



Scoping Summary Report

In support of the Environmental Assessment

Constantine North, Inc., Palmer Exploration Project

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U.S. Department of the Interior
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1 Introduction

Constantine North, Inc. (Constantine) has requested authorization to extend exploration and access to federal mining claims at its Palmer Exploration Project (the Project) in the Porcupine Mining District near Haines, Alaska. Constantine is currently authorized under the Bureau of Land Management (BLM) for up to 5 acres of ground disturbance to carry out exploratory activity on their federal claims. In June of 2015, Constantine submitted a new proposed plan of operations (Plan). This proposed action requires public, stakeholder, and agency review, including a National Environmental Policy Act (NEPA) analysis.

1.1 Scoping Process

Scoping, which is the first step in the NEPA process, is an early and open process for determining the scope of issues to be addressed and for identifying the key issues related to a proposed action and alternatives. During scoping, tribe members, public and agency representatives provide input to identify potential issues and resource topics that should be studied in detail, and possible mitigation opportunities. This scoping summary report is a tool to ensure that the analytical efforts of the study are focused on the appropriate issues.

1.2 Project Description

BLM will prepare an environmental assessment (EA) for the proposed Plan. The Project proposes up to 2.5 miles of additional road construction and includes installing culverts and bridges over gullies and streams in the vicinity of Glacier Creek. It includes a switchback road with rock fall berms and an area at the terminus of the switchback road to stage equipment and facilities such as temporary work trailers, storage containers, and a portable toilet facility. The proposed road would provide access for up to 40 new exploration drill sites. These drill sites are all planned to occur east of their current mineral exploration areas and would provide a staging area for helicopter and ground-supported exploration activities. Constantine plans to continue in the exploration phase of their project for the next 5 to 10 years.

2 Public Scoping

Public scoping is the key component to the environmental review process. BLM relies on public comments to help identify issues as well as to help gauge public sentiment about the proposed action. On November 30, 2015, BLM published the following notice of Constantine's filed Plan for public review to statewide public media:

http://www.blm.gov/ak/st/en/info/newsroom/2015/november/BLM_Invites_Public_Comment_Constantine_Metal_ResourcesLtd_New_Mining_PO_11302015.html

Chilkat Valley News, *Juneau Empire*, and KHNS-FM radio serving Haines, Skagway and Klukwan, ran the notice. BLM also published notice on BLM's ePlanning website platform:

<https://eplanning.blm.gov/epl-front-office/eplanning/projectSummary.do?methodName=renderDefaultProjectSummary&projectId=54990>

On December 1, 2015, BLM issued a public notice, via postal mail and e-mail, to stakeholders on its current public notice list, and to media outlets, city, state and federal agencies, conservation groups, native villages and corporations, mining groups, and elected officials. BLM accepted public comment on the plan pursuant to 43 CFR 3809.432(a). The public comment period began on December 2, 2015, and ended January 8, 2016.

3 Agency Scoping

3.1 Agency Coordination

It is important to coordinate with local, state, and federal agencies that oversee the management of resources in the project area. Since these agencies oversee various resources under their jurisdiction, it is important to include them in the initial scoping activities. In this way, issues are identified early so they can be properly considered and, if necessary, avoided, minimized, or mitigated as the project progresses.

On November 30, 2015, BLM issued a news release to the following federal agencies, state agencies, and local governments to request their participation:

- Alaska Department of Environmental Conservation
- Alaska Department of Natural Resources
- Alaska Department of Natural Resources, Office of Project Management and Permitting
- Alaska Department of Fish and Game
- Alaska Department of Transportation and Public Facilities
- State of Alaska Department of Commerce, Community, and Economic Development
- State of Alaska Department of Labor and Workforce Development
- City and Borough of Haines
- Citizen Advisory Council on Federal Areas

4 Tribal Organization/Entity Coordination

On December 18, 2015, BLM sent letters to the following tribal representatives and corporations to initiate consultation under Section 106 of the National Historic Preservation Act:

- Chilkat Indian Village
- Chilkoot Indian Association
- Sealaska Corporation
- Skagway Village

Throughout development of the EA, BLM will continue to consult with the tribes and corporations as required under its government-to-government consultation responsibilities, including Section 106, regarding potential cultural resource impacts of concern to the tribes.

5 Comments Received and Summary of Issues

5.1 Public and Agency Comments Received

BLM accepted scoping comments electronically via the BLM National NEPA Register, email, and postal mail. **Table 1** through **Table 28** summarize the comments received during the project scoping period. The issues and concerns taken from the comments are grouped in separate tables by resource category.

The following agencies submitted comments during the initial scoping period:

- Trust Land Office, Alaska Mental Health Trust
- Alaska Department of Natural Resources, Office of Project Management and Permitting
- Alaska Department of Environmental Conservation, Division of Spill Prevention and Response

5.2 Summary of Comments

Table 1 through **Table 28** summarize the comments received during the scoping period. The tables indicate whether the comment was submitted by a member of the public, a non-governmental organization (NGO), a federally-recognized tribe (Tribal), or a government agency (Agency). BLM received a total of 173 comment letters.

Comments addressing multiple resource categories appear in multiple categories; therefore, while there are 173 comment letters, the tables include more than 173 comments. Portions of comments that do not relate to the Project area or the proposed project are not included. Comments appear in the table with only minor spelling or grammatical corrections made. To preserve the anonymity of the commenters, the name of the commenter, commenting organization, or agency is replaced with “COMMENTER” or “TRIBE,” when necessary. The submitted comment letters were assigned a chronological number, which indicates the order of receipt; these numbers are listed in the first column of the tables to note from which letter each comment originated.

Table 1. Summary of Scoping Comments: General

Letter No.	Commenter	Comment
1	Public	I support Constantine’s proposed activities as outlined in this Plan of Operation.
7	Public	I am now retired, but I work part time with Constantine in the summer time. I would urge you to move the permits the company needs forward without any delays. Constantine has worked very hard at making this project one that fits in very well with our community. They have worked with all our community leaders in keeping them informed on all the work they are performing.
7	Public	Constantine has shown they are very capable of moving this project forward while protecting the environment they are working in and around.
8	Public	Constantine is a great addition to the Haines community, they have worked very hard to be responsible users of the public and private lands. Please allow them the opportunity to continue to explore for additional mineral deposits.

Letter No.	Commenter	Comment
9	Public	I would like to voice my support for the Constantine Road project.
9	Public	From the presentations and research I've seen this project has been planned in a responsible way. I hope the project will be approved and Constantine can continue their development.
11	Public	Additionally, in my time spent working for Constantine I have come to greatly respect their initiative in reducing environmental impacts wherever possible. From personal observation, if it is possible to make decisions which are smarter or safer, whether environmentally or otherwise, Constantine does so even if it comes at a greater cost.
12	Public	I support the proposed Plan of Operations application by Constantine Metal Resources as very reasonable next step. The proposed road extension will allow further exploration and evaluation of this potential mine in a responsible and low-impact way. The desired road work appears to have little if any negative impact – it's a small footprint in a vast and unused area. I have been impressed with the efforts of CMR staff to reach out to the community - through tours, education, open door policy, and a stated desire to meet community concerns head-on. I would urge approval the proposed road extension without delay.
13	Public	In looking at the environmental impact and the way Constantine is proceeding, I give them a high five for their endeavors to make this a fail safe project.
13	Public	These people have got there act together and are doing one heck of a good job; I have been impressed with the transparency Constantine has shown in the proactive approach to this project.
14	Public	I fully support Constantine's Road Project, they have spent a lot of time and money on these plans studying the most environmentally friendly path. They have hired numerous people for studies and testing to see that this road does the least impact to the environment.
14	Public	I believe Constantine exercises this principle in every stage of this exploration and this road important to the forward movement
15	Public	I am writing to support Constantine's efforts in Haines, specifically the proposed road for more exploration.
15	Public	I firmly believe that things need to be done properly with regard to the environment, etc., but I think Constantine has demonstrated its willingness to do things right.
15	Public	Constantine's proposed road will have little to no impact on the valley and I think it should be allowed to move forward.
17	Public	I am sure that Constantine will take the same efforts. Not because I know the operators, but because I know that they are invested in operating this mine in Alaska for many years to come. In order to do this successfully, they will stick to the good plan of action that they have for Exploration, mining and reclamation.
17	Public	I recommend that the new plans for Exploration in the Palmer deposit are to be processed without delay.
18	Public	The management of Constantine are experienced and responsible Alaska operators and well respected by the regulatory agencies. I recommend that BLM approve the Plan of Operations.
19	Public	I am in complete support of this plan. I hope the BLM expedites this process in a timely manner.

Letter No.	Commenter	Comment
20	Public	Please consider this my support for the Constantine Metal Resources access project to their Palmer project.
22	Public	I believe the plan is well thought out and minimizes impact while allowing efficient and safe exploration to take place.
23	Public	I am highly in favor of this project to open more land to resource development. We need more good jobs.
25	Public	This letter is written in support of approving the Palmer project access road.
26	Public	COMMENTER would like to provide these comments in support of the 2.5 mile road construction project proposed by Constantine Metals at its Palmer project near Haines, Alaska. The application thoroughly addresses their actions, the potential and real impacts of their proposal and the improvements to safety and reclamation of the 1970s-era trail that their route largely follows.
27	Public	It appears the proposed access road avoids and minimizes environmental impacts while achieving the purpose and need.
27	Public	They should be given the opportunity to continue in the long road to a producing mine.
31	Public	Having read the plan, I fully support the current plan of operations that Constantine Metals has proposed for their exploration project near Haines.
35	Public	I think the road extension Constantine Metals has planned is a positive step forward.
35	Public	I feel confident that Constantine is making every effort to be as environmentally safe as they possibly can. I feel they have not only invested time and money into our local economy, their people have invested their personal lives and energy into our community. They care about our environment as much as we do.
36	Public	I support Constantine's plan for opening up a road to access their drill site. This is a good project and I support it.
37	Public	I support Constantine Metal plans for enhanced road access, as they have shown themselves to be a conscientious company with respect for the needs of our community. Utmost in their minds is worker safety and protecting habitat.
38	Public	Please let Constantine make these improvements for the sake of their workers and the success of this project.
39	Public	I have reviewed the proposed action for construction of the Glacier Creek access road. The location of the road appears to meet the criteria of limiting environmental impacts of the project.
39	Public	For these reasons I encourage the agency to accept the project as presented and proceed with required permit issuance as rapidly as possible. I believe that the overall Constantine Project is important to the local economy and should be approved.
41	Public	I write in support of Constantine Metal Resources, Ltd. Plan of Operations to construct and operate a 2.5 mile road needed to support their mineral exploration activities.
42	Public	I have reviewed the plan submitted by Constantine Metals and am supportive of development of road access to support the exploration needs of the Palmer Project.
42	Public	Constantine has been transparent with their plans to the community and has conducted their current activity professionally with the highest possible environmental safeguards. I look forward to learning more about the feasibility of potential responsible resource extraction and reclamation of the Palmer Project.

Letter No.	Commenter	Comment
49	Public	To whom it may concern, I fully support Constantine Metals proposed Plan of Operations to expand their existing access road.
50,51	Public	I fully support Constantine's request to improve access to their mine site and would hope that their permit be approved without delay. To this point the company has shown to be a great example of how potential mine development should proceed. They seem to be trying to do it right
50,51	Public	I believe Constantine will maintain a healthy environment while at the same time providing a much needed economic base for our community.
54	Public	As such I support Constantine's continued efforts to explore and potentially develop a working mine, which would provide a sound working base for our community's economy. Please expedite the permitting process without delay.
55	Public	I believe that with the professionalism they have showed in the development of the road and in the public process that this permit should be granted.
60	Public	I want to share my full support for the proposed Constantine Palmer Mine road construction project to improve safe, reliable access to the site, I have personally worked with some of the management team on a previous mine project (Niblack) and truly believe the proposed plan, if given approval will be implemented with safety and environmental concerns being taken very seriously. They have a good plan and a good track record and should be given the green light
62	Public	I encourage your agency to approve this road so further exploration and evaluations may be completed.
67	Public	This project as proposed should be reviewed expeditiously and approved.
68	Public	As a professional economic geologist with previous experience in this general area, I strongly support Constantine's very professional proposal and the quality of their work thus far. I recommend that this project proposal be approved.
69	Public	The Chilkat Valley has a long history of mineral exploration and mining as a corner stone of the economy. The Palmer Project is an example of that since there has been exploration taking place since 1969. Constantine s proposed road extension will increase both efficiency and safety at the Palmer Project, while they continue to evaluate the mineral potential of the property.
69	Public	I urge the Bureau of Land Management to not delay approval so that work can commence in the short operating season of summer 2016.
70	Public	I have been following the Palmer project for a number of years. Constantine Metal Resources has been a great asset to our community. They want to develop a project that protects the surrounding environment while also providing jobs to Haines. I fully support their efforts.
70	Public	I encourage you to approve this permit in an expeditious manner so that Constantine Metal Resources can begin construction of this project during the upcoming summer construction season. They have proven themselves to be professional, caring for the surrounding area, and committed to doing things the right way.
71	Public	COMMENTER has enjoyed a professional relationship with Constantine as mine developers in Southeast Alaska and is encouraged by its high standards and community engagement. As such, COMMENTER fully supports the efforts of Constantine to construct a proposed 2.5-mile road to safely advance exploration activities at the Palmer Project. We urge the US Department of Interior, Bureau of Land Management to process the proposed plan swiftly in order for Constantine to continue developing the Palmer Project in spring 2016.

Letter No.	Commenter	Comment
72	Public	I am worried that Constantine is moving step by step toward mine operation while in the exploration phase. Is this road really necessary for exploration? The road may make exploration less expensive by replacing helicopter time with truck travel, but it is not the BLM's mandate to make projects financially viable.
73	Public	I am in support of this project and continued exploration.
74	Public	I support this plan that includes 2.5 miles of road construction. This road is essential to provide access to the main mining exploration area so the property can continue to be evaluated.
74	Public	I believe that the road should be approved. Mining companies have MANY rules to follow and I believe that Constantine will do what they can to make exploration and/or a whole mining operation a positive situation for Haines.
75	Public	I feel that logging and the fisheries were able to co-exist to the benefit of the community. I feel that mining and fisheries can do the same. With that being said, I support the proposed road work and drilling that Constantine wishes to complete this year if permitted. I have attended most of the meetings that pertain to the Palmer Project, some set up by Constantine and others by conservation groups. In those meetings Constantine representatives were very forthcoming with information and their plans. I have viewed the area they hope to develop by air and feel that the impacts to the area would be minimal.
75	Public	I hope that the Palmer Project can continue to have success in their exploration and support the development of mining operations in the Haines area.
76	Public	<p>The BLM should deny Constantine Metal Resource's request to expand the conditions of its exploration permit.</p> <p>The purpose of 48 CFR 3809 is to prevent unnecessary or undue degradation of public lands by operations authorized by the mining laws. Anyone intending to develop mineral resources on the public lands must prevent unnecessary or undue degradation of the land and reclaim disturbed areas."</p> <p>This expansion of Constantine's exploration program does not meet this most basic standard, the very first paragraph of the code. The Palmer claim has been successfully explored by helicopter for many years, and there is no reason that a road should be necessary at this point. The only reason for building such a road would be as a prelude to actual mine development. If this is a step toward mine development, then it needs to be publicly vetted and permitted as such.</p>
76	Public	Development in the Glacier Creek area surely qualifies "unnecessary and undue degradation," especially given the fact that the exploratory work can be done successfully from helicopters. Please deny the new perm
77	Public	I think that expanding the road would be a great addition. It would cut down flight time in the helicopter saving fuel and lowering emissions, I assume a local company would be hired to continue the road construction there for helping the local economy, and it will allow Constantine to access more ground safer and more efficiently.
114	NGO	I provide the following comments to express both my personal support and the support of COMMENTER for Constantine Metal Resources; application to the Bureau of Land Management for Additional Road Building in 2016 to support their Palmer Project in Haines, AK.
114	NGO	In both personal and professional capacities I have become well acquainted with the Palmer Project and the individuals who represent Constantine Metal Resources in Haines, AK. I am assured that their Mine Plan of Operations is sound and minimizes and avoids environmental impacts even as it improves project efficiency and worker safety. Indeed, their plan is one which will streamline the process of project evaluation simultaneous to positively impacting the socioeconomic landscape in Haines, AK--a community to which Constantine Metal Resources is highly committed.

Letter No.	Commenter	Comment
114	NGO	I urge you to process Constantine Metal Resources; application without delay.
116	Public	I urge you to approve the Palmer Project Plan of Operations as expeditiously as possible.
118	Public	I support approval of the Palmer Project PoO and urge the BLM to approve the plan. The project is necessary to provide safe, reasonable, and efficient access to continue exploration
121	Public	Please do not allow this road extension, or the mine to continue.
122	Public	What happens upstream affects everything downstream and this is no place for large-scale mining. Constantine needs to realize this and the sooner the better for them and for us. They should invest their monies elsewhere. The community does not support this project.
123	Public	There needs to be a clear need for the project itself. The stated benefit of cutting down on helicopter time and proximity to exploration areas does not balance out the potential to damage public resources.
124	Public	Please consider this road expansion.
125	Public	Constantine's track record is not good.
126	Public	Hello, as a resident of Haines, I feel, as many of my townfolk do, that this mine is not needed, and its inherent destruction of land, resources, and wildlife, is detrimental to our well being as residents of Alaska. NO mine.
127	Public	I disapprove of this expansion project on BLM lands.
127	Public	I don't want a mine slowly taking shape in the guise of exploration.
128	Public	As a lifelong resident of Southeast Alaska, one who is committed to the future health of our environment and industries, I support this project. Constantine has taken every possible measure to ensure that this development is done in a safe and responsible manner. This is a great opportunity for our community, and Constantine is committed to this type of sustainable development.
138	Public	After reviewing the Plan of Operations, I see no issues that this plan should be denied and the project should proceed without delays.
141	Public	This note is in support of the Constantine Plan of Operations for the re-establishment of a 2.5 mile road to assist in exploration. The road is an important step in reducing the environmental impacts of the project as well as enhancing the safety of the project staff.
143	Public	I have reviewed the Constantine Plan of Operations, Oct. 2015, and I have worked on site as a contractor. The Plan of Operations is well thought out with many important details considered and planned for. The Company and its managers have shown that they take excellent stewardship of the project, land, and employees.
143	Public	This Plan has my full support and I believe it is technically sound, and operated in good hands.
145	Public	This mine will be great for Alaska, and the community of Haines.
146	Public	Please consider dropping/disallowing this project for the simple fact that you will reap much less profit from it than you might think, as it will be very, very expensive fighting the local populace who are dead set against it for myriad reasons. We will fight against this, tooth and nail, as the idea of a mining operation such as this is nothing compared to the reality that it will have a detrimental effect on our existing resources.

Letter No.	Commenter	Comment
147	Public	I support the approval of Constantine Metals Plan of Operations for road construction and other mineral exploration work at the Palmer Project, Haines, Alaska.
148	Public	I am increasingly concerned about the project as Constantine Metals advances more and more industrial development, acquiring more land, extending the road once and now proposing to build an ugly and potentially impactful extension, with the plan to intensify exploration with many more drill holes. I don't want this company furthering its project by building more infrastructure in the name of "exploration". Constantine may seem sincere about environmental responsibility and concern for the Haines community, but they don't personally live downstream from the mine site, don't have that stake in the eventual outcome. As an exploration company, they don't have control over or even know who will do the actual mining.
149	Public	I am 100% for Constantine's new plan that would expand their existing access road and put them beyond the limits of their current permit. I've been very impressed with this company's willingness to share information with our local community as this project continues to advance. A successful project, healthy ecosystem and vibrant community are important to them.
155	Public	Exploration at the Palmer site has been underway since 1973, with no adverse impacts noted to date.
155	Public	I encourage the BLM to approve the Exploration Plan of Operations and approve related NEPA actions to allow the Palmer Project to continue the forward momentum it has established in spite of a downturn in the mining industry and the State economy.
157	Public	Constantine has shown due diligence and proposed a responsible and safe plan and COMMENTER urges Department of Interior, Bureau of Land Management to approve this plan swiftly and allow Constantine to move the Palmer Project forward in spring 2016.
158	Public	I had the opportunity to meet on multiple occasions with representatives of Constantine Metal Resources to discuss the proposed Palmer property development and visit the site. The Palmer site is located within the Porcupine Mining District which has historically supported both logging and mining activities. I am confident that proposed Constantine Plan of Operations to carry out exploratory activity on their Federal claims can and will be done in an environmentally safe and responsible manner. It is a good plan that minimizes and avoids impacts. In my communications with Constantine officials, they have always conducted themselves with a high degree of professionalism and have repeatedly emphasized the importance of environmental protection as a function of their corporate philosophy and individual conduct.
158	Public	I believe that the proposed activities identified in Constantine's Plan of Operations for the Palmer property are important to the future economic well-being of Haines, and I am confident that Constantine will continue to work closely with local, state, and federal stakeholders to ensure that plans and activities will be conducted in a manner as to avoid or mitigate adverse impacts to the greatest extent practicable.
159	Public	I support the Palmer Project and urge expeditious approval of the Plan of Operations. This project will be done with the utmost of care for the environment while providing valuable economic opportunities in an area that desperately needs them.
159	Public	Constantine Metal Resources should be afforded the opportunity to proceed.
161	Public	I support Constantine's Plan of Operations for operations including 2.5 miles of road construction to access mineral exploration sites. The Plan of Operations is a responsible approach to evaluating the mineral potential of this property.
165	Public	I support Constantine and their new POO. Alaska needs this type of project. Please consider this minor adjustment to their project.

