Decision Notice and Finding of No Significant Impact
UCore Bokan Mountain Mining Plan of Operations

July 08, 2013

Tongass National Forest
Craig Ranger District
PO Box 705
Craig, Alaska 99921

Decision

It is my decision to implement the Proposed Action as described in the *Ucore Bokan Mountain Mining Plan of Operations Environmental Assessment* (EA) with modifications to ensure that adverse environmental effects are minimized. This decision will allow for a five year plan of operations for mining activities at the Bokan Mountain claims and will expire 5 years from the date of this Decision Notice.

The following activities will be approved for a five year term:

- Track-mounted drilling of approximately 27 holes for geotechnical and environmental purposes using temporary access trails;
- Helicopter-supported drilling of approximately 8 holes for geotechnical, environmental, and/or exploration purposes;
- Installation of a temporary 12 person camp facility; and,
- Use of an existing gravel pit.

The following equipment will be approved for a five year term:

- Track mounted drill rig equipped with an ODEX down-hole hammer and casing drive system (or similar);
- Foundex helicopter-transportable top-drive rotary drill (or similar);
- Small tracked excavator (Cat 315 or similar); and,
- Various ATVs or Kubota utility vehicles.

The following infrastructure and facilities will be approved for a five year term:

- Temporary access trails necessary to facilitate an approximately 8-10 foot wide tracked drill rig;
- Approximately 100 foot camp access gravel road and 80' X 100' gravel camp pad;
- One, approximately 11x54 foot temporary cookhouse and staff quarters;
- One, approximately 10x48 foot temporary 8-person bunk house;
- One, approximately 10x20 foot temporary office;
- One, approximately 10x20 foot temporary bathrooms and shower house;
- Temporary domestic water treatment and portable camp wastewater facilities which will discharge in accordance with State permits;

- Two, approximately 50-75 kW power generators housed in a small shed adjacent to the fuel storage facility; and,
- Underground power line to the camp.

The following infrastructure or facilities are existing and authorized to continue under the 2012 Plan of Operations:

- Existing portable core logging buildings;
- Existing Quonset-style temporary shelter
- Existing fuel storage tanks
- Limited use of existing road

There is also an existing seasonal barge, anchored on the eastern side of Kendrick Bay, which provides skiff-access to the project prior to the construction any land-based accommodation and can also accommodate worker overflow if required.

For the basis of my decision, a temporary structure or facility is one that is not permanent and can be removed at any time.

UCore is required to obtain all other necessary Federal, State, and local permits. The Forest Service approval of a Plan of Operations does not exempt UCore Rare Metals, Inc. from potential CERCLA liability.

Rationale for the Decision

The 2008 Forest Plan under the Goals and Objectives identifies a Goal for Minerals and Geology is to provide for environmentally sound mineral exploration, development, and reclamation in areas open to mineral entry (2008 Forest Plan 2-5). The listed objective is to implement the Minerals and Geology Forest-wide Standards and Objectives. The authorization of this Plan of Operations would be consistent with this Goal as stated in the Forest Plan.

My decision contains modifications to the proposed Plan of Operations that will ensure that mining will occur in an environmentally responsible manner. I have reviewed the "Requirements for Environmental Protection" in 36 CFR §228.8 and the recommendations of resource specialists who have surveyed the project area. I will require the modifications and stipulations listed above to be incorporated into UCore's approved Plan of Operations for Geotechnical and Environmental Studies.

I have reviewed the Council on Environmental Quality Regulations for "significance" (40 CFR §1508.27) and I have determined that the decision is not an action that would significantly affect the quality of the human environment either individually or cumulatively; nor would this decision affect the quality of the human environment in either context or intensity.

Alternatives Considered

I have considered two alternatives, the No Action alternative and the Proposed Action alternative, respectively. I have selected Alternative 2, the Proposed Action, because it meets the purpose and need for the Forest Service to respond to Ucore's request, through their Plan of Operation. I have approved the Plan of Operations with modifications for implementation over the next 5 years. This decision includes requirements that minimize adverse impacts to the environment and allow for mining activities to occur in an environmentally responsible manner. The No Action alternative was analyzed but not selected because it would not be responsive to the proposed action.

