



THE STATE
of **ALASKA**
GOVERNOR MIKE DUNLEAVY

Department of Natural Resources
OFFICE OF PROJECT MANAGEMENT & PERMITTING

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Pat Dryer
Minerals Program Hydrogeologist
Tongass National Forest
8510 Mendenhall Loop Road
Juneau, AK 99801
Submitted electronically via <https://cara.ecosystem-management.org/Public/CommentInput?Project=60100>

Re: 2021 Niblack Surface Exploration Project

Dear Mr. Dryer,

The State of Alaska (State) has reviewed the 2021 Plan of Operations for the Niblack Surface Exploration Project submitted by Blackwolf Copper and Gold Ltd./Niblack Project LLC (Project Proponent) to conduct surface exploration activities within the Tongass National Forest. Please consider the following consolidated comments in your decision.

Background and Project Description

The Niblack Project is an advanced exploration project located along the shores of Niblack Anchorage on southern Prince of Wales Island. In the recent past, exploration focused on patented mining claims where drilling identified a resource of 9 million tonnes of copper, gold, zinc, and silver mineralization. The mineral resource is thought to extend east, onto USDA Forest Service lands, as a narrow belt along the southern shores of the Niblack Anchorage. It is this area that is the focus of the exploration activities described in the 2021 Plan of Operations. Niblack Project LLC controls the mineral rights to these Forest Service lands through 298 federal mining claims.

Proposed exploration activities include soil sampling and geophysical investigations. Minimal tree or brush clearing may occur to improve site access and facilitate helicopter landing zones. Field crews and support personnel will operate from a nearby camp located on patented mining claims, west of the exploration area. All materials and equipment will be removed when operations are complete. Sites will be rehabilitated, as necessary, to reduce visual impacts and stabilize any potential erosion.

Comments

General

The State supports the Forest Service's decision to exclude the proposed activities from documentation in an Environmental Impact Statement (EIS) or Environmental Assessment (EA); pursuant to 36 CFR 220.6(e)(8). Due to the *de minimis* nature of the proposed activities on the human environment, reviewing this project as a Categorical Exclusion under the National Environmental Policy Act (NEPA) is appropriate.

Fish Habitat

The Alaska Department of Fish and Game's Anadromous Waters Catalog shows that Stream 102-30-10720 is located within the proposed project area. Any brushing, clearing, geotechnical drilling (including drill run-off), or disturbance of any kind should avoid the stream channel. If the stream channel cannot be avoided, a Fish Habitat Permit may be required for such work. Currently, there are no other known anadromous streams along the shoreline of the Niblack Anchorage. However, a ground assessment should be conducted to identify any other streams within the project area that have the potential to contain fish and/or fish habitat.

In Closing

The State of Alaska appreciates the opportunity to review and comment on the 2021 Plan of Operations for the Niblack Surface Exploration Project. Please contact me if you have any questions or would like to discuss our comments in more detail.

Sincerely,



Kate Harper
Large Project Coordinator

cc: State Large Mine Permit Team
J. DiMarchi, BWC&G Consultant