



March 15, 2017

Colleen Garcia
Minerals Program Manager and Geologist
Inyo National Forest
351 Pacu Lane Suite 200
Bishop, CA 93514

Submitted via email: colleengarcia@fs.fed.us

Re: Robbie Hoyt Memorial Mine Proposed Action

Thank you for the opportunity to comment on the Robbie Hoyt mine four year plan of operation in Redding Canyon. For the last decade, Friends of the Inyo has followed proposed projects on the Inyo National Forest and commented if necessary. We understand that specialists will be reviewing the plan of operation and contributing to the environmental assessment and we hope the below comments will flag some areas of concern.

The road through Redding Canyon is in poor condition and the operator is proposing to provide road improvements. Any road work and improvements should be overseen by USFS staff and direction on best practices given. Straw buffers are needed to protect the creek in this area when improvements are made. Improving the road will invariably have impacts to the riparian corridor, which is acceptable if the impacts are monitored by the agency and steps are taken if further damage occurs. The acknowledgement that road improvements will result in more recreational use of the canyon should be stated in the environmental assessment (EA) and management actions put in place to address increases in motor vehicle use.

Secondly, the EA must include wildlife design criteria. Although there is a suggestion of a limited operating period in the PA, the EA needs to clearly state it. We suggest that the period of mining operation be shortened from November-March so as to reduce the impacts to migratory and breeding birds, as well as other wildlife. Panamint Alligator Lizard is documented in Redding Canyon's riparian habitat and is an Inyo National Forest Species of Conservation Concern (SCC). The EA must address how this species will be protected from mining activities. The area under proposal for mining is an Ebird hotspot, representing dozens of breeding and migratory birds. Many migrates move through this area in the months of April and October. Resident birds start breeding in the month of April. Restrictions should be placed on road improvements as well during the breeding season. Breeding bird surveys should be preformed by qualified biologists prior to the approval of this project and a monitoring plan for the four-year operation period outlined in the EA.



Data for bird observations can be obtained at: <http://ebird.org/ebird/hotspots> and entering “Redding Canyon” into the search engine.

Additionally, surveys for bats are needed. If bats are found, the operating period will need to be limited to the winter months as recommended by biologists and best available science. Annual monitoring should occur over the four-year operation period. The BLM Bishop RMP has exemplary protocols for such pre-project surveys and we encourage the USFS to consult with bat biologists working on existing projects in the Eastern Sierra. Several bat species are on the Inyo National Forest’s SCC list.

It is our understanding the Mr. Stevens must have a reclamation bond in place to proceed with operations. The USFS can provide a reclamation bond estimate and this information should be provided in the EA. The EA should outline the order of operations leading up to the Proposed Action for approving this plan of operation (i.e. the letter of intent and the validity claim). The EA should include the proof of value established through market verification of an ore sample. This discovery requirement was not discussed in the proposed action. The public also may want to know what mineral the operator is mining. As part of the plan of operation and reclamation the operator needs to disclose the location of ore processing off-site. He will need a permit from Inyo County to dump off site.

Thank you again for this opportunity to comment and engage in this process. I would like to be included in any field trip opportunities that are available to stakeholders this spring. I can be contacted at the below email for further correspondence.

Sincerely,

/s/ Jora Fogg
Preservation Manager
jora@friendsoftheinyo.org