Letter No.	Commenter	Comment
164	Public	The Exploration Plan of Operations proposed May 22, 2015 by Constantine North, Inc. for the Palmer Exploration Project is extensive and detailed. Exploration drilling procedures are typical for this type of project.
164	Public	This is a well defined plan, and with support from the BLM and the Sate of Alaska, this access option will advance exploration and help assess the viability of this project with minimal impact.
2	Public	I am in favor of the application for Additional Road Building in 2016.
3	Public	Please add my support for the additional road construction.
5	Public	This letter is our public comment which opposes the proposed expansion of exploratory drill operations at the Constantine Mine Palmer Project Site. We oppose the construction of: <ul style="list-style-type: none"> • Two steel vehicle bridges • One timber-frame bridge • 2.5 miles of unpaved roads • Staging area, work trailers, storage containers and portable toilets • Any underground work We request that the BLM deny Constantine Mines request for more site development at the Palmer Project Site.
5	Public	This mine is located in the most important environmental area in Haines. Local natives have kept this area pristine for over 10,000 years. As Haines residents we do not want to allow any expansion of mine development at the Palmer Project Site.
10	Public	Having worked very near Constantine's operations in the Porcupine Mining District for many years, I would offer these observations. They are a very professional company. Their emphasis has always been to minimize their impact on the surrounding area.
16	Public	Please accept this letter of support for Constantine's request to expand their access road to their Glacier Creek exploration site in Haines, Alaska. I urge you to process this permit without delay.
16	Public	I had the opportunity to tour their exploration site during the summer of 2015 and I was very impressed with their operation. This didn't come as a surprise because Constantine has always demonstrated a professionalism in their dealings with the Haines community and I expected no less in their interaction with the sensitive environment around their exploration site. I am confident that their proposed road expansion will be constructed and operated in this same manner.
29	Public	To me, the environmental disturbance, although stated as "minimal," is still too much of an adverse impact to the land. Please don't allow any further disturbance to Glacier Creek and the surrounding roads etc. Please do not approve.
30	Public	With these thoughts in mind, I have reviewed the nearly 100 page Constantine North, Inc.'s Exploration Plan and am of the opinion that the plan satisfies my concerns regarding environmental protection, while providing economic opportunities to citizens living in the Haines area. Constantine is asking to expand its Palmer Exploration Project from 4.7 acres of surface disturbance to 41.2 acres of potential disturbance. It's my understanding that Constantine has fully complied with the requirements of its current Alaska exploration application. This should give BLM an indication that Constantine will observer all of the conditions associated with an expanded exploration plan or operation.
4	Public	Constantine has proven that they are conscientious and have a solid track record of performance here in this region.

Letter No.	Commenter	Comment
4	Public	Please allow Constantine to move forward.
6	Public	When Constantine started their operations. I contacted management to better understand their operation. I have been to their base camp and have continued to meet with management. My observations have been that Constantine is a responsible company that will protect the environment during their operations. The plan appears to be complete and covers all areas that need to be examined.
6	Public	The Plan does not address a mine in any way and as far as I know a decision to build a mine has not been made.
32	NGO	I write in support of the Plan of Operations submitted by Constantine Metal Resources, Ltd and their proposed 2.5 mile road alignment.
33	Public	<p>This letter is written in support of Constantine Metal Resources application to build/re-build an access road to their project located near Haines, Alaska. Approval of the application will provide needed improvements to the project:</p> <ul style="list-style-type: none"> • The plan has been well studied and planned to minimize impacts • The improved access will enhance worker safety • Project evaluation will be improved and made more cost-effective • Constantine's Palmer project provides and will continue to provide economic enhancement to the community of Haines and other nearby Alaska communities • Constantine works with high standards of professionalism • Community involvement is a routine activity in development of this project • Openness and transparency has been a standard for Constantine.
34	Public	My position on the Constantine project is a reflection of a lifetime observation in solving other issues and trying to present an acceptable solution. To minimize impact to the local fishery, I spent 20 years building a road that now accesses Constantine's camp. I helped to remove the complaints of residents at 33 Mile over helicopter noise by leasing our camp at Porcupine both out of sight and noise disturbance. Constantine contributes thousands of dollars in taxes to the Haines Borough and employees 20 people. From what observations and statements made by Constantine it appears that the environment has a priority and they want to do everything in a way that will protect it. I, for one, want to stand by and observe the future planning of Constantine regarding how the ore will be processed and how the toxic waste rock, if any, will be handled. When these issues are made public, I will take a position, but in the meantime I cannot object to Constantine determining what the future of the Palmer site will be as a contributor to the Haines economy if the public feels it is professionally done.
34	Public	I feel we should support Constantine's efforts as I cannot find any fault with it being built.
44	NGO	COMMENTER supports the Constantine Metal Resources, Ltd., Constantine Metal Resources LTD'S - New Mining Plan of Operations for Continued Exploration.
44	NGO	The road follows a natural path through the valley and has been designed to avoid and minimize environmental impacts.
44	NGO	<p>Constantine operates with high standards and professionalism and regularly engages the community to keep open lines of communication on the project.</p> <p>Alaska is dependent on responsible resource development to maintain a vibrant economy providing jobs and opportunity to Alaskans. The Palmer Project is a positive activity in all aspects and should be approved as quickly as possible.</p>
40,46	Public	Constantine's proposal has developed a road plan that will be safe, environmentally responsible and avoid and minimize environmental impacts.

Letter No.	Commenter	Comment
40,46	Public	It is thus important that Constantine be allowed to move this project forward in a timely manner.
47	Public	This letter is to encourage support for Constantine Metals Resources Plan of Operations Application for the 2016 exploration season at their Palmer Project Haines Alaska.
47	Public	They have a high regard for the environment and bring in biologist and other qualified scientist to do studies to determine the most viable way to do any construction project.
45	Public	I have been informed that Constantine is interested in developing BLM lands in the Chilkat Valley, Haines, (Glacier Creek Area) for the purpose of obtaining road access to potential mining sites. I support this request and ask that you embrace the project. I have first-hand knowledge of Constantine's stewardship of others lands with regard to safety and environmental issues, and feel the development and BLM is in good hands.
45	Public	The BLM and our community are blessed to have a site for potential mining in the Haines area that is set up to work in harmony with the other business interests.
45	Public	As a local landowner, to have anyone volunteer to build a road on my property at little to no cost, would be a windfall, and remain hopeful the BLM will embrace and appreciate the efforts of Constantine. – A healthy Haines without Governmental dependency is critical and this approval only seems like a suitable partnership toward that end.
57	Public	I support Constantine's proposed project to extend their road to their drill site so they can further explore there mineral deposit.
58	Public	I trust my BLM to inspect this application. If details are in order, please process their application without delay. Understand this letter is not supporting mine development but is in full support of Constantine's road extension.
59	Public	This is to request that the Bureau of Land Management (BLM) approve Constantine Metals Resources, Ltd.'s Plan of Operations (PoO) to construct a 2.5 mile exploration road to Constantine's work area at the Palmer Project in Haines, Alaska.
59	Public	There is no good reason not to approve the PoO: 1. The 2.5 mile road is simply an extension of Constantine's existing road. Its path through the valley to the work area is logical - it roughly follows a "cat trail" built in the 1970s. 2. The PoO avoids adverse environmental impacts. There are no fish bearing streams within the area of work. Environmental studies have been conducted that show that the rocks within the area of disturbance are not acid-generating. Constantine will be required to post a bond to ensure these protections. And 3. The PoO is consistent with BLM's, the Borough's, the Alaska Mental Health Trust's, and the State of Alaska's land management plans.
172	Public	Constantine's Plan of Operations demonstrates considerable effort to prevent 'unnecessary or undue degradation', such as avoiding creek crossings with fish and following the old 1977 road.
172	Public	Their drilling has gone on for decades without significant impact and is also of no concern to me. The professional manner in which Constantine has operated in the past has demonstrated that modern best practices and current regulations are adequate at preventing significant impacts from drilling and road building in this area.
172	Public	I urge the BLM to review and approve Constantine's Plan of Operations in a timely manner so that progress on the project is not delayed.
166	Public	This letter is to voice my support for the Constantine Mine Project in Haines valley.

Letter No.	Commenter	Comment
166	Public	I believe the due diligence of the state and Constantine environmental concerns and issues will be covered and properly address.
167	Public	Thank you for the opportunity to comment on the proposed changes to the exploration plan of operations. My comments apply to this change only, and I reserve the right to comment further on more complete design proposals as the project progresses and upon hearing further from my constituents.
168	Public	I'm writing to encourage the BLM to approve the proposed plan on the Constantine Palmer Project. Their desire to expand and improve their access to further delineate their reserves involved enough acres to require them to submit a plan of operation.
168	Public	They have done an excellent job with their plan of operation.
144	Public	COMMENTER supports the approval of the Constantine Metal Resources Palmer Project by the BLM and other relevant Federal agencies. COMMENTER strongly encourages BLM to move forward on the review of this important matter.
169	Public	I am writing to recommend that you approve the proposed expanded exploration plan submitted by Constantine Metals at the Palmer Project.
170	Public	As a home and property owner in the Klehini Valley (33 mile, Haines Highway) I support the exploration and development of the Palmer Project by Constantine Metal Resources Ltd. (Constantine). Constantine has been exploring and developing the Palmer Project in an environmentally correct manner and have shown that they intend to continue following strict compliance with all rules and regulations.
171	Public	I offer my remarks in support of the review process, and not in support of or opposition to the identified activity request.
64	Public	Please add my support for the Bureau of Land Management (BLM) Plan of Operations requested by Constantine Metals Resources, Ltd. to construct a 2.5 mile exploration road to the work area at the Palmer Project in Haines, Alaska. The Plan of Operations is consistent with BLM, Borough, Alaska Mental Health Trust, and State of Alaska land management plans.
63	Public	This letter is to express COMMENTER's support of the Palmer Project Plan of Operations for development of the road to access the mining location. We also support further development as an industrial road once the exploration work transitions to construction and development.
81	Public	I am in favor of quickly processing the Constantine Metal Resources, Plan of Operations. They (Constantine) routinely go above and beyond requirement in terms of mitigating safety risks, minimizing environmental impacts and engaging with the community. They also hold their subcontractors to the highest standards. I ask that you process this permit application quickly so that construction can be completed during the 2016 field season.
82-109	Public	While I will reserve support for mining until there is a detailed plan to review, I urge you to approve the current Plan of Operations in a timely manner so that road construction can be completed during the summer of 2016.
110	Public	Since beginning their initial mining and exploration in Haines Borough, Constantine has conducted their operations in a well planned and professional manner. The mining and exploration to his point as not been detrimental to the environment, and they have been large supporters of the community. Reviewing this 100 page document, I support their continued mining effort and believe it will contribute to both the local economy and Alaska's economy without detrimental impact.

Letter No.	Commenter	Comment
111	Public	Constantine employees have always been hard working and go above and beyond in keeping the community informed. Questions have always been answered and they have gone out of their way to have public information programs to keep us informed. If we are not informed it is not because of lack of information coming from Constantine.
111	Public	The previous road was done to a high standard and we would expect nothing less of this development.
56	Public	I am writing to urge that Constantine's proposed Plan of Operation for the Palmer Project be approved at the earliest possible date to ensure that the road can be completed during good weather this coming Spring and Summer. I have reviewed Constantine's proposed POO and it is the most comprehensive and the best conceived such plan that I have seen. This plan is far more detailed than has ever been expected for a simple Environmental Assessment (EA). I urge that this POO be approved at the earliest possible time using the EA process while ensuring it is legally defensible.
112	Public	I have been a supporter of mining development and support the Constantine in their efforts to build the road and drill the holes in 2016.
112	Public	I am impressed with Constantine's continued efforts to avoid and minimize impacts from their proposed actives. Their avoidance of fish habitat is a good example of how they plan to prevent unnecessary or undue degradation of the lands. In my early meeting with them I've stressed the importance of being a good steward and work with the community, which I believe they have.
112	Public	My wife and I support the permitting requests of the Constantine Mine and their continued mining development and we will monitor the plans as they proceed.
112	Public	Generations of my Family have lived here and I would like my descendants to continue to live here. I'm concerned without some sort of jobs in Haines my children will have to leave, my Son just came back, but the only jobs are outside of Haines and require travel.
113	Public	The purpose of this letter is to express COMMENTER's strong support for Constantine Metal Resources' application to the BLM for Additional Road Building in 2016, in support of their Palmer Project in Haines, Alaska.
113	Public	Constantine has earned the respect and support of residents of Haines and Southeast Alaska, not only through the economic benefits it has created through new local employment and expenditures, but very importantly, by building trust by conducting business with high ethical, environmental, and professional standards. Constantine has been significantly engaged with the Haines community, and southeast Alaska as a whole, through regular public engagement and educational outreach. The company has been a key participant in regional forums such as Southeast Conference and the Prince of Wales Mining Symposium, sharing information on its activities in an open and transparent manner, and helping to provide informative answers to questions by the public. The company goes above and beyond in its commitment to "a successful project, healthy ecosystem, and vibrant community," and has proven a regional leader in public engagement. Constantine has proven that it is highly receptive to suggestions, input, and concerns presented by diverse members of the community. It has worked diligently to take a very broad range of stakeholder interests into account, and design a Plan of Operations which minimizes adverse impacts, and creates overwhelmingly positive benefits for families and businesses in the region. It has worked diligently to take a very broad range of stakeholder interests into account, and design a Plan of Operations which minimizes adverse impacts, and creates overwhelmingly positive benefits for families and businesses in the region.

Letter No.	Commenter	Comment
113	Public	COMMENTER urges the US BLM to expeditiously approve Constantine's Plan of Operations in a timely manner, so that the company can proceed into its next phase of development with minimal delay, and continue to generate new employment, local expenditures, and economic benefits which support residents of Haines and the surrounding area of southeast Alaska. Specifically, we strongly encourage the BLM to approve Constantine's proposed 2.5 mile road alignment project
117	NGO	The proposed Plan of Operation will significantly increase the footprint of exploration activities as well as enabling more efficient and expanded implementation of these activities. COMMENTER appreciates the efforts Constantine has made to be a good neighbor and to minimize disturbance to the community due to its activities.
119	Public	Once the roads have been completed and exploration activities are underway, Constantine has committed to industry standard best management practices that ensure exploration activities will have minimal impact to the project area.
119	Public	I support approval of the Palmer Project PoO and urge the BLM to approve the plan with no changes or additional conditions.
129	Public	I am writing to express my support of Constantine Metals Resources, Ltd.'s Plan of Operations (PoO) submission to construct a 2.5 mile exploration road to their work area at the Palmer Project in Haines, Alaska. It is my understanding the PoO is consistent with the Bureau of Land Management's, the Borough's, the Alaska Mental Health Trust's, and the State of Alaska's land management plans. I have been assured the developers have taken every precaution to limit adverse impacts to the surrounding ecosystems and Constantine Metals Resources Ltd. will be required to post a bond to ensure these protections.
61	NGO	The BLM must ensure that exploration of potential mineral resource, including the construction of approximately 2.5 miles of access road in the Porcupine Mining District by Constantine North, Ltd. is conducted consistently with 43CFR 3809.420 and prevents unnecessary on undue degradation. The COMMENTER lacks expertise in the science of environmental protection but is no less committed to the support of development that adheres to the referenced standards.
61	Public	Those who are employed by or associated with Constantine in its work recognize its commitment to meeting standards of environmental protection.
61	NGO	The COMMENTER therefore urges the BLM to positively consider Constantine's Plan of Operation and not delay approval so that work can commence in the short operating season of summer 2016.
130	NGO	The COMMENTER is working to enhance local infrastructure for a stronger economy and future; we support Constantine in their efforts to do the same.
130	NGO	Constantine already demonstrated their ability to meet State and Federal regulations with their road work completed in 2014. We ask the BLM to review and approve the Plan of Operations quickly so that the summer 2016 construction season is not lost
131	Public	In spite of the current challenging economic situation in the mining sector as a whole, I'm glad to hear that they are continuing to advance the drilling effort necessary to define an ore body of sufficient quality and quantity to lead to the eventually formulation of a mine development plan.

Letter No.	Commenter	Comment
131	Public	This approach is consistent with the environmental analyses used for reasonably phased mine development by the USFS on the Tongass National Forest. As a matter of fact, it essentially echoes the NEPA analyses used on the development of the presently operating Greens Creek and Kensington mines (e.g., CE for some initial heliborne drilling, EA for reasonably necessary access road building, & EIS for production level mine development).
131	Public	Constantine has demonstrated responsible planning and due diligence in their progressive efforts to date and BLM's prompt/timely NEPA action to evaluate their current proposal by EA will expedite their activities.
132	Public	When I first started working for Constantine, several days were dedicated to having employees oriented towards safety and environmental issues.
132	Public	I support this development and believe Constantine will do a top notch job.
151	Public	I am writing to express my support for the approval of the Plan of Operations (Plan) to build a 2.5 mile-long road to improve accessibility and safety, among other things, at Constantine Resource's Palmer Project in Haines, Alaska.
151	Public	While I reserve a final position on the mine itself until an Environmental Impact Statement is completed and a final mine plan is proposed, I fully support approval of the Plan. Approval.
151	Public	I respectfully request that consistent with all relevant rules, laws, and regulations, all due consideration be given to this application, and that BLM move swiftly to approve it.
133	Public	The environmental impact will be minimal due to the fact there is an existing "cat trail". Please consider this permit in a timely manner as the workable season is short.
134	Public	Constantine's activity there does not bother me one bit.
134	Public	I'm in full support of their operations in Haines and believe that Constantine Metals is a fine and reputable mining exploration company that is certainly likely to do the best job they possibly can with respect to the environment and other land users in the area.
134	Public	I say yes to Constantine metals
135	Public	I am very proud of the people and work of the Constantine team.
135	Public	Working with hired specialists, scientists, and permitting bodies to fully take stock of all the interwoven and integrated parts of the environments we traverse, it has giving me great confidence in the process, great confidence for Constantine to build a professional road through a well understood environment, making good decisions with integrity and great regard. Please move forward and allow this permit to pass as quickly as possible for all the above mentioned reasons.
135	Public	The proposed 2016 road will add to all the advantages of the 2014 road.
136	NGO	The proposed Plan of Operation will significantly increase the footprint of exploration activities. The impacts will increase from 4.05 acres to 37.06 acres.
139	Public	In summary I am in support of responsible mineral development and the proposed Plan of Operations for the Palmer Project as submitted by Constantine Metal Resources and request that the Bureau of Land Management approve of the plan as submitted.
153	NGO	Constantine has shown due diligence and proposed a responsible and safe plan, and BLM's action should be to approve the plan.

Letter No.	Commenter	Comment
153	NGO	COMMENTER urges you to approve this proposed plan as soon as possible and proceed with an Environmental Assessment so that Constantine can move forward at the beginning of field season this spring.
162	Public	As a general matter, COMMENTER would like to express support for development activities that would be beneficial to our region, our shareholders and our communities in terms of employment and economic opportunities.
162	Public	Because this particular revision to the Plan is merely for extension of a road for further exploration activities, and is not for actual mining at this stage, we support the proposal. We do, of course, reserve our right to provide further input as the project proceeds to actual mineral development, to ensure no impact based on our contingencies outlined above.
163	NGO	The COMMENTER is writing in support of Constantine Metal Resources, Ltd. request for a proposed 2.5 mile road that follows the general path of an existing cat trail from 1977, and re-establishes road access to the core area of activities. The road, which follows a natural path through the valley, and has been designed to avoid and minimize environmental impacts, will bring the total disturbance to about five acres.
163	NGO	The COMMENTER supports the need for the Bureau of Land Management (BLM) to review a Plan of Operations (PoO) for the Palmer Project near Haines.
163	NGO	The COMMENTER requests that BLM promptly complete its regulatory review, and environmental analysis, and approve this project to proceed. We strongly support Constantine in their efforts.
28	Agency	There are no documented contaminated sites near or within the project area, thus the COMMENTER does not have any comments on the plan nor any concerns with the proposed actions.
65	Agency	The COMMENTER supports the proposed activities outlined in the Plan of Operations, and encourages the BLM to act in an expeditious manner to authorize them.
137	NGO	The COMMENTER is writing to urge the Bureau of Land Management (BLM) to approve the Plan of Operations (PoO) for the Palmer Project near Haines.
79	Tribal	We appreciate efforts by Constantine to engage the COMMENTER on this project and for providing us with updated information as their activities progress.
79	Tribal	Members of the COMMENTER have visited the field site and reviewed the Pan of Operations. We are pleased with Constantine's efforts to avoid and minimize environmental impacts and prevent 'undue or unnecessary degradation of public lands'.
79	Tribal	For these reasons, the COMMENTER urges the BLM to complete their NEPA review in a timely manner so that construction can be completed during the 2016 field season and the project can continue to move forward in an efficient and safe manner.
176	Tribal	The COMMENTER thanks you for the opportunity to comment on the Constantine North Palmer Exploration Plan of Operations (POO) that forms the basis of the initial scoping document on the proposed exploration permit. This is our initial comments until such time as we can have a face to face, government to government meeting with you, which COMMENTER strongly prefers.
176	Tribal	Constantine fails to mention [TRIBE] at all in its POO.
176	Tribal	In short, the COMMENTER is strongly against any mining in the Chilkat Valley. The COMMENTER Constitution cites: "to protect natural environment of the Village".

Letter No.	Commenter	Comment
120	Public	I would like to voice my support for the Constantine Metals proposal to build a road along the alignment of the existing cat track on the west side of Glacier Creek.
160	NGO	The COMMENTER is writing to support the Constantine Metal Resources LTD's (Constantine) New Mining Plan of Operations for Continued Exploration.
66	Public	I'm very excited to hear that Constantine is moving forward in a proactive way to add a second phase of road to Glacier Creek to help with access to mining sites. I'm in favor of this project and feel that moving forward is a very positive thing for Haines and S.E. Alaska. I was very involved in the last project and can't say enough about Constantine's concerns for the environment and safety.
66	Public	Working with Constantine on the last project as a superintendent gave me the chance to witness their professionalism, and constant concern for the environment.
122	Public	The piecemeal approach to permitting serves no one, but a large private multi-national corporation. BLM needs to ensure the communities of Haines and Klukwan are fully informed of the whole of future plans, and details of all future plans, prior to any piecemeal approval of any part of this project.

