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February 12, 2020

Haines Borough Planning Commission
ATTN: Tim O'Melia

Dear Mr. O'Melia:

The Alaska Miners Association writes to comment on the application to permit heliports at the Palmer Project site.

AMA is a professional membership trade organization established in 1939 to represent the mining industry in Alaska. We are composed of more than 1,400 members that come from eight statewide branches: Anchorage, Denali, Fairbanks, Haines, Juneau, Kenai, Ketchikan/Prince of Wales, and Nome. Our members include individual prospectors, geologists, engineers, suction dredge miners, small family mines, junior mining companies, major mining companies, Alaska Native Corporations, and the contracting sector that supports Alaska's mining industry.

The Manager's determination (dated October 29th, 2019) includes a statement that "heliports are not 'customarily' part of mining" and therefore cannot be permitted as an accessory use to a resource extraction use-by-right in the General Use Zone. We disagree and submit that helicopters and heliports are used for exploration and mining activities throughout Alaska. Helicopters are used by the mining industry to transport people and equipment in rugged and remote areas, conduct technical studies, and to provide important emergency response transportation. The industry could not exist in Alaska without helicopters and heliports.

I have visited the project and can say with certainty that helicopters are absolutely necessary to conduct mining exploration at the Palmer Project in Haines. Indeed, Constantine's Palmer Project in Haines is a prime example of a project requiring helicopter use to access the mineral claims. The area is largely absent of roads and the steep terrain makes travel by ATV impractical and unsafe. Alaska's exploration industry is able to maintain a small footprint in the early stages of projects by accessing areas by helicopter. To build roads to all prospects would cause unnecessary surface impacts. It is common for projects to begin building roads when an area of interest is better defined, such as the Glacier Creek road that Constantine has built to relocate the main heliport site closer to the area of concentrated work.

While AMA supports the Manager's Recommendation to approve the Big Nugget and Glacier Creek heliport CUP #19-105, subject to their State and Federal permit stipulations, we disagree with the determination that these heliports are not considered accessory to resource extraction, and therefore exempt from conditional use permitting as a use-by-right activity.

Thank you for the opportunity to comment.

Deantha Crockett
Executive Director