Loren J Karro

26239 E Buckshot Dr.

Palmer, AK 99645

907-745-3712

*lorenk@mtaonline.net*

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Wendy Huber

Planning and Environmental Specialist

Bureau of Land Mangement

222 W 7th Ave., Stop #13

Anchorage, AK 99513

[BLM\_AK\_AKSO\_AmblerRoad\_Comments@blm.gov](mailto:BLM_AK_AKSO_AmblerRoad_Comments@blm.gov)

RE: Scoping Comments for the Supplemental Environmental Impact Statement for the proposed Ambler Mining District Industrial Access Road project

Dear Ms Huber:

Thank you for the opportunity to comment on the scope of the SEIS for the Ambler Road project. It is my position that the SEIS should address not just the admitted shortcomings in the ANILCA Section 810 and the NHPA act analysis deficiencies, but may more fundamental problems with the EIS.

I believe that the proposed project, if built, will have negative cascading effects on the peoples, lifestyles, traditions, habitats, wildlife, birds, fisheries and marine mammals in the very extensive project area and beyond. The previous authorizations were deficient in consideration of mitigation measures, of considerable widespread public and local public opposition to this project, and relied on future commitments to unstated designs, mitigation measures, locations, resource use details and many other issues, contrary to requirements of NEPA, FLPMA, ANILCA, the NHPA, and the CWA 404 permit requirements. I will attempt to address some of these herein.

There are numerous reasons why the permits and authorizations granted to date should be revoked, and the process started anew. NEPA requires that the Agencies consider a unified project prospective. NPS and BLM approved the road construction based on a 3 phase construction approach, requiring approximately 44 gravel mines.

“Construction will occur in phases. Phase 1 is a 1-lane “pioneer road” with minimal shoulder space. It will include installation of all culverts and bridge crossings of waterways needed for all phases and will allow access to the District late-summer through winter, but it is not anticipated to provide access in spring and early summer when portions of the road may be soft. All bridges (29 estimated) would be 1-lane structures and would not be widened in later phases. All culverts would be installed at the size needed for Phase 2. Phase 2, which may be constructed immediately following Phase 1 as a single construction effort or later in time, will widen, deepen, and otherwise finish the road embankment needed for year-round use, but the road would remain a 1-lane road. Phase 3 would be constructed when mining activity and resulting traffic warrant, and it is possible Phase 3 may never be built. Phase 3 would widen the embankment to accommodate 2-way traffic (allowance for 2 lanes with shoulders). All culverts would be extended for Phase 3.” [EIS 3.2.1]

However AIDEA submitted a revised DEIS to the Corps of Engineers, which was never released for public comment, which requested approval of the road construction only through phase II, and approximately 15 gravel mines. It is this project that was awarded a CWA 404 permit, yet the BLM and NPS approved a much greater construction project, including wider road beds and extended culverts, which never did receive a Section 404 permit. AIDEA has not provided sufficient information to be granted any authorizations by BLM or NPS (the Road Right of Way).

Additionally, the 45 day comment period, held during the fall subsistence gathering/hunting months, was not sufficient and is culturally insensitive. Many local peoples were busy harvesting the game, berries and fish needed to carry them through the winter months. Most were not even aware of the comment period and deadline. The BLM promised to hold public hearings during this time but did not provide any public hearing opportunities in the most affected communities or by online meetings such as Zoom. I, and many others, put in a request for an extension to the comment period, but never received any acknowledgement or answer.

I will address some of the other glaring problems with the present EIS, but this is by no means a comprehensive list. The extent of the lack of detailed information regarding design, mitigation, and effects means that the EIS approval is extremely premature and is not based on consideration of relevant information but on promises of future details.

ROAD CONSTRUCTION DESIGN

Road construction analysis is based on future design and detail promises. The National Park Service (NPS) issued its ROW permit based on a “Conceptual Alignment” to be fleshed out at a future, unspecified time. They also allowed information on construction impacts to resources such as permafrost, streams, air quality, culverts, cultural and tribal resources etcetera to be provided at a future time. [NPS, USDOI, ROW Permit for Alaska Industrial Development & Export Authority, ROW Permit No. RW GAAR-21-001, Jan 5, 2021] BLM also allowed AIDEA to agree to provide its complete development plan and resource and design elements at a later date. [BLM, ROW Grant F-97112, Jan. 5, 2021] Because details of design and resource use were not included, proper analysis of the gravel resource extraction as well as the amount of gravel needed was grossly insufficient. The amount of gravel mine sites needed was also varied between 15 under the CWA 404 permit and 44 under the BLM EIS Record of Decision.

