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Title: Conservation VP

Comments: As Conservation VP of the Southwest Council Fly Fishers International, I respectfully submit the following points in response to the public scoping notice dated March 31, 2021 for the above referenced project.

My issues, opportunities, concerns, and suggestions for the proposed project, as mentioned in your letter are as follows:

1. Review the initial categorical exclusion position taken by the USFS. I believe there are extraordinary circumstances that require an EIS or EA be conducted due to the project applicant's April 8, 2021 press release describing the project is part of of "The 15,965 acre land package is district in scale and covers all deep-rooted fault structures of similar genesis to the Hilton Creek fault, the primary 'conduit' for the current Long Valley deposit." The applicant has chosen to keep the project under the trigger points to specifically avoid proper environmental assessments. Environmental regulators frown on this practice.
2. Release to the public the Memorandum of Understanding entered into by USFS and Kore Mining referenced in the Kore Mining April 8, 2021 press release. I could not find the MOU on the USFS project website. What does the MOU contain and why was it deemed necessary? How does it impact the environmental review process?
3. Analyze impacts to groundwater movement and surface waterbodies. The dynamic Hot Creek area requires proper scrutiny of the impacts of drilling. How could the drilling impact springs and seeps, groundwater movement and surface flows? Could the drilling alter current water movements? How is water being used in the drilling operation and how are they disposing it?
4. Review the initial USFS position on proposed restoration activities. Three years is insufficient time to insure the recovery of the natural resources taken by the project. Restoration success measures need to be established and the project signoff and release of a financial assurance dependent on meeting the measures. The biological resources taken by the proposed project should be replaced and any invasive species eradicated. A minimum of 7 years of monitoring and maintenance is appropriate, but could be longer in order to meet performance measures. This is standard environmental restoration protocols.
5. Secure financial assurances so the public is not burdened with a degraded resource. All potential impacts of the project should be listed with recovery costs estimated utilizing market rates. A financial assurance needs to be given to the people of the United States prior to any permit issuance.
6. Examine impacts to public land access. Will the public use of the area around the project be impacted by the project? In other words, will the public be kept off any roadways currently used? How will this be compensated?
7. Examine the impact to Bi-State Sage Grouse. The US Fish and Wildlife Service was prepared to list this bird as threatened until the development of the Bi-State Action Plan. Is the project compatible with the Action Plan? What efforts will be made to avoid any incidental take of this bird?

Thank you for the opportunity and we look forward to being part of the subsequent processes on this project, as well as any other applications on the 15,965 acres. Please include me onto any distribution list pertaining to this mining proposal so we may inform our public.