



ALASKA MINERS ASSOCIATION, INC.

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May 24, 2010

Council on Environmental Quality
Attn. Ted Boling
722 Jackson Place, NW.
Washington, D.C. 20503

Mitigation.guidance@ceq.eop.gov

RE: Comments on the NEPA Draft Guidance "NEPA Mitigation and Monitoring"

Dear Mr. Boling,

The Alaska Miners Association is a non-profit membership organization established in 1939 to represent the mining industry. The AMA is composed of individual prospectors, geologists and engineers, vendors, small family miners, junior mining companies, and major mining companies. Our members look for and produce gold, silver, platinum, diamonds, lead, zinc, copper, coal, limestone, sand and gravel, crushed stone, armor rock, uranium, etc. Our members live and work throughout Alaska and have extensive experience working with federal agencies and the NEPA process.

We see no need for this guidance and feel that it will result in make work projects for already overburdened regulatory personnel working for federal agencies and increase the expense of federal projects.

AMA does not support this guidance as it duplicates existing procedures. Federal agencies already use the NEPA process to approve major actions on federal lands such as timber sales and mining plans of operations. They also use NEPA in their efforts to develop National and regional planning documents. AMA spends a considerable amount of staff time to respond to these federal actions. Federal Agencies such as the Forest Service, Bureau of Land Management, EPA and Army Corps of Engineers have well developed procedures for evaluating project impacts including evaluation of mitigation measures and ongoing evaluations. **Additional guidance would be of no value and will likely confuse the issue.**

NEPA was designed to ensure transparency and openness and mitigation should also be transparent and open. AMA agrees with the statement in theory, but in practice we are concerned that this guidance will increase the complexity and cost and lengthen the time frame of an already cumbersome and costly process.

Sincerely,

Steven C. Borell, P.E.
Executive Director

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