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Comments: This letter is in response to the KORE USA Ltd (KORE Mining) Notice of Intent submitted to the Inyo National Forest for the Long Valley Exploration Drilling Project. The proposed Project is to perform exploratory drilling for gold along Forest Service road 3S307 near Antelope Springs Road proximal to Hot Creek, CA.

California Trout strongly opposes the Long Valley Exploration Drilling Project (Project) proposed by KORE Mining. CalTrout further contends the proposed Project does not meet the criteria for a categorical exclusion under the National Environmental Protection Act (NEPA) for the following reasons.

First, the Forest Service stated that it anticipates that this project can be completed under a categorical exclusion under the category established under 36 CFR 220.6 (e)(8), because it is a "short term (1 year or less) mineral investigation and incidental support activities". However, the mineral investigation and incidental support activities themselves constitute extraordinary circumstances. Legacy effects of prospecting and subsequent extraction activities are still present today in terms of land disruption, water quality issues and water use, toxic metal contamination, and road construction, demonstrating a lack of accountability and oversight in mitigating mining-associated impacts. For example, the Inyo National Forest recently closed the Mammoth Stamp Mill Site, a former gold ore processing facility dating back to the 1870s, due to elevated levels of metals that were determined to pose a risk to human health and the environment. Antimony, arsenic, lead and mercury were identified as the primary chemicals of concern. Thus, a full EIS should be conducted to properly assess the full impacts and allow for meaningful public engagement.

Second, the need for a full EIS is further supported by KORE Mining's scoping document released on April 7, 2021. Drilling was proposed to occur in 14 locations concentrated in four areas. Ground disturbing activities proposed consisted of drilling with heavy equipment, the creation of fourteen drill pads (30 ft x 50 ft each) and the use of existing roads and temporary access routes. Up to three core borings would be drilled on each pad. Access to drill pads would require the temporary re-opening of 11 segments (1,849 total feet in length and 10 feet wide.) of non-system Forest Service roads for the duration of the project. Details are lacking on water source and amount needed for the proposed Project, groundwater and surface water impacts, drilling depth, and processing and truck haul assessment of drilling waste. Furthermore, the scoping document does not address impacts of the proposed Project to wildlife, recreation, and the tourist economy.

The proposed Project's proximity to Hot Creek, one of the region's iconic fisheries, is particularly concerning. Though this project is exploratory, the proposed KORE Mining operation that may follow such prospecting would be an open pit and heap leach. Mining impacts have documented negative impacts on fish and freshwater ecosystems. Mining operations can lead to sulfuric acid and heavy metal contamination when rainwater or surface drainage carries contaminants to nearby streams, rivers, lakes, and groundwater harming species who rely on these water sources. Not only is this proposed Project just above Hot Creek, but the water from Hot Creek eventually flows into Owens River and Crowley Lake, putting this entire ecosystem at risk.

The need to restore and protect ecosystems rather than degrade them is urgent. Approval of this Project poses a threat from current and future activities. Therefore, CalTrout strongly opposes even the first exploratory step of this effort to ultimately mine for gold. On a broader scale, the proposed Project threatens the future of the scenic, economically and ecologically important Long Valley area in Mono County.

A story about Long Valley mining history published in the Mono County Community Development Department Planning Division document (2007, p. 64) is instructive to acknowledge the negative impacts of such a project, and strategies to prevent it from gaining traction. As quoted from the 2007 Mono County document:

"Proposed Long Valley gold mine In the late 1980s and 1990s, there was a proposal by a mining company (Royal Gold, Inc. / Royal Long Valley, Inc. / Mono County Mining Company) to operate an open-pit gold mine over about four to six square miles of Inyo National Forest land between Hot Creek and Little Antelope Valley. The proposed mine was six miles east of the town of Mammoth Lakes and two to three miles north of the airport (T3S R28E, sections 14, 15, 22, 23, 24, 25, 26, and 35). The so-called Inyo Gold Project focused on a relatively low-grade ore body with about 0.2 ounces of gold per ton of ore. The ore is a hot-spring deposit where gold is disseminated along tiny fractures and between quartz grains (California Geology, 1990). An estimated 120 million tons of earth would have been excavated to uncover and extract the ore. The ore would have to be pulverized and then treated with a cyanide solution to remove the gold. Even though there is tremendous financial incentive to prevent leakage of gold-containing leachate from the processing, the mining industry has observed a high rate of failure of cyanide leach ponds. The risk of polluting the groundwater and surface water in addition to other potential environmental impacts led to extensive public opposition to the project. Although eight phases of exploratory drilling were conducted, information on water levels was not available to the public. If the ore body contained water, that water would have to be discharged somewhere and probably would have required costly treatment. Removal of groundwater from the ore body and the excavated pit would have altered the local groundwater flow system. The mine could have also expected to have a large water demand for ore processing, but ideas for obtaining that water were not disclosed. The proposal faded out after Mono County significantly strengthened anti-pollution requirements. In December 1998, the Mono County Board of Supervisors amended parts of the Mono County Code pertaining to mining to include more environmental safeguards. That action included a new approach to regulating adverse impacts of mining. The new ordinance requires a reclamation plan and a mining operation plan. Some of the key language of the ordinance follows: "It shall be and is hereby rebuttably presumed that any proposed processing operation located above or adjacent to surface or ground waters, or which could potentially impact such waters regardless of their location, that would use one or more of the following chemicals as a processing agent poses an unreasonable risk of environmental harm due to the toxicity of such chemicals and their demonstrated potential to cause damage to the environment: mercury, cyanide or cyanide compounds, breakdown products of cyanide, or sulfuric acid. Use of such chemicals shall not be permitted as part of any processing operation unless the project applicant can demonstrate, by substantial evidence, based on reliable scientific or engineering data, that the proposed use of such chemicals in a given project will not, under any reasonably foreseeable scenario, cause significant environmental impacts." The ordinance also requires a series of hydrological and other environmental studies for compliance with the California Environmental Quality Act."