Table 2. Summary of Scoping Comments: Scope of Analysis

Letter No.	Commenter	Comment
67	Public	Constantine's Plan of Operations (POO) for the Palmer Project is one of the most comprehensive POO submitted by a resource development company in Alaska for an advanced exploration project. The plan has incorporated "lessons learned" from other projects and innovative techniques to prevent Unnecessary and Undue Degradation from accessing the proposed exploration area, construction of bridges and the switchback road, drill pads, and laydown areas through concurrent and final reclamation. The POO as proposed meets and exceeds BLM's criteria as set forth in the 43 CFR 3809 regulations and additional standards established for projects in Alaska (e.g. BLM's APMA Supplements Guide) whether specific to hard rock exploration or placer operations.
72	Public	I am concerned about potential acid drainage from the waste rock piles and runoff water along the road. These should be contained and monitored until it has been confirmed that acid mine drainage is not a possibility. The assessment should consider the entire 10-year operating plan and not just the five years of the permit.
76	Public	If this is a step toward mine development, then it needs to be publicly vetted and permitted as such.
123	Public	This action is part and parcel of a larger project that will have significant impacts on the Klehini and Chilkat Rivers just as the last permit allowing the first section of exploration road led directly to this road expansion.
125	Public	There needs to be an assessment for ten years of the Plan of Operation; not just the five year term of permit. There needs to be containment and monitoring around the waste rock piles and runoff water from the road until such time as acid rock drainage can be shown not to be a possibility. There needs to be a clear need for the project itself. The stated benefit of cutting down helicopter time and proximity to explore does not balance out the potential to damage public resources. Erosion along the mineral exploration road, including steep switchbacks needs to not have any sediment reaching Glacier Creek. This should be further evaluated in the Plan of Operations.

Letter No.	Commenter	Comment
127	Public	There needs to be an assessment for the entire 10 years of the Plan of Operations and not just the five-year term of the permit. There needs to be containment and water quality monitoring around the waste rock piles and runoff water from the road until such time as acid rock drainage can be shown not to be occurring.
123	Public	There needs to be a clear need for the project itself. The stated benefit of cutting down on helicopter time and proximity to exploration areas does not balance out the potential to damage public resources.
127	Public	The prevention of sediments reaching Glacier Creek should be evaluated further in the Plan of Operations.
155	Public	The Exploration Plan of Operations is very well written. It appears that all impacts associated with the proposed work have been considered and addressed. The proposed road project seems to meet established regulatory requirements and various land use management plans in effect in the area. Well done Constantine!
156	Agency	<p>In the Environmental Assessment, please include an analysis of potential effects the proposed activities may have on these three species, and include mitigation measures that would avoid, minimize, and mitigate potential effects. COMMENTER recommends minimizing wildlife disturbance to the extent practicable by:</p> <ul style="list-style-type: none"> • Minimizing helicopter activity before June 15 each year; • Maintaining a 400 m distance between personnel and brown bear, wolverine, and other game; • Maintaining a 500 m distance between helicopters and brown bear and wolverine dens; and • Maintaining a 1.5 km distance between helicopters and mountain goats year-round
154	Tribal	COMMENTER finds that the proposed purpose and need, “shorter helicopter flights for the transport of personnel, equipment, fuel and supplies, and increased safety for Company personnel and contractors” is insufficient to justify direct and potential impacts of this proposal.
173	Tribal	<p>We find that the scoping process for the proposed action should not be viewed as a single five-year activity. The National Environmental Policy Act (NEPA) requires consideration of cumulative impacts which result from the incremental impact of the action when added to other past, present and reasonably foreseeable future actions. See 40 CFR 1508.7 – 1508.8. The impacts considered also must include impacts from others that are not the applicant but are related to the activity such as impacts due to increased access to the general public.</p> <p>We also suggest that the scoping not only include consideration of the direct effects of the proposed action but also indirect effects that are caused by the action and are later in time or farther removed in distance but are still reasonably foreseeable. The analysis for potential acid rock drainage is confusing and inadequate as are sections dealing with erosion and dusting.</p> <p>Finally, when taken in the context of reasonably foreseeable cumulative impacts, even without further additions forthcoming through scoping, COMMENTER finds the POO itself as written provides insufficient information for the public to make a reasonable decision as to the extent of possible impacts of the proposed action. See 40 CFR 15022.22, addressing “incomplete or unavailable information.”</p> <p>We ask that this Plan be re-written to account for the identified deficiencies and re-submitted for review prior to public scoping. If the decision is to retain this plan as written and move forward with scoping, then COMMENTER finds that the proposed action will individually and cumulatively have a significant effect on the human environment and therefore will require an Environmental Assessment be conducted prior to issuance of any further permits.</p> <p>POO fails to account for reasonably foreseeable future impacts.</p>

Letter No.	Commenter	Comment
173	Tribal	This reviewer asks that all activities conducted by this applicant on this project fall under scoping examination for this action.
173	Tribal	If this current Plan of Operations is accepted or becomes the Environmental Assessment for this project, it is likely to be modified in the future to account for increased activity and impacts. It is therefore imperative that this scoping be as complete as possible to avoid incremental permitting.

Table 3. Summary of Scoping Comments: Cultural Resources

Letter No.	Commenter	Comment
71	Public	Constantine has also demonstrated environmental responsibility in selecting a road route. Its PoO indicates qualified experts have reviewed the aquatic biology, cultural resources, geotechnical engineering, rock geochemistry, water quality, wildlife and wetlands data to design a road that is safe, responsible, and will fully satisfy regulatory requirements.
157	Public	In its evaluation and determination of the road route, Constantine hired qualified experts to review the aquatic biology, cultural resources, geotechnical engineering, rock geochemistry, water quality, wildlife and wetlands data so the road will exceed regulatory requirements.
32	NGO	In deciding the road route, qualified experts reviewed the aquatic biology, cultural resources, geotechnical engineering, rock geochemistry, water quality, and wildlife and wetlands data to design a road that is safe, responsible, and will meet regulatory requirements.
44	NGO	Aquatic biology, cultural resource, geotechnical engineering, rock geochemistry, water quality, and wildlife and wetlands data supported the development of Constantine's proposal to design a road that will be safe and environmentally responsible.
167	Public	I'm also told the route was based on qualified experts' review of aquatic biology, cultural resources, geotechnical engineering, rock geochemistry, water quality, wildlife, and wetlands data.
168	Public	In addition, they examined the geotechnical engineering, the fish and wildlife and aquatic biology, water quality, wetlands, and cultural resources.
144	Public	In deciding the road route, qualified experts reviewed the aquatic biology, cultural resources, geotechnical engineering, rock geochemistry, water quality, wildlife, and wetlands data to design a road that is safe, responsible, is protective of the environment and will meet regulatory requirements.
156	Agency	The COMMENTER received an electronic copy of Appendix 6.d. of the Plan, Cultural Resource Survey Report, from CNI. COMMENTER looks forward to working with BLM, CNI and other appropriate consulting parties as part of the consultation process required by Section 106 of the National Historic Preservation Act (36 CFR 800). The Environmental Assessment should adequately identify and discuss potential significant effects to cultural resources, as well appropriate avoidance, minimization and mitigation measures, per 36 CFR 800 and the Alaska Historic Preservation Act (AS 41.35.070). Additionally, COMMENTER recommends that Section 2.7.3 of the Plan be titled "Cultural and Paleontological Resources" since this section also discusses paleontological resources, which are not cultural resources.
137	NGO	The selected route was designed by qualified experts who reviewed the aquatic biology, cultural resources, geotechnical engineering, rock geochemistry, water quality, wildlife, and wetlands data to design a road that is safe, responsible, and will meet regulatory requirements.

Letter No.	Commenter	Comment
139	Public	Many qualified experts have reviewed the proposed road route and design for a multitude of factors including water quality, aquatic biology, wildlife concerns, wetland delineation, cultural resources, geotechnical engineering, and rock geochemistry.
53, 140	Public	In deciding the road route, qualified experts reviewed the aquatic biology, cultural resources, geotechnical engineering, rock geochemistry, water quality, wildlife and wetlands data to design a road that is safe, responsible, and will meet regulatory requirements.
153	NGO	Constantine also employed qualified experts to review the aquatic biology, cultural resources, geotechnical engineering, rock geochemistry, water quality, wildlife and wetlands data so that the road that will safe, responsible, and meet regulatory requirements.
162	Public	That being said, any support from COMMENTER is contingent upon some key factors: local and community support; tribal support; development and implementation of an environmentally sound project, with little to no risk to salmon stocks and other subsistence and cultural resources. Where there is a minimal risk, those risks should be mitigated appropriately to avoid undue harm.
173	Tribal	As the Palmer project expands and potential impacts to COMMENTER's traditional territory and subsistence way of life present themselves it is paramount that the BLM protects COMMENTER lands, assets and resources that will be affected by this project.
142	Public	It has been stated repeatedly that Constantine will be just like Greens Creek. Greens Creek was not expected to be acid generating, but they were wrong. Greens Creek has polluted Hawk Inlet and taken away valuable subsistence gathering areas from the Native Village of Angoon.

Table 4. Summary of Scoping Comments: Cumulative Impacts

Letter No.	Commenter	Comment
72	Public	The cumulative effects of this action need to be taken into consideration. It was just a short time ago that a permit was granted to build the first section of road. Now, another section is being added. There is also now a major timber sale moving forward on the Klehini River and the possibility of road expansion and tree cutting in the Preserve. This should be considered as well. A holistic approach to the Chilkat River watershed is necessary to protect downstream resources.
78	Public	Allowing this first part of expansion is only the beginning, and while this might seem harmless enough the BLM should consider future impacts of this exploration and if we really want a large mine upstream from our world class pristine salmon rivers and the Chilkat Bald Eagle Preserve. After seeing the impacts of mining mistakes this past year, it is impossible to have confidence that the Palmer project will not have environmental impacts.
122, 127	Public	BLM must consider all cumulative impacts of past, present and reasonably foreseeable future actions in relation to this permit.
125	Public	Please consider all cumulative impacts of past, present, and possible future actions in relation to this permit.
123	Public	This action is part and parcel of a larger project that will have significant impacts on the Klehini and Chilkat Rivers, just as the last permit allowing the first section of exploration road led directly to this road expansion. The BLM must consider all cumulative impacts of past, present and foreseeable future actions in relation to this permit.

Letter No.	Commenter	Comment
142	Public	All the past, present and future impacts of these permits should be thoroughly considered.
148	Public	As the governing agency with responsibility for permitting the next stage of the Constantine mine's development, I am asking the BLM to take into account the seriousness of the overall project and to see it in its entirety as opposed to viewing only the switchback road and addition of drill holes currently being considered.
154	NGO	After Year 5, assuming continued positive results, it is anticipated that emphasis will shift from exploration to engineering & development and the ongoing use of the exploration access road will be driven by the results of those studies.
136	NGO	<p>The COMMENTER believes the Plan of Operation would be greatly improved and a finding of 'no significant impact' validated once the standard for ensuring minimal downstream impacts is met. This standard should be one which:</p> <ul style="list-style-type: none"> • in addition to the project footprint the total area that could be impacted is identified and assessed; • calculates and plans for risks associated with proposed activities instead of assuming no risk;
173	Tribal	<p>The National Environmental Policy Act (NEPA) requires consideration of cumulative impacts which result from the incremental impact of the action when added to other past, present and reasonably foreseeable future actions. See 40 CFR 1508.7 – 1508.8. The impacts considered also must include impacts from others that are not the applicant but are related to the activity such as impacts due to increased access to the general public. We also suggest that the scoping not only include consideration of the direct effects of the proposed action but also indirect effects that are caused by the action and are later in time or farther removed in distance but are still reasonably foreseeable.</p>
173	Tribal	<p>The National Environmental Policy Act (NEPA) requires consideration of cumulative impacts which result from the incremental impact of the action when added to other past, present and reasonably foreseeable future actions. See 40CFR 1508.7 – 1508.8. The impacts considered also must include impacts from others that are not the applicant but are related to the activity such as impacts due to increased access to the general public. We also suggest that the scoping not only include consideration of the direct effects of the proposed action but also indirect effects that are caused by the action and are later in time or farther removed in distance but are still reasonably foreseeable. The analysis for potential acid rock drainage is confusing and inadequate as are sections dealing with erosion and dusting.</p> <p>Finally, when taken in the context of reasonably foreseeable cumulative impacts, even without further additions forthcoming through scoping, COMMENTER finds the POO itself as written provides insufficient information for the public to make a reasonable decision as to the extent of possible impacts of the proposed action. See 40 CFR 15022.22, addressing "incomplete or unavailable information."</p> <p>We ask that this Plan be re-written to account for the identified deficiencies and re-submitted for review prior to public scoping. If the decision is to retain this plan as written and move forward with scoping, then COMMENTER finds that the proposed action will individually and cumulatively have a significant effect on the human environment and therefore will require an Environmental Assessment be conducted prior to issuance of any further permits.</p>
173	Tribal	<p>Constantine Metals has increased its activity in the affected area in incremental steps since 2006; therefore it is reasonably foreseeable that activity and disturbance at the site will increase in the near future, even within the timeframe of the current Plan of Operations.</p>

Table 5. Summary of Scoping Comments: Engineering

Letter No.	Commenter	Comment
7	Public	They have shown professional work by the work they have already done on the first part of road construction.
15	Public	As long as this road is built using good engineering and construction practices, I do not believe it will hurt anything. I have read concerns of erosion, damage to forests, eyesore, etc. These concerns are largely unfounded. There are countless miles of old logging roads in Haines with switchbacks, benched cuts, etc. They have been around forever and have never hurt a thing. These roads were not even built with sound engineering and they have been fine.
38	Public	The proposed road will be designed and built by experienced engineers and road builders in a conscientious manner.
39	Public	By placing the road away from fish stream, utilizing existing cat trails, and the utilizing the topography to limit road length the applicant has minimized potential adverse impacts of the project.
41	Public	The road is short and mostly follows an existing trail; The road has been designed by professional engineers and other experts to maximize safety and minimize impacts to the environment;
55	Public	I worked with Constantine on the construction of the first 1.5 miles of the road across the Haines State Forest land and onto BLM land for the first part of their road. I asked that they use Best Management Practices and build the road to the Engineering Standards for the Haines State Forest. Constantine exceeded these standards, putting in extra culverts, avoiding fish habitat and wetlands, and doing a quality job on the road construction. The road accessed Haines State Forest timber land which helped our timber program immensely.
68	Public	The new route has been field checked by BLM technical professionals who have concluded that the new route is much better from every pertinent factor than the old route. The new route minimizes the environmental impacts, for instance.
70	Public	My reasons for supporting the road construction are; the road is pretty similar to a road permitted and constructed in the 1970s, the road construction they have already completed is a high quality road, the Glacier Creek crossing is a couple miles from the closest anadromous fish stream, and it will allow for fewer helicopter flights and shorter flights.
71	Public	Constantine has also demonstrated environmental responsibility in selecting a road route. Its PoO indicates qualified experts have reviewed the aquatic biology, cultural resources, geotechnical engineering, rock geochemistry, water quality, wildlife and wetlands data to design a road that is safe, responsible, and will fully satisfy regulatory requirements.
138	Public	The route chosen is on much more stable ground than the '77 cat trail. Also, the proposed alignment was chosen to specifically stay away from sensitive streams
143	Public	The road that they had built to the laydown area from camp was beautifully engineered and built. It was impressive how quickly the native grass seed mix that Constantine had custom-designed for this area grew vegetation that elegantly reduces run off and stabilizes the engineered road bank.
152	Public	With the steepness of the road and in an area with considerable precipitation the possibility of compromising the waters below the road need to be taken into consideration. A road such as this will continue to impact the area long after its intended use has stopped.

Letter No.	Commenter	Comment
157	Public	The proposed road alignment follows a natural path through existing topography and has been designed to avoid and minimize environmental impact. In its evaluation and determination of the road route, Constantine hired qualified experts to review the aquatic biology, cultural resources, geotechnical engineering, rock geochemistry, water quality, wildlife and wetlands data so the road will exceed regulatory requirements.
2	Public	Engineering teams are experts at what they do and the proposed activities are consistent with land use management plans in the area.
32	NGO	In deciding the road route, qualified experts reviewed the aquatic biology, cultural resources, geotechnical engineering, rock geochemistry, water quality, and wildlife and wetlands data to design a road that is safe, responsible, and will meet regulatory requirements.
167	Public	I'm also told the route was based on qualified experts' review of aquatic biology, cultural resources, geotechnical engineering, rock geochemistry, water quality, wildlife, and wetlands data.
168	Public	In addition, they examined the geotechnical engineering, the fish and wildlife and aquatic biology, water quality, wetlands, and cultural resources.
144	Public	In deciding the road route, qualified experts reviewed the aquatic biology, cultural resources, geotechnical engineering, rock geochemistry, water quality, wildlife, and wetlands data to design a road that is safe, responsible, is protective of the environment and will meet regulatory requirements.
80	Public	Does the current design of the ponds include a "pump" system or "catch" all for the seepage as well as the overflow of "clean water"?
119	Public	These roads have been designed to have minimal impacts to the environment by utilizing pre-existing and permitted roadbeds wherever possible, a route that avoids mapped wetlands and habitat with high diversity and ecological richness, and minimizing road width and utilizing bench cut road construction techniques that will reduce the required disturbance.
61	NGO	<ul style="list-style-type: none"> • Proposed road alignment minimizes disturbance by following a blazed trail (circa 1977) where reasonable. • Road width is minimal. Additionally, the design places a staging area at the end of the road, close to the drilling activities. This conscious placement reduces helicopter use and resultant noise disturbance.
56	Public	The route selected for the road is clearly the best and most feasible alignment. It generally follows the historic access road and minimizes potential impacts.
56	Public	The route selected for the road is clearly the best and most feasible alignment. It generally follows the historic access road and minimizes potential impacts.
113	Public	The proposed road follows a natural path through the valley, and has been designed to avoid environmental impacts.
129	Public	The proposed road would take a commonsense route through the valley to their area of operation.

Table 6. Summary of Scoping Comments: Fisheries

Letter No.	Commenter	Comment
21	Public	Data from the Alaska Department of Fish and Game and Constantine demonstrate the waterways within the road area are all non fish bearing and no fish habitat will be destroyed as a result of road construction or operations;
25	Public	The road appears to be protective of environmental concerns and there does not appear to be any impact on fisheries.
37	Public	At the same time, no fish habitat will be disturbed.
38	Public	No fish habitat will be disturbed.
39	Public	By placing the road away from fish stream, utilizing existing cat trails, and the utilizing the topography to limit road length the applicant has minimized potential adverse impacts of the project.
40,46	Public	No fish bearing streams will be disturbed by the project and the proposed activities are consistent with all land use management plans in the area.
43	Public	For many of us here in the Chilkat Valley, the whole idea of a mine situated right above our fish rearing streams and rivers, and with the potential of ore trucks hauling constantly along the river bed, puts our very way of life at risk. Mine tailings ponds will often leak their toxicity into the ground at some point. A truckload of toxic mineral heavy metal slurry dumped into the river will spell the end of salmon, and along with it our fishing and tourism industries. This would be both a human and spiritual travesty. No amount of short term jobs and revenues can replace what salmon means to us.
55	Public	Constantine exceeded these standards, putting in extra culverts, avoiding fish habitat and wetlands, and doing a quality job on the road construction.
55	Public	The road accesses an area of Haines that is little used by the public and does not have significant recreation, fish or wildlife values.
55	Public	During studies by Fish and Game for the first part of the access road the Anadromous Catalogue was actually moved down Glacier Creek since there had been no evidence of anadromous fish use in Glacier Creek and these studies documented that.
69	Public	Constantine has defined a road plan that crosses creeks reaches that are absent of any fish. This avoidance of fish habitat is a environmentally responsible approach to mineral exploration.
70	Public	My reasons for supporting the road construction are; the road is pretty similar to a road permitted and constructed in the 1970s, the road construction they have already completed is a high quality road, the Glacier Creek crossing is a couple miles from the closest anadromous fish stream, and it will allow for fewer helicopter flights and shorter flights.
71	Public	Constantine has also demonstrated environmental responsibility in selecting a road route. Its PoO indicates qualified experts have reviewed the aquatic biology, cultural resources, geotechnical engineering, rock geochemistry, water quality, wildlife and wetlands data to design a road that is safe, responsible, and will fully satisfy regulatory requirements. Additionally, the Alaska Department of Fish and Game data has indicated that no fish or fish habitat will be disturbed as the waterways along the proposed route are non-fish bearing.
72	Public	I am concerned about the downstream effects on subsistence fishing for the village of Klukwan and other Haines residents. If water quality is affected, salmon could be affected. If salmon are affected, this will affect subsistence users.

Letter No.	Commenter	Comment
72	Public	I am concerned about the affects of this project on salmon, and consequently, tourism businesses like mine that rely on eagle and bear viewing.
76	Public	SALMON - The area of development lies at the head of a large and virtually pristine salmon-producing river system. And big healthy salmon-producing river systems are becoming exceedingly rare on this earth. A VMS mine, or even mine exploration, in the headwaters of this rare ecosystem is a foolish undertaking--even more so given the high rainfall, the hydrology, and the inevitability of acid rock drainage.
78	Public	The Palmer Mine Project will impact on one of our most important resources, our salmon. Without salmon we won't have bald eagles in the preserve, tourists, and subsistence fishing. It is not worth the risk, and it is hard to imagine that this can be done without risk. Mineral exploration increases the potential for acid rock drainage that could contaminate the Klehini and Chilkat Rivers with heavy metals, including copper. As little as two parts per billion of copper in rivers and streams can damage a salmon's sense of smell, make juvenile salmon vulnerable to predators and disorient adult salmon seeking their home streams.
78	Public	In addition, extending the roads and steep switchbacks above Glacier Creek will cause erosion and increase sediment in the creek which flows into major rivers and is harmful to fish.
78	Public	Allowing this first part of expansion is only the beginning, and while this might seems harmless enough the BLM should consider future impacts of this exploration; and if we really want a large mine upstream from our world class pristine salmon rivers and the Chilkat Bald Eagle Preserve. After seeing the impacts of mining mistakes this past year, it is impossible to have confidence that the Palmer project will not have environmental impacts.
116	Public	The proposed road alignment is within an area of low fish habitat value and an alignment has been selected that minimizes environmental impact.
121	Public	I would simply like to say that our fish are much more important than a boom and bust economy from mining
122	Public	The Chilkat Watershed near Haines, Alaska, supports five runs of wild salmon, and sensitive run of eulachon (hooligan), and other important fish and wildlife. What happens upstream affects everything downstream and this is no place for large-scale mining.
142	Public	I cannot state strongly enough, that there is no mining project worth risking our salmon for.
142	Public	As a long standing subsistence community, we do not wish to risk the health of our salmon and pristine waters for some temporary money to be made from mining.
146	Public	Trading clean water and healthy fisheries for a mine is BAD BUSINESS!
148	Public	A Constantine employee actually said to my 16-year-old son, who was raised trolling and aspires to earn his own living commercial fishing, "I guess you're going to have to find another livelihood because the transboundary mines are going to destroy your salmon".
148	Public	One of the slides in Constantine's presentation stands out: "Fish and Mining - YES!" Acid mine drainage and minute amounts of copper are well known to be harmful to fish.
148	Public	Comprehensive environmental review will have to convince me there is NO risk to salmon - zero - before I can get behind the development of this mine.
150	Public	First of all I would like ask you to "Think Fish First"; I am firmly opposed to the expanded surface exploration of Constantine Metal Resources for the Palmer project.

