

May 30, 2023

To: Sara Church
Division of Mining, Land, and Water
Alaska Department of Natural Resources
dnr.fbx.mining@alaska.gov

Re: APMA J20195690#1

Ms. Church,

Please accept these comments from the Upper Lynn Canal Fish and Game Advisory Committee on the multi-agency permit application from Constantine Mining for expanded mine development activities in the Chilkat Valley.

We believe that given the scope of the work proposed, and the significant departure from past exploration activities, that this application should not be treated as an amendment, but should be its own separate permit application, with its own comment period. We ask that the comment period be at least 90 days to give the residents of Haines, Klukwan, and the Chilkat Valley enough time to research the proposal, and to provide thoughtful feedback to DNR. Delaying approval of this permit for 90 days will also allow State agencies, the mining company, and others, to conduct investigations, and to properly assess, the possible detrimental impacts to valuable fish and wildlife resources. The current comment period of just 14 days, following a near total absence of public notice, outreach, or inter-agency communication, is unacceptable.

Nearly all past work at the Palmer Project site has taken place high up on the mountainsides. This new application proposes development work down in the Klehini Valley bottom. This area is prime moose and bear habitat, and much of it is old growth spruce-hemlock forest, very little of which still remains in the Chilkat watershed following a century of industrial-scale timber harvest. There will be 5.6 miles of new roads constructed. Heavy equipment and vehicles will be fording salmon streams at multiple locations. Seismic blasting is to occur as much as twice a day every day for more than two months. These activities will displace wildlife and harm habitat.

These new development areas are not in a remote location. There are numerous homes and rural homesteads just across the Klehini Valley. The nearest homesteads are less than one mile from the Klehini development site indicated in the permit application. The 1982 legislation which created the Haines State Forest classified this area for multiple use, including mining. However, the character of the Klehini Valley has changed significantly in the past 40 years. There have not been any large-scale timber harvest activities in all of that time, and there are many more people living in the upper valley now--hunting, fishing, cutting firewood, and recreating. Additionally, tourism and commercial fishing have now completely replaced resource extraction as the basis of the local economy.

The Upper Lynn Canal Fish and Game Advisory Committee is concerned that the expanded mining development activities proposed in this permit application will have a significant impact on locally-important natural resource values in the area, specifically fish and wildlife, and that these impacts have not been investigated or assessed.

We do not believe that enough pre-development research has been done on the extent of fish habitat in the affected area. Upper "Plateau" creek has not been thoroughly investigated for the presence of salmonids, yet the application proposes numerous impacts to this stream, including

seismic blasting and fording of the creek with equipment, as well as road building, and the clearing of trees and brush in riparian areas. All of these activities can directly harm fish habitat and displace fish.

The activities proposed in this application, particularly using Glacier Creek as a roadway for heavy equipment, will be detrimental to highly valuable fish habitat. Klehini River chum salmon run late in the season and traditionally provided a lucrative opportunity for commercial fishermen after most runs are over. In the past a large part of the gillnet fleet in southeast would come to Lynn Canal in September and October to fish this run, but in recent years it has dropped off dramatically. Further impacts on this vulnerable run are a bad idea.

The road building and seismic blasting will also displace wildlife, and no investigations have been made to assess the extent of these effects. This is a popular moose hunting area, and there is a permanent moose camp within the boundaries of the "Klehini Site" identified in the permit application. One of the largest bull moose ever harvested in the Chilkat Valley was taken at this location just a few years ago. Seismic blasting, road building, and associated activities will displace moose cows and calves, and it may reduce bull harvest opportunities for local hunters in the fall.

There are also bear baiting stations in the areas proposed for mining development in this permit application. Bears will likely be disturbed and displaced by the noise and sudden increase in traffic and activity associated with these activities. These disturbances may decrease hunting opportunities in these areas.

The activities proposed in the application APMA J20195690#1 are significant. DNR should delay approval of this permit so that additional investigations into fish and wildlife impacts can be conducted. Future impacts include a tailings disposal facility that could have a significant negative impact on fish and wildlife. The results of these investigations can inform future permit applications for activities in this area and at the Palmer Project in general.

This delay in permit approval can also serve to provide a 90-day comment period for increased public outreach and cooperation. The resources being impacted by mining development are very important to the people of Haines, Klukwan, and the Chilkat and Klehini Valleys. Hunting, fishing, spending time out on the water and on the land are the basis of the culture here. Local fish and wildlife users deserve to be consulted and to have their voices heard whenever these important permitting decisions are being made by our State agencies.

Sincerely,

Tim McDonough
Chair, Upper Lynn Canal Fish and Game Advisory Committee