Mitigation Measures

Some of these concerns are addressed within the Plan of Operations submitted to the Forest Service and distributed with the initial scoping letter to interested parties. (Please see comment table, Attachment 1 to this Decision Notice). The EA discloses the environmental consequences of the proposal, as submitted by the proponent. The following modifications or stipulations to the proposed Plan of Operations will be required, and address identified Agency concerns not already addressed in the Plan of Operations:

Wildlife resources:

- If any previously undiscovered endangered, threatened, candidate or sensitive species are encountered prior to or during implementation, a District Biologist will be consulted and appropriate mitigation measures will be enacted
- Minimize the footprint of the camp area and retain as much of the surrounding forest as possible
- Ensure that there are no uncapped pipes associated with exploration sites or the camp area which can result in wildlife entrapment
- Operators are required to abide by the Marine Mammal Protection Act and Marine Mammal Viewing guideline

Aquatics resources:

- Locate the temporary trails outside of Riparian Management Areas and wetlands to the extent feasible (BMPs AqEco-2, Min-2, Road-2, Road-5, Road-7, 12.5, 14.2)
- Incorporate erosion control practices to minimize rutting, exposed soils, and the potential for sedimentation in nearby streams (BMPs AqEco-2, Veg-2, Road-7, 14.5 and 14.8)
- Minimize the number of stream crossings, locate them appropriately, and time the work to minimize impacts to fish (Road-7, AqEco-2, 14.2)
- In-stream work must be coordinated with the Alaska Department of Fish and Game, Habitat Division.
- Rehabilitate and re-vegetate disturbed areas (BMPs AqEco-3, Veg-2, Veg-3, 12.17, 14.8)
- Follow the refueling and pollution prevention Best Management Practices (BMPs Min-2, Road-10, 12.8, 12.9)

- Avoid water withdrawals from fish streams where feasible and treat any produced water appropriately (BMPs Min-2, Min-7)

- Water withdrawals must be permitted by Alaska Department of Fish and Game, with site-specific input from Forest Service fish biologists to assure adequate flow is maintained.

- Avoid the north/northeast part of the existing gravel pit, where a berm separates the pit from a Class III stream channel (BMP AqEco-2)

- Re-route the ditch drainage across the road upslope of the gravel pit using a drivable waterbar to minimize transport of sediments from the gravel pit along the ditch and into the Class III stream downslope (BMP 14.18)

- Avoid disturbance of the adjacent stream channel when constructing the temporary land camp (BMPs AqEco-2, Fac-2. 14.25)

- Preserve to the extent feasible, large conifers within the beach buffer and those near the ephemeral channel in the temporary camp area

- Sanitation system management must meet State standards and Forest Service manual direction. Management requirements and controls to minimize the possibility of water contamination from wastewater collection, treatment, and disposal must be incorporated into a camp facility operation and maintenance plan (BMPs Fac-4 and 12.15, 12.16)

- UCore may not proceed with building the camp or infiltration gallery until the Forest Service has received notice that the State review process has been completed and State engineers have reviewed and approved UCore's plans.

Ecology resources:

- Photos of Pacific Yew will be provided to operators to aid them in identification and avoid direct impacts

- If any previously undiscovered sensitive plants are encountered at any time during operations, the population will be protected and any disturbance in the area will be avoided until the Forest Service is contacted for further instruction

- Equipment cleaning is required for any heavy equipment (drill, etc) prior to arriving to Kendrick Bay. The equipment/vehicle will be free of soil and/or mud contaminated with plant parts (including roots, seeds, flowers, stems) on the tractor, wheels, shovel, and undercarriage of the vehicle or equipment

- In the event that sediment control is necessary, use of silt fence or coconut fiber matting is required instead of straw bales, since straw bales have been known to introduce invasive species

- The Forest Service shall be contacted before any reseeding

Heritage resources:

- If during implementation any archaeological remains, such as stone tool artifacts, a layer of soil with charcoal or fire cracked rock, or historic artifacts such as bottle glass and metal cans are discovered, all work in that location is to be halted and the Forest Service shall be contacted

- Operators will be given GPS coordinates of known heritage resources to avoid

Soil and Wetland resources:

- Where necessary, use temporary natural or manufactured matting material as a running surface for drill rig or tracked equipment to prevent rutting or damage to soil or wetland resources.
- Minimize the number of equipment passes
- Operate during periods of snow pack and/or frozen ground when feasible
- Construct water bars to transport surface water off of trails
- Use alternative methods of accessing drill sites (i.e. helicopter) when necessary to prevent rutting or damage to soil or wetland resources
- Any drill cuttings or produced water with scintillometer readings above background will be buried at the drill site, returned to the subsurface via the drill hole, or transported to the laydown yard for disposal off site

Financial Assurances

- An updated reclamation bond must be in place before camp construction or drilling operations begin (36 CFR 228.13 (a)).

Roads

- All conditions placed on road use in the 2011 CE/DM will be applied to this decision as well, as follows:
  - The CERCLA release areas as defined by the 2004 Preliminary Assessment/Site Inspection Report prepared by Kent & Sullivan include the Ore Staging Area (OSA) and roads. Characterization work is being conducted through the Kendrick Creek drainage basin to ascertain the full extent of surface disturbance associated with previous site work. No surface disturbing activities or placement of waste within the full extent of the CERCLA release areas will be allowed as part of this Plan of Operations. One additional area of concern that has been included in the CERCLA study but not documented in the Kent & Sullivan report is the road fill on the I&L spur. Precautions mentioned above will also be applied to this area.
  - Grading work cannot include placement of fill (clean or otherwise) or moving existing road fill around. The only acceptable grading work would be surface water channel maintenance. Gamma characterization has been completed for all the roads and is the baseline for the engineering design.
  - Due to the relatively recent/active landslide in the area, vehicle access to the 300 Level via road is closed.
  - In the event that sediment control is necessary, use of silt fence or coconut fiber matting is recommended instead of straw bales (since straw bales have been known to introduce invasive species).
- Minimize travel and speed on the haul road to minimize the potential for fugitive dust

Other

- All other Federal, State, or local required permits.

The *Ucore Bokan Mountain Mining Plan of Operations Environmental Assessment* (EA) is the supporting environmental analysis for this decision and is incorporated by reference. This EA discusses the need for the project, the environmental impacts of the Proposed Action and No Action alternative, and a listing of the agencies and persons contacted.

Monitoring

The following monitoring will be required:

- Forest Service personnel will conduct inspections of the mining operation during the operating season for consistency with the terms and conditions of the plan of operations.
- The lead driller will inspect drilling operations at each shift.
- Water quality sampling in accordance with a monitoring plan being developed by UCore with State of Alaska and with Forest Service input and oversight.

Public Involvement

The public has been invited to participate in the project in the following ways:

- A legal notice was placed in the Ketchikan Daily News, the newspaper of record for the Tongass National Forest, and the Island News on January 19, 2013 requesting comments on the environmental analysis.
- A letter was sent to interested parties on January 16, 2013. Three comments were received.
- A letter was sent to the Craig Tribal Association, Klawock Cooperative Association, Central Council of Tlingit and Haida Indian Tribes of Alaska, Haida Cooperation, the Organized Village of Kasaan, Hydaburg Cooperative Association, Wrangell Cooperative Association, Shaan-Sheet, Inc., Sealaska Corporation, Cape Fox Corporation, Ketchikan Indian Community, Klawock Heenya Corporation, and Kavilco Inc. No comments were received.
- The project has been listed on the Tongass National Forest Schedule of Proposed Actions.
- A letter was sent to the following agencies, containing the proposed Plan of Operations, for comment: City of Craig; Alaska Departments of Natural Resources, Fish and Game, and Environmental Conservation; US Fish and Wildlife Service; National Marine Fisheries Service.