Letter No.	Commenter	Comment
150	Public	The Palmer Mine would be a acid generating mine which is harmful to fish and wildlife. Southeast Alaska, Haines, Klukwan, residents depend on these 5 species of salmon for subsistence, commercial, and sport fishing. Jeopardizing this for a relatively short term mine project, (in comparison) is a bad idea!
157	Public	Alaska Department of Fish and Game data shows that no fish or fish habitat will be disturbed as the waterways are non-fish bearing.
30	Public	Although it appears that Glacier Creek contains no salmon or other fish varieties in the disturbance area, it's my opinion that the exploration plan is so carefully and exhaustively done that the plan would protect fish if there were any fish present in the potential disturbance area.
32	NGO	Date from the Alaska Department of Fish and Game (ADF&G) has shown that the waterways within the road area are all non-fish bearing, no fish are present, and no fish habitat will be disturbed.
44	NGO	The creek system within the work area are non-fish bearing according to the Alaska Department of Fish and Game, thus no fish habitat would be disturbed by the project.
40,46	Public	No fish bearing streams will be disturbed by the project and the proposed activities are consistent with all land use management plans in the area.
45	Public	Fisheries do not appear to be threatened, and if so feel Constantine can and will respect controls that may be necessary to limit the impact.
56	Public	Also, the streams in the area are not used by salmon so there is no concern there.
58	Public	The fish and fishing industry are of paramount importance to protect as Constantine's project progresses. It seems to me, that the company, has, to this point in time, been admirably responsive to this sensitivity.
59	Public	The PoO avoids adverse environmental impacts. There are no fish bearing streams within the area of work.
172	Public	Glacier Creek is full of sediment that is eroding from the mountains — naturally. There is nothing in their Plan that concerns me about road construction impacts to water quality and fish.
166	Public	There is no salmon spawning in glacier creek.
168	Public	In addition, they examined the geotechnical engineering, the fish and wildlife and aquatic biology, water quality, wetlands, and cultural resources.
168	Public	It looks like the Alaska Department of Fish and Game determined that the waterways within the road area don't have fish so there won't be any fish habitat disturbed.
144	Public	Data from the Alaska Department of Fish and Game (ADF&G) has shown that the waterways within the road area are all non-fish bearing, no fish are present, and no fish habitat will be disturbed. Rocks and soils in the road area have been analyzed and determined to be chemically benign.
169	Public	The Alaska Department of Fish and Game data shows that waterways within the road area are all non-fish bearing, no fish are present, and no fish habitat will be disturbed.
64	Public	While it disturbs more than five acres, there are no fish bearing streams within the area of work.

Letter No.	Commenter	Comment
81	Public	The current Plan of Operations was developed after incorporating numerous scientific and engineering studies and should have very little impact to the environment. The new road does not cross any fish bearing streams, and avoids wetlands, and the rock impacted by construction is non-acid generating.
111	Public	The plan also shows great effort to take into consideration salmon streams and areas to have the least impact on the environment.
82-109	Public	I am also in support of Constantine's proposed drilling and road work and am satisfied with their efforts to avoid impacts to aquatic resources.
117	NGO	COMMENTER commends Constantine Metals for conducting exploration activities with no significant impact on Chilkat River watershed resources, and for providing a significant positive boost to the local economy.
112	Public	Their avoidance of fish habitat is a good example of how they plan to prevent unnecessary or undue degradation of the lands.
117	NGO	While not noted as a planned water source, Sarah Creek is identified as an alternative source. We encourage Constantine to work with the COMMENTER to avoid future use of water from this stream and COMMENTER is currently pursuing a water rights reservation on this stream to ensure stream levels are sufficient to sustain the anadromous fish population.
117	NGO	As COMMENTER feels it is imperative that any NEPA related document acknowledges the area directly downstream of the mineral exploration activities. This includes the Klehini River, the Chilkat Bald Eagle Preserve and the Critical Habitat Area set aside by the State of Alaska for the protection of fish and wildlife resources. The COMMENTER would like to see the potential impacts to the watershed from these exploration activities (i.e. ARD, fuel spillage, etc.) addressed in this plan with adequate remediation financial guarantee for premature closure or catastrophic accidents.
117	NGO	<ul style="list-style-type: none"> • Avoid water removal from Sarah Creek and coordinate with COMMENTER to obtain instream water reservation for fish in Sarah Creek. • Addressing the potential watershed-wide impacts from the proposed activities with adequate financial guarantee.
61	NGO	<p>The proposal before you indicates that Constantine is diligent in meeting standards by designing a project that avoids impacts:</p> <ul style="list-style-type: none"> • Creek crossing do not impact fish habitat
130	NGO	We are impressed with Constantine's comprehensive Plan of Operations and their efforts to avoid impacts to aquatic resources.
132	Public	I believe they will do what it takes to make sure water quality, fish habitat, and potential environmental degradation will be monitored and remedied.
156	Agency	The Plan accurately describes fish resources ADF&G biologists documented in tributaries to Glacier Creek along the new road. The proposed road extension would cross three more tributaries using 0.5 m diameter culverts and a 6 m long timber bridge, and cross Glacier Creek using a pre-fabricated 18.3 m long steel bridge. ADF&G biologists have not documented fish in these tributaries or the upper extent of Glacier Creek and will sample these water bodies on a future site visit. Fish Habitat Permits are not required for the proposed stream crossing structures, or for water use to support drilling activities as none of the withdrawal sites are located in anadromous or resident fish streams.
136	NGO	Though the direct impacts under this POO appear to be to low or medium functioning aquatic resources and habitats, the potential impacts to resources downstream are and will continue to be much more significant.

Letter No.	Commenter	Comment
136	NGO	The Chilkat River drainage supports one of the largest freshwater Coho and the 3rd to 4th largest Chinook fisheries in Southeast Alaska.
136	NGO	Multiple management and community plans highlight the area downstream of glacier creek, including the Klehini River, as areas to manage for the protection of fish, wildlife habitat, subsistence use and water quality. The Haines Borough Comprehensive Plan, the Chilkat Bald Eagle Preserve Management Plan, Alaska Department of Fish and Game, the Haines State Forest Plan, and the Chilkat Indian Village Outstanding Natural Resource Water Nomination resolution all highlight the significance of downstream resources. In addition, though the BLM has slated the leased lands for mining, the 1980 Memorandum of Understanding between the Alaska Department of Fish and Game and BLM commits the agency to protect fish habitat in Alaska. ⁶ The Klehini River provides habitat to all five salmon species and is only 5 miles downstream from Constantine's activities.
137	NGO	<p>The selected route was designed by qualified experts who reviewed the aquatic biology, cultural resources, geotechnical engineering, rock geochemistry, water quality, wildlife, and wetlands data to design a road that is safe, responsible, and will meet regulatory requirements.</p> <p>Data from the Alaska Department of Fish and Game has shown that the waterways within the road area are all non-fish bearing. No fish are present and no fish habitat will be disturbed.</p>
139	Public	Many qualified experts have reviewed the proposed road route and design for a multitude of factors including water quality, aquatic biology, wildlife concerns, wetland delineation, cultural resources, geotechnical engineering, and rock geochemistry. More specifically the data collected on the rocks and soils has determined them to be chemically benign and data from the Alaska Department of Fish and Game has shown that the waterways within the road area are all non-fish bearing and no fish habitat will be disturbed.
140	Public	<ul style="list-style-type: none"> • In deciding the road route, qualified experts reviewed the aquatic biology, cultural resources, geotechnical engineering, rock geochemistry, water quality, wildlife and wetlands data to design a road that is safe, responsible, and will meet regulatory requirements. • Data from the Alaska Department of Fish and Game (ADF&G) has shown that the waterways within the road area are all non-fish bearing, no fish are present, and no fish habitat will be disturbed.
153	NGO	Constantine also employed qualified experts to review the aquatic biology, cultural resources, geotechnical engineering, rock geochemistry, water quality, wildlife and wetlands data so that the road that will safe, responsible, and meet regulatory requirements. The Alaska Department of Fish and Game data shows that creek crossings within the road area are all non-fish bearing, no fish are present, and no fish habitat will be disturbed.
162	Public	That being said, any support from COMMENTER is contingent upon some key factors: local and community support; tribal support; development and implementation of an environmentally sound project, with little to no risk to salmon stocks and other subsistence and cultural resources.
79	Tribal	Continued exploration work and potential mining at the Palmer Project has the potential to significantly enhance the quality of life for members of the COMMENTER and other local residents, but it must be done in a manner that is protective of fish and water quality.
79	Tribal	Importantly, planned creek crossings will not disturb fish habitat and existing regulatory requirements, such as Storm Water Pollution Prevention Plan, adequately mitigate any potential water quality impacts from construction.

Letter No.	Commenter	Comment
173	Tribal	Large scale industrial mining by anyone in the Valley would put the wild stock salmon runs in the Chilkat Watershed at extreme risk.

Table 7. Summary of Scoping Comments: Geochemistry

Letter No.	Commenter	Comment
21	Public	Rock and soil along the road route have been analyzed and determined to be chemically benign - no ARD issues will result from road construction or operations;
21	Public	The road has been designed using qualified experts in aquatic biology, geotechnical engineering, rock geochemistry, water quality and hydrology as well as recognizing cultural resources, wetlands and wildlife habitat. It a been responsibly designed to be safe and will meet regulatory requirements;
43	Public	Mine tailings ponds will often leak their toxicity into the ground at some point.
71	Public	Constantine has also demonstrated environmental responsibility in selecting a road route. Its PoO indicates qualified experts have reviewed the aquatic biology, cultural resources, geotechnical engineering, rock geochemistry, water quality, wildlife and wetlands data to design a road that is safe, responsible, and will fully satisfy regulatory requirements.
72	Public	I am concerned about potential acid drainage from the waste rock piles and runoff water along the road. These should be contained and monitored until it has been confirmed that acid mine drainage is not a possibility. The assessment should consider the entire 10-year operating plan and not just the five years of the permit.
78	Public	Mineral exploration increases the potential for acid rock drainage that could contaminate the Klehini and Chilkat Rivers with heavy metals, including copper. As little as two parts per billion of copper in rivers and streams can damage a salmon's sense of smell, make juvenile salmon vulnerable to predators and disorient adult salmon seeking their home streams. While the Plan of Operations claims rock stored in stockpiles and berms will be free of acid rock drainage, accurate prediction of acid rock drainage is challenging and sometimes wrong. There should be containment and acid monitoring around the waste rock piles and runoff water from the road. There needs to be an assessment for the entire 10 years of the plan and not just the 5 year term of the permit.
123, 127,	Public	Constantine has stated repeatedly that this project will be just like Greens Creek. Greens Creek was not expected to be acid generating, but they were wrong.
123, 125	Public	There needs to be containment and monitoring around the waste rock piles and runoff water from the road until such time as acid rock drainage can be shown not to be a possibility.
127	Public	Constantine has stated repeatedly that this project will be just like Greens Creek. Greens Creek was not expected to be acid generating, but they were wrong. Greens Creek has polluted Hawk Inlet for years by using a mixing zone to bypass water quality standards. Constantine won't have that option and all acid runoff from exposed rock will end up in the Klehini and Chilkat Rivers affecting our water quality and salmon stocks.
148	Public	Tailings disposal is still a big unknown.
157	Public	In its evaluation and determination of the road route, Constantine hired qualified experts to review the aquatic biology, cultural resources, geotechnical engineering, rock geochemistry, water quality, wildlife and wetlands data so the road will exceed regulatory requirements.

Letter No.	Commenter	Comment
157	Public	The analysis of rocks and soils in the road area have indicated they are chemically benign.
32	NGO	In deciding the road route, qualified experts reviewed the aquatic biology, cultural resources, geotechnical engineering, rock geochemistry, water quality, and wildlife and wetlands data to design a road that is safe, responsible, and will meet regulatory requirements.
32	NGO	Rocks and soils in the road area have been analyzed and determined to be chemically benign.
44	NGO	Aquatic biology, cultural resource, geotechnical engineering, rock geochemistry, water quality, and wildlife and wetlands data supported the development of Constantine's proposal to design a road that will be safe and environmentally responsible.
59	Public	Environmental studies have been conducted that show that the rocks within the area of disturbance are not acid-generating.
167	Public	I'm also told the route was based on qualified experts' review of aquatic biology, cultural resources, geotechnical engineering, rock geochemistry, water quality, wildlife, and wetlands data.
168	Public	For building the road they analyzed the rock and soils that would be disturbed and determined that are chemically benign.
144	Public	In deciding the road route, qualified experts reviewed the aquatic biology, cultural resources, geotechnical engineering, rock geochemistry, water quality, wildlife, and wetlands data to design a road that is safe, responsible, is protective of the environment and will meet regulatory requirements.
64	Public	Environmental studies have been conducted which show the rock within the area of disturbance is not acid-generating.
80	Public	What is the life span of the toxicity in the tailings pond? Is there a material made today that will outlive that toxicity?
81	Public	The new road does not cross any fish bearing streams, avoids wetlands, and the rock impacted by construction is non-acid generating.
117	NGO	The COMMENTER believes there are some areas of Constantine's Plan of Operations that should be addressed in order to reach the finding of "no significant impact" as part of the NEPA process. These issues are tied to five components: wildlife information, noxious weeds management, monitoring for acid rock drainage (ARD) from rock stockpile areas, water sources, and the need to look at the watershed-wide potential for impacts from these activities.
117	NGO	Rock geochemistry of all waste rock should be tested during construction and stockpiles monitored yearly.
61	NGO	Proposed road development occurs in area of benign rock and soil condition

Letter No.	Commenter	Comment
156	Agency	<p>Performance Standards Appendix 2 of the Plan, Specific Performance Standard (b)(2) Mining wastes, discusses the manner in which tailings, dumps, and other materials will be disposed. However, Section 3.23 of the Plan points out that there will not be any tailings as this is an exploration project. The use of these terms should be consistent and all documents should be clear about the scope of the project.</p> <p>Potential Acid Drainage Section 6.13 of the Plan discusses potential for acid drainage or leachate. The switchback road will be constructed on a slope of basalt talus which ABA testing shows to have high neutralizing potential. If any geological units are encountered other than the basalt, or if bedrock is encountered below the talus or in other areas, the rock should be geochemically characterized using appropriate methods.</p>
151	Public	I understand Constantine's testing demonstrates no environmental concern or indication of acid rock drainage from bedrock that may be blasted for road construction.
136	NGO	In the current POO Constantine's capacity to pay for monitoring and mitigation of noxious weeds, water quality, and Acid Mine Drainage is not documented.
137	NGO	The selected route was designed by qualified experts who reviewed the aquatic biology, cultural resources, geotechnical engineering, rock geochemistry, water quality, wildlife, and wetlands data to design a road that is safe, responsible, and will meet regulatory requirements.
139	Public	Many qualified experts have reviewed the proposed road route and design for a multitude of factors including water quality, aquatic biology, wildlife concerns, wetland delineation, cultural resources, geotechnical engineering, and rock geochemistry.
53, 140	Public	In deciding the road route, qualified experts reviewed the aquatic biology, cultural resources, geotechnical engineering, rock geochemistry, water quality, wildlife and wetlands data to design a road that is safe, responsible, and will meet regulatory requirements.
53,140, 144	Public	Rocks and soils in the road area have been analyzed and determined to be chemically benign
153	NGO	Constantine also employed qualified experts to review the aquatic biology, cultural resources, geotechnical engineering, rock geochemistry, water quality, wildlife and wetlands data so that the road that will safe, responsible, and meet regulatory requirements.
153	NGO	Rocks and soils in the road area have been analyzed and determined to be chemically benign, and importantly, a reclamation plan to return the area to a natural setting and a bond will be in place.
173	Tribal	The analysis for potential acid rock drainage is confusing and inadequate as are sections dealing with erosion and dusting.
120	Public	The stability and chemistry of the geologic formations that support the road for safety of personnel and the surrounding environment.
142	Public	It has been stated repeatedly that Constantine will be just like Greens Creek. Greens Creek was not expected to be acid generating, but they were wrong. Greens Creek has polluted Hawk Inlet and taken away valuable subsistence gathering areas from the Native Village of Angoon.

Table 8. Summary of Scoping Comments: Geotechnical

Letter No.	Commenter	Comment
21	Public	The road has been designed using qualified experts in aquatic biology, geotechnical engineering, rock geochemistry, water quality and hydrology as well as recognizing cultural resources, wetlands and wildlife habitat. It a been responsibly designed to be safe and will meet regulatory requirements;
71	Public	Constantine has also demonstrated environmental responsibility in selecting a road route. Its PoO indicates qualified experts have reviewed the aquatic biology, cultural resources, geotechnical engineering, rock geochemistry, water quality, wildlife and wetlands data to design a road that is safe, responsible, and will fully satisfy regulatory requirements.
157	Public	In its evaluation and determination of the road route, Constantine hired qualified experts to review the aquatic biology, cultural resources, geotechnical engineering, rock geochemistry, water quality, wildlife and wetlands data so the road will exceed regulatory requirements.
32	NGO	In deciding the road route, qualified experts reviewed the aquatic biology, cultural resources, geotechnical engineering, rock geochemistry, water quality, and wildlife and wetlands data to design a road that is safe, responsible, and will meet regulatory requirements.
44	NGO	As Constantine advances the Palmer Project it needs to improve road access to the core of their activities to support employee safety, exploration activities, and environmental and geotechnical studies.
44	NGO	Aquatic biology, cultural resource, geotechnical engineering, rock geochemistry, water quality, and wildlife and wetlands data supported the development of Constantine's proposal to design a road that will be safe and environmentally responsible.
167	Public	I'm also told the route was based on qualified experts' review of aquatic biology, cultural resources, geotechnical engineering, rock geochemistry, water quality, wildlife, and wetlands data.
168	Public	In addition, they examined the geotechnical engineering, the fish and wildlife and aquatic biology, water quality, wetlands, and cultural resources.
144	Public	The Palmer Project is a volcanogenic massive sulphide (VMS) type deposit that is located within the same belt of rocks that is host to the Greens Creek and Windy Craggy VMS deposits - both widely recognized to be world class systems. For both grade and size, there is no better VMS belt to explore. As a deposit class, VMS are attractive for being polymetallic and for having high dollar value per ton.
144	Public	In deciding the road route, qualified experts reviewed the aquatic biology, cultural resources, geotechnical engineering, rock geochemistry, water quality, wildlife, and wetlands data to design a road that is safe, responsible, is protective of the environment and will meet regulatory requirements.
144	Public	Additionally, the road will offer better access for exploration, environmental, and geotechnical studies, and will also improve the safety of workers.
137	Public	The selected route was designed by qualified experts who reviewed the aquatic biology, cultural resources, geotechnical engineering, rock geochemistry, water quality, wildlife, and wetlands data to design a road that is safe, responsible, and will meet regulatory requirements.

Letter No.	Commenter	Comment
139	Public	Many qualified experts have reviewed the proposed road route and design for a multitude of factors including water quality, aquatic biology, wildlife concerns, wetland delineation, cultural resources, geotechnical engineering, and rock geochemistry. More specifically the data collected on the rocks and soils has determined them to be chemically benign and data from the Alaska Department of Fish and Game has shown that the waterways within the road area are all non-fish bearing and no fish habitat will be disturbed.
53,140	Public	In deciding the road route, qualified experts reviewed the aquatic biology, cultural resources, geotechnical engineering, rock geochemistry, water quality, wildlife and wetlands data to design a road that is safe, responsible, and will meet regulatory requirements.
153	NGO	Constantine also employed qualified experts to review the aquatic biology, cultural resources, geotechnical engineering, rock geochemistry, water quality, wildlife and wetlands data so that the road that will safe, responsible, and meet regulatory requirements.

Table 9. Summary of Scoping Comments: Health and Safety

Letter No.	Commenter	Comment
11	Public	From my time spent on the mountain - building drill pads, mapping, laying geophysical loops, and conducting various environmental studies - it is apparent that the most dangerous aspects of the job are directly related to helicopter use. The proposed road expansion and laydown area would significantly reduce helicopter flight time and necessity, therefore reducing many of the inherent hazards associated with helicopter supported work. As fun as the helicopter is to ride in, the timely approval of this expansion plan would have many benefits, first and foremost the increased safety of those working from/near the helicopter.
21	Public	The road was designed with worker safety in mind as the number one priority;
21	Public	The road has been designed using qualified experts in aquatic biology, geotechnical engineering, rock geochemistry, water quality and hydrology as well as recognizing cultural resources, wetlands and wildlife habitat. It a been responsibly designed to be safe and will meet regulatory requirements;
22	Public	I believe the plan is well thought out and minimizes impact while allowing efficient and safe exploration to take place.
25	Public	The road will increase safety and facilitate additional exploration, potentially decreasing the time frame to mine production that will have a significant beneficial economic impact for the local communities, state, and the people of the United States.
26	Public	The application thoroughly addresses their actions, the potential and real impacts of their proposal and the improvements to safety and reclamation of the 1970s-era trail that their route largely follows.
31	Public	The plan for the construction of a road into the referenced area for both access and safety is reasonable and acceptable as put forth in the project description.
37	Public	Utmost in their minds is worker safety and protecting habitat. The proposed road alignment will make it safer for their workers to access areas of exploration.
38	Public	Please allow Constantine Metal Resources to realign 2.5 miles of road in order to more safely reach areas of exploration. I have been working for Constantine for three summers and can attest to their attention to safety and proper land use practices.

