



**Finding of No Significant Impact  
Bonanza and Little El Mining Plan of Operations  
July 2016**

Recommended:

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Eric Veach  
Acting Superintendent, Wrangell-St. Elias National Park and Preserve

Date

Approved:

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Bert Frost  
Regional Director, Alaska

Date



**National Park Service  
U.S. Department of the Interior**

July 2016

**Wrangell-St. Elias National Park and Preserve  
Alaska**

## **FINDING OF NO SIGNIFICANT IMPACT Bonanza and Little El Mining Plan of Operations**

### **INTRODUCTION**

In compliance with the National Environmental Policy Act of 1969 (NEPA), the National Park Service (NPS) prepared an Environmental Assessment (EA) to examine alternative actions and environmental impacts associated with the proposed mining plan of operations (MPO) which was submitted by Chisana Mining LLC. The project purpose is conducting a suction dredge placer gold mining operation on the Little Eldorado (Little El) unpatented mining claims located in the Gold Hill area within the preserve of Wrangell-St. Elias National Park and Preserve (WRST). Chisana Mining LLC also proposes to continue placer gold mining operation on the Bonanza unpatented mining claims and these proposed operations are included in the MPO.

Chisana Mining LLC submitted an MPO, after consultation with NPS specialists, as required by Title 36 of the Code of Federal Regulations (CFR), Part 9A, detailing their proposed means and methods. Access to both claim groups (Little El and Bonanza) is via fixed wing aircraft to the Chicken Creek Airstrip, then via off road vehicle (ORV) to the claim groups. This access is authorized by an existing Right Of Way Certificate of Access (RWCA), issued to Chisana Mining LLC by the NPS in 2013. The mineral rights to the Little El (tract #WRST-33-108) and Bonanza (tract #WRST-33-111) claims are owned by Chisana Mining LLC.

The statements and conclusions reached in this finding of no significant impact (FONSI) are based on documentation and analysis provided in the EA and associated decision file. To the extent necessary, relevant sections of the EA are incorporated by reference below.

## **ALTERNATIVES CONSIDERED**

This EA provided an overview of the proposed project and analyzed two alternatives and their impacts on the environment: Alternative A, the No Action Alternative; and Alternative B, the Proposed Action with NPS stipulations.

### **Alternative A: No Action Alternative**

Under the No Action alternative, The NPS Alaska Regional Director would not approve the operator's proposed mining plan of operations. As a result, authorized mining would not occur on the Bonanza and Little Eldorado placer claims at Gold Hill.

### **Alternative B: Proposed Action with NPS Stipulations**

Under this alternative, the NPS Alaska Regional Director would approve the operator's mining plan of operations (MPO) on the Little Eldorado and Bonanza unpatented placer claims. This authorization would include NPS stipulations for resource protection. These stipulations would constitute a mitigation plan designed to minimize and/or prevent potential environmental impacts to park resources and values and would be conditions to the authorization of the mine.

The proposed placer mining activities would consist of suction dredge mining operations, highbanker mining operations and the use of a metal detector for exploration and nugget detection. Proposed mining operations would likely continue for the next 10 years or more. The operations would start in early June each year and may continue until September 30 depending upon weather conditions. It is estimated that 1 – 10 yards of material would be processed each day, depending on the size of the material and the dredge being used. Maximum yardage would be 500 cubic yards per season, based on a 60 – 100 day season. On an average year, 100-400 linear feet of creek would be mined per season, depending on the depth of the overburden and the width of the creek. Overburden ranges from 1 – 14 feet deep, with an average of 4 – 6 feet. Creek width varies from 5 – 40 feet. The approximate length of creek bed (within the Bonanza and Little El claims, up to the confluence with Snow Gulch) is about 15,020 feet. Average estimated disturbance from suction dredge activities would be approximately 6,000 square feet per year (0.138 acres/per year).

Metal detectors would be used for the purpose of prospecting and sniping exposed bedrock areas. Exploration activities are planned for all claims. Prospecting would be limited to already disturbed, un-vegetated areas. Test holes would be approximately 6 feet in diameter, and hand dug with a shovel. The maximum number of pits dug per season would be six. Some pits would be out of the active floodplain. Upon completion of testing, all holes would be backfilled into their previous state. Average estimated disturbance from prospecting activities would be 216 square feet per year (0.005 acres).

A highbanker may be used for areas where suction dredging is not feasible, such as in the steep sections of the creeks. Mineral bearing deposits in these locations would be processed using the sluice box attached to the highbanker. Gravels to be processed in the highbanker

would be moved by hand. It is anticipated that the gravels to be processed in the exposed bench area on the Bonanza and Little El claims would be obtained only from areas that were previously disturbed. Average estimated disturbance from highbanker activities is less than 500 square feet per year (approximately 0.01 acres per year).