In fact, the sentence “Design features related to this mitigation would be determined during the design or permitting phase and incorporated into the permit stipulations” (after the fact), or a very similar phrase, is used over 25 times in one section of part 3 of the EIS alone!

The Right of Way analysis and permits are based on conceptual plans and right of ways. BLM required AIDEA to complete a development plan and design elements at a future, unspecified

point in time. [Bureau of Land Mgmt., Right-of-Way Grant (BLM ROW): F-97112 (Jan. 5, 2021) at 6-7] Water access points are left to be defined at a later date, as is the quantity of water needed. AIDEA advises that short spur roads will be needed to most water resources used in road building and maintenance, but doesn’t yet know or say which water bodies will be used as they have not done a survey of the available sources or the fish and vegetative species therein. No EIS should be approved nor permits issued until the locations and amounts of water withdrawals is specified.

UNDEFINED BASELINE INFORMATION

Under NEPA, the agencies must “describe the environment of the area(s) to be affected … by the alternatives under consideration.” [40 CFR Sec 1502.15] “Without establishing the baseline conditions … there is simply no way to determine what effect the [action] will have on the environment, and consequently, no way to comply with NEPA.”[ *Carlucci*, 857 F.2d at 510]

Glaringly, this EIS does not provide the comprehensive baseline information required by law. How can the consequences of the project construction and operation be known if the baseline information is not first provided, relating to such things as surface and groundwater resources, fisheries inventory, air quality, wildlife resources, habitat specifics, avian species and numbers, and cultural, recreation and economic resources? Indeed the EIS just proposes that, in the end, they anticipate that the impacts of a proposed decision will be insignificant, and this surely does not meet its NEPA obligations. [*Carlucci*, 857 F.2d at 510] In plain language, if we don’t know what we have, how can we know how our actions will effect things? And how can you reasonably define mitigation measures when you don’t know what you have? Over and over again, the EIS defers to studies at a later date, and to the mitigations that might arise from them and be incorporated into permit stipulations. This applies to rare plant identification, geotechnical surveys, identification of water sources and the fish present in them etc. While the number and location of the 44 gravel mines has been proposed, the gravel has not been analyzed to see if it contains Naturally Occurring Asbestos (NOA). They have not yet done a geotechnical survey, nor a permafrost survey.

The EIS states unequivocally that the road will have serious effects on the environment and wildlife:

“ Air and water quality and water flows would be altered along the corridor compared to current, mostly natural conditions. Thousands of culverts would channel flowing water under the road and would affect natural flow patterns, erosion patterns, natural channel migration, ponding, and flooding patterns. Best management practices would be stipulated to minimize impacts. Construction could hasten thawing of permafrost in localized areas and could damage natural topography and alter water flows and vegetation patterns.” [EIS Executive Summary pg. ES-6]

However they cannot properly analyze effects to an environment that they have not yet thoroughly studied and identified and thus they cannot yet propose mitigation efforts; therefor how can the Agencies properly assess the adequacy of the safeguards?

SUBSISTENCE/ANILCA 810 ANALYSIS DEFICIENCIES

BLM acknowledged that it subsistence impacts analysis under the ANILCA 810 obligations was deficient, specifically as related to caribou and fish resources. In its analysis it did not

“meaningfully discuss . . . impacts on vegetation, or the consequences for caribou foraging, caribou abundance, caribou availability for subsistence harvesting, or any other vegetation-related impacts on caribou and subsistence.” [AVC Remand Mot. At 2, 14-17] Likewise, it did not take into account the impacts of dewatering on fish, their spawning habitat and their subsistence use, despite the significant reliance on fisheries resources by interior rural residents.

