

From: [Daniel Kunches](#)
To: [Ferguson, Tracey](#)
Subject: public comment on Engels Mine vested right
Date: Friday, April 5, 2024 1:50:33 PM

CAUTION: This email originated from OUTSIDE THE ORGANIZATION. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hello Tracey,

My name is Daniel Kunches, and I am from Genesee Woods. I would like to express my opposition to the granting of a vested right at the old Engels Mine along a couple of lines of concern.

From a legal perspective, I'll just say that I was born in 1981, and have been around in Genesee and Indian Valley since then, and I've never seen or heard of anything resembling an active mining operation near the old Engels Mine during that time.

It seems clear that if a vested right is granted, it is more likely that a mining operation will take place -- and with less regulation and oversight. I have worked for the United Nations on an open-pit mine reclamation project in Kazakhstan, and subsequently did my Ph.D. in geography and Penn State in the context of the Marcellus Shale fracking in Northern Pennsylvania, and open-pit coal mining in neighboring West Virginia. I did coursework on the political economy of mining, and have taught the social and ecological impacts of mining operations to undergraduates. There is a well known boom-bust character to local economies with mining operations. The "boom" can be gentrifying, and seems particularly volatile in Indian Valley given the displacement of residents, and housing shortages, that we have experienced in the wake of the Dixie Fire. The "bust" can be delayed through innovation in mining methods, for example the longevity of the Bingham Canyon Copper Mine outside of Salt Lake City, but the bust comes at some point, and rural economies with less economic diversification are more susceptible to impacts when the bust happens. It seems to me that stability, both social and ecological, is what is best for Indian Valley at this point in time.

The other side of longevity in a mining operation is a larger amount of tailings and the increased health risks that poses to residents, livestock, and ecology in general. A new tailings pond this high up in the watershed, in an area with active faults and an evolving history of significant wildfire impacts, seems like a hazardous configuration. I live downstream from the old Walker Mine, and even after all of the money that has been spent on reclamation, we still have high copper content in our drinking water, which may have been a source of health issues in my family.

All things considered, I opposed vested rights at the Engels Mine and encourage the need for the applicant to go through the modern regulatory process to assess whether or not to resume an operation at a derelict mine.

Kind Regards,
Daniel Kunches, Ph.D.