

YDWP Comments on CR 595

Project Purpose

The stated purpose in the application reads that the road is necessary for better emergency transport, recreational access, and commercial access. Roads already exist that serve these purposes. The only need yet unmet is a ore haul road. The project purpose is clearly a misleading statement that is attempting to make it more acceptable. The bottom line is that Kennecott wants the road, is paying for much of it, and is a driving force behind it. Having the applicant change to a public entity does not change the purpose of the road. This is a haul road for Kennecott, starting at Eagle Project and ending at Humboldt Mill.

Alternatives Analysis

Alternative analysis is weak and comparatively undocumented. Little field verification was done when drawing conclusions about wetland impacts for alternatives. Alternatives do exist that are less damaging to the surrounding environments.

Impacts on Wildlife and Habitats

The applicant is using material from the Woodland Road application, a study paid for by Kennecott from 2009, to substantiate its findings for the large mammal survey. That means no field work was done to support conclusions for CR 595.

The large mammal survey states that there is no conclusive evidence of mountain lions in the area. That statement is untrue. The Michigan Department of Natural Resources have positively identified tracks near the Huron Mountain Club and a mountain lion was caught via trail camera near the Keweenaw Peninsula. Since the animal's daily range can be as high as 100 miles per day, it is entirely possible this undeveloped area is used by mountain lions.

The large mammal survey follows the proposed route for most of the way until it hits the Yellow Dog River watershed. The survey lines then branches away from proposed route. The survey should have followed the proposed route.

An adequate wetland analysis for alternatives is needed. List of identified plant species along road corridor is deficient. Our consultant found twice as many species, including two threatened plants: Linear Leaved Gentian and Farwell's Water Milfoil

Application Deficiencies

The proposed haul road should be included in either the Humboldt Mill application or the Eagle Project application, since it is an associated activity with mineral extraction. Application states that this is a public/government project, even though paid for by private companies wanting to use the road for their financial gain.

Overall Conclusion

The need for this road is not substantiated by this application. There are reasonable alternatives that need to be further explored. Advocating for the use of existing roads would reduce the potential negative impacts to surrounding wildlife habitat and aquatic resources.

