

US Forest Service
Josh Nicholes, District Ranger
Humboldt-Toiyabe National Forest
660 South 12th Street, Suite 108
Elko, Nevada 89801

Sept. 30, 2020

Also submitted electronically at
https://www.fs.fed.us/nepa/nepa_project_exp.php?project=58700

Re: South Jerriitt Exploration Project

Dear Mr. Nicholes,

We, JRS Properties III LLLP ("Simplot") received an email from you on September 3, 2020 regarding the South Jerriitt Exploration Project. I accessed additional materials at the project website, <https://www.fs.usda.gov/project/?project=58700> on Sept. 23, 2020. Thank you for the notification and opportunity to provide scoping comments for this proposed project.

Simplot owns the "base property" for USDA-FS Grazing Preferences within the Foreman Creek Allotment. This Preference is authorized under a Grazing Permit number 60128 for the Foreman Creek Allotment. This Grazing Permit remains effective through December 31, 2027. Upon review of the legal description provided, it is apparent at least a portion of this proposed expansion will occur within the boundaries of our grazing permit.

Beyond our dependency by use of the public lands to sustain our livestock operation, we, along with our employees and guests, rely upon the public lands in the allotment to maintain the custom and culture of public land livestock grazing and also to recreate and otherwise enjoy the open space and quality of life that the public lands and associated private lands provide us, as well as our employees and guests.

It is critical that USFS acknowledge and address potential impacts to grazing operations within the NEPA process, including access to water, infrastructure maintenance, travel safety, fire mitigation, and prevention of risk to livestock and employees in project area. Specifically:

I. The need for continued access to water

Access to livestock water is a critical element of our operation within the Forest Permit, and to our downstream private property. This includes physical access to live stream water and any water developments within the forest, as well as the impact to the aquafer. The NEPA document must consider impacts to livestock watering locations and impacts to downstream water quality and quantity.

II. The need to maintain existing range improvements in working order and install new improvements as needed for new access points



The utilization of any existing roads within the grazing allotment must recognize that fences within the project area are a management tool that must be kept in the state found. Gates must be kept in working order and stay open or closed as needed. Alternatively, cattle guards could be used to replace any gates to ensure gate is not left open resulting in livestock management issues. In addition, any new road that is created should be placed in an area to reduce impacts to livestock trailing routes and range improvements, and must include cattle guards at fence crossings.

III. The need to ensure safe travel to our employees accessing the allotment for management purposes

It is critical to note that the grazing allotment within the permit area requires regular management, and all routes within the allotment are utilized by employees to access and manage the allotment. It is critical the NEPA documents acknowledge that we can continue to safely access these areas.

IV. The need to mitigate increase risk of catastrophic wildfire

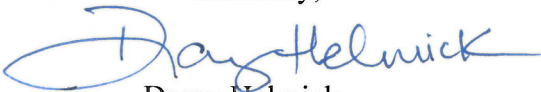
Wildland fire is a constant threat to the resource within this area. With limits put in place due to sagegrouse habitat, it is important to recognize that the greatest threat to the species is loss of habitat due to wildland fire. NEPA documents must consider the increase risk of wildland fire and provide some mitigation to reduce that risk.

V. The need to provide a safe environment for livestock, employee and the public

The scoping document identifies up to 500 acres may be disturbed, with drill holes, monitoring wells, trenching and sumps to be installed. It is critical that areas where potential safety hazards may occur have some mitigation in place to prevent accidental harm to our livestock, employees or the general public.

Thank you for considering these points, and please reach out to me if you need additional information. Looking forward to participating in the process,

Sincerely,



Darcy Helmick
Land Manager

