

February 1, 2018

Gay Baxter
Klamath National Forest
11263 North Highway 3
Fort Jones, CA 96032

Discovery Day Mining Scoping Proposal

Dear Forest Service,

Thank you for accepting these brief scoping comments concerning the Discovery Day Mining Proposal on behalf of the Klamath Siskiyou Wildlands Center, the Environmental Protection Information Center and the Klamath Forest Alliance. Contact information for our organizations may be found at the conclusion of this document.

We ask you to please recognize the outstanding remarkable values of the Wild and Scenic South Fork Salmon River which serves as a NW Forest Plan Key Watershed for fisheries and water quality. We urge you to be mindful of the significant recreational and fisheries values provided by the Salmon River. Please further note that it appears that the proposed actions are located within the Late Successional and Riparian Reserve land use allocations in which providing high quality terrestrial and aquatic habitat are the required management goals.

Please disclose the methodology of how hazard trees may be identified for utilization at the mill. Will old-growth wildlife snags in the LSR or riparian reserve be subject to felling/milling activities?

We are unable to locate a water right for the project proponent. Please disclose if the Forest Service is proposing to grant use of a riparian water right for this private mining operation.

Who for the Forest Service will examine and analyze the acid mine drainage chemistry? What will such analysis consist of and entail? It appears that the existing adit discharge water metals sample was taken in 2012 when less mining activity was occurring than is proposed in the Plan of Operations currently under consideration.

The scoping notice indicates “weed-whacking or mowing would be effective in controlling the yellow star thistle within the project area...” We are surprised that the Forest Service has reached this conclusion prior to conducting its NEPA analysis for this project. We have often observed weed-whacking or mowing that has not controlled star thistle infestations. Further, why has weed-whacking and mowing at the site proved ineffective to this point such that star thistle continues to be a problem at the site?

It appears that an unauthorized road/route is proposed for continued utilization in this project. How does continued use of this road/route contribute to the Transportation Management Plan as implemented through the Motor Vehicle Use Map or to the goals and the objectives of reducing road density in the Key Watershed? Is the unauthorized road/route also located in the Late-Successional and Riparian Reserve land use allocations.

We are concerned about the proposed heavy equipment crossing through Knownothing Creek. Does this portion of the creek provide critical habitat or essential habitat for fisheries? Is there an existing permit to “rock” the low-water crossing?

The Plan of Operation fails to disclose what “disposal alternatives” are being considered for mill tailings or to discuss the findings of the testing concerning these mine tailings. The Plan of Operations also fails to disclose the content of the hypothetical “optimal tailings disposal plan” that may (or may not) be developed with the Forest Service.

Figure 8 in the Plan of Operations leads us to believe that disturbance to Northern spotted owls in the area may be an issue for this project.

Thank you for considering our comments and concerns.



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