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Comments: Thank you for the opportunity to comment on the subject application. I have two comments at this time both recommendations for the applicant, public and Forest Service's consideration. First, I recommend that the applicant supplement its Proposed Plan of Operations with documentation of the record the applicant, its officers, and those of its parent companies has in compliance with past such mineral exploration permits in the United States. The documentation would list all prior such exploration projects and whether they have resulted in adverse environmental impacts to air, land, water, view, hazardous substances, biological or cultural resources, any violations of permit conditions or requirements, and whether successful reclamation and restoration was completed without any claims against reclamation bonds or other securities required to discourage such avoidable impacts. Further, documentation of the applicant's worker and community health and safety records with respect to such prior mineral exploration projects in the United States is also recommended.

Second, recognizing that a more detailed Restoration and Re-Vegetation Plan is forthcoming, the applicant and the Forest Service may wish to consider a reclamation and bond process that is much more detailed with respect to the actual sequence of exploration proposed. For example, consideration is recommended to deposit of an entire reclamation bond in an amount established under the presumption that the CNF will have to perform the reclamation in its entirety. That bond would take an interest-earning form with the interest accruing to the benefit of the CNF from the time the permit is issued, with the applicant being encouraged to perform reclamation at individual exploration sites and work elements as soon as expoloration or work is completed at each such site with portions of the base bond being released for such subproject sites following satisfactory inspections over the three-year period measured at each subproject site and a final base bond amount and all accrued interest being returned to the applicant only at the conclusion of all exploration, reclamation and satisfactory inspections during the last three-year inspection period in conformance with the permit requirements. As an example, once exploration at the first drill site, or even road-widening is completed, the applicant would implement reclamation work there immediately (rather than waiting until all exploration is completed), and a pro-rata portion of the base bond would be released to the applicant after a three-year history of satisfactory inspections at that site by CNF and the applicant.