Most proposed mining operations would be confined to areas that have been previously mined and/or directly impacted by past mining activities.

## **SELECTED ALTERNATIVE AND RATIONALE FOR THE DECISION**

The EA examined and analyzed the proposed mining operations and reasonable alternatives to ensure that it satisfies the requirements of 36 CFR 9.10, and would not injure or adversely affect federally owned land. The NPS has selected Alternative B (the Proposed Action with Stipulations) which will authorize the proposed mining operations on the Little Eldorado and Bonanza claims with NPS stipulations to protect resources.

Alternative B will result in no significant adverse impacts to natural or cultural resources. Placer mining carried out as described in the Mining Plan of Operations and subject to NPS stipulations is consistent with management of the area as part of the Chisana-Gold Hill Historic District, which is listed in the National Register of Historic Places. The mining operations are expected to have minor direct and indirect impacts to floodplains, vegetation, wetlands, visual resources, and water and aquatic resources. Mining operations are expected to have positive impacts to cultural resources.

Approval of mining fulfills the requirements of Title 36 CFR 9A and is consistent with the Mining in the Parks Act of 1976 because it would not constitute a nuisance in the vicinity of the operations or significantly affect federally owned lands. It is also consistent with the "Interim Operations" described in the 1990 Wrangell-St. Elias National Park and Preserve Final Environmental Impact Statement Cumulative Impacts to Mining ROD (Mining ROD).

## **MITIGATION MEASURES**

Mitigation Measures adopted as part of the selected alternative describe actions to avoid or reduce impacts to soils and water quality, cultural resources, floodplains and wetlands, and aquatic resources. Generally, the stipulations cover the following:

- Annual reporting requirements.
- Conditions for All Terrain Vehicle (ATV) use in support of mining operations.
- Fuel storage conditions.
- Conditions for protection of water quality.
- Conditions for protection of cultural resources.
- Reclamation requirements and conditions.
- Conditions for protection of wildlife.

A complete description of stipulations is provided in Appendix D of the EA.

## **PUBLIC INVOLVEMENT/AGENCY CONSULTATION**

The NPS published a "Notice of Availability" for the Bonanza and Little Eldorado Mining Plan of Operations in the Federal Register on April 15, 2016 (FR Doc. 2016-08698). The EA was placed on the NPS Planning, Environment and Public Comment (PEPC) website on June 13, 2016, where it was available for public review and comment through July 8, 2016. Notice of the EA's availability was published in two local newspapers (Tok and Glennallen), and e-mailed to individuals in Fairbanks, Tok, and Chisana. No comments were received.

## **FINDING OF NO SIGNIFICANT IMPACT**

The selected alternative will not have a significant effect on the human environment. This conclusion is based on examination of the significance criteria defined in 40 CFR Section 1508.27. As described in the EA, the selected alternative has the potential for adverse impacts on floodplains, vegetation, wetlands, visual resources, and water and aquatic resources; however, no potential for significant adverse impacts was identified. Mining operations are expected to result in positive impacts to cultural resources. The selected alternative will not result in the impairment of any resources that fulfill specific purposes identified in the parks enabling legislation or that are key to its natural or cultural integrity (See Attachment A, Determination of Non-Impairment).

The selected alternative will not have significant effects on public health and safety, or rare or unique resources of the region. No highly uncertain or controversial impacts, unique or unknown risks, significant cumulative effects, or elements of precedence were identified. Implementation of the NPS selected alternative will not violate any federal, state, or local environmental protection law. The environmental effects of other reasonably foreseeable mining operations in the area are discussed in the cumulative effects portion of the environmental assessment. No cumulative effects are significantly adverse.

The selected alternative will have a positive impact on cultural resources within the Chisana-Gold Hill Historic District, which is listed in the National Register of Historic Places.

## **CONCLUSION**

As described above, the selected alternative does not constitute an action meeting the criteria that normally requires preparation of an environmental impact statement (EIS). The selected alternative will not have a significant effect on the human environment in accordance with Section 102(2)(c) of NEPA. Based on the foregoing, it has been determined that an EIS is not required for this project and, thus, will not be prepared.

This action complies with the Endangered Species Act, the National Historic Preservation Act and Executive Orders 11988, 11900, and 12898. There will be no significant restriction of subsistence activities as documented by the ANILCA Title VIII, Section 810(a) summary evaluation and findings. No federal, state or local laws or requirements imposed for the protection of the environment will be violated by implementing this action.

