



Our membership and services span the globe

10 N Post St Ste 305 | Spokane WA 99201-0705

Phone: 509.624.1158 | Fax: 509.623.1241

E-mail: nwma_info@nwma.org | Web: www.nwma.org

September 27, 2010

BLM Anchorage State Office
Attention: NPR-A Planning Team
222 W. 7th Avenue
Anchorage, Alaska 99513

Re: Integrated Activity Plan and Environmental Impact Statement for the National Petroleum Reserve – Alaska

To whom it may concern:

The Northwest Mining Association (NWMA) respectfully submits the following comments for the formal scoping period for the Bureau of Land Management's (BLM) Integrated Activity Plan and Environmental Impact Statement (IAP/EIS) for the National Petroleum Reserve – Alaska (NPR-A). Through this process, the BLM is beginning a new plan for all federally managed land in the NPR-A, and NWMA appreciates the opportunity to outline important areas we feel need to be addressed in the plan.

NWMA is a 115 year old, 1,850 member, non-profit, non-partisan trade association based in Spokane, Washington. NWMA members reside in 40 states, including Alaska, and are actively involved in exploration and mining operations on public and private lands, especially in the West. Our diverse membership includes every facet of the mining industry including geology, exploration, mining, engineering, equipment manufacturing, technical services, and sales of equipment and supplies. NWMA's broad membership represents a true cross-section of the American mining community from small miners and exploration geologists to both junior and large mining companies. More than 90% of our members are small businesses or work for small businesses. Most of our members are individual citizens. Our members are directly affected by the BLM's management decisions for the NPR-A.

Open the NPR-A to Mineral Entry

NMWA strongly urges the BLM to recommend to Congress that it open all NPR-A lands to mineral entry under the General Mining Laws to explore for and develop locatable minerals. A healthy and vibrant domestic mining industry is indispensable to our nation's economic recovery. In fact, mining supports the very foundation of our economy, creating new wealth and providing the high-paying family-wage level jobs with good benefits our country desperately needs.

The NPR-A contains tremendous opportunities for mineral development. A stable domestic supply of strategic minerals and metals is critical to our nation's economic, energy, and national security. Efforts to expand and upgrade our nation's infrastructure will require metals and minerals. Indispensable components of our infrastructure include steel, copper, industrial

minerals, molybdenum and iron ore. No infrastructure project, including bridges, buildings or transportation, in fact, no society can move forward without metals and minerals.

Furthermore, efforts to diversify our energy portfolio and reduce our dependence on foreign oil will require minerals and metals – and lots of them. Hardrock mining is essential to America’s clean energy future. A plain and simple fact is that American renewables need American metals and minerals – unless, of course, we are willing to trade our unhealthy dependence on foreign oil for a dangerous dependence on foreign sources of critical minerals. Plans to aggressively expand our renewable and clean energy production will require significant amounts of copper, steel, molybdenum, zinc, gold, silver, cobalt, lead, uranium and rare earth minerals. For example, wind turbines such as the Vestas V90 – 3.0 MW require approximately 335 tons of steel; 4.7 tons of copper; 3 tons of aluminum; 13 tons of glass fiber; 1,200 tons of reinforced concrete; and 2 tons of rare earth minerals. Also, hybrid vehicles require at least 50% more copper than the average car, and the motor requires rare earth minerals. No renewable or clean energy project, including wind turbines, solar panels, fuel efficient cars, or nuclear power plants can move forward without metals and minerals that are currently produced from mines in the United States.

The U.S. can and should be more self-reliant for the minerals we need. Despite reserves of 78 important mined minerals, the United States currently attracts only seven percent of worldwide exploration dollars. As a result, our nation is becoming more dependent upon foreign sources to meet our metal and minerals requirements, even for minerals with adequate domestic sources.

Currently, America is 100 percent dependent on foreign sources for 18 minerals commodities and more than 50 percent import reliant on another 45 commodities (USGS Mineral Commodity Summaries 2010). Increased import dependency causes a multitude of negative consequences, including aggravation of the U.S. balance of payments, unpredictable price fluctuations, loss of high paying jobs and vulnerability to possible supply disruptions.

Opening the NPR-A to mineral entry also recognizes the mining industry as the highly regulated, technologically advanced and environmentally responsible industry it is today. The U.S. has the highest environmental standards and the most stringent regulations in the world. Existing environmental laws, regulations, and financial assurance requirements protect the environment, ensure public participation in the process and ensure that modern mines are reclaimed and do not become tomorrow’s abandoned mines.

We don’t have the luxury of choosing where minerals are located. Far too often, areas with mineral potential in the United States have been withdrawn through segregation orders, Wilderness, Wild & Scenic Rivers and other conservation designations to the detriment of our mineral security. We need to open areas such as the NPR-A to mineral entry and mining to ensure that America can meet its mineral requirements and not add an unhealthy reliance on foreign sources of minerals to our unhealthy reliance on foreign sources of oil.

In addition, the BLM should include in the new plan transportation corridors and development of port sites to facilitate mineral resource development.

The NPR-A should be Managed for Multiple-Use

In addition to being open to mineral entry for locatable minerals, the entire NPR-A should be open to oil, gas and coal leasing. Managing the entire area for multiple-use will greatly contribute to America’s economy and our energy independence.

The BLM should not recommend any further Wilderness designations or any additional restricted use areas. Alaska already has more conservation system units than the rest of the nation combined. In fact, the Alaska National Interest Lands Conservation Act of 1980 (ANILCA) placed 104 million acres in National Parks, Preserves, Refuges, Monuments, and Wilderness designations. We do not need any more restricted set-asides.

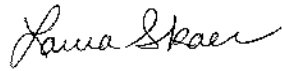
Conclusion

It is more important than ever for the United States to responsibly utilize our own mineral and energy resources. In fact, our economic and energy security depends on it. The U.S. mining industry stands ready to provide the jobs and materials needed to build our renewable energy infrastructure and lead this nation out of recession and into mineral and energy independence.

The NPR-A should be open to mineral entry, and NWMA urges the BLM to make such recommendation to Congress as part of the IAP/EIS.

Thank you for considering our comments.

Sincerely,

A handwritten signature in cursive script that reads "Laura Skaer".

Laura Skaer
Executive Director