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*In this photo from May of 2015 a
Bald Eagle perches on a powerpole
with the project area in the
background lower right.*

Public Comment

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United States Department of Agriculture; Inyo National Forest:
White Mountain Ranger Station: Mammoth Ranger District:
Care of; Colleen Garcia, Minerals Program Manager,
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CC: Gordon P. Martin, District Ranger

CC: Harry Williams, Bishop Paiute Tribe Environmental Office

CC: Brian Adkins, Bishop Paiute Tribe Environmental Director

CC: BryAnna Vaughan, Bishop Paiute Tribe Water Quality
Coordinator

CC: Stacey Corless, Mono County Board of Supervisors

CC: Jennifer Kreitz, Mono County Board of Supervisors

CC: Rhonda Duggan, Mono County Board of Supervisors

CC: Bob Gardner, Mono County Board of Supervisors

CC: John Peters, Mono County Board of Supervisors

Public Comment

For addition to and publication in official public records in regards to Long Valley Exploration Drilling Project

To whom it may concern.

NO! Absolutely, unequivocally, NO!

This comment serves to communicate my personal disapproval of proposed mineral drilling exploration in Long Valley, and a short summary of the elementary reasoning as to why I oppose this project, and why the Inyo National Forest ought to deny permit to such activities as the applicant “KORE Mining Ltd” (KORE) proposes.

The full breadth of reasoning, science and data concerning why KORE’s application ought be denied is too numerous to be fully documented in brief. Thus I will summarize them as best I can in short numerical order.

1. Planned Future Operations.

KORE minerals itself, in its own, Economic Assessment NI 43-101 Technical Report, dated Sept. 21, 2020,((1)) declares a plan of future mineral extraction at this locality utilizing pit mining techniques in conjunction with cyanide heap leach on site. This is unacceptable in all its forms. I fully understand that the current application in question is a separate but related process in regards to that, and is thus considered separately and on its own merits by Inyo National Forest (INF) regulators. And therein lies the problem. Permitting the process incrementally without

considering the full future impacts and potential impacts is improper and unfair to the land itself. On this merit alone, exploratory drilling permits ought to be denied. The proper course of action would be as the old adage goes, to, “nip this in the bud”, thereby stopping the entire project now, in the exploratory phase.

2. Hydrothermal and Geologic: Unforeseen Risks

It is extensively documented that the area in question is geologically, seismically, and hydrothermally active. A great number of hot springs, hydrothermal vents, fumaroles and seeps populate the area. It is in fact these very hydrothermal features that KORE wishes to explore,(2) as it is within the very host rock for the gold mineralization they wish to extract. The mere act of boring a test hole of small diameter into the unpredictable subsurface could result in immediate, irreversible and unforeseeable disruptions to the hydrothermal system beneath. It is quite possible that hydrothermal fluid circulation has a critical role in caldera geology and unrest (3). We don't know what's down there, and through abundance of caution ought not to disturb it any further. I would here remind that the planned area of operations is immediately adjacent to The Hot Creek Geologic Area. In regards to the KORE future plan of operations, removal of rock mass for ore processing will disrupt the isostatic equilibrium over what we know to be a potentially active magma chamber (4). In conjunction with the unforeseeable hydrothermal risks, the entire plan and scope of operations poses an unacceptable geologic danger in the immediate area.

3. Undocumented/Unrecognized Cultural Resources.
Proposed operations, both for the instant project of exploratory drilling and future mining operations to which drilling is inextricably linked, is located immediately adjacent to the North of the Hot Creek Geologic Area. Therein exists Cultural items of which I am unable and unwilling to communicate further than to strongly recommend that the entire area be left undisturbed.
4. Wetlands and Water Quality
Future planned operations at the locality will threaten Hot Creek primarily, as it is located immediately to the north within the ephemeral watershed of Hot Creek. The Alkali Ponds, Upper Owens River, Crowley Lake and potentially the Los Angeles Aqueduct system. The last item I will digress to the Los Angeles Department of Water and Power to further assess.
5. Ornithological Considerations.
The immediate area is home to Threatened and/or Endangered Sage Grouse. The disturbance to this habitat, however minor, should on its own merit prohibit both exploratory drilling operations, and all future operations as planned by KORE. The area is also keystone habitat for numerous migratory waterfowl, migratory birds in general, as well as healthy populations of Bald and Golden Eagles. I would like to keep them that way: healthy. It is well understood that the specific plan in question will have only a minor effect on the Eagles, as the logging portion of the

proposed drilling pads will remove some tall pine trees overlooking Hot Creek that the Eagles utilize for perching. The long range plan will be devastating. See item #1.

