

SAR - PWS - Interests - Minerals

Comment # Comment

0026640-001

-- Under the preferred alternative none of the Forest's 5.5 million acres is designated for Resource Development. Only 6,860 acres are set aside for pre-existing, site specific mining claims.

0026811-003

3. I support mining activities. The minerals evaluation is clearly insufficient. Most of the data date from the 1930s. The Forest Service is not using the best and most recent scientific information, in violation of its own regulations. The Plan does not provide meaningful opportunities for access. Moreover, any person fortunate to get established would face an insurmountable uphill battle in developing his or her operations. This is due, in large part, to the fact that the Forest Service has, and still is, transforming the Chugach into a defacto National Park. I strongly object to this direction. It is clearly contrary to the letter and spirit of the various statutory mandates directed to the Forest Service's activities in Alaska.

0026812-009

The Forest Service is using outdated data to determine the alternative management prescriptions. Most of the minerals data date back to the 1930s and are based upon locations of historic developments and not locations new developable deposits. On April 27, 1999 the Interagency Minerals Coordinating Group (made up of representatives from the USFS, USGS, BLM and Alaska Division of Geologic & Geophysical Surveys) recommended that a modern airborne geophysical survey be completed for the Chugach National Forest before completion of the Forest Plan revision. No such survey was requested, or completed by the Forest Service. Though the insufficiency of the data used in the planning process has been noted on several occasions (December 19, 1997; October 30, 1997; November 1, 1999), the Forest Service declared the data sufficient in January of 2000, and released the DEIS with its proposed alternatives on October 14, 2000.

Comment # Comment

- 0027589-004 All current recorded mineral surveys should be shown. Plan does not address the material extraction locations at mile 37,42, 49, 62 of the Seward Highway.
- Chapter 2, page 25, line 139; suggest you expand the objectives of the plan to include approved and recorded Mineral Surveys, and areas where current US Patent applications are on file.
- 521, page 3-93. Plan does not seem to allow for new mineral claim locations on lands designated as having mineral potential in the Chugach Forest.
- 2-14. Mining Plans of Operations. Appendices do not reflect current areas which have valid plans of operations in effect.
- Minerals 3.403, line 1147. Rewrite to allow mineral entry on all lands within the Revised Forest Plan. Using 'Wilderness' designations to exclude mineral entry to 27% of the Forest discriminates against other users of the Forest and in some instances exclude lands readily accessible to the public for potential mineral identification, exploration and future development.
- A miner should have the same rights of use and entry as a back-packer, mountain-biker, horseback rider, skier, helicopter tourist, fisherman or other recreational user.
- General Effects. Minerals Materials. 1371, pg. 3-412. Commercial resource extraction should be identified as an allowable use. Extraction of gravel and rock would allow materials to be provided for federal, state and private improvements at a reasonable cost as many sites already have road access or are located adjacent to the existing State highway system. Everyone would benefit as the cost to improve facilities within the park would be cheaper to improve or construct.
- Appendix D, Six-Mile Creek. Recreational use of mineral activity should be encouraged, not discouraged. Historically it is an important mining location, which can be mined on a recreational basis with little or no significant impact on the surrounding geology.
- 0027614-001 Our understanding is that this prescription allows mineral activities with regard to locatable minerals.
- 0027627-002 I oppose the revised Chugach Land and Resource Management Plan (CLMP) and Draft EIS and ask that you withhold publication of a record of decision on this plan until deficiencies have been addressed. I am concerned about the plans stated bias against mineral exploration. This bias goes against the mandate for multiple use and appears to be based on emotional rather than scientific reasoning.
- A mine in this area would supply jobs and other economic benefits, and would constitute a tourist destination. if by chance an ore deposit is developed in the Forest it would be of major scientific interest and would be toured by people from all over the world.
- In summary, mineral exploration and development have little negative impact on the Chugach National Forest and would have a positive economic effect on the area. The National Forests need to be managed for the benefit of all citizens and not managed exclusively for the most vocal.

