



BACKCOUNTRY HUNTERS AND ANGLERS ALASKA CHAPTER



3/15/10

To: Alaska Department of Natural Resources
Division of Mining, Land, and Water
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Re: APMA F109742—Pure Nickel 2010-2015 Exploration Permit Application

Thank you for this opportunity to comment on Pure Nickel's 2010-2015 exploration permit. We understand and appreciate the need to permit hard rock mining exploration in areas likely to hold good mineral resources. However, the area being proposed for large scale hard rock mining is in this case, critically important to the Nelchina caribou herd, one of the most accessible, extensively studied and heavily utilized caribou herds in Alaska. The Nelchina herd has provided food for Alaskans since time immemorial, and is managed to provide thousands of families with food to this day. We believe this property of the land, it's ability to provide a basic need for so many, is more important than the mineral resources that may be found. For this reason, AK BHA opposes granting Pure Nickel the exploration permit that could lead to large scale mineral exploitation.

We believe that mining exploration itself will cause significant negative impacts to the Nelchina herd and the people who utilize it. In all likelihood, the most disruptive result of exploration will be the numerous low elevation helicopter flights and landings, which have been shown to be highly disruptive to caribou, and certainly create an untenable situation for hunters attempting to fill their freezers. Noise from drilling camps, the prolonged presence of workers at these camps, and visual disturbances will also contribute to caribou stress, and will likely cause negative changes to migration habits and foraging behavior.

The Nelchina herd has recently shown signs of nutritional stress. Fires, in particular, have altered summer foraging patterns with the result that many caribou going into the rut are in poor condition, and calves are born small. It is particularly important therefore, that preferred winter foraging and rutting areas within the Tangle Lakes region, be free from disruption that could cause further harm to the herd. **The areas used by the herd in the fall and winter should receive special scrutiny and consideration from DNR during their permit deliberations. This includes the “Beta Complex” which abuts the Denali Highway and the Tangle Lakes/ Delta River Wild and Scenic River System.** These areas are too important to numerous Alaskans to be valued only for their mineral potential.

DNR has a serious responsibility to safeguard the public trust they hold; they must without fail manage the land under their care to respect this trust, and consider the results of their actions not only on current citizens, but on those following. This ethic should be at the forefront of all decisions regarding mineral development in the Tangle Lakes region. The loss of our renewable wildlife resources due to a lack of concern for the same, would be an unforgivable breach of said trust.

Thank you again for your hard work, patience and consideration,

Dave Lyon
Co-Chair Alaska Backcountry Hunters and Anglers