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Subject: Generalized DEIS statements

Hi John -

Nice talking with you this morning. As we discussed, I have compiled a list of the broad statements/ideas made in the DEIS for which BRD is not in agreement.

- The DEIS considers impact in terms of habitat destruction and/or fragmentation and the repelling of species from the area. We disagree because this approach fails to account for mining sites being attractive nuisances for some species. Some species will be drawn to the area (and thus have greater potential exposure) because of water availability in the waste ponds, human activity, and perching structures. Migratory birds are good examples of species that may be attracted to mining sites.

- "Increased levels of uranium and decay products are anticipated to be minor and long term" to biological resources. There is no scientific basis for this statement in the DEIS nor data to support it from our USGS report.

Site specific contaminant data is lacking but needed. To truly make such a statement, a risk assessment needs to be performed as suggested in our BRD chapter.

- The DEIS evaluates impact based on habitat but fails to account for chemical toxicity, and radiation toxicity is barely even mentioned in the DEIS because of its focus on aquatic habitats.

- Given the complexity of radiation toxicity, we think that it would be unwise to speculate on risks to human health. Questions like these should be deferred to EPA or state health agencies.

- Habitat quality is only discussed in terms of aquatic habitat quality. We disagree with this because terrestrial habitat is sensitive and should be considered as well. A good example is Kanab North mine (below) which hasn't been mined for 20+ years. Note how vegetation has not re-established within the mining perimeter.

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If you have any follow-up questions for me, please let me know. Also - I didn't seem the link for Don's presentation this afternoon. Could you send it to me?

It would also be useful to see the final Q&A you pulled together from our input in January. Could you send that to Susan and me as well?

Thanks-

Jo

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