The Forest Service received two comment letters containing comments concerning the proposed project. Comments from Southeast Alaska Conservation Council (SEACC) include concerns that the EA did not contain: an adequate discussion of the "No Action Alternative", a detailed description of the proposed action, impact analyses of aquatic resources, soil and wetland resources, and information regarding financial assurance.

The State of Alaska commented that the EA did not address a lack of data regarding the location of Mean High Tide as it relates to the boundary between State and Forest System Lands, and included a hazardous waste characterization request for the gravel pit and

access road previously associated with the Ross Adams uranium mine. Additionally, the State requests more information regarding the determination of background levels of radiation and comparison criteria, elaboration of special waste disposal procedures, camp water quality, and fugitive dust discussions.

The Forest Service has revised the EA to address these comments as appropriate. Specifically, the EA now includes a discussion of the No-Action alternative as a baseline against which proposed activities can be compared, a more-detailed description of Alternative 2, the proposed action, including specifically directing readers to the Plan of Operations submitted by UCore Rare Metals, Inc., attached to the EA. There is also an expanded discussion of cumulative effects and recognition of the CERCLA process which is ongoing for the adjacent historic Ross-Adams mine clean-up.

Finding of No Significant Impact

Context

The proposed exploration drilling is located in Kendrick Bay on the southern end of Prince of Wales Island; there are no communities near the project area. The Bokan Project area is located within a Timber Development LUD with a Minerals Overlay LUD as identified in the 2008 Forest Plan. As such, it is managed for uses compatible with timber production objectives. These lands are also opened to mineral exploration and development. Adequate access to mining claims and leases and authorization of orderly mineral resource development is allowed. After considering the environmental effects described in the EA, I have determined that these actions will not have a significant effect on the quality of the human environment when considering the context and intensity of impacts (40 CFR 1508.27). Thus, an environmental impact statement will not be prepared. I base my finding on the following:

Intensity

1. Impacts that may be both beneficial and adverse. A significant effect may exist even if the Federal agency believes that on balance the effect will be beneficial. Effects are not significant in context or intensity to warrant an EIS for this project. My finding of no significant environmental effects is not biased by beneficial effects of the action.

2. The degree to which the proposed action affects public health or safety. Based on the conclusions in the EA, I have determined that no significant impact would occur to the public health and safety. The project area is located on the southern end of Prince of Wales Island; no populated areas are located within the project area. Mitigations measures are in place to avoid disturbance of the historic Ross-Adams mining area.

3. Unique characteristics of the geographic areas such as proximity to historic or cultural resources, park lands, prime farmlands, wetlands, wild and scenic rivers, or ecologically critical areas. No historic properties, park lands or farmlands are located within the area of potential effects for the project. No wild and scenic rivers occur in the project area. Wetlands will be protected through the application of the identified BMPs

for the project. Therefore, I have determined there will be no significant effects on any unique characteristics of the area.

4. The degree to which the effects on the quality of the human environment are likely to be highly controversial. The effects on the quality of the human environment are not likely to be highly controversial. This project is proposing to complete geotechnical drilling for the identification of rare earth elements. This project proposes to drill 35 holes for exploratory purposes, (27 locations via track-mounted drill and 8 locations via a helicopter-supported drill), and construction of a temporary 12-person camp. This project responds to the goals and objectives of the Forest Plan and helps move the project area towards conditions described in the Forest Plan. Therefore, I have determined that there are no significant impacts based on the evidence found in the EA that would be highly controversial.

5. The degree to which the possible effects on the human environment are highly uncertain or involve unique or unknown risks. The effects analysis shows the effects are not uncertain, and do not involve unique or unknown risk. Based on this analysis, I have determined there are no unique or unknown risks involved with this project, therefore there is no significant impact due to uncertainty or a possible unique or unknown risk.

6. The degree to which the action may establish a precedent for future actions with significant effects or represents a decision in principle about a future consideration. Ucore anticipates future development, but the degree and timing of that development is not known today. These actions will provide baseline information for future studies but does not, in and of itself, provide for the development of an operating mine.