## **Non-Impairment Finding**

A determination of non-impairment is made for each of the resource impact topics carried forward and analyzed in the environmental assessment for the preferred alternative. The park's 2010 Foundation Statement was used as a basis for determining if a resource is:

- Necessary to fulfill specific purposes identified in the establishing legislation or proclamation of the park, or
- Key to the natural or cultural integrity of the park or to opportunities for enjoyment of the park, or
- Identified in the park's general management plan or other relevant NPS planning documents as being of significance.

Impairment determinations are not necessary for visitor services, visitor experience, economic environment, safety, and park operations, because impairment findings relate back to park resources and values. These impact areas are not generally considered to be park resources or values according to the Organic Act, and cannot be impaired the same way that an action can impair park resources or values.

### **Cultural Resources**

Protection of cultural resources is not specifically identified as one of the park's purposes in the establishing legislation of the park. The park's general management plan does identify cultural resources as a significant resource and protection of cultural resources would be key to the natural or cultural integrity of the park.

Active mining on the scale proposed would not alter the integrity of the landscape of the historic district. The Cultural Landscape Report proposed active mining as a suitable treatment for these claims, with the caveat that it not destroy, degrade, or alter the landscape, structures or artifacts. The proposed uses and repairs of the structures, if done with in-kind materials, would be a moderately positive, long-term impact that would help retain the structures on the landscape. Alternative B would result in direct and cumulative, long-term positive impacts to cultural resources and would not result in impairment to cultural resources.

### **Soils**

Management for healthy soils is not identified as a specific purpose in the establishing legislation of the park and soils are not specifically identified in the park's general management plan as being of significance. Soils are a key component to "continuous intact ecological communities that create visually diverse scenery largely unaffected by humans," which is identified as a significance statement for Wrangell-St. Elias National Park and Preserve. Alternative B would result in impacts to soils of approximately 0.01 acres per year. This would result in a minor impact to soils and would not result in impairment.

## **Vegetation**

Management for vegetation is not specifically identified as a purpose in the establishing legislation of the park and vegetation is not specifically identified in the park's general management plan as being of significance. Vegetation is a key component to "continuous intact ecological communities that create visually diverse scenery largely unaffected by humans," which is identified as a significance statement for Wrangell-St. Elias National Park and Preserve. Alternative B would result in impacts to vegetation of approximately 0.1 acres per year. This would result in a minor impact to area vegetation and would not result in impairment.

## **Wetlands**

Management for wetlands is not specifically identified as a purpose in the establishing legislation of the park and vegetation is not specifically identified in the park's general management plan as being of significance. Wetlands are a key component to "continuous intact ecological communities that create visually diverse scenery largely unaffected by humans," which is identified as a significance statement for Wrangell-St. Elias National Park and Preserve. Alternative B would result in impacts to wetlands of approximately 0.01 acres per year. Disturbance at this level would not result in impairment of wetlands.

## **Visual Resources**

"To maintain unimpaired the scenic beauty and quality of high mountain peaks, foothills, glacial systems, lakes and streams, valleys, and coastal landscapes in their natural state" is identified as a park purpose. Expansive vistas and scenic wildlands are identified as significant resources that define what is most important about the park's resources and values and are tied to the park purpose. Unimpaired scenic quality is necessary to fulfill the purposes for which the park was established and is key to the natural integrity of the park.

Past and present mining has created visual impacts in the form of creek bed and riparian disturbance. More obvious visually are the historic roads (some of which have become ORV trails) and ditches. These linear features have created visual scars across the landscape. However, these are features that are important components of the cultural landscape within a National Register Historic District. As such, the visual evidence of past and present mining has a positive impact on the cultural landscape and will add to the experience of most visitors. Alternative B will not result in impairment to visual resources.

## **Water and Aquatic Resources**

Water quality is not specifically identified as a purpose in the establishing legislation of the park and is not specifically identified in the park's general management plan as being of significance. Protection of fish habitat and protection of populations of fish are specifically identified as park purposes. There are no fish species present in Bonanza Creek.

The direct and indirect impacts from mining activities would be temporary and low impact on an important park resource. These would result in minor impacts to water resources but would not result in impairment.

### **Conclusion**

In conclusion, as guided by this analysis, good science and scholarship, advice from subject matter experts and others who have relevant knowledge and experience, and the results of public involvement activities, it is the Superintendent's professional judgment that there will be no impairment of park resources and values from implementation of Alternative B. Proposed mining operations, conducted under the stipulations identified as part of Alternative B, would not result in impacts that would constitute impairment.