

January 2, 2024

RE: OBJECTION to Iron Creek Exploration Drilling Project, Salmon-Challis National Forest

Objection submitted on-line, and to:

comments-intermtn-salmon-challis-salmon-cobalt@usda.gov

Responsible Official – Salmon-Cobalt District Ranger Bobbi Filbert
Objection Reviewing Officer -Heather Degeest

Dear Forest Service,

Here is an Objection from WildLands Defense (lead Objector), Alliance for the Wild Rockies, Native Ecosystems Council and Yellowstone to Uintas Connection on the Iron Creek Exploration Drilling Project.

We Object to the posted Legal Notice missing lines and missing information on who is the District Ranger and who actually is the Objection Reviewing officer. We have now been informed the Objection Reviewing Official is the Salmon-Challis Forest Supervisor, Heather Degeest. The USFS should be required to re-do the EA info and re-initiate the objection process with this information included.

Final EA and Draft DN/FONSI: <https://www.fs.usda.gov/project/?project=60392..gov>

<https://www.fs.usda.gov/project/scnf/?project=63150>

TO: Objection Reviewing Officer, Re: Iron Creek Exploration USFS Intermountain Regional Office, 324 25th Street, Ogden, UT 84401.

Here is an Objection from WildLands Defense (lead Objector), Alliance for the Wild Rockies, Native Ecosystems Council and Yellowstone to Uintas Connection regarding the SCNF Salmon-Cobalt Ranger District Iron Creek Exploration Project Lead Objector: WildLands Defense.

The selected alternative in the draft EA, FONSI and DN would authorize a decade of large-scale mining drilling and access disturbances in remote forest wildlands. This is on top of several other massive drilling projects and cobalt mining already authorized in this fragile biodiverse rugged mountainous remote landscape. There is a very significant concern that this project may intersect groundwater, alter surface expression of waters linked to this groundwater, and also could potentially contaminate groundwater, with significant adverse impacts to threatened and endangered native salmonids, as well as having significant detrimental impacts to rare native carnivores including Wolverine.

Our issues of concern span all parts of this significant new and expanded mining exploration and significant terrestrial and aquatic species habitat disturbance scheme that will destroy and fragment sensitive wildlife habitats, result in opening over 11 miles of closed road plus construction of 3.5 miles of new “temporary” roads and bulldozing of 91 drill pads that will suffer 24 hour a day year-round activity. This significant disturbance includes plowing additional miles of access routes in the dead of winter amid this vital native carnivore habitat, and endangered and threatened native salmonids, Chinook Salmon, Steelhead and Bull Trout in this Salmon River watershed, amid Wolverine, Canada Lynx, Fisher and Gray Wolf habitat. The USFS even allows drilling in and near RHCAs. There is no analysis of the effects of existing exploration and drilling and historical and other mining on ground and surface waters and sustainability in this landscape also faced with climate change stress. Moreover, the SCNF has authorized. – or is foreseeably undertaking massive prescribed burning and, logging and vegetation treatments across innumerable watersheds also tributary to the Salmon River.

It is clear an EIS based on current critical baseline data and science-based analysis to assess the direct indirect, cumulative and synergistic impacts of the project must be prepared. The project will result in expanded disturbance and fragmentation of habitats and tearing up portions of watersheds on National Forest lands that contain vital sensitive and imperiled species habitats and watersheds and wild land areas will be destroyed/harmed/impaired These actions will intensify and worsen the harmful effects of climate change stress across the landscape.

The EA’s superficial self-serving circular reasoning NEPA review does not take a hard look at all direct, indirect and cumulative effects of this new large-scale purposeful disturbance and the irreversible harms – such as project drilling noise, traffic disturbance, habitat disruption displacing wildlife into sub-optimal habitats, disturbance, resulting in increased human harassment and poaching of threatened and other native carnivores, runoff sediment and other pollution from all aspects of road use and improvement or building here polluting downstream waters including critical habitat occupied by rare native salmonids. Road construction may also result in a proliferation of invasive weeds that doom wildlife habitat, and wild land roadless and other areas as a result of this landscape-level manipulation. The high degree of risk, harm and uncertain actions violate NFMA, will significantly harm and jeopardize important MIS and sensitive species, and push species towards ESA listing. The EA bulldozing, noise, 24 hour a day project activity disturbance will result in loss of sustainability of Forest biotic and natural values - in violation NFMA. There will be even greater losses of sustainable perennial flows and degradation of water quality.