7. Whether the action is related to other actions with individually insignificant but cumulatively significant impacts. I have determined the Selected Alternative will have individually and cumulatively insignificant impacts as they relate to past, present, and reasonably foreseeable actions. No significant cumulative effects were identified for any resource in the EA.

8. The degree to which the action may adversely affect districts, sites, highways, structures, or objects listed in or eligible for listing in the National Register of Historic Places or may cause loss or destruction of significant scientific, cultural, or historical resources. The Forest Service has determined that no significant cultural resources were found in the project area. This project meets the provisions stipulated in the Programmatic Agreement between the Forest Service, Alaska Region, the Advisory Council on Historic Preservation, and the State Historic Preservation Officer. Therefore, I have determined no significant impacts would occur that adversely affect districts, sites, highways, structures, or objects listed in or eligible for listing in the National Register of Historic Places or cause loss or destruction of significant scientific, cultural, or historical resources.

9. The degree to which the action may adversely affect an endangered or threatened species or its habitat that has been determined to be critical under the Endangered Species Act of 1973. The action will not adversely affect any endangered or threatened species or its habitat that has been determined to be critical under the Endangered Species Act of 1973. Therefore, I have determined no significant impacts would occur that adversely affect an endangered or threatened species or its habitat.

10. Whether the action threatens a violation of Federal, State, or local law or requirements imposed for the protection of the environment. The following findings show that the action does not violate Federal, State, or local law requirements imposed for the protection of the environment and has been reviewed by Federal and State agencies.

Consistency

National Forest Management Act – The proposed action is consistent with the 2008 Forest Plan, and all proposed activities are allowable under the Timber Production and Minerals LUDs.

Endangered Species Act – Biological evaluations were completed for threatened and endangered species. No threatened or endangered species would be affected by the action alternatives.

Bald Eagle Protection Act – Management activities within bald eagle habitat will be in accordance to a Memorandum of Understanding between the Forest Service and the U.S. Fish and Wildlife Service. No bald eagle nests are known in the project area.

ANILCA Section 810, Subsistence Evaluation and Finding – There is no documented or reported subsistence use that would be restricted by any of the action alternatives; none of the alternatives would result in a significant possibility of a restriction of subsistence use of wildlife, fish, or other foods.

National Historic Preservation Act of 1966 – Section 106 of the National Historic Preservation Act requires that all federal undertakings follow the regulations found at 36 CFR 800 to identify and protect cultural resources that are within the project areas and which may be effected by projects. The Programmatic Agreement between the Tongass National Forest, the Advisory Council on Historic Preservation, and the Alaska State Historic Preservation Officer (SHPO) regarding management of the project area will be followed. No significant cultural resources were found in the project area for the proposed action.

Executive Order 12898 – Environmental Justice – Implementation of this project is not anticipated to cause disproportionate adverse human health or environmental effect to minority or low-income populations because the proposed activities are not expected to cause any affects to human health or result in meaningful adverse environmental consequences.

Clean Air Act – Emissions anticipated from the implementation of the Proposed Action would be of short duration and would not be expected to exceed State of Alaska ambient air quality standards (18 AAC 50).

Clean Water Act - Proposed mining activities, which result in any discharges into waters of the United States, are subject to compliance with Clean Water Act Sections 401, 402, and/or 404 as applicable.

Executive Order 13112 – Invasive Species – Invasive species populations have the potential to spread in the project area; mitigations will be required to reduce this potential.

Executive Order 11988 – Floodplain Management and Executive Order 11990 – Protection of Wetlands – The project area is not located within a floodplain as defined by Executive Order 11988 and there will be no significant effect to wetlands as defined in Executive Order 11990.

Inventoried Roadless Areas – This project is located within an inventoried roadless area. Secretary's Memorandum 1042-154 reserves to the Secretary of Agriculture decision making authority over the construction and reconstruction of roads and the cutting, sale, or removal of timber in inventoried roadless areas. This proposal will be reviewed by the Regional Forester for consistency with Secretary's Memorandum 1042-154.