Letter No.	Commenter	Comment
39	Public	The applicant has also demonstrated that the construction of the proposed road will have a positive impact on worker health and safety.
40,46	Public	From my experience at Jualin and other property in Southeast Alaska I am very familiar with both helicopter and road supported drilling and see the safety aspects alone as sufficient justification for approval of Constantine's proposal. The shorter flight distance will mean that the helicopters can carry and burn less fuel. Carrying less fuel will mean they can carry a larger payload and thus make fewer trips in less time. Small items but they add up. Constantine's proposal has developed a road plan that will be safe, environmentally responsible and avoid and minimize environmental impacts
42	Public	The road access will improve worker safety.
55	Public	The access road also makes the mining exploration and future operation safer so that access in and out can occur on days when helicopter access is unfeasible. This is important for worker safety.
60	Public	I want to share my full support for the proposed Constantine Palmer Mine road construction project to improve safe, reliable access to the site, I have personally worked with some of the management team on a previous mine project (Niblack) and truly believe the proposed plan, if given approval will be implemented with safety and environmental concerns being taken very seriously.
68	Public	This new route will significantly improve worker safety, the top priority factor.
70	Public	This project protects the natural environment, provides additional safety to workers, and lessens potential helicopter disturbances to neighbors and wildlife.
71	Public	In order to advance the Palmer Project, Constantine has proposed the construction of a 2.5-mile road to provide reasonable, safe year-round access to state and federal mining claims. Constantine has shown that safety is a top priority by proposing access to enhance the safety of workers at the Palmer site, increasing the availability to ground-supported and providing safer access for helicopter-supported exploration activities.
74	Public	This road is essential to provide access to the main mining exploration area so the property can continue to be evaluated. It will also to enhance worker safety.
77	Public	I think that expanding the road would be a great addition. It would cut down flight time in the helicopter saving fuel and lowering emissions, I assume a local company would be hired to continue the road construction there for helping the local economy, and it will allow Constantine to access more ground safer and more efficiently.
114	NGO	I am assured that their Mine Plan of Operations is sound and minimizes and avoids environmental impacts even as it improves project efficiency and worker safety.
116	Public	Having been involved in mineral exploration activities, including those not accessible by road, and surviving a helicopter crash on one project, I am keenly aware of the extra measure of safety provided by road access. Even a pioneer road provides a secure means of access and/or evacuation during weather that is dangerous to aircraft. Therefore, even if aircraft are part of the exploration operations, a 2.5 mile road is obviously a prudent option for protecting worker safety.
118	Public	The project is necessary to provide safe, reasonable, and efficient access to continue exploration
124	Public	And to make this a safe place for all who are working on this project is to go forth with the remainder of this road expansion. I do agree with that it will be much safer if we used vehicles to transport material and workers to their destination rather than rely on helicopters.

Letter No.	Commenter	Comment
138	Public	The proposed road will also provide better safety for workers by eliminating some helicopter work and allowing an alternate evacuation from area during bad flying weather.
141	Public	The road is an important step in reducing the environmental impacts of the project as well as enhancing the safety of the project staff.
155	Public	The proposed road project is an important step in being able to continue to safely explore the Palmer Project.
157	Public	Constantine should be commended for their commitment providing a safer environment for workers and visitors by proposing a road allowing year-round access to state and federal mining claims.
161	Public	Worker safety will be enhanced by aspects of the plan.
164	Public	A road-supported project in this terrain and climate will provide a better alternative for safe and efficient access than by means of helicopter alone.
2	Public	For the safety of their workers this should be of importance.
10	Public	Safety is a top priority.
6	Public	I believe the avalanche threat is the real issue. The road location and design appears to take that in consideration. I therefor support all aspects of the Plan.
32	NGO	The road was designed with worker safety as a number one priority: this proposed road access will enhance the safety of workers at the Palmer site.
33	Public	The improved access will enhance worker safety.
44	NGO	As Constantine advances the Palmer Project it needs to improve road access to the core of their activities to support employee safety, exploration activities, and environmental and geotechnical studies.
40,46	Public	From my experience at Jualin and other property in Southeast Alaska I am very familiar with both helicopter and road supported drilling and see the safety aspects alone as sufficient justification for approval of Constantine's proposal.
47	Public	Since assuming the property lease in 2006 they have done an excellent job in providing safe working conditions for their employees. Their operating plan would provide access to the lower region of the work sight when weather conditions do not permit the use of helicopter's, thus insuring additional safety for the crew.
56	Public	Road access would allow for more efficient and safe operations as the project expands.
59	Public	Travel to the work area by vehicle will be safer for Constantine's workers than flying to it by helicopter.
167	Public	I understand the road was designed with worker safety in mind.
168	Public	They designed the road with worker safety as the number one priority.
53,144	Public	The road was designed with worker safety as a number one priority: this proposed road access will enhance the safety of workers at the Palmer site.
144	Public	In deciding the road route, qualified experts reviewed the aquatic biology, cultural resources, geotechnical engineering, rock geochemistry, water quality, wildlife, and wetlands data to design a road that is safe, responsible, is protective of the environment and will meet regulatory requirements.

Letter No.	Commenter	Comment
144	Public	Additionally, the road will offer better access for exploration, environmental, and geotechnical studies, and will also improve the safety of workers.
169	Public	This proposed road will improve safety of the workers that are exploring and doing environmental studies on the proposed project.
64	Public	Most importantly, traveling to the work area by vehicle will be safer for employees than accessing the site by helicopter.
119	Public	In order to facilitate exploration activities and provide safe and reasonable access to their project and drill sites, Constantine is proposing 37.6 acres of new disturbance, of which approximately 95% is related to construction of new access road.
56	Public	This road is necessary for the safe exploration of the area. Several years of helicopter-supported drilling from a base camp several miles away has been done safely but the project has reached the stage where a large amount of drilling is necessary. This road will also accommodate geotechnical and environmental studies that are needed next. Road access would allow for more efficient and safe operations as the project expands.
63	Public	Access to this mining location via a short road is the most appropriate and safest transportation option.
113	Public	The new road project will help support new exploration activities, environmental and geotechnical studies, and will improve worker safety for its team of scientists, technicians, and development specialists.
119	Public	Constantine Metals has successfully conducted exploration activities at the Palmer Project since 2006 and the new PoO will allow them to safely and efficiently continue these activities over the next five to ten years.
132	Public	As far as the 2.5 mile road extension, the current conditions have not remedied the dangerous work conditions. Working on a mountain, and being mostly reliant on a helicopter for getting off the mountain is hazardous. A worker is completely dependent on the weather for getting off the mountain. Extending this road will make working conditions much safer. Drillers, mountain workers, geologist and others will have a much better option of hiking to a safety point. In this exploration phase of this development, having a developed road closer to operation, will not only be safer, but will use less fossil fuels.
133	Public	This road will provide safer less expensive access to the project.
135	Public	Due to its much higher elevation and proximity to Constantine's working area, the 2016 proposed road will make a significant increase in safety for employees and contractors. Road access to respond to emergency situations at night time or when it is foggy and unsafe to fly (fog, hellish wind, etc.) is invaluable. Having this access will limit flights and exposure of crews to the many hazards of air travel.
137	NGO	The selected route was designed by qualified experts who reviewed the aquatic biology, cultural resources, geotechnical engineering, rock geochemistry, water quality, wildlife, and wetlands data to design a road that is safe, responsible, and will meet regulatory requirements.
137	NGO	Additionally, the road will offer better access for exploration, environmental, and geotechnical studies, and will also improve the safety of workers.
139	Public	This proposed road is consistent with all of the land use management plans in the area (Borough, State, Alaska Mental Health Trust, and BLM) and would enhance safe worker access to the project area, which cannot be understated.

Letter No.	Commenter	Comment
140	Public	Better access for exploration, environmental and geotechnical studies, and improved safety of workers is required to advance the Palmer Project near Haines, operated by Constantine Metal Resources Ltd.
53,144	Public	The road was designed with worker safety as a number one priority: this proposed road access will enhance the safety of workers at the Palmer site
153	NGO	To advance the Palmer Project near Haines, Constantine Metal Resources Ltd. Requires better access for exploration and environmental and geotechnical studies, and also to improve the safety of it workers. Constantine also employed qualified experts to review the aquatic biology, cultural resources, geotechnical engineering, rock geochemistry, water quality, wildlife and wetlands data so that the road that will safe, responsible, and meet regulatory requirements.
153	NGO	In its evaluation and determination of the road route, Constantine thoroughly analyzed a number of factors. First and foremost, the road was designed with worker safety as a number one priority.
153	NGO	Constantine has shown due diligence and proposed a responsible and safe plan.
163	NGO	The road has been designed to be safe, responsible and will meet regulatory requirements.
79	Tribal	The site visit also helped us understand that road access into the steep terrain will enhance safety for their workers.
120	Public	The stability and chemistry of the geologic formations that support the road for safety of personnel and the surrounding environment.
160	NGO	It will improve safety for workers, and provide easier access for exploration activities, environmental and geotechnical studies.
66	Public	I was very involved in the last project and can't say enough about Constantine's concerns for the environment and safety. The road access is a good plan that minimizes and avoids impacts, will improve worker safety, and will help Constantine perform the work needed for evaluating the project.

Table 10. Summary of Scoping Comments: Land Use

Letter No.	Commenter	Comment
21	Public	The proposed activities at he Palmer Project are consistent with the Borough, Alaska Mental Health Trust and BLM Land Use Plans for the area
25	Public	The road is consistent with BLMs Multiple Land Use policy.
27	Public	The project can be accomplished with minimal impacts and appears by all measures to be reclaimable to a productive land use. To continue the logical and workmanlike development of this project, surface access is required.
40,46	Public	No fish bearing streams will be disturbed by the project and the proposed activities are consistent with all land use management plans in the area.
41	Public	The activities of the small project are all compatible with existing federal state and local land use plans

Letter No.	Commenter	Comment
62	Public	I would ask that these roads on public land be made available to the public. If hazardous operations are in progress I would ask that a representative of the mine be at the gate/roadway entrance or office to explain why the road is closed and how long the closure is going to be in effect.
68	Public	The Palmer Project is a very good exploration project consistent with all the land use management plans controlling this work.
72	Public	This area, while public, is not being made accessible to the public. The road is blocked off and the public is not allowed.
116	Public	The mineralization under exploration for the Project is within State and Federal planning areas where mineral development is contemplated and should be encouraged.
155	Public	The proposed road project seems to meet established regulatory requirements and various land use management plans in effect in the area.
2	Public	Engineering teams are experts at what they do and the proposed activities are consistent with land use management plans in the Area.
32	NGO	The proposed activities at the Palmer Project are all consistent with the land use management plans in the area — Borough, State, Alaska Mental Health Trust, and BLM plans.
34	Public	When I installed the bridge at 26 Mile it opened up the Klehini to home sites, wood cutters, trappers, recreationists as well as access to Mosquito Lake and the Kelsall. By bridging Glacier Creek it provides the public access to Jarvis Glacier which will expand tourism.
56	Public	The area has been known for mineral development for more than 100 years and the first mining claims for this mineralized zone were staked in 1969. The area land plans designate the area for mineral development and the State of Alaska and the Alaska Mental Health Trust have selected the area because of that potential. Indeed, the federal mining claims are an isolated island surrounded by State/Mental Health owned lands.
59	Public	The PoO is consistent with BLM's, the Borough's, the Alaska Mental Health Trust's, and the State of Alaska's land management plans.
53,140,144	Public	The proposed activities at the Palmer Project are all consistent with the land use management plans in the area — Borough, State, Alaska Mental Health Trust, and BLM plans.
65	Agency	The COMMENTER has significant land holdings in the Haines area, including over 90,000 acres of fee and mineral estate that surround the federal claims where the proposed work outlined in the subject Plan of Operations is to occur. In fact, this land is leased to Constantine for mineral exploration and development.
65	Agency	In the near term, the proposed road extension will directly benefit the federal claims, but it is anticipated that any exploration success and geological knowledge gained on those claims will also enhance the value and opportunity for success on the adjacent Trust land.
65	Agency	Furthermore, since the proposed road will facilitate access to the Alaska Mental Health Trust (Trust) land both now and in the future (Trust land is a perpetual trust), the COMMENTER requests that the BLM consider that the road be left in place for future use.

Letter No.	Commenter	Comment
113	Public	Section 2.1.4. of Constantine's Plan of Operations highlight Borough, State, and Federal land use management plans which all designate this area as being appropriate for the development of mineral resources. It is vital to note that Constantine's plans are significantly aligned with the Haines Borough's Comprehensive Plan, which specifies "responsible development of renewable and non-renewable resources" as being one of the community's core goals. Significantly, Constantine's proposed activities would occur within a historic mining district area which has been subject to continual use for over 100 years.
151	Public	The potential mine is currently located on approximately 6,765 acres of Bureau of Land Management lands, which the State of Alaska has selected for future conveyance. It also appears the deposit spans 63 state mineral claims over 9,200 acres, some of which are already owned by the Alaska Mental Health Trust (AMHT).
136	NGO	The federal land holdings being leased by Constantine are managed by BLM for mining activity and many local management plans support mining activity in this area, however it must be stated in any NEPA related document that the area directly downstream of the mineral exploration activity is the Klehini River, the Chilkat Bald Eagle Preserve and the Critical Habitat Area set aside by the Alaska Legislature for the protection of fish and wildlife resources, and Klukwan and the Chilkat Indian Village.
137	NGO	Furthermore, the proposed activities at the Palmer Project are all consistent with the land use management plans in the area – Borough, State, Alaska Mental Health Trust, and BLM plans.
139	Public	This proposed road is consistent with all of the land use management plans in the area (Borough, State, Alaska Mental Health Trust, and BLM) and would enhance safe worked access to the project area, which cannot be understated.
53,140,144	Public	The proposed activities at the Palmer Project are all consistent with the land use management plans in the area – Borough, State, Alaska Mental Health Trust, and BLM plans.
163	NGO	However, it is important to note the proposed activities at the Palmer Project are all consistent with the land use management plans in the area - Borough, State of Alaska (SOA), Alaska Mental Health Trust and BLM plans.
173	Tribal	As the Palmer project expands and potential impacts to COMMENTER's traditional territory and subsistence way of life present themselves it is paramount that the BLM protects COMMENTER lands, assets and resources that will be affected by this project.
120	Public	The proposed activities are consistent with the land use management plans, of the Borough, State and Federal plans that apply to that area.

Table 11. Summary of Scoping Comments: Mitigation

Letter No.	Commenter	Comment
136	NGO	<ul style="list-style-type: none"> proposes contingency plans and costs associated to manage any future event or circumstance instead of assuming best case scenarios;
136	NGO	This POO authorizes Constantine North to build the infrastructure to knowingly carryout these activities with out any contingency plans and/or monies to cover costs associated with mitigating an issue if something was to go wrong.
136	NGO	This plan as written fails to provide any confidence that if something should go wrong and impacts to downstream habitat do occur, there are the plans and monies available to address the issues.

Letter No.	Commenter	Comment
162	Public	That being said, any support from COMMENTER is contingent upon some key factors: local and community support; tribal support; development and implementation of an environmentally sound project, with little to no risk to salmon stocks and other subsistence and cultural resources. Where there is a minimal risk, those risks should be mitigated appropriately to avoid undue harm.
79	Tribal	Importantly, planned creek crossings will not disturb fish habitat and existing regulatory requirements, such as Storm Water Pollution Prevention Plan, adequately mitigate any potential water quality impacts from construction.

Table 12. Summary of Scoping Comments: NEPA

Letter No.	Commenter	Comment
41	Public	The project is providing positive economic benefits to the local economy and will continue to do so if the mineral prospect ultimately is permitted for construction and operations, a decision which will require full Environmental Impact Statement compliant with the provisions of the National Environmental Policy Act
127	Public	Constantine is doing exploration, not mining, a full EIS should be required before they go any further.
148	Public	I feel a full Environmental Impact Statement should be completed before further permits are granted.
155	Public	I encourage the BLM to approve the Exploration Plan of Operations and approve related NEPA actions to allow the Palmer Project to continue the forward momentum it has established in spite of a downturn in the mining industry and the State economy.
117	NGO	The COMMENTER believes there are some areas of Constantine's Plan of Operations that should be addressed in order to reach the finding of "no significant impact" as part of the NEPA process.
117	NGO	<p>Watershed-wide Impacts</p> <p>It is important to note that the Klehini River (5 miles downstream from Constantine's activities) provides habitat for all five Pacific salmon species and the Chilkat River drainage supports one of the largest freshwater Coho and the 3rd to 4th largest Chinook fisheries in Southeast Alaska.</p> <p>As a watershed council, COMMENTER feels it is imperative that any NEPA related document acknowledges the area directly downstream of the mineral exploration activities. This includes the Klehini River, the Chilkat Bald Eagle Preserve and the Critical Habitat Area set aside by the State of Alaska for the protection of fish and wildlife resources. COMMENTER would like to see the potential impacts to the watershed from these exploration activities (i.e. ARD, fuel spillage, etc.) addressed in this plan with adequate remediation financial guarantee for premature closure or catastrophic accidents.</p>
130	NGO	Furthermore, it seems our limited tax dollars do not need to be spent on a lengthy Environmental Assessment for a road proposal that is essentially reestablishing an access route that was previously constructed in 1977.
131	Public	As a matter of fact, it essentially echoes the NEPA analyses used on the development of the presently operating Greens Creek and Kensington mines (e.g., CE for some initial heliborne drilling, EA for reasonably necessary access road building, & EIS for production level mine development).

Letter No.	Commenter	Comment
136	NGO	Constantine fails to mention Klukwan and the CIV at all in its POO. In addition, because Klukwan is a minority low-income community - under the Environmental Justice executive order 12898- BLM is charged with engaging CIV early on in the NEPA process and ensuring permittees are adequately addressing Klukwan's concerns. This engagement would include mandating Constantine to conduct both a social impact assessment and economic impact assessment.
137, 153	NGO	The road, which follows a natural path through the valley and has been designed to avoid and minimize environmental impacts, will bring the total disturbance to over 5 acres, triggering the need for a Plan of Operations and NEPA review by the Bureau of Land Management (BLM).
53,140, 144	Public	Public comments will be considered through the National Environmental Policy Act (NEPA) process currently underway.
140	Public	The road, which follows a natural path through the valley and has been designed to avoid and minimize environmental impacts, will bring the total disturbance to over 5 acres, triggering the need for a Plan of Operations and NEPA review by the Bureau of Land Management (BLM).
173	Tribal	In addition, because COMMENTER is a minority, low-income community – under the Environmental Justice executive order 12898 – BLM is charged with engaging COMMENTER early on in the NEPA process and ensuring permittees are adequately addressing COMMENTER's concerns. This engagement would include mandating Constantine to conduct both a social impact assessment and economic impact assessment.
173	Tribal	The National Environmental Policy Act (NEPA) requires consideration of cumulative impacts which result from the incremental impact of the action when added to other past, present and reasonably foreseeable future actions. See 40 CFR 1508.7 – 1508.8. The impacts considered also must include impacts from others that are not the applicant but are related to the activity such as impacts due to increased access to the general public.

Table 13. Summary of Scoping Comments: Operation

Letter No.	Commenter	Comment
10	Public	They have very experienced and knowledgeable personnel running the field operations.
40,46	Public	The shorter flight distance will mean that the helicopters can carry and burn less fuel. Carrying less fuel will mean they can carry a larger payload and thus make fewer trips in less time. Small items but they add up.

Table 14. Summary of Scoping Comments: Noise

Letter No.	Commenter	Comment
45	Public	Noise (nearby neighbors) doesn't appear to be an issue.
61	NGO	Additionally, the design places a staging area at the end of the road, close to the drilling activities. This conscious placement reduces helicopter use and resultant noise disturbance.
132	Public	Having less helicopters will contribute to less impacts, not only with fuel consumption but also noise.

Letter No.	Commenter	Comment
135	Public	It has also allowed for us to reduce helicopter noise for our neighbors as flights in Glacier Creek area are hardly audible from the Klehini.

Table 15. Summary of Scoping Comments: Permitting Requirements

Letter No.	Commenter	Comment
18	Public	I have read the Plan of Operations. It is well thought-out and reasonably complete. It is protective of the environment and meets the requirements of 43 CFR 3809.401 and 43 CFR 3809.420 as well as meeting the requirements of Alaska Department of Natural Resources and Department of Environmental Conservation/Water.
21	Public	The road has been designed using qualified experts in aquatic biology, geotechnical engineering, rock geochemistry, water quality and hydrology as well as recognizing cultural resources, wetlands and wildlife habitat. It a been responsibly designed to be safe and will meet regulatory requirements;
27	Public	I encourage Constantine to prioritize good stewardship and I encourage the BLM to emphasize compliance inspection rather than protracted planning in the abstract.
27	Public	To date, Constantine has demonstrated they can plan, mobilize, execute, and evaluate their performance. They should be given the opportunity to continue in the long road to a producing mine.
71	Public	Constantine has also demonstrated environmental responsibility in selecting a road route. Its PoO indicates qualified experts have reviewed the aquatic biology, cultural resources, geotechnical engineering, rock geochemistry, water quality, wildlife and wetlands data to design a road that is safe, responsible, and will fully satisfy regulatory requirements.
123	Public	There needs to be containment and monitoring around the waste rock piles and runoff water from the road until such time as acid rock drainage can be shown not to be a possibility.
125	Public	There needs to be an assessment for ten years of the Plan of Operation; not just the five year term of permit. There needs to be containment and monitoring around the waste rock piles and runoff water from the road until such time as acid rock drainage can be shown not to be a possibility.
127	Public	There needs to be an assessment for the entire 10 years of the Plan of Operations and not just the five-year term of the permit. There needs to be containment and water quality monitoring around the waste rock piles and runoff water from the road until such time as acid rock drainage can be shown not to be occurring.
155	Public	The proposed road project seems to meet established regulatory requirements and various land use management plans in effect in the area.
157	Public	In its evaluation and determination of the road route, Constantine hired qualified experts to review the aquatic biology, cultural resources, geotechnical engineering, rock geochemistry, water quality, wildlife and wetlands data so the road will exceed regulatory requirements.
158	Public	The exploration phase of the project will require many years more years of effort. In addition to delineating and quantifying the resource, the exploration effort includes important environmental assessments that will make a significant contribution to the understanding of the region, as well as provide baseline data for establishing permitting requirements, should the project advance to any actual mining.