Organizational Interests: The following Objection is based on biodiversity loss, wildlife habitat disturbance, impairment of wild lands, weed risk, potential groundwater impacts, pollution or reduction of surface and groundwaters, cumulative ecological stresses and other impacts acting synergistically to harm irreplaceable Salmon River watershed regional values. There are important issues related to climate change cumulative stresses on waters and biodiversity, biodiversity loss, watershed and water impacts, sensitive and imperiled species and rare native carnivores and other concerns about project harm raised in our comments on this project.

Thus, Pursuant to 36 CFR Part 218, WildLands Defense (WLD) Lead Objector, Alliance for the Wild Rockies, Native Ecosystems Council and Yellowstone to Uintas Connection are submitting this Objection to the SCNF Salmon-Cobalt RD Iron Creek exploration project.

Alliance for the Wild Rockies is a 501c3 public interest organization whose mission is to secure the ecological integrity of the Wild Rockies Bioregion through citizen empowerment and the application of conservation biology, sustainable economic models, and environmental law. Alliance for the Wild Rockies is headquartered in Helena, Montana.

Native Ecosystems Council is a 501c3 public interest organization whose staff reviews Forest Service National Environmental Policy Act (NEPA) assessments of logging impacts on wildlife in Montana and Idaho. NEC is headquartered in Willow Creek, Montana.

Wildlands Defense is a 501c3 public interest organization dedicated to protecting and improving the ecological and aesthetic qualities of the wildlands and wildlife communities of the western United States for present and future generations. WLD does so by fostering the natural enjoyment and appreciation for wildlands habitats and wildlife by means of legal and administrative advocacy, wildland and wildlife monitoring and scientific research, and by supporting and empowering active public engagement. Wildlands Defense has offices in Boise and Hailey, Idaho.

Yellowstone to Uintas Connection is a 501c3 non-profit entity working to restore fish and wildlife habitat including the Regionally Significant Wildlife Corridor connecting the Greater Yellowstone Ecosystem to the Uintas Mountains and Southern Rockies through the application of science, education, and advocacy. Through the years Yellowstone to Uintas Connection and our members have observed the steady destruction and degradation of the natural character, water quality, and wildlife habitat integrity of the Regionally Significant Wildlife Corridor and sensitive species habitats across the Region from human developments including energy development, mining, livestock grazing, motorized recreation, and logging on public and private land.

Our organization staff and members would be directly affected by this project and past and ongoing actions or inaction by the Forest Service on these lands and watersheds that are vital for biodiversity protection and wild lands preservation, for the viability of species like migratory birds and rare native carnivores including Wolverine. The Iron Creek project would directly and significantly harm us and our members, who use the SCNF National Forest, other Region 4 Forests, and project area lands in question for quiet recreation, enjoyment of the natural world, bird watching, nature photography, scientific pursuits, aesthetic and spiritual purposes.

The proposed Iron Creek EA actions will destroy, fragment and disturb forests and wild lands for a prolonged period - to the great detriment of many species our organizations work to preserve – Wolverine, Gray Wolf, migratory songbirds, Great Gray Owl, Boreal Owl, Northern Goshawk, Flammulated Owl, Dusky Grouse, and many others, as well as disturb big game habitats and tributary drainages to occupied Bull Trout, Chinook Salmon and Steelhead habitats. The USFS thinks so little of several of these species that it doesn't even bother to conduct on the ground surveys so an informed NEPA document can be developed, but merely uses models. The EA

actions will thus deprive our members of enjoying, viewing, studying, photographing, seeking solace in, these beautiful animals and the natural wild and undeveloped habitats upon which they rely. These impacts will cause unnecessary and undue degradation, and will be cumulatively harmful with the consequences of other connected and cumulative actions the USFS and BLM are authorizing on federal land – ubiquitous livestock grazing disturbance to wildlife and aquatic species, watersheds, wild lands, and a host of other mining exploration projects in this landscape mining “boom”, relentless SCNF logging and other vegetation disturbance “treatments” and habitat manipulation – along with extensive roading and expanded motorized intrusions, and other significant habitat disturbance and habitat loss.

