning web site includes the statement “lands in the WSA are open to mineral entry”. This needs to be stated in the MA1 discussion on pages 44-45.

Page 44, Wilderness Study Area – Management Intent - The last sentence under management intent, after “will follow the direction provided by ANILCA” delete “to the extent consistent with law”. As currently written, this implies that ANILCA is not a law.

Page 46, Wild, Scenic and Recreational Rivers (MA2) – AMA opposes recommendations for additional Conservations System Units, including Wild and Scenic Rivers. ANILCA designated numerous rivers for inclusion within or study for possible addition to the National Wild and Scenic River system. Additional recommendations contained in the proposed plan violate the intent of ANILCA Section 101(d).

If the plan includes Wild and Scenic River recommendations, these should exclude all valid mining claims and should specifically allow for access through Wild and Scenic River corridors to access mining claims and mining areas. Of particular concern are proposals for Sixmile Creek and East Fork Sixmile Creek on the Kenai Peninsula. There is a long history of mining and currently there area valid and recently operating mining claims on Canyon Creek and at other nearby locations.

Page 48-49, Research Natural Areas (MA 3) – AMA requests that the USFS justify why specific RNAs may need to be withdrawn from mineral entry. We oppose the following general guideline on page 48 – “*Minerals - Guideline MA 3-GL-03: RNAs may be withdrawn from mineral entry for locatable minerals.*” Proposed withdrawals from mineral entry in the Kenai Lake-Black Mountain (5,850 acres), Wolverine Glacier (6,861 acres), and Olsen Creek (6,821) would require Congressional approval as they exceed the 5,000 acre limit established in ANILCA Section 1326(a).

Page 50, Backcountry Management Area (MA 4) – AMA is opposed to Guideline MA 4-GL-01 that reads “*Small mineral materials sites should be developed only to support trail or facility development. All sites should be completely rehabilitated upon completion of projects.*” This appears to be the only allowance for any mining activity in the Backcountry Management Area. This is the largest management area in the Forest should remain open to mineral entry, mineral exploration and mining, consistent with the stated goal for mining on page 23.

Page 51, ANILCA 501(b) Areas (MA5) – In ANILCA Section 502, Congress specifically withdrew the Copper River portion of the addition “from location, entry, and patent under the United States mining laws”, but directed through Section 501(b) for the remainder of the area that “Multiple use activities shall be permitted in a manner consistent with the conservation of fish and wildlife and their habitat ...”. The area must remain open to mineral exploration, mineral entry, mining, and access to mineralized areas.

Minerals Guideline MA 5-GL-04 is not consistent with this intent. The guideline reads: “*Minerals activities, including oil and gas development and exploration and development of locatable minerals resources, should be limited, modified, or restricted to maintain, to the extent possible, fish and wildlife habitat values and the natural character of the area.*” To be consistent with the language in ANILCA, the guideline should read: “Minerals activities, including oil and gas development and exploration and development of locatable minerals resources, shall be allowed if these activities are consistent with protection of fish and wildlife habitat values and the natural character of the area.”

Page 57, Front Country Management Area (MU 8) Management Intent. This management area, which is the road accessible areas primarily on the Kenai Peninsula, has a long history of mining and remains important to Alaska’s mining industry. The area should remain open to mineral entry, mining, and provide access to mineralized areas.

We note on page 57 that this area “includes most of the acreage identified as tentatively suitable for timber production”, but table 6 states that timber production is generally unsuitable in MU8. In paragraph 3 on page 57, the proposed plan states “Forest Products may be harvested to meet forest products and resource objectives”. AMA agrees with this statement but finds it to be inconsistent with table 6’s determination that the area is generally unsuitable. AMA recommends that in keeping with the Forest Service’s multiple use mandate, that timber production should be considered a suitable use in the more accessible and better forested lands within MA8.

There is no mention of mining or mineral entry in MA8. AMA supports allowing mineral entry, mining, and access for mining in the Front Country.

We thank you for the opportunity to comment on the Proposed Revised Land Management Plan.

Sincerely,



Deantha Crockett
Executive Director