Comment # Comment

0029059-006 Comment #5: The plan should clearly state that in keeping with the multiple use mandate of the U, S. Forest Service, the CLMP intends to comply with the goals stated in the National Mining and Minerals Policy Act, 30 USC Section 21a; i.e., to foster and encourage private enterprise in the development of an economically sound and stable domestic mining industry within the Chugach National Forest.

Comment #6: The evaluation of mineral resources in the forest was based on inadequate, outdated, and insufficient data. At a minimum the FS should have contracted for a modern state-of-the-art geophysical data collection and analysis program like the State of Alaska has performed recently in various parts of the state to evaluate mineral potential in the Forest, This is especially important in areas to be recommended for 'Wilderness' status. The mineral potential of these areas should be evaluated before they are 'locked up' to properly analyze the economic impacts of the designation.

0029147-003 I also want to support, at least, recreational mining in our Forest, 5.5 million acres is a large area to not to allow mining.

Comment # Comment

0028328-033

Mining

The lowest average satisfaction ratings for public land uses on the Chugach include both logging and mining. Yet, 72.5% of the forest remains open to mining under the preferred alternative. On these available lands is 90% of the Most Favorable, identified resources (table 3-96). From 3-392

"The Forest Service considers mineral exploration and development to be important parts of its management program(the Forest Service) recognizes that mineral exploration and development are ordinarily in the public interest". (emphasis added)

Under the antiquated Mining Law of 1872, industry pays nothing to the government for gold or other minerals removed from public lands. Not only are the minerals taken free of charge, the miner also has the right to purchase the mineral-rich public lands from the government for a price that cannot exceed \$5.00 per acre in a patenting process. Recent investigations by the General Accounting Office have revealed many instances where public lands were patented but never actually mined. Instead, they were used for real estate speculation and development. (Mineral Policy Center) This was exactly the concern of Hope residents with Hope Mining Company's operation. Little to no oversight had been conducted by the FS; cursory investigation revealed Hope Mining Company had been in the practice of renting space to RVs during summer months, then selling the visitor a recreational gold panning experience. Further, hardrock mining generates twice as much solid waste each year as all other industries and cities combined. Although much of this waste is toxic and threatens water resources, hardrock-mining wastes are exempt from federal toxic waste regulation under the Resource Conservation and Recovery Act (RCRA). Hardrock mining also creates the potential for acid mine drainage. Hardrock mining unearths and exposes iron sulfides, which form sulfuric acid when exposed to air and water. The acid mine drainage can then leach out of mine openings into streams and aquifers, posing grave danger to aquatic life. The lack of adequate environmental controls over hardrock mining has resulted in over 57,000 abandoned hardrock mine sites left unreclaimed. Sixty-six of these sites are so polluted that they are included on the Superfund National Priorities List. A 1992 EPA report to Congress (EPA/530-SW-85-033) found that mining practices that resulted in many of the Superfund listings represent methods still used by the mining industry today. (Mineral Policy Center) How is this in the public interest? It's unfortunate the Forest Service seems so willing to accommodate an industry that, undeniably, receives the greatest governmental giveaway program.

Of all land uses and opportunities listed in the two community surveys, the lowest average satisfaction rating is for jobs from logging and mining. The most important values to respondents are undeveloped land/wilderness, fishing and hunting. The preferred alternative should reflect the values of those whose opinion they sought. Antiquated laws and a "manifest destiny" philosophy should not jeopardize the public trust, which is also outdated.

The preferred alternative should give priority to stated public desires (not industry special interest) by withdrawing significant biologically rich portions of the Chugach to mineral entry. Further, the FEIS should provide adequate cumulative impacts through a baseline environmental assessment of forestwide mine sites, including contaminated sites.

0029399-002

3. The minerals evaluation is only reconnaissance in nature. Very little on-the-ground geologic study was done. The mineral evaluation was done by the government who could not find their asses with either hand. I know, I work for the government.

0029465-004

Existing mineral evaluations are of the [Illegible] vintage and therefore totally inadequate and out of date.

Comment # Comment

0029468-002 * Mining

The lowest average satisfaction ratings for public land uses on the Chugach include both logging and mining. Yet, 72.5% of the forest remains open to mining under the preferred alternative. Of all land uses and opportunities listed in the two community surveys, the lowest average satisfaction rating is for jobs from logging and mining. The most important values to respondents are undeveloped land/wilderness, fishing and hunting.