It is known that the Western Arctic Caribou Herd (WACH) population has dropped significantly over the last decade, especially the last two years; and new hunting restrictions have been put in place. Also the Yukon River salmon runs are now at historic lows. Thus any actions that would further deplete these vitally important subsistence resources must be evaluated in a much more stringent light. The mere existence of the road will probably alter the historic caribou migration routes. Migration route changes would not just affect subsistence use access but cause further stress to the herd, already in a “preservative decline”. Changes in water flow and water resources might change both migration routes and caribou calving ground locations. It is admitted that aircraft operations alone “would have significant impacts on the herd population” [3 FEIS M-5], but there was no discussion of their effects on subsistence use. There is not even an identification of the location and number of airstrips or flights associated with the project. The same is true with the fact that mines and mining roads built as a result of this proposed project will “increase habitat fragmentation exponentially” [3 FEIS M-20], affecting caribou migration patterns and grazing areas. A baseline study of caribou populations, migration routes, and vegetative resources needed for their sustenance must be made before effects of the road construction and use can be known or mitigations measures considered.

Possible spills of toxic wastes from trucks; sediment buildup from water washing across roadways into flowing water; and changes in water flow patterns and use of water from local water sources could negatively impact salmon spawning grounds. Downstream impacts lead all the way to Kotzebue Sound via the Kobuk River. A large variety of fish (Sheefish, Chum Salmon, Chinook Salmon, Dolly Varden, Grayling, Whitefish, Northern Pike and Burbot) live and spawn in the area waters and would be affected by sedimentation and blocked migration routes. Water access points outside of GAAR and not identified. There are different requirement where ‘sensitive fish’ are present in lakes used for water withdrawal but location of water withdrawal sites are not yet decided and a survey of where which fish are has not yet been done. The EIS also doesn’t identify anadromous streams or stream flow patterns.

None of the EIS subsistence analysis is adequate in that no baseline information is available, therefore no real effects of the project can be concluded.

The Subsistence Analysis must also look at a loss of access to traditional subsistence resources caused by the road:

“The proposed ROW would not permit access to residents for subsistence purposes but would allow residents to cross the road at established crossing areas. The efficacy of crossing ramps to reduce access impacts for local hunters would depend on the location, design, and frequency of the ramps along the ROW. Subsistence users do not always use or follow established trails when pursuing resources overland; instead traveling in various directions based on environmental factors (e.g., weather, snow and ice conditions) and traditional knowledge of resource distribution and behavior. Therefore, the presence of crossing ramps would not eliminate significant impacts to user access***.*** Subsistence users may have to travel additional distances when pursuing resources in order to locate approved crossing areas, or they may take safety risks by crossing in areas not approved for crossing. In addition, despite the presence of crossing ramps, some individuals may still have difficulty using crossing ramps, especially when hauling sleds.” [FEIS, M-7]

Despite this acknowledgement, the EIS did not come to any conclusions on subsistence use access restrictions, which prohibits a meaningful impact analysis.

Studies must be extended to include the effects of the operation of the road itself, not just the construction phase. The effects of an estimated 168 trucks a day driving the length of the road would obviously mean impacts that cannot be mitigated simply by asking drivers to halt vehicles when caribou are crossing! Additionally, although the public comments often mentioned fears that use of the road would impact subsistence activities by increasing outside hunting pressure, this was not included in the subsistence analysis. What would the effects to subsistence be if the road were to open to the public, as the Dalton Highway was?

Under the Tier 2 requirements of sec 810, the EIS should have established that the Ambler road was necessary, involved the minimal amount of public lands, or that it includes reasonable mitigation measures to minimize the impacts to subsistence activities. The road cannot be claimed to be ‘necessary’ as it is primarily for the use of a multinational mining company. It definitely does not involve a minimal amount of public lands, as it extends over 200 miles, includes runways, man camps, 44 gravel mines and 29 bridges, and permanently fills over 2,000 acres of wetlands. No reasonable mitigation measures can be defined when a baseline analysis is missing, and those proposed in the EIS are minimal and not very effective.

Although the BLM scoping announcement said that they would hold public hearings during the comment period, no community public meetings were held. There is a wide ignorance of the scoping comment period in the affected communities due to poor communication and a lack of government to government communication. The 45 day comment period, as noted before, was held during the fall subsistence activity times, when locals are out hunting, fishing and berry picking. It was also too short, especially given the time it was held, and despite numerous requests, no extensions were given or requests even acknowledged. All of these shortcomings are further reasons that all existing permits and authorizations should be rescinded.

CULTURAL AND TRIBAL IMPACTS, NHPA Sec 106 COMPLIANCE

A baseline study of cultural and tribal resources is missing from the EIS, including history and sacred areas, hunting grounds and critically important subsistence resources. All of these are of vital importance to the health of the local communities and peoples. Sec 106 of the National Historic Preservation Act (NHPA) requires that the agency must have meaningful consultation with Tribes, including meetings with all villages and Tribal councils. With the poor internet quality and availability in many villages, in person meetings become imperative. A lack of meaningful communication and the timing of this last comment period shows disrespect of the local peoples and their traditions and needs.