Letter No.	Commenter	Comment
16	Public	I trust that any adverse environmental impacts of their proposed road will be minimized because the State and Federal agencies involved in the permitting process will demand it and Constantine and their sub contractors have proven themselves to be environmentally responsible.
32	NGO	In deciding the road route, qualified experts reviewed the aquatic biology, cultural resources, geotechnical engineering, rock geochemistry, water quality, and wildlife and wetlands data to design a road that is safe, responsible, and will meet regulatory requirements.
144	Public	In deciding the road route, qualified experts reviewed the aquatic biology, cultural resources, geotechnical engineering, rock geochemistry, water quality, wildlife, and wetlands data to design a road that is safe, responsible, is protective of the environment and will meet regulatory requirements.
169	Public	Constantine has done a very methodical and detailed job of studying the area of proposed disturbance. Employing many qualified professional experts to evaluate the route in order the meet all the regulatory requirements.
64	Public	The plan for the road appears to avoid adverse environmental impacts. While it disturbs more than five acres, there are no fish bearing streams within the area of work. Environmental studies have been conducted which show the rock within the area of disturbance is not acid-generating. Constantine Metals will be required to post a bond to ensure these protections.
80	Public	Does the current design of the ponds include a “pump” system or “catch” all for the seepage as well as the overflow of “clean water”? Who monitors these systems? Hopefully a 3~ party unaffiliated with either the mine or The Borough.
131	Public	I strongly urge you to evaluate the environmental impacts associated with the reasonable access (road proposal) that the proponents have requested via an EA, the most expeditious NEPA instrument available (If I recall correctly under BLM regs. if the proposal had been under 5 acres it could have been authorized by categorical exclusion).
156	Agency	<p>CNI currently holds a multi-year (2014-2018) Miscellaneous Land Use Permit (MLUP) for hard rock exploration and reclamation (Permit #5690; as amended), which was issued on April 25, 2014 by ADNR, Division of Mining Land and Water (DMLW), Mining Section.</p> <p>The proposed activities would not affect the stipulations in the existing authorization under MLUP 5690, which is effective until December 31, 2018. An increase in disturbance on federal land will likely influence the acreage bonded through the Statewide Bond Pool, which is currently utilized by CNI. The Statewide Bond Pool deposit and authorization for 2016 operations will be due no later than April 1, 2016 or prior to operation, whichever is earlier, per 11 AAC 97.425(d) and requires the Plan of Operations to be approved by BLM. CNI is currently bonded for 5 acres (as of the end of 2015).</p>
156	Agency	<p>The ADNR, DMLW, Water Section has issued the following Temporary Water Use Authorizations (TWUA5) to CNI:</p> <ul style="list-style-type: none"> • F2014-101 (issued August 6, 2014, expires October 31, 2018); • F2014-102 (issued August 13, 2014, expires October 31, 2018); and • F2015-080 (issued July 14, 2015, expires July 13, 2020). <p>In the event CNI will need to divert, impound, or withdraw water for the proposed bridge installations a TWUA may be needed if the water use meets the definition of significant amount of water, per 11 AAC 93.03 5. A diversion would be considered a non-consumptive use, per 11 AAC 93.970 (33).</p> <p>CNI has also obtained a Construction General Permit from ADEC, Division of Water for the existing access road.</p>

Letter No.	Commenter	Comment
156	Agency	Fish Habitat Permits are not required for the proposed stream crossing structures, or for water use to support drilling activities as none of the withdrawal sites are located in anadromous or resident fish streams.
156	Agency	The first sentence in the second paragraph of Section 2.2.6 (Water Uses and Sources) should read "Authorizations TWJA F2014-101 and <u>TWUA</u> F2014-102 each allow..." [Underlined word added].
136	NGO	Considering the extraordinary resources of the Chilkat River and its tributaries the process of permitting large-scale mineral exploration and resource extraction should be carried out with up most caution by the land-permitting agency. The legal standard for impacts occurring to high functioning and high valued ecosystems is to avoid impacts whenever possible. It should be a goal early on in the permitting relationship between BLM and Constantine to set a high standard to protect the ecological resources that the economy and social welfare of Haines, Klukwan and the greater Southeast AK region depend upon.
136	NGO	At this point in the permitting process COMMENTER and its constituents would like to see meaningful forethought by the agency about what this still small project could lead to and what it could mean to the Chilkat Valley and its outstanding ecological attributes.
136	NGO	COMMENTER would like to see the agency requiring Constantine to address potential impacts and ensure plans and monies are in place to adequately address any foreseen issues. Though the direct impacts under this proposal are to low to medium functioning resources the potential impact to high functioning resources downstream need to be addressed and properly planned for.
117	NGO	Rock geochemistry of all waste rock should be tested during construction and stockpiles monitored yearly.
117	NGO	Noxious weed surveys should be completed every year and removal of any such plants found in the project area.
79	Tribal	Importantly, planned creek crossings will not disturb fish habitat and existing regulatory requirements, such as Storm Water Pollution Prevention Plan, adequately mitigate any potential water quality impacts from construction.
173	Tribal	In addition, because COMMENTER is a minority, low-income community – under the Environmental Justice executive order 12898 – BLM is charged with engaging COMMENTER early on in the NEPA process and ensuring permittees are adequately addressing COMMENTER's concerns. This engagement would include mandating Constantine to conduct both a social impact assessment and economic impact assessment.
173	Tribal	In addition, "A total of 20 un-reclaimed and partially reclaimed pre-2014 and 2014 drill pads are present in the Project Area." See POO at 19. These as yet un-reclaimed drill pads were constructed under a "temporary, one-year or less" exclusion for environmental review exploration permit, yet here they still are.

Table 16. Summary of Scoping Comments: Reclamation

Letter No.	Commenter	Comment
17	Public	I am sure that Constantine will take the same efforts. Not because I know the operators, but because I know that they are invested in operating this mine in Alaska for many years to come. In order to do this successfully, they will stick to the good plan of action that they have for exploration, mining and reclamation.

Letter No.	Commenter	Comment
21	Public	An appropriate reclamation plan and bond will ensure that the area will be returned to its natural setting when the road is no longer needed;
27	Public	The project can be accomplished with minimal impacts and appears by all measures to be reclaimable to a productive land use. To continue the logical and workmanlike development of this project, surface access is required.
40,46	Public	An approved reclamation plan and bond will assure that no sign or effects will long remain after cessation of operations.
68	Public	Approval of this new route will include a significant reclamation plan.
70	Public	I have one question, why is Constantine Metal Resources having to post a bond for reclamation? I am unaware of any other road in the area that have had to post a bond for reclamation. If one looks at the previous road path you can see that mother nature was very effective in its reclamation efforts. While I am impressed that they would put up a reclamation bond, I would prefer for the road to be left intact.
116	Public	Furthermore, upon completion of operations, the road will be reclaimed to return the land to a natural state as soon as practicable.
118	Public	The project has been designed to mitigate the environmental impacts during construction, operation, and ultimately reclamation.
127	Public	When they are done exploring the road needs to be put to bed and revegetated.
157	Public	There will also reclamation plan and bond in place to return the area to a natural setting.
164	Public	The reclamation plan closely follows the operation plan, and in many instances is redundant in its presentation due to the template nature of the document.
5	Public	We recommend that the BLM terminate Constantine the Mine Palmer Project and require them to return the area to its original condition.
6	Public	Some residents are concerned permanent structures will be built and a mine will be started (without permits). I believe the plan calls for temp. structures that will be reclaimed as required.
32	NGO	With approval of the road, a reclamation plan to return the area to a natural setting and a bond will be in place.
40,46	Public	An approved reclamation plan and bond will assure that no sign or effects will long remain after cessation of operations.
168	Public	They have a reclamation plan with bond to reclaim the area to a natural condition.
144	Public	With approval of the road, a reclamation plan to return the area to a natural setting and a bond will be put in place.
169	Public	A very comprehensive reclamation plan and bond will be in place to assure that the area will be returned to its natural characteristics.
119	Public	Finally, once activities are complete, the reclamation plan detailed in the PoO will ensure that BLM's management plan for post-exploration land uses will be achieved.
61	NGO	The COMMENTER is aware of Constantine's modern approach to reclamation work in its 2014 road project.
130	Public	Why is the BLM requiring a reclamation plan and reclamation bonding when the State is trying to increase access to its resources?

Letter No.	Commenter	Comment
156	Agency	<p>Pursuant to the Cooperative Agreement between ADNR and BLM, Section IV Part H states the following:</p> <p>An operation will be allowed to participate in the statewide bond pool for a disturbance up to 40 acres; however, an operation may request participation in the statewide bond pool for more than 40 acres of disturbance and may be allowed to participate after providing calculations acceptable to the ADNR and BLM that the reclamation liability requested of the bonding pool will not exceed 33% of the unrestricted assets of the bonding pool at the time of application; provided further that any operation that is approved for the bonding pool may be renewed and continue disturbance at the levels previously approved if BLM and ADNR determine that concurrent reclamation is occurring to the extent practical.</p> <p>As per Section 3.27 of the Plan of Operations, CNI intends to amend the Statewide Bond Pool deposit to include 41.12 acres of disturbance. Per 11 AAC 97.415(d), the bond pool deposit shall be rounded up to the nearest whole number. The total bond increase should be 37 acres or \$5500.00. The increased bonded amount, to total 42 acres, will require an acceptable reclamation cost estimate to prove liability will not exceed 33 percent of the available funds. Since the Plan (p. 39) states “The actual area of disturbance of the road is expected to be much less” COMMENTER recommends CNI revisit their disturbance calculations to determine if operations can run efficiently by reducing the estimated proposed disturbance by approximately 2 acres. This may or may not be possible. Alternatively, CNI could elect to bond for a season at a time over successive years and revisit their bond pool approval with ADNR and BLM should the actual disturbance approach the 40 acre threshold.</p>
156	Agency	<p>Section 3.3 of the Plan discusses reclamation of the exploration access road. To COMMENTER’s knowledge, the proposed seed mix (p. 62) has not been used at other mine sites in Southeast Alaska. In the Environmental Assessment, please evaluate the suitability of the proposed seed mix for use in the project area.</p> <p>Plate 3.3 in the Plan (p. 60) depicts two drill casings protruding from the ground at a reclaimed drill site. All abandoned drill holes should be plugged and the casings removed or cut off at, or below, ground level upon final reclamation, per the Reclamation Plan (Plan Section 3.2).</p>
136	NGO	<ul style="list-style-type: none"> requires adequate reclamation costs estimates instead of eliminating necessary expenditures
136	NGO	<p>In addition, if everything goes absolutely perfectly the reclamation cost estimate fails to account for post-closure management and labor costs. The Financial Guarantee amount should reflect true costs associated with cleaning up. Finally, the Tier 1 Spill Prevention, Control and Countermeasure Plan (appendices 5c) is blank, which is confusing to the reader.</p>
137	NGO	<p>When the road is approved, it will include a reclamation plan to return the area to a natural setting and a bond will be in place.</p>
53,140	Public	<p>With approval of the road, a reclamation plan to return the area to a natural setting and a bond will be in place.</p>
153	NGO	<p>Rocks and soils in the road area have been analyzed and determined to be chemically benign, and importantly, a reclamation plan to return the area to a natural setting and a bond will be in place.</p>
173	Tribal	<p>In addition, “A total of 20 un-reclaimed and partially reclaimed pre-2014 and 2014 drill pads are present in the Project Area.” See POO at 19. These as yet un-reclaimed drill pads were constructed under a “temporary, one-year or less” exclusion for environmental review exploration permit, yet here they still are.</p>
120	Public	<p>A good plan for reclamation of the area after project completion is in place.</p>

Table 17. Summary of Scoping Comments: Recreation

Letter No.	Commenter	Comment
55	Public	Constantine also provided maintenance needs to the existing State Forest Roads which benefits all road users, from hunters, firewood harvesters, snow machiners, loggers, sightseers, miners and others in the valley.
55	Public	The road accesses an area of Haines that is little used by the public and does not have significant recreation, fish or wildlife values.
70	Public	While I am impressed that they would put up a reclamation bond, I would prefer for the road to be left intact. The logging roads are vital to many of our subsistence efforts. They have opened up areas for berries, firewood, hunting, and recreation. I see this road in the same way. It will allow residents access to even more opportunities.
72	Public	I am concerned about the affects of this project on salmon, and consequently, tourism businesses like mine that rely on eagle and bear viewing.
76	Public	HUNTING AND TRAPPING; The Glacier Creek drainage is one of my personal favored hunting locations, as well as that of many others. There are not a lot of moose, but there are some. There are also bears, grouse and ptarmigan, hares and fur-bearers, and goats up on the ridges. Mine exploration and development can be nothing but detrimental to all of these resources. RECREATION; I live in the Klehini Valley and often hike, ski, and snow machine in the Glacier Creek drainage. The further development of the area would degrade the enjoyment of the peace and wild character of the area, not just in and around Glacier Creek, but for dozens of miles all around. As it is now, summer evenings I can see the bright lights of the drill rigs up there on the mountainsides. They are the only artificial lights that can be seen over hundreds of square miles of wild country
34	Public	When I installed the bridge at 26 Mile it opened up the Klehini to home sites, wood cutters, trappers, recreationists as well as access to Mosquito Lake and the Kelsall. By bridging Glacier Creek it provides the public access to Jarvis Glacier which will expand tourism.
132	Public	As an outdoor enthusiast, developing a road will down the road make better access to some amazing country. I know this is not the purpose or intent of the road, but am aware these type development help create access for outdoor enthusiast.

Table 18. Summary of Scoping Comments: Seismic

Letter No.	Commenter	Comment
136	NGO	Considering the location of the Palmer project and the frequency and severity of seismic and earth quake activity in the Haines area as Constantine starts to expand its operations it should, at the very least, be required to demonstrate its capacity to plan for and pay to mitigate for the impacts due to natural disasters, including, landslides, avalanches, and earthquakes to the drill pads, the road, equipment and fuel storage pad while in operation

Table 19. Summary of Scoping Comments: Socioeconomics

Letter No.	Commenter	Comment
7	Public	Have lived here this long I see this project as one that is very beneficial to our communities economy in a time when people and businesses are struggling.
7	Public	So in closing I would urge to help get this project moving forward in timely manner, our community could really use the economic benefits this project brings to it.

Letter No.	Commenter	Comment
9	Public	The mine would have a very positive impact on the economy of Haines, which in my opinion is much needed. Some of my children have chosen the trades as a career and would like to remain in the area. This project would help them remain in the Haines area.
11	Public	I've worked for Constantine for 4 of the last 5 summers. Three field seasons were spent working on the Palmer Project and one was spent with them on a project in the Yukon.
11	Public	Currently I'm attending the UNBC/UBC joint environmental engineering program. I owe much of my motivation to study in this field to Constantine and their commitment to safer, more thoughtful exploration and I take pride in working for them.
12	Public	They seek to work in partnership with all interested parties to build a state of the art and safe project that has long range economic benefits for Haines and Klukwan.
13	Public	We are in desperate need of year round jobs. Our school enrollment is down and many businesses are closing for the winter. In my years in Haines (50) I have seen many changes. Not many of them for the good. Our two mills have shut down, the tank farm and cannery have also shut down. Our population is nearly double and the only jobs are supportive and government. Many of our younger men and women are working out of town. I believe Constantine would be a plus for our community, borough, and state.
15	Public	I have seen industries come and go, and Constantine has the potential to bring much needed economic opportunity to Haines.
21	Public	The Palmer project has demonstrated that it is benefitting the local community by hiring locally and using local businesses to support it exploration efforts. Furthering the exploration efforts an advancing the project through feasibility and mine construction and operation;
21	Public	Once in operation the Palmer project could add 300 new, well paying jobs to Southeast Alaska- a region that desperately
22	Public	The property is well advanced in exploration indicating the strong possibility of an economic mining project is possible in the future. Such a project could be important economically to SE Alaska and all to of Alaska.
23	Public	I am highly in favor of this project to open more land to resource development. We need more good jobs.
25	Public	The road will increase safety and facilitate additional exploration, potentially decreasing the time frame to mine production that will have a significant beneficial economic impact for the local communities, state, and the people of the United States.
27	Public	The Palmer Project has continued to meet exploration goals. This is a very good thing for the region's economy. As resources are realized, continued funding has been obtained in an otherwise less than optimal commodities market. This is a very good sign, indicating the deposit has real potential for ultimate development and profitable operation. As such, this is no pipe dream. There is a real possibility that a producing mine could be realized, employing hundreds of workers in high paying and challenging jobs in a region that otherwise offers limited employment opportunities.
31	Public	I hope that approval will proceed poste haste to maintain economy and continuity for the project, the developers, and the people of Southeast Alaska who are working to develop the project.
35	Public	It is going to make a safer operation, reducing helicopter time and fuel.
35	Public	I feel they have not only invested time and money into our local economy, their people have invested their personal lives and energy into our community.

Letter No.	Commenter	Comment
36	Public	This project will support jobs in Haines at a time when State Budget cuts will be impacting jobs negatively.
37	Public	The economy of Haines is very poor. It is a struggle to keep our business going. It is sad that we can't keep our young people working here. They have to go elsewhere for employment. Since Constantine has started investing in our community, there is hope. For the last three years, my son, _____, has been employed, cutting core samples for Constantine Metals. He is paying his own way through college, studying Civil Engineering at UAF. We are very thankful to Constantine. Other young people in our town are benefitting from the opportunities that Constantine is providing.
38	Public	I am a Sophomore at UAF Fairbanks and am paying my own way through school because I have been able to work at Constantine. I am studying Civil Engineering and hope to stay in Alaska and work after college. It would be especially great if I could have work in my hometown of Haines. Constantine has been very supportive of my endeavors.
38	Public	I really appreciate all they have done for me and for my town and really hope their project succeeds. It would make a big difference to a lot of people here.
39	Public	I believe that the overall Constantine Project is important to the local economy and should be approved.
40,46	Public	The Palmer Project is important the local Haines economy and the region. It has the potential to provide a significant contribution to well being of the region in jobs for residents and tax payments to the local government. It is thus important that Constantine be allowed to move this project forward in a timely manner
41	Public	The project is providing positive economic benefits to the local economy and will continue to do so if the mineral prospect ultimately is permitted for construction and operations, a decision which will require full Environmental Impact Statement compliant with the provisions of the National Environmental Policy Act
42	Public	The exploration activity has provided economic benefits for the community.
43	Public	No amount of short term jobs and revenues can replace what salmon means to us.
43	Public	Creating a boom / bust economy doesn't make sense for a small, isolated community like ours.
50,51	Public	I believe Constantine will maintain a healthy environment while at the same time providing a much needed economic base for our community.
54	Public	As such I support Constantine's continued efforts to explore and potentially develop a working mine, which would provide a sound working base for our community's economy.
55	Public	Constantine also provides jobs to locals not only in doing the road work but also in running a camp and doing their mineral exploration and hopefully in the future development of a mine. They also purchase fuel and supplies locally. This is important to the economy and the people in Haines.
60	Public	There are very few new opportunities in SE Alaska that provide year round employment, this one should be allowed to proceed without a bunch of bureaucratic BS; RED TAPE .
62	Public	We see how divisive this community is and it is something I hope will be overlooked by an agency that has the foresight to realize this will be a ghost town if we don't embrace this entire project.
62	Public	I have no personal or financial interest in this project I simply know that the community needs the project.

Letter No.	Commenter	Comment
68	Public	The local economy receives substantial economic benefits from the exploration work and this new route and the subsequent expenditures will continue these benefits.
69	Public	Constantine is a member of the Haines Chamber of Commerce, and has made efforts to support the local economy. As a 40 year resident of Haines and the past owner of 33 Mile Roadhouse (1977-2011) of 34 years, I am well aware of the project input to the valley. Since 2013, 3 million dollars have gone into our economy by hiring locals and buying local. In decreased State revenue and a challenging local economic climate, mineral exploration expenditures represent an important contribution to the Haines area economy.
70	Public	They want to develop a project that protects the surrounding environment while also providing jobs to Haines.
72	Public	I am concerned about the affects of this project on salmon, and consequently, tourism businesses like mine that rely on eagle and bear viewing.
73	Public	With the permitting Constantine can continue to move forward and some day will be able to operate and produce. This will be very good for the economy of Haines. Jobs and economic growth will allow people who want to stay in the Haines area to make a good living. It will also bring families to the area which in turn helps the school and community.
74	Public	It will be good for the community economically-both for workers and businesses. There could be job opportunities for high school graduates who wanted to stay in the Valley. The school will benefit as will the borough.
76	Public	ECONOMY; What Constantine Metals adds to the economy of Haines is nothing, not a drop in the bucket, compared with the fishing, tourism, and other industries in Haines. Furthermore, development of the Palmer claim poses the very real threat of undermining those other, larger and more lucrative industries. I am a general contractor, and I know for a fact that people buy real estate, build houses, and start businesses here in this community because the water is clean, the fish are plentiful, the scenery is gorgeous, and the land is largely undeveloped and unspoiled. Further exploration will ultimately degrade the economy of Haines.
77	Public	It would cut down flight time in the helicopter saving fuel and lowering emissions, I assume a local company would be hired to continue the road construction there for helping the local economy, and it will allow Constantine to access more ground safer and more efficiently.
78	Public	The Palmer Mine Project will impact on one of our most important resources, our salmon. Without salmon we won't have bald eagles in the preserve, tourists, and subsistence fishing.
114	NGO	Indeed, their plan is one which will streamline the process of project evaluation simultaneous to positively impacting the socioeconomic landscape in Haines, AK--a community to which Constantine Metal Resources is highly committed.
114	NGO	I urge you to process Constantine Metal Resources; application without delay. The people of Southeast Alaska will thank you for it and, most importantly, the opportunity it will create to be part of an environmentally responsible and economically sound resource development project in Southeast Alaska.
116	Public	Mines such as the potential Palmer Project, have proven to be highly beneficial economic drivers, especially for local economies. Jobs and tax revenues from such projects provide a means for local jurisdictions to be more self-sufficient.
118	Public	Exploration will continue to provide socioeconomic benefits to Haines and if successful exploration results in development, future benefits will be very significant to the Haines area and region.