Executive Order 12962 – Recreational Fisheries - Federal agencies are required, to the extent permitted by law and where practicable, and in cooperation with States and Tribes, to improve the quantity, function, sustainable productivity, and distribution of U. S. aquatic resources for increased recreational fishing opportunities. As required by this Order, the effects of this action on aquatic systems and recreational fisheries have been evaluated and the effects relative to the purpose of this order have been documented. No impact to recreational fisheries is expected from the proposed project.

Magnuson-Stevens Fishery Conservation and Management Act, Public Law 94-265 - This project is not expected to result in any adverse effects to essential fisheries habitat as defined in the Magnuson-Stevens Act because it has been determined that this activity, individually, will not cause any action that may adversely affect essential fish habitat as defined by the Act.

36 CFR §215 Administrative Review or Appeal Opportunities

The Forest Service, Craig Ranger District, Tongass National Forest, has completed an Environmental Assessment for the Ucore Bokan Mountain Mining Plan of Operations. Based on this analysis the Craig District Ranger selected the Proposed Action (Alternative Two).

Copies of this Environmental Assessment and Decision Notice may be obtained by contacting:

Sarah Samuelson
Tongass Minerals Group
907-789-6274

As required by Forest Service appeal regulations found at 36 CFR §215.5, a legal notice of the opportunity to comment on the Proposed Action was published in the Ketchikan Daily News newspaper on January 19, 2013. Individuals or non-federal organizations who submitted a comment letter or otherwise expressed interest in this action during the comment period ending on February 19, 2013, as specified at 36 CFR 215.6, have standing to appeal this decision.

The notice of appeal must be in writing, meet the appeal content requirements at 36 CFR 215.14 and be filed with the Appeal Deciding Officer:

Forrest Cole, Forest Supervisor, Tongass National Forest
Forest Service, 648 Mission Street, Ketchikan, AK 99901
Fax 907-228-6292
appeals-alaska-tongass@fs.fed.us

The Notice of Appeal, including attachments, must be filed (regular mail, fax, e-mail, express delivery or messenger service) with the Appeal Deciding Officer at the correct location within 45 calendar days after the publication of notice of this decision in the Ketchikan Daily News, the newspaper of record for the Craig Ranger District.

Maeve L. Taylor (for)
Matthew Anderson
Craig District Ranger

July 8, 2013
Date

Comments Received – UCore Bokan Mountain 2012 Plan of Operations EA

Commenter	Comment	Response
State of Alaska (SOA)	Various comments regarding State permitting processes	See Decision Notice (DN), Mitigation Measures
SOA	Please discuss the hazardous waste characterization of the gravel pit and gravel access road, and other contaminated sites, proposed for use in the Proposed Action. If contaminated, please clarify whether these sites will be used in their current state or first remediated	EA Alternatives; Figure 2
SOA	Effects from fugitive dust resulting from the proposed action should be considered if contaminated sites will be used before remediation	See Decision Notice, Mitigation Measures.
SOA	Provide additional details on the determination of background radiation and comparison to pit wastes for disposal consideration. Please include a discussion on how background will be determined, instrumentation to be used, and comparison criteria.	Please see Plan of Operations, Section 2.1.3, and EA, Alternatives
SOA	Elaborate on special waste disposal procedures (e.g. special handling, storage, and disposal procedures)	Please see Plan of Operations, Sections 2.1.3, 2.3.3, 3.7, 3.8.1 & 3.8.2
SOA	Please confirm in your FONSI that camp water from Cabin Creek meets drinking water quality standards for radionuclides	Please see attached water quality monitoring results
SOA	Blasting has the potential to generate dust, but potential impacts from fugitive dust are not discussed in the EA	Please see Plan of Operations, Section 2.5, for a discussion of bulk sample procedures including the use of blasting mats
SOA	Concurrence with Forest Service and ADFG must be reached before in-stream work (including equipment crossings and proximity blasting) can occur in fish-bearing water bodies.	See EA, Aquatic Resources; Decision Notice, Mitigation Measures