WILD AND SCENIC RIVERS

The EIS is deficient in its consideration of the effects of the Ambler Road on the designated Wild Kobuk River as well as other possible Wild and Scenic Rivers. The Wild and Scenic River Act (WSRA) says that designated wild rivers “shall be preserved in a free flowing condition, and that they and their immediate environments shall be protected” [16 USC S 1271]. This includes rivers not yet designated but available for inclusion in the WSRA. [16 USC S 1286] “[i]n all planning for the use and development of water and related land resources, consideration shall be given by all Federal agencies involved to potential national wild, scenic and recreational river areas.” [16 USC S 1276(d)(1)] Both Alternatives A and B cross the Wild Kobuk River, and there are multiple crossing of rivers that might be available for inclusion but not yet designated. The project also proposes to use water withdrawal from the Kobuk River.

Despite the obvious application of the WSRA to this proposed project and the study area, there was very little discussion of it. BLM purported to shift the burden to the National Park Service (NPS) as the Kobuk River crossing occurred in the Gates of the Arctic. However the crossing of multiple rivers which could be included in the Act makes a WSR analysis necessary for the BLM EIS also.

SOCIAL ISSUES

The local communities will be affected by the proposed project in both the construction and operations stages. Besides the earlier discussed effects on subsistence activities, the project might affect the mental and physical health of local residents. Air pollution caused by dust raised in the gravel mining and in the operation of big equipment over the gravel roads will surely impact nearby villages and peoples. Public Health can also be affected by stress exacerbated by noise of the vehicle and airplane traffic, by diet changes due to changes in subsistence resource availability, by light pollution and visual disturbances in the once quiet and wild landscapes, by increased activity in the villages by arriving and departing workers, and by increased safety risks caused by crossing the road, strangers in the area, and increased road and air traffic. A revised health impact assessment is needed. It needs to include the effect on health of climate change and of the increased GHG emissions that will be a result of the project construction and operation and of the mines it enables.

Operation of the road once complete has it’s own health risks. The risk of spills and their impacts along the road corridor are significant and need to be addressed. [Susan Lubetkin, Alaska Mining Spills: A Comparison of the Predicted Impacts Described in Permitting Documents and Spill Records from Five Major Operational Hardrock Mines (Dec. 20210)] Research on five major mines in Alaska found that since 1995 there have been 8,150 total spill incidents, releasing 2,360,000 gallons and 1,930,000 pounds of hazardous materials. Despite assertions that new concentrate containers are designed such they have reduced the loss of concentrates from spills during transportation, the ADEC spill database found that the amount of ore concentrate spills from 2008-202 was higher than from 1995-2007. State officials have also acknowledged the difficulty of cleaning up concentrate spills on the tundra, as well as how damaging it is to the tundra when such spills must be removed by excavation. Damage to tundra takes long-term restoration when tundra root systems are damaged by an excavator. All of these spill results would cause direct and indirect health problems to local communities, potentially affecting drinking water quality, air quality, berry picking areas etc. It is also possible that both land and aquatic resources that are part of the local diets might become polluted and unsafe to eat.

These social concerns tend to be buried under a continued palaver of what the great economic benefits of the proposed road will be. However, an independent study [Powers Consulting, An Economic Analysis of the Proposed Alaska Ambler Access Road, Dec. 2021 ] states that AIDEA has failed to consider realistic costs, risks and liabilities inherent in financing the proposed Ambler Road. Additionally the report states that “While the multinational mining companies may see substantial positive economic impacts from the proposed Ambler Access Road mines, the local people and local economies will see little of those projected economic benefits…” [Report, pg 31] Instead, small local businesses such as guide services and recreational lodges and companies may well see a decreased economy due to the construction and mining activities in their use areas, as well as increased noise from traffic, increased airplane activity etc. Some of the activity will be near Walker Lake, which is a take off point for many wilderness recreational activities, and it will significantly degrade the wilderness experience there. Additionally, the EIS analyzed a road that had a 50 year life, although most previous analyses assumed the road’s life to be 30 years.

