



# ALASKA MINERS ASSOCIATION, INC.

121 W. Fireweed Lane, Suite 120 Anchorage, Alaska 99503 (907) 563-9229 [www.alaskaminers.org](http://www.alaskaminers.org)

January 17, 2014

Ms. Jeanie Cole  
BLM Fairbanks District Office  
1150 University Avenue  
Fairbanks, AK 99709-3844

**Re: Central Yukon Resource Management Plan and Environmental Impact Statement**

Dear Ms. Cole:

Thank you for the opportunity to submit scoping comments for the Central Yukon Resource Management Plan (RMP) and Environmental Impact Statement (EIS).

The Alaska Miners Association (AMA) is a non-profit membership organization established in 1939 to represent the mining industry in Alaska. We are composed of more than 1,500 individual prospectors, geologists, engineers, vendors, suction dredge miners, small family mines, junior mining companies, and major mining companies. Our members look for and produce gold, silver, platinum, molybdenum, lead, zinc, copper, coal, limestone, sand and gravel, crushed stone, armor rock, and other materials.

AMA offers the following comments, suggestions, and requests for inclusion in the Central Yukon RMP documents.

## **Mineral Resources on Federal Lands**

AMA urges the BLM to recognize mineral resources on federal lands not just in the Central Yukon RMP, but in all federal land management processes. Minerals on federal lands are a critical resource for the nation's economy and defense. Minerals on federal lands, if developed, can lead to less dependency on foreign sources, but the land must first be available for mineral entry and discoveries. The economic benefits to surrounding communities, the State of Alaska, and the United States are well worth consideration in land management decisions on their own; and importantly, mining in Alaska is done in accordance with stringent state and federal environmental regulations that protect all land uses.

While some RMPs have been preceded by a BLM-authored "Mineral Occurrence and Development Potential Report", many do not have that type of data for input to the various management alternatives. Moreover, it is important to note that where the "Mineral Occurrence and Development Potential" reports are available, they are, by definition, limited to discussion of "known" (already discovered) mineral occurrences and their development potential. Undiscovered occurrences and the true "mineral-potential" of a region are not discussed, and are generally absent from the final RMPs. Central Yukon, and all RMPs, should contain a thorough discussion of the mineral potential of the area- not just the likelihood of development of already identified ("known") mines, prospects and mineral occurrences.

An ideal mineral-potential section of an RMP would review all data related to regional geology, geochemistry and geophysics, and include maps, data summaries, and a thorough discussion of geologically-based mineral deposit models and their likelihood of occurrence within the RMP area. This type of material can and should be provided by the U.S. Geological Survey, who are notably absent in the development of many of these RMPs.

## **Land Designations within the Environmental Impact Statement (EIS)**

The RMP and any accompanying or proposed EIS should consider the cumulative impact on the state's economy and public access to federal, state and ANCSA lands that results from special land designations such as Wild

and Scenic Rivers, Wilderness recommendations, special management for lands with "wilderness characteristics", Areas of Critical Environmental Concern, and Research Natural Areas recommended in this plan; combined with the impacts of similar designations contained in other recently adopted BLM Resource Management Plans.

### **Access (including RS 2477)**

The plan should acknowledge the existence of and include maps of access routes claimed by the state under RS 2477 and ensure that existing access routes are kept open for public use.

AMA urges the BLM not to designate land uses that would impair or prevent the State of Alaska, Alaska Native Corporations and other landowners from gaining access to their lands that are adjacent to federal lands within the planning areas. The plan should also provide for new access corridors across vacant and unappropriated BLM-managed, public domain land.

### **Public Land Orders**

The plan should evaluate all existing Public Land Orders (PLOs) in the planning area and recommend revocation of all obsolete and unnecessary PLOs and other land withdrawals for which the original purpose of the withdrawal has been completed. In particular, the plan should recommend revocation of all land withdrawals on BLM lands that were established pursuant to the Alaska Native Claims Settlement Act (ANCSA) Section (d)(1). When these withdrawals were put in place 40 years ago, they were intended to be temporary to enable ANCSA selections and for possible land classifications. ANCSA selections have long since been completed and the issue of permanent federal land classifications was settled with passage of the Alaska National Interest Lands Conservation Act (ANILCA) in 1980. Congress recognized that these withdrawals were obsolete when, in Section 207 of the Alaska Land Transfer Acceleration Act of 2004, it directed the Secretary of Interior to recommend possible revocation. The Secretary's conclusion contained in a June 2006 report to Congress was that many of these withdrawals are obsolete and decisions on revocation would be made through the BLM RMP process. Now is the time to fulfill the Secretary's commitment.

### **Public Land Order 5150**

This land withdrawal was established to enable construction of the Trans Alaska Pipeline. It should be revoked and the land within PLO 5150 that is topfiled by the State of Alaska should be made available for transfer to the State or opened to the public land laws. The transportation corridor can and will be protected under state management. The withdrawal was evaluated as part of the 1991 BLM Utility Corridor Plan and several nodes (such as at Coldfoot) and a large area of PLO 5150 North of the Brooks Range were subsequently conveyed to the state, and state management has continued to protect the transportation corridor. The state owns more than half of the TAPS corridor. The corridor provides access to millions of acres of state lands rich in mineral and oil and gas resources.

### **"No More" Clause**

AMA encourages the BLM to recognize the spirit and the language of the great compromise that was effectuated with the passage of the ANILCA, upon which it was agreed by all parties that no additional lands would be studied for inclusion in the four land preservation systems (the National Park System, the National Forest System, the Wilderness System and the Wild and Scenic Rivers System).

The mandate of the BLM is to ensure that public domain lands are available for reasonably regulated multiple use where the limits on regulation do not conflict with health and safety of the general public. AMA would like to remind the BLM that setting aside public domain is beyond the scope of the Public Use mandate and barred by ANILCA Sections 101(b) and 1326 (a) & (b). Any determination by the BLM to preclude multiple use within portions of the study area, in the absence of specific language in ANILCA to the contrary, is prohibited.

Thank you for the opportunity to comment on the Central Yukon RMP and EIS.

Sincerely,

Deantha Crockett  
Executive Director

Cc: Senator Lisa Murkowski  
Senator Mark Begich  
Congressman Don Young  
Governor Sean Parnell