Letter No.	Commenter	Comment
121	Public	I would simply like to say that our fish are much more important than a boom and bust economy from mining.
124	Public	This would give a little more people jobs close to home.
127	Public	The public ends up paying the costs to the environment when the company pulls out and can't afford to clean up or monitor the site.
142	Public	As a long standing subsistence community, we do not wish to risk the health of our salmon and pristine waters for some temporary money to be made from mining.
145	Public	Responsibly developing resources and creating jobs will bring countless benefits to this region.
146	Public	Trading clean water and healthy fisheries for a mine is BAD BUSINESS!
148	Public	A Constantine employee actually said to my 16-year-old son, who was raised trolling and aspires to earn his own living commercial fishing, "I guess you're going to have to find another livelihood because the transboundary mines are going to destroy your salmon". This unfortunate and hurtful exchange offers a glimpse of mining's social impacts: the Constantine project has the potential to tear our community apart. There is no doubt that it is controversial and it will certainly become more so as it advances. It is hard to imagine an issue causing more crippling division than a mine in the headwaters of the river we depend on for our economy, our way of life, our food.
149	Public	I believe they have and will do everything they are regulated to do to assure that the new plan will not harm or negatively impact our local environment and will also bring many needed local jobs that will positively impact our economy.
157	Public	COMMENTER has enjoyed mutual support with Constantine through outreach, recruitment and training of individuals from the Haines area. The Palmer Project has already benefitted the local economy through exploration spending and local hire, which will only increase as the project advances. _____ will be the ideal location to engage and train the 300 workers estimated for eventual mine operation, based on a 2015 Economic Impact report produced by the McDowell Group and Alaska Miners Association.
158	Public	In order to maintain adequate funding for education, public safety, public works, and other important government functions and services, communities, including the Haines Borough, must endeavor to supplement existing revenue centers with new sources. For the Haines Borough, that could be in the form of a well-designed and operated mine at the Palmer property. I believe that the proposed activities identified in Constantine's Plan of Operations for the Palmer property are important to the future economic well-being of Haines, and I am confident that Constantine will continue to work closely with local, state, and federal stakeholders to ensure that plans and activities will be conducted in a manner as to avoid or mitigate adverse impacts to the greatest extent practicable.
159	Public	This project will be done with the utmost of care for the environment while providing valuable economic opportunities in an area that desperately needs them.
161	Public	The local economy will also benefit from construction aspects of the Plan.
3	Public	As a former Haines resident and current land owner I fully understand the need for economic support the construction work would bring in the short term and the long term benefits of getting the mine online.
30	Public	When one balances the minimal and environmental risk against the immediate and potential long-term economic benefits to the Haines area, it becomes apparent that Constantine's exploration plans should be approved.

Letter No.	Commenter	Comment
16	Public	Unfortunately, with the drop in oil prices and the migration of human resources to Alaska's rail-belt, rural Alaska will continue to struggle economically. Mining is the one bright spot, but it must occur without damaging the environment that we all love and cherish. I have been told that Constantine's Palmer Project can do this, and in doing so, the Palmer Project can be a showcase to other communities trying to develop their resources responsibly.
32	NGO	The Palmer Project has already begun benefitting the local economy through exploration spending, and will continue to do as the project advances. The project will also benefit the community through job creation - it is estimated that 300 workers will be needed for mine operation.
33	Public	Constantine's Palmer project provides and will continue to provide economic enhancement to the community of Haines and other nearby Alaska communities.
34	Public	When I installed the bridge at 26 Mile it opened up the Klehini to home sites, wood cutters, trappers, recreationists as well as access to Mosquito Lake and the Kelsall. By bridging Glacier Creek it provides the public access to Jarvis Glacier which will expand tourism.
44	NGO	The Palmer project provides a strong component of the Haines and Southeast Alaska economy by providing jobs and purchasing goods and services in the Haines area.
40,46	Public	The Palmer Project is important the local Haines economy and the region. It has the potential to provide a significant contribution to well being of the region in jobs for residents and tax payments to the local government.
47	Public	They have a positive economic effect on the local community, each year adding more local workers and spending more with local business, this while in an exploration stage.
45	Public	The remoteness of the proposed area is another benefit. Tourism appears to jump on-board as I observe the use of the Porcupine Mine Site by tour operators.
57	Public	This project will support jobs at a time when the state is cutting jobs. I am a business owner and have lived in Haines my entire life. This project and its future could provide jobs that could keep my son and daughter in Haines.
59	Public	Construction of the road will provide high paying jobs for Haines workers and will result in the purchase of goods and services from merchants in Haines and Southeast Alaska.
166	Public	Being life long resident a year round sustainable long term employment for Haines is greatly needed and would be appreciated.
167	Public	As the COMMENTER, which includes Constantine Metals' Palmer Project, I appreciate the opportunity to comment on its revised plan of operation that includes 2.5 miles of additional road. My district currently benefits from two well run operational hard rock mines that contribute significantly to our local economy. I am therefore very familiar with the benefits of responsible mining in my district.
168	Public	There has already been a socio-economic benefit with the exploration spending and jobs for the exploration. Depending on results from further exploration, there could be a much larger socio-economic benefit in the future.
144	Public	The Palmer Project has already begun benefitting the local economy through exploration spending, and will continue to do so as the project advances. The project will also benefit the community through job creation - it is estimated that 300 workers will be needed for mine operations.

Letter No.	Commenter	Comment
169	Public	The local economy has already benefitted from the project through exploration spending. An estimated 300 jobs will be needed if the project advances. Projects of this type can have a very positive impact on rural communities in Alaska without sacrificing the environment.
171	Public	However, I do recognize that the exploration activities, and any subsequent development activities would provide a positive economic benefit to the community.
64	Public	Construction of the road will provide jobs for Haines workers along with the purchase of goods and services in the Haines area.
80	Public	<ul style="list-style-type: none"> Will the Borough of Haines receive monies tied to the amount of profits it makes? How does the community profit besides providing low level jobs to potential applicants? Will the Borough receive a "tax" incentive? I am not sure how the money flows, please clarify.
80	Public	<ul style="list-style-type: none"> If/When there is a spill what type of bonding/compensation will be available for the commercial fishermen who make their living in this valley? How difficult will it be for them to receive that compensation? What is the usual and customary arbitration time frame?
81	Public	I have been involved with Constantine for many years, working for them in camp management, mountain safety and community engagement and have been consistently impressed by the level of professionalism shown by this company.
81	Public	I believe this Plan of Operations will have negligible environmental impact while providing an economic stimulus to the community.
110	Public	After reviewing this 100 page document, I support their continued mining effort and believe it will contribute to both the local economy and Alaska's economy without detrimental impact.
113	Public	Constantine is an essential component of the Haines region's economy, exploration activities at the Palmer Project have contributed \$6m to Alaska's economy, including nearly \$3m spent within the Haines region. Constantine has generated \$1m in local payroll, and spent \$1.9m on local goods and services. Additionally, the company has distinguished itself as a vital component of the community by providing generous charitable support and donations to important local causes. The value of these private sector expenditures within the context of rural southeast Alaska, where government is the predominant employer, cannot be overstated, particularly as Alaska's government-dominated economy poises for a significant slowdown due to the low price of oil, which has historically provided 90% of the State's revenue.
113	Public	COMMENTER urges the US BLM to expeditiously approve Constantine's Plan of Operations in a timely manner, so that the company can proceed into its next phase of development with minimal delay, and continue to generate new employment, local expenditures, and economic benefits which support residents of Haines and the surrounding area of southeast Alaska.
115	NGO	I have read the Constantine Mine Fact Sheet, the Palmer Community Brochure and the Constantine Scoping Notice and I am confident that this project as proposed will be beneficial to Alaska and its residents and will not cause environmental harm.
117	NGO	COMMENTER commends Constantine Metals for conducting exploration activities with no significant impact on Chilkat River watershed resources, and for providing a significant positive boost to the local economy.

Letter No.	Commenter	Comment
129	Public	As you may know, over the last three years, exploration at the Palmer Project has contributed over \$6 million to the economy of the State of Alaska, \$1 million in local payroll, and \$13,000 in donations and sponsorships. It is my firm belief, construction of this road will not only continue to benefit the Chilkat Valley as it has done so over the years, but will be a great investment for the State of Alaska.
61	NGO	It has demonstrated through many actions its commitment to improving the quality of life for residents and the community.
131	Public	In this current environment of depressed commodity prices/economic insecurity, the Palmer project will greatly benefit the local economic outlook through local spending/purchases and job creation.
132	Public	Over the past 4 years but not presently, I have worked with Constantine as a part time mountain operations employee.
151	Public	As a result, I believe the proposed Plan would provide great benefit to the State of Alaska, the AMHT, and Constantine Resources.
133	Public	The project has the potential to employ 300 people in an area with high unemployment and provide an economic boost to the town of Haines.
134	Public	It's not very often that you come across a company like Constantine that contributes so much to the community. I feel confident that they will take care of the land and help create a stronger economy for the people of Haines by providing jobs and opportunities for all of us who live here.
135	Public	I have worked with Constantine Metal Resources since the summer of 2006.
136	NGO	<ul style="list-style-type: none"> adequately assesses socio/economic impacts.
136	NGO	Sport fishing for all species comprises a significant share of the overall economy for both Southeast Alaska and the Haines/Skagway management area. In a report for the Haines Borough, Haines Tourism Management Plan, the McDowell Group estimated that the commercial fishing industry accounted for an annual equivalent of about 90 jobs and \$2.5 million in net income in 2000.....Though a few individuals living fulltime in Haines Alaska appreciate the economic impact from Constantine's activities, it is a relatively minor factor in comparison to the sustainable economic input from the tourism and fishing industry.
136	NGO	In this POO, Constantine fails to acknowledge and demonstrate its capacity to address the potential impacts on the social/cultural and economic welfare of Haines, Klukwan and the greater Southeast AK region. The assumption made in the POO that a little over 1 million dollars into the Haines economy is the only socioeconomic impact from Constantine's mineral exploration activities is concerning. Agency staff, Constantine staff and the public are all well aware of the potential impacts the Palmer project has and could have on the quality of life of the comment that falls over a significant federal and statewide holiday is an indicator of the lack of acknowledgement and/or care by Constantine of its social impacts on the community of Haines and Klukwan. The POO provides no insight on how Constantine is and will continue to work with the people of Haines and Klukwan who will be negatively impacted by this project and its future activities. Releasing this POO and providing an opportunity for public comment that falls over a significant federal and statewide holiday is an indicator of the lack of acknowledgement and/or care by Constantine of its social impacts on the community of Haines and Klukwan.

Letter No.	Commenter	Comment
136	NGO	The Chilkat Indian Village (CIV), a neighboring landowner and federally recognized tribe has openly shared concerns about the mineral exploration. The Department of Interior, BLM, as an executive agency, is committed to the federal Indian trust responsibility. As the Palmer project expands and potential impacts to the Chilkat Indian Village's traditional territory and subsistence way of life present themselves it is paramount that the BLM protects CIV lands, assets and resources that will be affected by this project. Constantine fails to mention Klukwan and the CIV at all in its POO. In addition, because Klukwan is a minority low-income community - under the Environmental Justice executive order 12898-BLM is charged with engaging CIV early on in the NEPA process and ensuring permittees are adequately addressing Klukwan's concerns. This engagement would include mandating Constantine to conduct both a social impact assessment and economic impact assessment.
137	NGO	The Palmer Project which has already begun and will continue to benefit the local economy through exploration spending which will increase as the project advances. The project will also benefit the community and state through job creation. It is estimated 300 workers will be needed when the mine goes to full operation.
139	Public	Furthermore, the Palmer Project is benefitting the local economy through exploration expenditures, and will continue to do so as the project advances. The project will also benefit the community through job creation, with an estimated 300 workers for any future mine operation.
140	Public	Part of the land package under Constantine's exploration development plan includes Alaska Mental Health Trust Lands. Thereby all revenues from mineral development on Mental Health Trust Lands go to support mental health issues in Alaska-and that's a good thing that no one should have a problem with!
53,140	Public	The Palmer Project has already begun benefitting the local economy through exploration spending, and will continue to do as the project advances. The project will also benefit the community through job creation - it is estimated that 300 workers will be needed for mine operation.
153	NGO	The Palmer Project has already begun benefitting the local economy through exploration spending, and will continue to do as the project advances. The project team has made a commitment to shop and hire locally whenever possible, and as a result, has spent nearly \$6 million in Alaska and \$3 million directly to the community in which Palmer is located. In addition, the project will also benefit the community through job creation. AMA's 2015 Economic Impact of Alaska's Mining Industry report produced by the McDowell Group estimates that 300 workers will be needed for mine operations. Mining jobs carry an average annual wage of \$100,000 and many are located in areas with limited economic opportunities. Moreover, bringing a mine into operation will generate millions of dollars in revenue to the local, state, and federal governments. At this time in our state and country, promoting responsible economic development could not be more important.
162	Public	As a general matter, COMMENTER would like to express support for development activities that would be beneficial to our region, our shareholders and our communities in terms of employment and economic opportunities. We do believe that the Palmer Project would provide such economic and employment benefits that we can support. That being said, any support from COMMENTER is contingent upon some key factors: local and community support; tribal support; development and implementation of an environmentally sound project, with little to no risk to salmon stocks and other subsistence and cultural resources.
163	NGO	If the Palmer Project is successful it will provide important tax and economic benefits to the federal government, SOA, and the community of Haines. It will generate construction jobs for Alaskans and provide well-paying jobs for hundreds of employees of Constantine and contractors. With the industry suffering from low prices and potential delayed development this project would give Alaska an economic boost.

Letter No.	Commenter	Comment
139	Public	Furthermore, the Palmer Project is benefitting the local economy through exploration expenditures, and will continue to do so as the project advances. The project will also benefit the community through job creation, with an estimated 300 workers for any future mine operation.
53,140	Public	The Palmer Project has already begun benefitting the local economy through exploration spending, and will continue to do so as the project advances. The project will also benefit the community through job creation - it is estimated that 300 workers will be needed for mine operation.
153	NGO	The Palmer Project has already begun benefitting the local economy through exploration spending, and will continue to do so as the project advances. The project team has made a commitment to shop and hire locally whenever possible, and as a result, has spent nearly \$6 million in Alaska and \$3 million directly to the community in which Palmer is located. In addition, the project will also benefit the community through job creation. AMA's 2015 Economic Impact of Alaska's Mining Industry report produced by the McDowell Group estimates that 300 workers will be needed for mine operations. Mining jobs carry an average annual wage of \$100,000 and many are located in areas with limited economic opportunities. Moreover, bringing a mine into operation will generate millions of dollars in revenue to the local, state, and federal governments. At this time in our state and country, promoting responsible economic development could not be more important.
137	NGO	Alaska has a long history of mining despite the limited infrastructure and access in our state. Approval of this PoO will encourage investment and further activities in the area. COMMENTER urges the BLM to approve this plan in a timely manner.
79	Tribal	Responsible mineral exploration by Constantine is consistent with COMMENTER values and our Strategic Plan, as it contributes to a strong economy that will help sustain a healthy community. Continued exploration work and potential mining at the Palmer Project has the potential to significantly enhance the quality of life for members of the COMMENTER and other local residents, but it must be done in a manner that is protective of fish and water quality.
160	NGO	Constantine has committed to supporting local workers, contractors and service providers. Already, Constantine's Palmer Project has increased the revenue in the Haines area. Of the more than \$1,000,000 benefit to the Alaskan economy in 2013, \$476,000 went to Haines local hires (10), suppliers, and contractors. In 2014, the Palmer Project activities provided nearly \$3 million dollars of direct economic benefit to the Alaska economy; \$1,703,000 was paid to Haines area workers (15), suppliers and contractors, and other Alaskan hires (5). The Palmer Project has the potential for long term benefits to the town of Haines and the State of Alaska. Should Palmer eventually advance to a mine, potential operations would likely include between 150 to 300 direct long term jobs including: miners, heavy and light duty equipment operators and mechanics, engineers, geologists, metallurgists, lab technicians, environmental scientists, and drillers, electricians, carpenters, office managers, accountants, health and safety specialists, medics, warehouse staff, janitors, truck drivers, and cooks.
160	NGO	A robust workforce and associated economic benefits provided by the Constantine Palmer project is clearly in the public interest. COMMENTER strongly urges the Bureau of Land Management to consider the economic benefit and safety benefits that the 2.5 mile Palmer access road and potential mine will have on the Haines area and Alaska as a whole.
66	Public	I feel that this will help build the community of Haines by providing good jobs, helping the growth of other business, and helping Haines set up for a long term economy improvement.

Table 20. Summary of Scoping Comments: Solid and Hazardous Waste

Letter No.	Commenter	Comment
43	Public	A truckload of toxic mineral heavy metal slurry dumped into the river will spell the end of salmon, and along with it our fishing and tourism industries.
5	Public	The proposed new site development could cause sedimentation in Glacier Creek, possible spilled vehicle fuels and human waste deposits in a very sensitive environmental area that has been free from this type of abuse.
156	Agency	Section 2.2.8 (Hazmat) describes, the presence and handling of numerous' non-hazardous materials (e.g. solid waste from drill pads, oils, lubricants, diesel fuel, etc.). Although management of hazardous materials is outside the regulatory authorities of the reviewing state agencies, discussing petroleum, oils, lubricants and other non-hazardous materials in the "Hazmat" section of the Plan is confusing and may misrepresent the amount of actual hazardous materials expected on site We suggest that the "Hazmat" section be reserved for discussing aviation fuel, gasoline and any other classified hazardous materials that will be managed or generated on site. All other wastes, lubricants, oils and non-hazardous materials should be discussed in a separate section of the Plan (e.g. "Non-hazardous Materials" or "Oily Wastes"). We further suggest that the "Hazmat" section of the Plan specifically state whether or not any hazardous materials will be generated from the proposed activities.
136	NGO	Under this POO Constantine plans to construct and put into operation 40 new drill pads, operate heavy machinery, drive multiple trucks daily, fly and land helicopters with sling loads multiple times daily, and store over 8000 gallons of diesel and aviation gas on a steep slope directly in the fall path of the crumbling 500ft "South Wall" (see image on pg. 5). This POO authorizes Constantine North to build the infrastructure to knowingly carryout these activities with out any contingency plans and/or monies to cover costs associated with mitigating an issue if something was to go wrong A report put out by the State of Washington Department of Ecology puts Aviation Fuel as the most acutely toxic (lethal) petroleum product to all organisms.

Table 21. Summary of Scoping Comments: Surface Water Hydrology

Letter No.	Commenter	Comment
21	Public	The road has been designed using qualified experts in aquatic biology, geotechnical engineering, rock geochemistry, water quality and hydrology as well as recognizing cultural resources, wetlands and wildlife habitat. It a been responsibly designed to be safe and will meet regulatory requirements;
72	Public	I am worried about erosion along the roadside and the effect this might have on Glacier Creek and further downstream.
78	Public	In addition, extending the roads and steep switchbacks above Glacier Creek will cause erosion and increase sediment in the creek which flows into major rivers and is harmful to fish.
125	Public	Erosion along the mineral exploration road, including steep switchbacks needs to not have any sediment reaching Glacier Creek.
127	Public	Erosion along the mineral exploration road, including steep switchbacks up the mountainside, is a major concern.
152	Public	With the steepness of the road and in an area with considerable precipitation the possibility of compromising the waters below the road need to be taken into consideration.

Letter No.	Commenter	Comment
4	Public	From logging to mining this area has issues with unstable land but it has not been and should not be a determining factor in whether development should continue or not. It should simply be a factor in where roads and bridges are built. If you review the history of this region, every road outside of Haines suffers from mudslides, and more. We have a historic area between 18 and 22 mile of the Haines highway that slides every year into the Chilkat river and has not affected the salmon spawning or escapement. That is a huge area in comparison to what might occur up in the Porcupine district.
6	Public	There is some concern the proposed road will wash out into Glacier Creek. I have observed steams being block by avalanches every May and June. That includes not only ice and snow, but soil, mud, rocks, and sometimes alder and spruce; The stream will blow out the soil and mud when the snow and ice melts.
34	Public	I have built over forty miles of road in the past sixty years in the Haines Borough and to date no erosion has been show and the proposed extension follows a cat trail that has been stable.

Table 22. Summary of Scoping Comments: Transportation and Access

Letter No.	Commenter	Comment
31	Public	The plan for the construction of a road into the referenced area for both access and safety is reasonable and acceptable as put forth in the project description.
55	Public	Constantine also provided maintenance needs to the existing State Forest Roads which benefits all road users, from hunters, firewood harvesters, snow machiners, loggers, sightseers, miners and others in the valley. With the cuts to the Division of Forestry this maintenance to the existing roads in the Klehini is significant
70	Public	While I am impressed that they would put up a reclamation bond, I would prefer for the road to be left intact. The logging roads are vital to many of our subsistence efforts. They have opened up areas for berries, firewood, hunting, and recreation. I see this road in the same way. It will allow residents access to even more opportunities.
72	Public	This area, while public, is not being made accessible to the public. The road is blocked off and the public is not allowed.
47	Public	Since assuming the property lease in 2006 they have done an excellent job in providing safe working conditions for their employees. Their operating plan would provide access to the lower region of the work sight when weather conditions do not permit the use of helicopter's, thus insuring additional safety for the crew.
137	NGO	Additionally, the road will offer better access for exploration, environmental, and geotechnical studies, and will also improve the safety of workers.
169	Public	Better access is a requirement for the success of all projects in Alaska and particularly important for the Palmer Project near Haines.
65	Agency	The COMMENTER views the improvements already made to the existing access road along with the proposed road extension as major enhancements to access in the area that will safely facilitate exploration both on the federal claims and the adjacent Trust land.
65	Agency	Furthermore, since the proposed road will facilitate access to Trust land both now and in the future (Trust land is a perpetual trust), the Trust requests that the BLM consider that the road be left in place for future use

Letter No.	Commenter	Comment
113	Public	The new road project will help support new exploration activities, environmental and geotechnical studies.
132	Public	As an outdoor enthusiast, developing a road will down the road make better access to some amazing country. I know this is not the purpose or intent of the road, but am aware these type development help create access for outdoor enthusiast.
156	Agency	The proposed road would provide access for up to 40 new exploration drill sites.
151	Public	Approval would significantly improve exploration access to the Palmer Project, roughly following a pre-existing cat trail that Mr. Merrill Palmer, a Haines miner, constructed in the 1970s.
135	Public	It has proven to be a huge savings of helicopter flight time, and given us a staging area closer to our surface operations.
144	Public	Additionally, the road will offer better access for exploration, environmental, and geotechnical studies, and will also improve the safety of workers.
140	Public	Better access for exploration, environmental and geotechnical studies, and improved safety of workers is required to advance the Palmer Project near Haines, operated by Constantine Metal Resources Ltd.
130	NGO	We would like to remind everyone that the Alaska Department of Transportation & Public Facilities has a "Roads to Resources" program in place that encourages proponents to design and build transportation access projects (i.e. roads and ports) that support the development of natural resources. Is Constantine's road proposal not aligned with this State initiative?
65	Agency	Furthermore, since the proposed road will facilitate access to the Alaska Mental Health Trust (Trust) land both now and in the future (Trust land is a perpetual trust), the COMMENTER requests that the BLM consider that the road be left in place for future use.
173	Tribal	The impacts considered also must include impacts from others that are not the applicant but are related to the activity such as impacts due to increased access to the general public.
160	NGO	The proposed road to the Palmer project, re-establishes road access to the core area of Constantine's activities. It will improve safety for workers, and provide easier access for exploration activities, environmental and geotechnical studies. The road follows a natural path through the valley and follows the general path of a 1977 cat trail.