The EIS relies on the premise that there will be at least four mines in the Ambler region to pay for the road. However at this point only one mine has undergone any feasibility analysis, and none of them have any permits yet. The report goes on to say that “…the Ambler Access Road, as presented in the FEIS, cannot pay for itself”. [Report, pg 17]

CLIMATE CHANGE RELATED IMPACTS

NEPA requires that agencies discuss proposed projects’ environmental effects and their significance [40 CFR S 1500.1]. This includes the projects’ ”incremental impact’. As discussed earlier many aspects of the proposed road construction and operation, as well as the operation of the mines it would serve, would cause increased releases of GHG. Even the road infrastructure and related structures would help to melt the underlying permafrost, which releases methane, a very potent GHG considered to have a global warming potential 25 times that of CO2 [EPA Overview of Greenhouse Gas Emissions in 2019] This causes a spiraling effect as the methane itself works to raise the global temperatures, causing more thawing and more methane release.

“Soil warming and thawing permafrost would make previously frozen, stable soils vulnerable to decomposition that generates greenhouse gasses (GHG) such as carbon dioxide (CO2) and methane. The release of these GHGs from soils across polar regions is anticipated to create a positive feedback that would amplify or accelerate climate warming beyond existing projections.” [EIS 3.2.1 Permafrost Impacts]

“ Mining project and road project effects of the types discussed in the EIS that can hasten permafrost thaw, coupled with the effects of a generally warming climate on permafrost, could cumulatively release methane and further contribute to climate change. Current CH4 emissions from melting permafrost are estimated at approximately 1 percent of global methane budget, but are anticipated to grow to be the second largest anthropogenic source of GHGs by midcentury (Walter Anthony et al. 2018; NASA 2018; Schaefer et al. 2014). “ [EIS 3.2.7 pg 3.48]

In addition, the proposed road will create impounded water. This will cause a rise in water temperatures, warming the permafrost and tundra under and around the sedentary groundwater, releasing more methane. The gravel road itself, although to be built with yet unspecified plans to decrease underlying permafrost melting, will undoubtedly add to melting to some degree, as has happened on the Dalton HIghway. So will the man camps, gravel mines, and maintenance stations. Dust from the gravel transported and used for roads, as well as mine dust, will darken the snow and soils, increasing heat retention and thereby melting more of the tundra and permafrost under it, again releasing methane.

Activities associated with construction of the road such as vehicle and airplane operation and use of generators for power supply for man camps and work areas, all have their own emissions of GHG. The EIS points out that these emissions are negligible on a global scale. However, where do they fit in with the US pledge to limit warming to 1.5 degree celcius?? When also considering the Administration’s “America the Beautiful Act”, the proposed project would set us back in the Act’s 30 X 30 pledge to have 30% of lands preserved by 2030.

It is presently acknowledged that the Arctic is warming 4 times faster than the rest of the world. This warming is melting sea ice, allowing for more damaging tidal storms that threaten the very existence of many communities. It also is changing the flora of the Arctic itself, bringing high shrubs and willow higher into the Arctic, impeding historic caribou migration paths, increasing mosquito activity and making travel more difficult for man and animal. Increased temperatures seem to have brought beaver into the arctic area. The beaver dam flowing streams, creating more impounded water bodies, increasing the water’s temperature, which releases more trapped methane in the water body and melts the underlying and adjacent tundra and permafrost, releasing more methane.

All of these incremental impacts of the road construction and operation, and of the mines it is providing transportation for, must be considered against any benefit of the road. Lack of proper consideration of the direct and indirect, incremental effects of the proposed project are another reason to rescind all authorizations and permits already granted.

EXTENDED TRANSPORTATION PLANS

This EIS does not cover other areas of the transportation chain that will be significantly affected by the proposed road. It will greatly increase traffic on the Dalton Highway. The estimated 168 trucks a day [EIS Sec 3.31] will also travel on the Dalton highway and into Fairbanks. Already the DOT says that they cannot keep up with maintenance on the Dalton highway, and the addition of that many heavy trucks per day would be significantly more wear and tear. It will also create even more of a safety hazard for personal traffic on the Dalton Highway. The trucks will go all the way to Fairbanks where the loads will presumably be offloaded unto trains, and from there to the Port of Anchorage or other ports. All of these areas could be affected by the proposed project and AIDEA has commissioned a feasibility study to evaluate the transportation route all the way to the potential export terminals within Alaska. This whole transportation chain needs to be included in the EIS analysis.

