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Comments: The proponent of this project proposes to upgrade existing roads and as needed construct new roads. The use of the word "upgrade" makes it seem that only minor work will be required in the Forest. I will cite one example where this would be an understatement. FS road 5519 is a road that has a very steep initial ascent, the surface of the road is mostly outcropping bedrock. The road is barely 10 feet wide. This road continues a meandering uphill climb with more exposed bedrock surface. This road comes to a dead-end where the proponent proposes to construct a new road down a steep decline to reach Flux Canyon road. Just this one road will be a massive construct and destruction of the forest just to gain access to some drilling sites. This road is right next to an active mining operation that has had an extensive toll on the Forest. The cumulative effect of this project added to the operation already in progress will put more pressure on critical habit. The other roads in the proponent's request are almost as bad FS 5519 The EA proposed by the FS does not do enough to determine the effects of all this road construct. I request that an EIS be required for this project, nothing less would be a disservice to the people who are the owners of this land but it would be an abdication of the responsibilities of the Forest Service to make sure all projects in the Forest are done properly with the least amount of disturbance of the natural environment.

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