

Date submitted (UTC-11): 10/14/2018 1:00:00 PM

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Comments:

To whom it may concern:

We are writing to submit a public comment in response to the US Forest Services consideration for regulatory revision(s) to 36 CFR 228 A, which involves the review and approval process of proposed mineral operations and mineral exploration programs on lands managed by the USFS. Bronco Creek Exploration is a mineral exploration company with 9 employees located in Tucson, AZ. We have been consistently exploring for mineral deposits on USFS managed lands in the western United States since 2002, and plan to continue doing so for decades to come. Bronco Creek Exploration prides itself in conducting responsible, early stage exploration programs with little to no surface disturbance. Our proposed Plans of Operation attempt to utilize existing infrastructure and natural clearings to reduce disturbance. Employing this methodology to our exploration programs results in frequent compliments, from regulatory agencies, regarding the low initial impacts and high quality of reclamation work that is built into our Plans of Operation.

Bronco Creek spends approximately \$1,070,000 per year to maintain tenure to its mineral lands in the western US, the majority of these costs are the maintenance of unpatented federal mining claims on federal lands (\$917,000). These costs coupled with 2 to 5 year permitting time-frames to complete an initial basic drill test, which generally only last a couple of months, makes mineral exploration on these lands untenable. We strongly support a revision or amendment to the 36 CFR 228 A that would allow minimal impact activities, with less than 5 acres of disturbance to take place in an expedited fashion. This would greatly enhance the availability of USFS personnel for other activities, lessening the burden to tax payers and proponents, and enhance the attractiveness of exploring USFS lands.

The current system for permitting mining exploration activities is fundamentally broken. We are encouraged that the USFS is considering rule changes that will more appropriately allocate the time and capital of USFS and proponents looking to conduct responsible mineral exploration on lands managed by the USFS. In our experience, plans of operation with limited scope that would take 2-6 months to permit on land managed by BLM, can take 2-5 years to permit on land managed by USFS, though this may vary depending upon the local forest. This increased permitting time strains the budgets of USFS and proponents alike, and damages local economies that stand to benefit from responsible exploration and mining activities conducted in their communities. More importantly, the increased permitting time does not lead to superior mitigation measures, resulting in reduced environmental impact after Plans of Operation are concluded.

On a global level, the identification, development, and extraction of natural resources has been recognized as a crucial matter for economic independence and national security. Due to the ubiquitous importance placed on this process, many Federal governments have begun publishing their individualized lists of Critical Minerals. The United States is no different in this matter, and has recently announced that as a country we should be working towards less foreign dependence on natural resources, especially when they can be feasibly located domestically. The current permitting process and accompanying extended timelines are, by design, discouraging mineral exploration and development. Increasing the efficiency of the permitting process for mineral deposits on lands administered by the USFS is a logical step to more effectively securing these domestic resources for current and future generations.

While we feel many of the proposed changes put forward should be implemented, it is critical that the USFS immediately implement a 5 acre rule to mimic the BLMs rule for Notice Level Operations. We strongly recommend that the USFS separate this provision from the rest of the proposed rulemaking and immediately send it to the Office of Management and Budget (OMB) for a determination of non-significance and proceed to publish it in the Federal Register as soon as that determination is made. Since the USFS is adopting a

regulation similar to what the BLM has been using for almost 20 years, it should be able to obtain a non-significant determination.
Sincerely, Bronco Creek Exploration

See attached file(s) for the entirety of the comment