The EIS also needs to look into different scenarios for use of the road. The EIS states that it will allow commercial use of the road for village supplies on a permit basis, but it doesn’t detail how that system will work , which commercial services will be allowed etc. The EIS also needs to look into the effects if the road is later opened to the public. They claim that it will not be, that it will be used only for mining and allowed uses and then totally removed at the end of the mining period. Remember that the Dalton Highway was built for industrial use only. When I traveled it in 1981 you had to have a permit from the oil companies or the government to go beyond Coldfoot. However public pressure and lawsuits changed that, and the road opened to the public. It has been a major problem for the DOT ever since, and melting permafrost along the road is exacerbating that problem greatly. The same scenario is very likely for the Ambler Mining District Road, despite all claims to the contrary, and the result of such a change in road use needs to be examined. It would significantly change life in the connected and nearby villages, perhaps lead to additional spur roads to other villages, increase outside hunting pressure thereby potentially decreasing subsistence activity, and increase outside pressure and stress on the nearby villages and peoples.

THE ROAD IS NOT IN THE PUBLIC INTEREST

The EIS considers that the development of the Ambler Mining District is itself enough of a benefit to offset the high social, economic, environmental and wilderness value costs of the proposed road. This claim needs to be examined in detail, as to where the true advantages would be. Surely it is a big advantage to the one multinational mining company that has filed for feasibility studies. And it will be an advantage to the mostly outside workers who will get jobs in the construction and maintenance of the road itself as well as at the resulting mining camps. However to put the benefits of a project in the jobs and money that it’s construction will bring is to ignore the actual reality. Construction jobs are temporary, and if they result in something which will significantly impact the lives, health, and culture of surrounding communities as well as the use of the area by thousands of recreationalists and the guides and services which they use, then the project needs to be economically evaluated purely on what it’s completion will mean. “Construction of Project facilities would occur over a total of approximately 4 to 6 years and employ approximately 680 workers per year**. Once operational, the FEIS estimates that the Project will employ approximately 50 full-time employees.** The future mines would employ a substantial workforce each year during construction (estimated at 178 to 1,792 jobs, depending on the mine), and **each mine is projected to employ dozens of workers during operations** (55 to 217 jobs, depending on the mine). “ [EIS 6.2] Emphasis mine

In this case, the mining company will presumably benefit economically. By AIDEA estimates about 10% of jobs may be given to local residents. Some of the locals provisions (groceries, utilities) maybe be less expensive if they can be trucked up. However the project will also significantly affect their lives through increased stress, pollution threats to health, decreased subsistence opportunities, declines in sacred, cultural and traditional areas and activities, noise pollution, increased dangers etc.

The land will be permanently altered. It will not only bear the scars of the construction of the road, airstrips, man camps, maintenance stations, gravel pits, but it will be affected by the permanent alterations to water flow, river beds, aquatic, avian and mammal species declines, vegetation mats, permafrost areas, and the indescribable wilderness ethos. No longer will this be a beautiful, untrammeled, unsullied land where the major noise is of birds and animals, where signs of human habitations are few and far between, and those humans have a centuries old respect for and knowledge of the environs. This land has never laid fallow; it is teeming with vegetative life, with birds and fish and bugs (yes even millions of mosquitoes have their purpose) and mammals. It has been used by generations of people, with very little sign of their activity. There is no way to weigh the value of this land, part of the 30 % that can be protected, home to thousands of caribou, to moose and bear and wolverine and otters and eagles and hawks and ptarmigan and geese and ducks and songbirds, to many species of fish and waterlife, to blue waters and yellow grasses and green expanses, against the use of it for a noisy, dusty, ugly scar of a road that will provide access to mines not yet committed to pay for it or even permitted to operate, and owned by multinational companies who have no problem taking our resources, shipping them abroad and then leaving the country when they are done. Keep in mind that very few mines in history have ever been properly reclaimed at the cost of the company that operated them!

The EIS does not even have a proper reclamation plan. It simply states that a reclamation plan will be put in place at some unspecified future date.

For these reasons and for many more covered in other comments, all authorizations for this project should be rescinded and the process should start over. This EIS is so lacking that to piecemeal it in an effort to make it comply with NEPA requirements would result in an unreadable document. It should never have been approved in the first place.

Sincerely,

Loren J Karro