Mineral potential on the Chugach is generally not high; in fact, only 5% is considered most favorable. The majority of mining claims are small operators in road-accessible areas, such as the Kenai Peninsula. Although the Wilderness Study Area had written into its language specifically stating its availability to mineral exploration, little to none has been explored. If there were significant mineral potential in the Sound, it would have been developed years ago. Table 3-93 shows significant decline in mineral production. And according to a report by Steve Nelson, USGS, 'Current feasibility evaluations suggest that production is unlikely for any of the lode deposits at current prices' (3-397). In other words, the DEIS states there is little favorable potential, reports that production is unlikely, yet the preferred alternative leaves over 75% of the forest open to mineral exploration, at the potential expense of other resources enjoyed by a greater majority.

The same logic applies to oil and gas development. The DEIS acknowledges most of the forest has no potential for oil or gas, yet much of the Chugach remains open to exploration. Even the Katalla area has low potential and, in fact, has never produced much even at the height of operations. Over a thirty-year period, 18 wells produced a mere 1.54 thousand barrels.

The preferred alternative should give priority to stated public desires (not industry special interest) by withdrawing significant biologically rich portions of the Chugach to mineral entry. Further, the FEIS should provide adequate cumulative impacts through a baseline environmental assessment of forest-wide mine status, including contaminated sites.

0034413-004 4. The minerals evaluation is insufficient with most of the data dating from the 1930s.

0034418-001 While I have not had the opportunity to review the document in detail, information circulated by the Alaska Miners Association (AMA) indicates that the vast majority of the Forest will be designated as wilderness, I support the position of the AMA whole heartedly and urge you to preserve multiple use designation, including resource development for the Chugach National Forest.

0034420-005 Mining:

Protecting waterways from the tailings is critical. Any mining activity must have a plan in writing on sound water quality protection with the public notified. Large scale mining should not be allowed.

Comment # Comment

- 0034442-005 Most of the minerals data date back to the 1930s and are based upon locations of historic developments and not locations new developable deposits. On April 27, 1999 the interagency Minerals Coordinating Group (made up of representatives from the USFS, USGS, BLM and Alaska Division of Geologic & Geophysical Surveys) recommended that a modern airborne geophysical survey be completed for the Chugach National Forest before completion of the Forest Plan revision.
- 0034768-005 In general, we support increased protection from clear-cutting, mineral extraction, and the potential sprawl of industrial tourism over that which currently exists in the revised plan.
- 0034888-001 Subject: Stop the New Lock out.
- Dave Gibbons, Section 17(d)(2) of ANCSA prohibits the creation of any more CSUs, NO MORE. Period. Your attorney's have misconstrued the Law to fit your Agenda of keeping the owners of the Chugach National Forest from enjoying the bounties of their land, specifically the citizens of Alaska.
- Your study does not recognize MLA 5-84 Mineral Occurrences in The Chugach National Forest, by Jansons, Hoekzema, Kurtak, and Steve Fechner. This is an open file report that specifically located any old or possible new minerals that were of economic value. The new Chugach Forest as you envision it does not recognize US Mining laws allowing me location, entry, and patenting of Mining Claims by the rightful owners of the land.
- As stated in ANILCA 1326(b), 16 USC 3213(b), 'No further studies of Federal lands in the State of Alaska for the single purpose of considering the establishment of a conservation system unit, national recreation area, national conservation area, or for related or similar purposes shall be conducted unless authorized by this Act or farther Act of Congress'
- As we all know during the Clinton Regime, you folks have avoided the intent of ANILCA by piggy backing your pet projects onto other studies so they are disguised, and not seen as a 'single purpose'. In the end your study is illegal.
- I call on you to read MLA 5-84, and keep the Chugach open to mineral entry under the 1872 locating criteria. I do not recognize R10-MB-416A-08/00, due to its blatant disregard of the LAW.
- 0034898-003 3. The minerals evaluation is a bogus joke, with most of the data dating from the 1930's.
- 0036174-002 I also want to support, at least, recreational mining in our Forest, 5.5 million acres is a large area to not to allow mining.