



ALASKA MINERS ASSOCIATION, INC.

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July 2, 2004

Ms. Susan Childs
Project Manager
Bureau of Land Management
Alaska State Office
222 West 7th Avenue
Anchorage, AK 99513

196937

RE: Northeast National Petroleum Reserve-Alaska Plan Amendment

Dear Ms. Childs,

The Alaska Miners Association (AMA) is a non profit membership organization established in 1939 to represent the mining industry. The AMA is composed of individual prospectors, geologists and engineers, vendors, dredge miners, small family mines, junior mining companies, and major mining companies. Our members explore for and produce gold, silver, platinum, diamonds, lead, zinc, copper, coal, limestone, sand and gravel, crushed stone, armor rock, etc. Our members live and operate in all parts of Alaska and are very interested in the area covered by this management plan.

Thank you for the opportunity to comment on the Bureau of Land Management Northeast National Petroleum Reserve-Alaska (NEPRA) Resource Management Plan (Plan) reevaluation and draft Environmental Impact Statement (DEIS). This is an extremely important area of the state that has been neglected and under explored for mineral resources. We ask that the following areas be addressed and included in the Plan.

1. Land Management and Multiple Use. The BLM has a mandate from congress to manage its lands for multiple use. This requirement should be paramount in all aspects of the Plan.

001
Land
Exchange

a. We ask that all federal withdrawals including Public Land Orders, secretarial orders, congressional acts, etc. be identified on the maps and that the purpose of each be included in the Plan, especially those for which the defined purpose of the withdrawal no longer exists.

002
Land
Exchange

b. We ask that all state selections and Native selections be identified in the Plan and shown on the maps. It is important that everyone reviewing the Plan know that these selected lands will in all likelihood become State or Native lands at some point in the future.

003
ANILCA

c. We ask that no area be studied for further land management restrictions, including wilderness designation, wild & scenic rivers, etc. The ANILCA "no more" clause does not allow such studies and the recent Secretary's decision prohibits such studies unless the Congressional delegation and the Governor agree and so request.

004
Jurisd.
Issues

d. We ask that all navigable waters be defined in the plan per the Gulkana decision.

Minerals. This area of the state has an unknown mineral potential. As shown by Red Dog and Donlin Creek, development of lode minerals has the greatest opportunity for creating high quality,

skilled, good paying jobs in rural Alaska and everything possible should be done in the Plan to encourage and foster this development.

- 005 Mining a. The current Plan does not address mining and assessment of locatable minerals.
- 006 Mining b. We ask that the plan be reviewed by an experience geologist or mining engineer from the BLM minerals office as a team member, specifically charged with addressing minerals issues.
- 007 Mining c. We ask that at least one geologist from the USGS Science Center be part of the plan review to assist in understanding the undiscovered mineral potential.
- 008 Mining d. We ask that the Plan include an appendix bibliography of all known minerals and mining reports for the planning area.
- 009 Mining e. We ask that a mineral occurrence map be developed for the area and that this map be included in the Plan. This map should also show all locations where mining has occurred in the past. This information is available through the USGS.

3. Access. Surface access is a major issue.

- BLM-10 a. We ask that all roads, trails and historic access routes be shown on all maps and identified with their BLM and/or State of Alaska identification numbers. These should include all trails, whether they qualify as RS-2477s or not. Those that do qualify as RS-2477s should be so identified. An appendix should be included to provide a comprehensive list of all trails of every type.
- BLM-11 b. We ask that all 17(b) access routes be shown on the Plan with their identifying name and/number.
- BLM-12 c. We ask that the Plan include and integrate the State of Alaska land selections that were established for access roads everywhere in the planning area that they exist.

Thank you for the opportunity to participate in this planning effort. We are always available to review ideas and concepts regarding minerals. If you have any questions, please contact me.

Sincerely,



Steven C. Borell, P.E.
Executive Director

cc: Mr. Henri Bisson