

Friends of the Bitterroot

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Friends of the Bitterroot submits the following comments concerning the Iron Creek Exploratory Drilling project #63150 on Salmon-Challis National Forest:

A goal of the 1988 Salmon National Forest Plan is to: “Encourage the legitimate exploration and extraction of leasable and locatable minerals from National Forest lands **while maintaining or improving other resource values**” (scoping document, p. 1). While it is unlikely that mineral exploration and extraction could ever improve other resource values, exploration activities can and should maintain those values. Our comments are focused on that maintenance of resource values that include intact ecosystems, wildlife, clean air, and clean water.

Please explain what “2A Forest Plan Management Area prescriptions” are (scoping document, p. 1). Is this area an appropriate one for developing a mine, given its location in the headwaters of the Salmon River? The degraded land and water around the historic, abandoned Blackbird Cobalt Mine are well-known and persist to this day, despite extensive and expensive reclamation measures.

The scoping document indicates that Forest Service surveys for rare plants or Threatened, Endangered or Sensitive wildlife species, large carnivores, and large raptors, including dens and nests, have not been done. Instead, the scoping document states that it is up to Idaho Cobalt Company (ICC) to “notify the Forest Service if rare or sensitive plants including pink dandelion (pink agoseris), are encountered” or “if threatened endangered, or sensitive wildlife species are found”. Are ICC personnel trained to identify these species, for example pink dandelion? The project’s potential impact on bull trout or on anadromous fish is not even mentioned in the scoping document. Neither is there an assessment of the project’s stream diversions’ impacts on the aquatic ecosystems. In short, the document does not demonstrate compliance with the Endangered Species Act.

Most exploration activities do not result in development of a mine, and so these activities simply leave behind a network of roads and drill pads crossing the hillsides, causing erosion, shedding sediment into streams, and fragmenting habitat. The project area is a prime example of past exploration’s impacts, with many miles of “closed, non-system roads” that appear to have resulted from previous drilling projects. Will this project turn out differently? It will add to this network, proposing an additional 3.2 miles of “temporary” roads. Temporary roads cannot be considered temporary unless the are

completely recontoured and revegetated, reclamation activities that are not required in the scoping document, even though, concerning temporary roads, it states (p. 9): “Surface disturbance would be restored to the approximate pre-exploration conditions”. Pre-exploration conditions would be a recontoured slope, not a hillside broken by roadbeds. All temporary roads and all drill pads need to be recontoured and revegetated with native plants. An alternative to building 3.2 miles of temporary roads is to helicopter in small drill rigs, a measure that has been used in other exploration projects to minimize environmental effects. Another alternative would be to use directional drilling from existing roads. In order to actually improve resource conditions, a stated goal, p. 1, consider also recontouring and revegetating the 11.4 miles of non-system roads to be used.

Four drill pads are proposed in riparian habitat conservation areas (RHCAs), “where effective mitigation measures will be used.” Will roads be bulldozed through the RHCAs to access the drill pads? Given the spills of various chemicals that are common during drilling operations, it is doubtful that any mitigation measures will be effective at preventing degradation. Drilling in RHCAs should not be permitted. An alternative could be to use directional drilling from drill pads and roads located outside RHCAs.

Scoping document states: “Personnel will travel to work sites each shift from a camp setup on ICC’s land or campgrounds operated by the Forest Service on public land”. Why should the public’s National Forest campgrounds be used as work camps by ICC to the exclusion of the public who own them? The 1872 mining law does not require this and other laws require a special use permit that is **non-exclusive**. It should not be allowed. ICC needs to provide its own accommodations.

Please respond to the above questions, consider our suggestions, and release more analysis and detail on this proposed project.

Sincerely,

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Friends of the Bitterroot  
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