OBJECTION ISSUES (AS RAISED IN COMMENTS)

First, the USFS provided no Preliminary Draft EA for public comment – only cursory scoping material. Some new information is now provided in the EA/FONSI draft, and we address that here.

This project will result in significant new habitat and ecosystem disturbance and degradation in a remote wild land area of great importance for rare native carnivores like Wolverine, Fisher and Gray Wolf, many native raptor species including potentially Bald and Golden eagles, Northern Goshawk, rare forest owls, and vital habitat for a wide variety of rare and declining native migratory songbirds and resident birds. See Rosenberg et al. 2019, describing loss of 3 billion birds in North America.

The Iron Creek watershed contains occupied Bull Trout, Chinook Salmon and Steelhead habitat. It is also home to Wolverine and Canada Lynx and Gray Wolf habitat. All of these species are jeopardized by the array of human disturbances including agency vegetation treatments; wildfire; a cobalt, gold and other mining boom; and chronic harmful levels of livestock of grazing disturbance in this area of the SCNF.

IDFG data at <https://idfg.idaho.gov/ifwis/fishingplanner/water/1139684448873> shows”

“Species Observed in Surveys

- [Bull Trout](#) *Salvelinus confluentus* observed in 2016
- [Chinook Salmon](#) *Oncorhynchus tshawytscha* observed in 2016
- [Cottus](#) *Cottus* observed in 2016
- [Cutthroat Trout](#) *Oncorhynchus clarkii* observed in 2016
- [Fry](#) *Oncorhynchus* observed in 2016
- [Rainbow Trout](#) *Oncorhynchus mykiss* observed in 2016
- [Brook Trout](#) *Salvelinus fontinalis* observed in 2011
- [Steelhead](#) *Oncorhynchus mykiss* pop 13 observed in 2010
- [Golden Trout](#) *Oncorhynchus mykiss aguabonita* observed in 2004
- [Rainbow x Cutthroat Trout](#) *Oncorhynchus mykiss x clarkii* observed in 2002” .

For these aquatic species, and all terrestrial species, full and complete integrated baseline habitat and population surveys must occur and be provided to the public for comment as part of this

process. Current surveys have not been conducted, as demonstrated by the Aquatic BA now available to the public. Thus, the FS cannot have taken a hard look at the severity of impacts of the project to these populations and the agency has no baseline for understanding the scale of harm.

The legal notice shows this is large, and very prolonged drilling proposal – it states:

“ICC will drill from an average of 10 drill pads per year and up to 20 drill pads per year. The maximum total area of disturbance under this 10-year plan is 11.6 acres and 92 drill pads. However, the maximum annual disturbance will be limited to 3 acres to construct 20 drill pads and 1 mile of temporary roads.

The project would be accessed from county and Forest System Road, approximately 11.4 miles of existing roads temporarily, and 3.2 miles of new temporary roads. New temporary roads would be up to 15 feet wide and planned to maintain grades of less than 10 percent, where possible. Temporary roads and closed roads used for more than one year will be barricaded with large boulders and/or gates to prevent public entry and stabilized with erosion control measures during periods of non-usage”.

This appears to be a major federal action that warrants an EIS to consider all the multi-dimensional and foreseeably irreversible damage and degradation. We Object to the failure to prepare an EIS to take a hard, current science-based look at all the mining activity and other disturbances now taking place or planned in this and surrounding watersheds and in the Salmon River watershed in this region.

The Scoping Notice and minimal FS baseline info provided insufficient baseline environmental information for the public to effectively comment on “ICC” or all the other cobalt mining activity and speculation taking place. There has been no POO provided to date, nor many of the specialist reports. We Object to the inadequate information the USFS provided.