Commenter	Comment	Response
Southeast Alaska Conservation Council (SEACC)	EA project records not available for public review	Project record is stored on electronic database, which was not functioning on the day of SEACC representative's visit. Project record is available at the Juneau Ranger District office.
SEACC	Request extension of 30-day comment period to review records	36 CFR 215.6 (a)(iv) states that "The time period for the opportunity to comment on environmental assessments shall not be extended".
SEACC	Forest Service should prepare an EIS to analyze, develop, and describe appropriate alternatives and to recommend courses of action for this proposal in order to resolve conflicts concerning alternative uses of available resources and impacts to the human health environment	Significant surface disturbance and significant effects to resources are not predicted due to the low level of disturbance proposed in the Plan of Operations, therefore, the Forest Service will not prepare an EIS at this time.
SEACC	Analysis of the No Action alternative is insufficient	See EA, Alternatives, and subsequent discussion in each resource.
SEACC	The description of the Proposed Action is insufficiently defined and too narrow in temporal and physical scope to provide the information necessary for the public to provide knowledgeable and informed comments on this action.	The Proposed Action is summarized in this EA, and is tied to the proposed Plan of Operations, distributed with Scoping letters on September 5, 2012.
SEACC	Temporary is not defined, and therefore public cannot provide knowledgeable comments about the possible direct, indirect, and cumulative impacts.	See Decision Notice, Decision Section.
SEACC	Drill sites are not located on the drill site map	The proposed drill sites are shown on the map; however, the legend was cut off. Please see EA, which includes corrected versions of the figures.

Commenter	Comment	Response
SEACC	The Proposed Action contains no information as to the restrictions, or possible impacts from road use due to increased erosion or fugitive dust.	See Decision Notice, Mitigation Measures.
SEACC	The description of potential effects of the proposed action describes "temporary reduction in water supply to streams if water is diverted or withdrawn for drilling" The analysis fails to consider any reserve flow for the protection of returning salmon.	See Decision Notice, Mitigation Measures, and EA, Aquatics. Permits must be obtained for water withdrawal from ADFG and work must be timed to avoid impacts to fish.
SEACC	Kendrick Creek and Cabin Creek are both listed on ADFG's Anadromous Waters Catalogue. The analysis contains no information about timing for withdrawals to minimize the risk to returning salmon or provide any alternatives or mitigation	See Decision Notice, Mitigation Measures, and EA, Aquatics. Permits must be obtained for water withdrawal from ADFG and work must be timed to avoid impacts to fish.
SEACC	The road was constructed with materials containing radio-nucleotides and subject to a CERCLA clean-up action. The summary of impacts to aquatic resources makes no mention as to the possibility of the spread of water borne radio-nucleotides from the road, their mitigation, or any alternatives to the action that would be less environmentally harmful.	See Decision Notice, Mitigation Measures.
SEACC	Erosion from tracked vehicles: The analysis does not indicate any mitigation or possible alternatives that may be less environmentally harmful such as the use of rubber tires or the use of plywood track barriers	See EA, Soil and Wetlands.

Commenter	Comment	Response
SEACC	Waste Water: The analysis does not include any analysis pertaining to the 2,500 square foot infiltration gallery proposed for the disposal of waste water from the man camp. This leeching field is located in a wet land where there is a close connection between surface and ground water. The disposal of human effluent in such a manner could have significant impacts to surface and ground water resources and therefore needs to be analyzed for direct, indirect, and cumulative impacts. Analysis also fails to consider alternatives such as above-ground storage tanks or barging waste to a publically-owned treatment works off-site	Camp wastewater treatment will be approved via a State review process. UCore may not proceed with building the camp or infiltration gallery until the Forest Service has received notice that the State review process has been completed and State engineers have reviewed and approved UCore's plans.
SEACC	The EA makes no mention of any financial assurances or bonds held to assure compliance with the work plan.	See Decision, Mitigation Measures. Financial assurance must be updated and collected before work can begin.