

MNBC Comments Red Mountain Underground Project EIS Summary

Section	Page	Concern/Comment	Recommendation
7.3	49-51	The opening statement for this section identifies that the Project can have potential impacts on terrain stability and subsequently specifies changes to the intensity and frequency of avalanches as a key effect. However, despite stating that mitigation measures focus on terrain stability (among other concerns), none of the mitigation measures address terrain stability as it pertains to avalanche risk. This may have a direct impact on recreational users at certain times of the year.	Clarify how the public will be informed of high risk operations (i.e., blasting), and identify how the risks to increased intensity and frequency of avalanches will be mitigated.
7.5.2	54-55	Tailings seepage is “expected” during operations, but it is unclear what will be done if this seepage influences groundwater quality.	Clarify how operations will be mitigate for a significant impact to groundwater quality.
7.9	62	Invasive plant spread is of particular concern on newly disturbed lands in remote areas. There is no stipulation for washing equipment or managing the introduction of invasive-plant seed in this EIS. These preventative measures are paramount as once an invasive is established, its eradication is very difficult.	Add cleaning vehicles prior to introduction to site as a mitigation measure.
7.10		The effects assessment and mitigation/minimization measures to reduce impacts to wildlife are in the Wildlife Management Plan (WMP), suitably so, but cannot be reviewed and commented on in this context.	Will a mechanism for review and comment of the WMP be made available? If not, the mitigation measures should be included in this EIS to allow for MNBC consideration and review.
7.17.2	79-80	No mention of the line of communication for reporting a spill/malfunction/accident.	Specify that a clear reporting framework will be established for any spill/accident/malfunction.
8.3		MNBC use in the area.	Please see map below. We have 3 use sites mapped in the

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project area: trapping, overnight, and a mountain goat harvest location. These were overlaid on the project map.

