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Comments:

I'll try to keep my comment succinct and bulleted.

First, thank you for your service and all that you do. I have worked for the DOI before and it's a proud organization.

* Please add language to require mining plans to be updated regularly. Canyon Mine's Management Plan, for example, hasn't been updated since 1984. That's the year I was born. I'm 34 now. That's a really long time. A lot has changed in that amount of time. We know a lot more about the harms of radiation, the way tailings filter into the water table, etc. What other industry can you think of that should be government by a plan 34 years old?

* Please increase fines and penalties for negligence. People who intentionally disobey the DOI's already fairly lax rules for mining are crooks. They damage the public health, pollute and contaminate public lands, and fall out of compliance for what... profits? These are big businesses, and a small fine or penalty is just a tiny road bump to business as usual. Give them something to think twice about.

*Please require plans of operations for all mining activities. Is this even a thing? How can a mine, which by the nature of its existence causes severe stress on ecosystems, water tables, and as a result public health, not have a plan of operation? That strikes me as criminal. This Proposed Rule shouldn't just be geared at punitive measures, but also preventative ones. The point is to AVOID accidents and practices that threaten public health and public lands.

*Please require mining companies, not taxpayers, to put aside enough money for cleanup. Again, how can this even be a question? Are the mining companies planning to share their profits with the tax payers? No? Well then why should the tax payers be expected to clean up their mess for them?

*Please require validity exams for all mining operations. Certain mines that already exist can be grandfathered in to areas with mining bans. But it would be imprudent to allow an operation to be grandfathered in without a validity exam. That would be like allowing a discriminatory law from the 1950s to be grandfathered in to Arizona's election without examining it to see if it makes sense. What can be lost by requiring exam except a little bit off the company's bottom line? There's far more to gain with validity exams than there is to lose without them.