

Reece, Matthew A -FS

From: Reece, Matthew A -FS
Sent: Monday, August 6, 2018 7:48 AM
To: Guy Archibald
Subject: RE: Herbert Glacier exploration

Guy-

Firstly, let me apologize. My staff let some things slip on the process side and didn't follow our established procedures for responding to comments and using the Tongass' electronic mailing list for notification of the completion of the NEPA process for this project, and to distribute the decision memo. I should have double checked at the end of the process that everything had been completed, so that's on me. We have reviewed your submitted comments in detail. Below are responses to SEACC's comments.

The Southeast Alaska Conservation Council (SEACC) letter to the Forest Service, dated April 6, 2018, expressed concerns with the Herbert Gold Project and the Forest Service analysis of the 2018 Plan of Operations (POO). The Forest Service has grouped SEACC's comments and concerns into three main categories, listed below.

Forest Service compliance with the National Environmental Policy Act (NEPA)

Many of SEACC's concerns stem from the Forest Service decision to analyze this project by means of a categorical exclusion instead of an environmental assessment or environmental impact statement. Specifically, SEACC believes the use of 36 CFR 220.6 (e) (8), "*Short-term (1 year or less) mineral, energy, or geophysical investigation and their incidental support activities...*", is misplaced and unreasonably narrows the scope of analysis, and the use of this category after more than 10 years of sustained exploration is unreasonable.

However, the 2018 POO proposes mineral exploration between June 16 and October 30, a window that falls squarely within the "1 year or less" stipulation. Further, exploration at the Herbert Gold Project has been intermittent; drilling occurred in 2010, 2011, 2012, and 2017. After reviewing the 2018 POO, the Forest Service made the determination that the short-term, intermittent nature of this project does, indeed, fit into the category of actions defined in 36 CFR 220.6 (e) (8). Additionally, the Forest Service determined that this project falls within a category of actions, which normally do not individually or cumulatively have a significant effect on the quality of the human environment. Therefore, this project has been categorically excluded from documentation in an environmental impact statement and environmental assessment.

Potential environmental effects of a mine near the Herbert River

Several comments in the letter referred to future mining development in the area. However, the Herbert Gold Project is currently in the exploration phase. Because the 2018 POO from Grande Portage was for an annual surface exploration plan, it would be inappropriate and unnecessary to analyze the effects of a hypothetical, future mine. The Forest Service analyzed environmental effects of all activities proposed in the 2018 POO. Further, all proposed activities are consistent with the 2016 Tongass National Forest Land and Resource Management Plan, which places the project within a Semi-Remote Recreation land use designation with a Minerals Overlay.

Project analysis area

SEACC commented that it is unreasonable to limit the analysis of impacts "to within a 20 square foot drill pad". The Forest Service analyzed environmental effects at a spatial scale much larger than the disturbances described in the POO (drill pads). For example, a recreation resource specialist analyzed the project's effects on the Herbert Glacier Trail and the Windfall Lake Trail and Cabin, a wildlife resource specialist analyzed a project area that includes most of the Herbert and Eagle River drainages (30,237 acres), and a fisheries resource specialist analyzed the Herbert River watershed.

After analyzing these project areas, Forest Service specialists then developed a list of mitigations to isolate project activities and reduce risks to the surrounding environment. These mitigations can be found in the Decision Memo, and include requirements like operating windows and specific helicopter clearances to avoid mountain goat disturbance; buffers between project activities and streams; and sumps, spill kits, and secondary containment to protect aquatic resources.



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Caring for the land and serving people

From: Guy Archibald [mailto:guy@seacc.org]
Sent: Friday, August 03, 2018 2:16 PM
To: Reece, Matthew A -FS <matthewareece@fs.fed.us>
Subject: Re: Herbert Glacier exploration

Do we have any answers yet?
Guy

On Fri, Jul 20, 2018 at 11:28 AM, Reece, Matthew A -FS <matthewareece@fs.fed.us> wrote:

Guy-

I'm looking into this. I'll have an answer for you soon.

Regards,

-Matt



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Caring for the land and serving people

From: Guy Archibald [mailto:guy@seacc.org]

Sent: Friday, July 20, 2018 10:21 AM

To: Dudek, Richard - FS <richarddudek@fs.fed.us>; Reece, Matthew A -FS <matthewareece@fs.fed.us>

Subject: Re: Herbert Glacier exploration

We have a serious problem here. SEACC has been involved in this project for years and sent in timely comments. We did not receive notice of this decision, nor is there any response to our comments.

On Fri, Jul 20, 2018 at 10:10 AM, Dudek, Richard - FS <richarddudek@fs.fed.us> wrote:

Hi Guy, Grande Portage Resources was approved for surface exploration drilling on May 29, 2018. Attached is the 2018 Decision Memorandum for surface exploration.

From: Guy Archibald [mailto:guy@seacc.org]

Sent: Wednesday, July 18, 2018 4:19 PM

To: Dudek, Richard - FS <richarddudek@fs.fed.us>

Subject: Herbert Glacier exploration

Richard,

I was wondering where in the process the Herbert Glacier exploration application was. Will there be a decision soon?

Guy

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Guy Archibald
Staff Scientist
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Cell: 907 209-2720

Southeast Alaska Conservation Council

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