

comments-eastern-ottawa-ontonagon@fs.fed.us

March 31, 2008

Dear Forest Supervisor Susan Spear,

I am writing to comment on the Hardrock Mineral Prospecting Permits Environmental Assessment, being proposed for lands around Prickett Lake in the Ontonagon Ranger District.

I am strongly opposed to the leasing of the public's minerals, especially in such a sensitive watershed as the Sturgeon River. Natural features, including the Sturgeon River Gorge Wilderness, the Wild and Scenic River corridor, creeks, wetlands, and the river itself, should trump the value of mineral exploration now being proposed for lease and exploitation. The Sturgeon River Gorge Wilderness is a well-visited area, adding greatly to the local tourism economy. Mineral exploration and the potential for mining conflict with long-established values that warrant environmental protection.

The EA does not address the issue of uranium exploration, and lumps it in with "other minerals" when discussing the company target metals. However, the lease applicant, Trans Superior, has been exploring for uranium, and may likely be looking for it here. There has been no information presented in the EA to assure the public that our government is properly assessing the impacts that uranium and other metallic mineral exploration could have on underground aquifers. Potential exists for water-well contamination from the mineral drillings, and health concerns have been expressed across the United States (TX, AZ CO, NM, SD, etc.) and Canada, especially regarding uranium drilling.

An article uranium exploration and mining, found on the Association for Media Accuracy's web site, <http://www.nuclearpowerprocon.org/pop/mining.htm> states this about exploration and risks for contamination:

The first states of uranium excavation -- exploration and mining -- create both known and unknown occupational and environmental risks. During the exploration stage, bore holes used to collect ore samples penetrate seams of uranium ore and underground aquifers, greatly increasing the chances of groundwater contamination by dissolved radioisotopes. This type of contamination has occurred in British Columbia, New Mexico, Wyoming, and Minnesota.⁸ Water pollution from mining operations also occurs when groundwater or rainwater accumulates in an underground or surface mine, passes through loose rock, and picks up both radioactive and toxic contaminants.⁹ There are also risks (the extent of which are unknown) associated with the release of airborne radiation, in the form of radon gases, during the exploration and excavation processes.¹⁰

Scott, quoted in the article above, elaborates on this (Elizabeth V. Scott, *Unfinished Business: the Regulation of Uranium Mining and Milling*, 18 U. Rich. L. Rev. 615, 617-18 (1985)).

[t]he first environmental impacts of uranium development are seen during the exploration phase. The exploration for uranium involves the drilling of core holes to collect ore samples. Its chief environmental impact stems from the solubility of uranium and its by-products. Bore holes penetrating seams of uranium ore and the underground aquifers create channels where the groundwater runs, increasing the risk of groundwater contamination by dissolved radioisotopes. This type of contamination has been seen in British Columbia, New Mexico, Wyoming and Minnesota, where elevated levels of radioactivity in groundwater have been reported near exploratory drilling sites

Although we've made the Forest Service aware of some of the literature available on potential effects of mineral exploration, it has chosen to ignore these references. Only one paper makes it into mineral

exploration EA's – the 1980 Michigan DNR uranium report. And there the Ottawa chooses to ignore almost the entire report and cherry-pick one statement claiming uranium drilling should be permitted. When it comes to discussing the potential contamination of wells, the agency stands mute.

The Ea fails to adequately assess the potential impact of the sump pits used for exploratory drilling. The water used to circulate through the drill is contaminated with lubricating oils and a slurry of sulfides from the ground rock. Nothing is done to test for water contaminants in sump pits, and when the site is "reclaimed" prospectors are allowed to fill the contaminated pit with soil. Nothing is done to assess the potential impacts of sump pits on wildlife, despite the fact that sump pits associated with oil drilling were shown to be a trap for bats, birds, and other species. If hundreds and even thousands of these sump pits are found across the region, what is the cumulative impact to the environment?

The EA fails to even mention any measures necessary to protect mineral drillers from potential negative health effects of uranium contamination. In Canada, drillers are required to monitor radiation exposure. See attached file.

The EA also fails to address the lack of assessment of mineral exploration across the Ottawa, and the region, on BLM, state, and private mineral leases. Thousands of exploration holes have been drilled in the western Upper Peninsula alone. The BLM and Forest Service need to conduct an EIS assessing the cumulative impacts of these activities across the Ottawa and the region.

The Forest Service and Bureau of Land Management encourage exploitation of mineral resources in the Lake Superior region, despite the fact that metallic sulfide mining and uranium mining (hardrock mining) is polluting. There has never been one of these types of mines that hasn't polluted the environment. Instead of acknowledging the risk in developing minerals in this water-rich landscape, Ottawa and BLM short-sightedness put the environment and local economy at-risk.

Please deny this project. If you plan to proceed, an EIS should be conducted.

Sincerely,

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