Table 23. Summary of Scoping Comments: Vegetation

Letter No.	Commenter	Comment
143	Public	It was impressive how quickly the native grass seed mix that Constantine had custom-designed for this area grew vegetation that elegantly reduces run off and stabilizes the engineered road bank. The thought Constantine put into the custom native seed mix is characteristic of the positive intention and high standard they have consistently presented throughout the time I have been familiar with the project, and is again demonstrated in this Plan of Operations.

Letter No.	Commenter	Comment
117	NGO	The COMMENTER believes there are some areas of Constantine’s Plan of Operations that should be addressed in order to reach the finding of “no significant impact” as part of the NEPA process. These issues are tied to five components: wildlife information, noxious weeds management, monitoring for acid rock drainage (ARD) from rock stockpile areas, water sources, and the need to look at the watershed-wide potential for impacts from these activities.
117	NGO	<u>Noxious Weeds</u> Section 2.7.6 regarding noxious weeds states that a possible measure of controlling noxious weeds would be the washing of project vehicles before they enter a weed-free area, and that it is therefore recommended to install a portable vehicle washing station. In addition, yearly monitoring for noxious weeds in the project area should be required, along with immediate noxious weed removal if found.
117	NGO	Noxious weed surveys should be completed every year and removal of any such plants found in the project area.
136	NGO	In the current POO Constantine's capacity to pay for monitoring and mitigation of noxious weeds, water quality, and Acid Mine Drainage is not documented.

Table 24. Summary of Scoping Comments: Visual Resources

Letter No.	Commenter	Comment
127	Public	There will also be visual impacts from the Haines Highway, our Scenic Byway from a road up the mountainside.
148	Public	I am increasingly concerned about the project as Constantine Metals advances more and more industrial development, acquiring more land, extending the road once and now proposing to build an ugly and potentially impactful extension, with the plan to intensify exploration with many more drill holes.

Table 25. Summary of Scoping Comments: Water Resources

Letter No.	Commenter	Comment
72	Public	I am concerned about the expansion of the footprint of Constantine on the area upstream of the Klehini River. The Klehini is a major tributary to the Chilkat River, and flows into the Chilkat River just upstream of the Alaska Chilkat Bald Eagle Preserve Council Grounds. This is a very sensitive area, and developments upstream could have negative impacts on this river system. Even though the ACBEP is not under BLM jurisdiction, the effects of actions taken in the BLM lands would impact the Preserve.
121	Public	No matter what they say about keeping our water clean, there are too many possibilities for mistakes, and blunders.
123	Public	This action is part and parcel of a larger project that will have significant impacts on the Klehini and Chilkat Rivers, just as the last permit allowing the first section of exploration road led directly to this road expansion.
138	Public	Also, the proposed alignment was chosen to specifically stay away from sensitive streams.
142	Public	I do not believe any further mining exploration should take place in the upper Klehini and Chilkat Rivers. These are sacred rivers that have fed the people for 10,000 years and more.

Letter No.	Commenter	Comment
152	Public	I am familiar with the area and the proposed road is a very real threat to Glacier Creek and waters down stream. With the steepness of the road and in an area with considerable precipitation the possibility of compromising the waters below the road need to be taken into consideration
5	Public	The proposed new site development could cause sedimentation in Glacier Creek, possible spilled vehicle fuels and human waste deposits in a very sensitive environmental area that has been free from this type of abuse.
44	NGO	Aquatic biology, cultural resource, geotechnical engineering, rock geochemistry, water quality, and wildlife and wetlands data supported the development of Constantine's proposal to design a road that will be safe and environmentally responsible.
167	Public	I'm also told the route was based on qualified experts' review of aquatic biology, cultural resources, geotechnical engineering, rock geochemistry, water quality, wildlife, and wetlands data.
168	Public	In addition, they examined the geotechnical engineering, the fish and wildlife and aquatic biology, water quality, wetlands, and cultural resources.
144	Public	In deciding the road route, qualified experts reviewed the aquatic biology, cultural resources, geotechnical engineering, rock geochemistry, water quality, wildlife, and wetlands data to design a road that is safe, responsible, is protective of the environment and will meet regulatory requirements.
117	NGO	The COMMENTER believes there are some areas of Constantine's Plan of Operations that should be addressed in order to reach the finding of "no significant impact" as part of the NEPA process. These issues are tied to five components: wildlife information, noxious weeds management, monitoring for acid rock drainage (ARD) from rock stockpile areas, water sources, and the need to look at the watershed-wide potential for impacts from these activities.
117	NGO	<u>Water Sources</u> While not noted as a planned water source, Sarah Creek is identified as an alternative source. We encourage Constantine to work with the COMMENTER to avoid future use of water from this stream and COMMENTER is currently pursuing a water rights reservation on this stream to ensure stream levels are sufficient to sustain the anadromous fish population.
117	NGO	<ul style="list-style-type: none"> • Avoid water removal from Sarah Creek and coordinate with COMMENTER to obtain instream water reservation for fish in Sarah Creek. • Addressing the potential watershed-wide impacts from the proposed activities with adequate financial guarantee
136	NGO	The COMMENTER encourages BLM to do the best it possibly can to safeguard the exceptional ecological values of the Chilkat watershed.
136	NGO	Multiple management and community plans highlight the area downstream of glacier creek, including the Klehini River, as areas to manage for the protection of fish, wildlife habitat, subsistence use and water quality. The Haines Borough Comprehensive Plan, the Chilkat Bald Eagle Preserve Management Plan, Alaska Department of Fish and Game, the Haines State Forest Plan, and the Chilkat Indian Village Outstanding Natural Resource Water Nomination resolution all highlight the significance of downstream resources.
117	NGO	COMMENTER commends Constantine Metals for conducting exploration activities with no significant impact on Chilkat River watershed resources, and for providing a significant positive boost to the local economy.

Table 26. Summary of Scoping Comments: Water Quality

Letter No.	Commenter	Comment
21	Public	The road has been designed using qualified experts in aquatic biology, geotechnical engineering, rock geochemistry, water quality and hydrology as well as recognizing cultural resources, wetlands and wildlife habitat. It a been responsibly designed to be safe and will meet regulatory requirements;
71	Public	Constantine has also demonstrated environmental responsibility in selecting a road route. Its PoO indicates qualified experts have reviewed the aquatic biology, cultural resources, geotechnical engineering, rock geochemistry, water quality, wildlife and wetlands data to design a road that is safe, responsible, and will fully satisfy regulatory requirements.
127	Public	Constantine has stated repeatedly that this project will be just like Greens Creek. Greens Creek was not expected to be acid generating, but they were wrong. Greens Creek has polluted Hawk Inlet for years by using a mixing zone to bypass water quality standards. Constantine won't have that option and all acid runoff from exposed rock will end up in the Klehini and Chilkat Rivers affecting our water quality and salmon stocks.
157	Public	In its evaluation and determination of the road route, Constantine hired qualified experts to review the aquatic biology, cultural resources, geotechnical engineering, rock geochemistry, water quality, wildlife and wetlands data so the road will exceed regulatory requirements.
32	NGO	In deciding the road route, qualified experts reviewed the aquatic biology, cultural resources, geotechnical engineering, rock geochemistry, water quality, and wildlife and wetlands data to design a road that is safe, responsible, and will meet regulatory requirements.
44	NGO	Aquatic biology, cultural resource, geotechnical engineering, rock geochemistry, water quality, and wildlife and wetlands data supported the development of Constantine's proposal to design a road that will be safe and environmentally responsible.
167	Public	I'm also told the route was based on qualified experts' review of aquatic biology, cultural resources, geotechnical engineering, rock geochemistry, water quality, wildlife, and wetlands data.
168	Public	In addition, they examined the geotechnical engineering, the fish and wildlife and aquatic biology, water quality, wetlands, and cultural resources.
144	Public	In deciding the road route, qualified experts reviewed the aquatic biology, cultural resources, geotechnical engineering, rock geochemistry, water quality, wildlife, and wetlands data to design a road that is safe, responsible, is protective of the environment and will meet regulatory requirements.
80	Public	Does the current design of the ponds include a "pump" system or "catch" all for the seepage as well as the overflow of "clean water"?
61	NGO	We are aware that the proposal before the BLM currently includes a Storm Water Pollution Prevention Plan (SWPPP) and Spill Prevention and Countermeasure Plan (SPCCP) that is required but nonetheless thorough.
132	Public	I believe they will do what it takes to make sure water quality, fish habitat, and potential environmental degradation will be monitored and remedied.
136	NGO	In the current POO Constantine's capacity to pay for monitoring and mitigation of noxious weeds, water quality, and Acid Mine Drainage is not documented.
137	NGO	The selected route was designed by qualified experts who reviewed the aquatic biology, cultural resources, geotechnical engineering, rock geochemistry, water quality, wildlife, and wetlands data to design a road that is safe, responsible, and will meet regulatory requirements.

Letter No.	Commenter	Comment
139	Public	Many qualified experts have reviewed the proposed road route and design for a multitude of factors including water quality, aquatic biology, wildlife concerns, wetland delineation, cultural resources, geotechnical engineering, and rock geochemistry.
53, 140	Public	In deciding the road route, qualified experts reviewed the aquatic biology, cultural resources, geotechnical engineering, rock geochemistry, water quality, wildlife and wetlands data to design a road that is safe, responsible, and will meet regulatory requirements.
153	NGO	Constantine also employed qualified experts to review the aquatic biology, cultural resources, geotechnical engineering, rock geochemistry, water quality, wildlife and wetlands data so that the road that will safe, responsible, and meet regulatory requirements.
79	Tribal	Continued exploration work and potential mining at the Palmer Project has the potential to significantly enhance the quality of life for members of the COMMENTER and other local residents, but it must be done in a manner that is protective of fish and water quality.
79	Tribal	Importantly, planned creek crossings will not disturb fish habitat and existing regulatory requirements, such as Storm Water Pollution Prevention Plan, adequately mitigate any potential water quality impacts from construction.
120	Public	The area has undergone expert analysis of all ecological impacts on wildlife and aquatic biology.

Table 27. Summary of Scoping Comments: Wetlands and Riparian Areas

Letter No.	Commenter	Comment
21	Public	The road has been designed using qualified experts in aquatic biology, geotechnical engineering, rock geochemistry, water quality and hydrology as well as recognizing cultural resources, wetlands and wildlife habitat. It a been responsibly designed to be safe and will meet regulatory requirements;
55	Public	Constantine exceeded these standards, putting in extra culverts, avoiding fish habitat and wetlands, and doing a quality job on the road construction.
71	Public	Constantine has also demonstrated environmental responsibility in selecting a road route. Its PoO indicates qualified experts have reviewed the aquatic biology, cultural resources, geotechnical engineering, rock geochemistry, water quality, wildlife and wetlands data to design a road that is safe, responsible, and will fully satisfy regulatory requirements.
157	Public	In its evaluation and determination of the road route, Constantine hired qualified experts to review the aquatic biology, cultural resources, geotechnical engineering, rock geochemistry, water quality, wildlife and wetlands data so the road will exceed regulatory requirements.
32	NGO	In deciding the road route, qualified experts reviewed the aquatic biology, cultural resources, geotechnical engineering, rock geochemistry, water quality, and wildlife and wetlands data to design a road that is safe, responsible, and will meet regulatory requirements.
44	NGO	Aquatic biology, cultural resource, geotechnical engineering, rock geochemistry, water quality, and wildlife and wetlands data supported the development of Constantine's proposal to design a road that will be safe and environmentally responsible.

Letter No.	Commenter	Comment
167	Public	I'm also told the route was based on qualified experts' review of aquatic biology, cultural resources, geotechnical engineering, rock geochemistry, water quality, wildlife, and wetlands data.
168	Public	In addition, they examined the geotechnical engineering, the fish and wildlife and aquatic biology, water quality, wetlands, and cultural resources.
144	Public	In deciding the road route, qualified experts reviewed the aquatic biology, cultural resources, geotechnical engineering, rock geochemistry, water quality, wildlife, and wetlands data to design a road that is safe, responsible, is protective of the environment and will meet regulatory requirements.
119	Public	These roads have been designed to have minimal impacts to the environment by utilizing pre-existing and permitted roadbeds wherever possible, a route that avoids mapped wetlands and habitat with high diversity and ecological richness...
137	NGO	The selected route was designed by qualified experts who reviewed the aquatic biology, cultural resources, geotechnical engineering, rock geochemistry, water quality, wildlife, and wetlands data to design a road that is safe, responsible, and will meet regulatory requirements.
139	Public	Many qualified experts have reviewed the proposed road route and design for a multitude of factors including water quality, aquatic biology, wildlife concerns, wetland delineation, cultural resources, geotechnical engineering, and rock geochemistry.
53,140	Public	In deciding the road route, qualified experts reviewed the aquatic biology, cultural resources, geotechnical engineering, rock geochemistry, water quality, wildlife and wetlands data to design a road that is safe, responsible, and will meet regulatory requirements.
153	NGO	Constantine also employed qualified experts to review the aquatic biology, cultural resources, geotechnical engineering, rock geochemistry, water quality, wildlife and wetlands data so that the road that will safe, responsible, and meet regulatory requirements.

Table 28. Summary of Scoping Comments: Wildlife Resources

Letter No.	Commenter	Comment
21	Public	The road has been designed using qualified experts in aquatic biology, geotechnical engineering, rock geochemistry, water quality and hydrology as well as recognizing cultural resources, wetlands and wildlife habitat. It a been responsibly designed to be safe and will meet regulatory requirements;
55	Public	The road accesses an area of Haines that is little used by the public and does not have significant recreation, fish or wildlife values.
70	Public	This project protects the natural environment, provides additional safety to workers, and lessens potential helicopter disturbances to neighbors and wildlife.
71	Public	Constantine has also demonstrated environmental responsibility in selecting a road route. Its PoO indicates qualified experts have reviewed the aquatic biology, cultural resources, geotechnical engineering, rock geochemistry, water quality, wildlife and wetlands data to design a road that is safe, responsible, and will fully satisfy regulatory requirements.

Letter No.	Commenter	Comment
72	Public	I am concerned about the expansion of the footprint of Constantine on the area upstream of the Klehini River. The Klehini is a major tributary to the Chilkat River, and flows into the Chilkat River just upstream of the Alaska Chilkat Bald Eagle Preserve Council Grounds. This is a very sensitive area, and developments upstream could have negative impacts on this river system. Even though the ACBEP is not under BLM jurisdiction, the effects of actions taken in the BLM lands would impact the Preserve.
78	Public	Allowing this first part of expansion is only the beginning, and while this might seem harmless enough the BLM should consider future impacts of this exploration and if we really want a large mine upstream from our world class pristine salmon rivers and the Chilkat Bald Eagle Preserve. After seeing the impacts of mining mistakes this past year, it is impossible to have confidence that the Palmer project will not have environmental impacts.
126	Public	Hello, as a resident of Haines, I feel, as many of my townfolk do, that this mine is not needed, and its inherent destruction of land, resources, and wildlife, is detrimental to our well being as residents of Alaska.
157	Public	In its evaluation and determination of the road route, Constantine hired qualified experts to review the aquatic biology, cultural resources, geotechnical engineering, rock geochemistry, water quality, wildlife and wetlands data so the road will exceed regulatory requirements.
32	NGO	In deciding the road route, qualified experts reviewed the aquatic biology, cultural resources, geotechnical engineering, rock geochemistry, water quality, and wildlife and wetlands data to design a road that is safe, responsible, and will meet regulatory requirements.
44	NGO	Aquatic biology, cultural resource, geotechnical engineering, rock geochemistry, water quality, and wildlife and wetlands data supported the development of Constantine's proposal to design a road that will be safe and environmentally responsible.
167	Public	I'm also told the route was based on qualified experts' review of aquatic biology, cultural resources, geotechnical engineering, rock geochemistry, water quality, wildlife, and wetlands data.
168	Public	In addition, they examined the geotechnical engineering, the fish and wildlife and aquatic biology, water quality, wetlands, and cultural resources.
144	Public	In deciding the road route, qualified experts reviewed the aquatic biology, cultural resources, geotechnical engineering, rock geochemistry, water quality, wildlife, and wetlands data to design a road that is safe, responsible, is protective of the environment and will meet regulatory requirements.

Letter No.	Commenter	Comment
117	NGO	<p>The COMMENTER believes there are some areas of Constantine’s Plan of Operations that should be addressed in order to reach the finding of “no significant impact” as part of the NEPA process. These issues are tied to five components: <u>wildlife information</u>, noxious weeds management, monitoring for acid rock drainage (ARD) from rock stockpile areas, water sources, and the need to look at the watershed-wide potential for impacts from these activities.</p> <p><u>Wildlife and Habitat Assessment</u></p> <p>The Terrestrial Wildlife and Habitat Assessment prepared by Hemmera (2015), provides a good general overview of the habitat in the project area using 2014 sighting data. Updating this report with 2015 sighting data would be helpful for comparison. The limited wildlife location data available from ADF&G for this area is consistent with the Hemmera report’s findings of suitable habitat for mountain goats with low densities of animals in the current exploration area.</p> <p>The image in Figure 3 of the Hemmera wildlife report is unclear and makes it difficult to determine the location of the wildlife observations. It would be helpful for these sightings to be overlain with the activities proposed in the Plan of Operations. We would like to see continued collection of anecdotal wildlife observations and reports made available to the public annually.</p>
117	NGO	<ul style="list-style-type: none"> • 2015 wildlife sighting data should be released publicly as soon as possible. • ADF&G and/or BLM should resume wildlife surveys, especially for mountain goats, in the project area.

Letter No.	Commenter	Comment
156	Agency	<p>The proposed road extension will increase access to the area, potentially resulting in habitat abandonment and increased wildlife disturbance and harvest pressure.</p> <p>We appreciate the work CNI has undertaken to document terrestrial wildlife and predict habitat use in the Terrestrial Wildlife and Habitat Assessment (TWH; Appendix 6.c.iii of the Plan). COMMENTER recommends the following changes be made to the TWH:</p> <ul style="list-style-type: none"> • Wolf, black bear, and marten are important to Alaskans for hunting and trapping and we recommend these animals be included as species of interest; • Caribou, elk, and mule deer do not occur in the area and should not be included in Section 4; • We do not consider mountain goat or grizzly bear hardy species and recommend eliminating this term; and • In coastal environments, we use the term brown bear rather than grizzly bear. <p>In spring 2015, ADF&G biologists documented one brown bear den less than 1 km from the flight path for the Mount Henry Clay prospect. The aerial survey was performed at a specific elevation, which prevented detection of all dens in the project area. ADF&G biologists have documented brown bear dens in the Haines area ranging between sea level and 1190 m, and usually on 30—40 degree slopes (Anthony Crupi, Wildlife Biologist, ADF&G, Juneau, personal communication). During spring, sows with cubs typically spend spring months near dens and are vulnerable to disturbance.</p> <p>In fall 2015, ADF&G biologists surveyed the project area and determined the proposed drill sites are located within suitable habitat for mountain goats, confirming the habitat model predictions presented in the TWH. Mountain goats are easily disturbed, especially nannies with kids during spring and early summer, and helicopter use and drilling activities could negatively affect habitat use and animal behavior.</p> <p>ADF&G biologists do not have wolverine data specific to the project area, though we agree with the wolverine habitat suitability model prediction in the TWH that suggests wolverine habitats are present.</p> <p>Proposed exploration timing, between mid-May and September each year depending on snowpack, should minimize disturbance to brown bear, mountain goat, and wolverine. During that period brown bears will have emerged from their dens and be foraging at lower elevations, mountain goats will have transitioned from lower elevations and be using rocky outcrops at higher elevations, and wolverine will be foraging at both low and high elevations. For all three species, the stressful breeding and winter seasons will have passed, most females will have given birth, and animals will be focused on replenishing fat reserves.</p>
156	Agency	<p>In the Environmental Assessment, please include an analysis of potential effects the proposed activities may have on these three species, and include mitigation measures that would avoid, minimize, and mitigate potential effects. COMMENTER recommends minimizing wildlife disturbance to the extent practicable by:</p> <ul style="list-style-type: none"> • Minimizing helicopter activity before June 15 each year; • Maintaining a 400 m distance between personnel and brown bear, wolverine, and other game; • Maintaining a 500 m distance between helicopters and brown bear and wolverine dens; and • Maintaining a 1.5 km distance between helicopters and mountain goats year-round
137	NGO	<p>The selected route was designed by qualified experts who reviewed the aquatic biology, cultural resources, geotechnical engineering, rock geochemistry, water quality, wildlife, and wetlands data to design a road that is safe, responsible, and will meet regulatory requirements.</p>
53, 140	Public	<p>In deciding the road route, qualified experts reviewed the aquatic biology, cultural resources, geotechnical engineering, rock geochemistry, water quality, wildlife and wetlands data to design a road that is safe, responsible, and will meet regulatory requirements.</p>

Letter No.	Commenter	Comment
153	NGO	Constantine also employed qualified experts to review the aquatic biology, cultural resources, geotechnical engineering, rock geochemistry, water quality, wildlife and wetlands data so that the road that will safe, responsible, and meet regulatory requirements.
120	Public	The area has undergone expert analysis of all ecological impacts on wildlife and aquatic biology.

5.3 Additional Opportunities to Comment

When BLM releases the EA, they will ask agencies and the public to comment. BLM will consider public, NGO, tribal, and agency comments received during the comment period as they form their final decision and prepare a decision record.