

Data Submitted (UTC 11): 6/5/2019 4:10:54 PM

First name: EA Andy

Last name: Johnson

Organization:

Title:

Comments:

Comment 1.

2.4.8 Energy, Minerals, and Geologic Areas of Interest (EMIN)

Locatable minerals: Under the Mining Law of 1872 (as codified by 36 Code of Federal Regulations 228), U.S. citizens are guaranteed the right to prospect and explore lands reserved from the public domain and open to mineral entry. The disposal of these commodities is non-discretionary.

This last sentence has been perverted from a statement first seen in the HLCNF Assessment Document: "The right of access to explore for and develop these minerals on federal lands open to the location of mining claims is guaranteed and not a discretionary action." CGNF is being disingenuous with its attempt to change the full intent of the 1872 Mining Law which confers a statutory right of access.

Change the sentence to read "The right of access to explore for and develop these minerals on federal lands open to the location of mining claims is guaranteed and not a discretionary action."

Comment 2,

In general, like so much of the US Forest Service (FS) today, the Custer Gallatin National Forest (CGNF) cannot bring itself to acknowledge that mineral development on public lands they administer for citizens of these United States is an integral part of their mandate. Thus, they seldom mention it, either by accident or purpose, in the Plan Revision.

For example, on Suitability of Lands, Page 6 of the Draft Plan, outdoor recreation, grazing, and timber harvest are mentioned. Mineral and oil development are not.

For example, in 2.4, Benefits to People, Ecosystem Services --- provide a full suite of goods and services that are vital --- such as recreation, forage, and timber. Mineral and oil development are left out.

For example, in 2.4.2, Desired Conditions, #02, Sustainable levels of goods and services include wilderness (?) and energy resources. Mineral resources are not mentioned. This is ludicrous. Is "wilderness" really a good or service? Is it equivalent to a tank of gasoline, or car? Including "wilderness" in "goods and services" indicates how far USFS has drifted from reality.

CGNF should make a concerted effort to include impacts to mineral and energy developments in all sections of this Plan were appropriate.

Comment 3.

Desired Conditions (FW-DC-EMIN)

In my view, this is a hodge-podge of considerations for a whole slew of geologic related items with, in FS eyes, of minimal interest. It includes energy and mineral development, windmills and solar farms, abandoned mine remediation, caves, rock hounding, and hazards including two rare minerals I've never heard of before.(WHO WROTE THIS SECTION?).

Here are three more Desired Conditions to consider:

1. Mineral development contributes to high paying jobs and income in the local economy, community stability and growth and the quality of lifestyles in rural areas.

2. Mineral developments, because of their small footprints, have minimal impacts on resources, including ecological integrity and diversity, at-risk species, heritage and cultural sites, water quality, and aquatic species.
3. Reasonable mitigation will be used to offset any surface resources impacted by mineral development.

Comment 4.

Goals (FW-GO-EMIN)

Two goals are given: One regards exchanging information on caves and potential uses thereof, and the other coordinates CERCLA sites with EPA, Tribes, and State partners. It is as if someone was searching for something, anything, to write. These goals are inane and immediately draw attention to the competence of the person writing them.

Following are two suggestion goals:

1. Continue to encourage, facilitate, and administer the orderly exploration, development, and production of our mineral resources to help meet the needs of our Nation.
2. Strive to manage surface disturbance of mineral activities fairly and honestly, according to existing laws and regulations, using common sense and good judgement.

Comment 5.

Infrastructure - roads

Objectives - 03 Remove from 5 to 85 miles of roads.

No! Keep existing roads in place. They can be gated or bermed but they will be needed for future fire suppression, mineral exploration and development and timber development.