6. Mule Deer Winter Range. Long Valley provides a large winter and seasonal transition range for the local Mule Deer population. Human encroachment into this terrain is already a major environmental issue, both in Long Valley and elsewhere. It is well understood that the drilling plan in question will have only a minor effect on Mule Deer in the area, in that the drilling operations are of short term and will only effect a single migratory/seasonal shift of deer through the small canyon it is situated in. The Future operations will have a wide and very significant effect. See #1

7. Multiple Sustained Use Conflict

The project in its instant and overall future scope is not consistent with multiple use principles, as it will negatively effect all other human activities in the area. Primarily tourism, camping, and other related outdoor activities. It will cordon off and fence what was once public domain, withdrawn now for mineral exploitation, and that area of land will not be accessible for other public use, likely for over a century or more, due to the nuisance and hazard of mine reclamation. It will also leave a permanent visible scar on the visage of the land. I would remind INF decision makers also, that the planned area of future operations is immediately adjacent to the NE of Hot Creek Geologic Area. And that is worth considering.

8. The Black Swan, or Regulatory Concerns

Black Swan is a term used in the fossil fuel industry to describe what is also known as “worst case scenario” in regards to environmental safety. It can be applied to other industries with similar environmental risks as well. A good example of a Black Swan in the Mineral Resources Industry would be the 2015 Gold King Mine Wastewater Spill near Silverton Colorado.

Corporations do not like to discuss or entertain the possibility of worst case scenario events, or plan to avoid them. As you may see in section 18.4.1, “No simulation was conducted to incorporate major events at this stage of the stud.” (5). This instead falls on the shoulders of government regulators. It is thus the responsibility of the INF to consider the absolute Worst Case Scenario in regards to the OVERALL project plan, and not restrain itself to the instant and seemingly benign plan of primary discussion here. Regulators have a duty to the public to approach the project from an overarching holistic standpoint and seriously consider if the potential harm to the public is outweighed by the benefit of the project. So let us ask, if a 1.5 Million liter impoundment of cyanide sludge (CRE1: 17:5, average of impoundment volumes over span of operations) were to breach during a major flood event in Long Valley, spilling all of its contents into the surrounding environment and Owens River, what would the impact be then? With full understanding, once again, that the instant plan does not include the full operation, I would again refer the reader to #1. What if any benefit is there to the public domain as a result of this project. I see none. I see less than zero benefit, I see public liability. This needs nipped in the bud now, before it's too late.

NO! Absolutely, unequivocally, NO!

I look forward to your regulatory diligence in this matter.

Bibliography:

- (1) Economic Assessment NI 43-101 Technical Report. Sept 21, 2020, Kore Mining Ltd.; Global Resource Engineering Ltd.; Mine Development Associates. (Ch. 16-17) <https://www.koremining.com/about-kore>
- (2) Economic Assessment NI 43-101 Technical Report. Sept 21, 2020, Kore Mining Ltd.; Global Resource Engineering Ltd.; Mine Development Associates. (Ch. 8.0) <https://www.koremining.com/about-kore>
- (3) Hydrothermal Fluid Circulation and its Effect on Caldera Unrest, Micol Todesco; Istituto di Geophysica e Vulcanologia, Bologna.
- (4) Seismic Evidence for Significant Melt Beneath the Long Valley Caldera, California, USA. Flinders and Shelly et. Al. Geology(2018) 46(9): 799-802
- (5) Economic Assessment NI 43-101 Technical Report. Sept 21, 2020, Kore Mining Ltd.; Global Resource Engineering Ltd.; Mine Development Associates. (Ch. 18.4.1) <https://www.koremining.com/about-kore>