This project would occur over a prolonged period of time this significant habitat and landscape disturbance “exploration” would take place – a decade, with extensive drilling of bore holes – with 6 bore holes at each of the 91 drill sites, and using horizontal drilling. Yet ecological conditions and the environmental baseline could change dramatically over this time due to serious losses of habitats and viable populations due to other drilling/treatment/logging projects and/or fire; the effects of climate change stress; the effects of megadrought and/or increased climate change stress on waters, watersheds and rare species sustainability and viability, ; mining activities: potential wildlife or other diseases impacting local and/or regional populations and many other factors. We Object that the USFS does not provide adequate monitoring and analysis of mechanisms to allow prompt curtailment or reduction of drilling activity disturbance as environmental circumstances change, or to apply increased control measures to limit disturbance - such as no winter and no 24 hour a day drilling and use of helicopter drilling. These all should have been examined in a reasonable range of alternatives yet the USFS failed to do this. We Object to these EA NEPA and NFMA deficiencies. Scoping stated:

“ICC will conduct exploration drilling for solid minerals containing copper and cobalt on its unpatented mining claims.

The project schedule is proposed for 10 years. Operations may be conducted throughout the year, except during periods in the spring when road conditions are soft and susceptible to damage. Final reclamation will be completed by November 30, 2034 (2 years after cessation of drilling operations”.

The company seeks to conduct many very damaging environmental disturbance actions with minimal controls during very harmful seasonal periods for wildlife and aquatic species. The FS failed to consider a full range of actions to reduce, minimize and pare ICC’s wish-list to a reduced and much more controlled project with effective and certain mandatory environmental safeguards. Project activity should only be allowed in fall during daylight hours and not in ESA-listed species spawning periods. Activity in winter will disturb and displace wintering wildlife, and in spring and summer will “take” numerous migratory bird and other native wildlife species. There is fire danger in summer. There was not an iota of information in the scoping notice about species of concern that will be harmed here; habitats that would be altered/disturbed/destroyed; whether the Forest is meeting its goals and objectives in the Forest plan for these species and their habitats; and goals for protection of wild land areas, visual values and many other critical attributes. Winter activity will disturb and displace wintering wildlife from critical habitats which are not even referenced here again depriving the public of basic info needed to provide³ informed comment – and that will suffer vehicle and motorized travel disturbance by workers to and from this remote site. We Object to the failure to assess a valid range of alternative and minimization and mitigation actions to protect these jeopardized forest values.

We Object that the project’s exploration activity in spring and summer is not restricted, as the destruction of vegetation, “take” of migratory birds, bulldozing, noise, night lights, constant human traffic, etc. will disturb and displace habitat; will destroy bird nests, eggs and young; will displace raptors from nests; and disrupt fawning/calving big game and other mammals during birthing and young rearing periods. This violates NFMA and the FS plan.

The FS has stated: “Drilling equipment will be mobilized and demobilized from the project once per year. Up to 4 core drilling rigs and 2 reverse circulation (RC) drilling rigs may be operational at a time”. How much cumulative noise and disturbance will result? Where are noise studies for this project? How loud are these drill rigs? How much noxious air pollution will be generated? How wide is the sound disturbance footprint? Will the noxious noise travel several miles in this steep, rugged terrain ?

We Object that the FS did not conduct necessary upfront noise and visual studies to determine the severity of disturbances and to assess ways to minimize and mitigate this noise – including a lack of baseline data and hard look NEPA analysis at the following: How much noise will this generate? What will be the noise frequencies generated? How will these types and levels of noise impact wildlife habitats and animal use of forest lands including during critical reproductive and nesting and other periods? What sensitive species may be particularly sensitive to this noise and disturbance? Please provide detailed pre-decisional noise studies and analysis of wildlife species and recreational use disturbance from this drilling activity under all weather conditions over all periods of the year when this would take place.

The FS failed to consider a reasonable range of alternatives, including alternatives that reduce the amount, decade-long length and seasonal time period of any exploration activity here, and that would actually minimize adverse impacts instead of just letting the bulldozers rip however the miners want them to. We Object to this violation of NEPA, as well as the failure to reduce and minimize harms thus also violating NFMA protections for forest lands, waters, watersheds, and for important, sensitive and ESA-listed species,

The SN stated: “Drilling will be conducted in 2, 12-hour shifts per day, 7 days per week”. The FS failed to consider a range of alternatives to cut this back to mid-morning to only late afternoon drilling allowed – as the noise at dawn and dusk will interfere with wildlife during periods when animals are most active. No night-time exploration and other mining related activity should be allowed.

The FS failed to consider a range of alternatives that limited drilling in areas that require bulldozing in yet another “temporary” road – especially since the SCNF lands are rife with unauthorized routes and the failure of the SCNF to effectively control unauthorized route proliferation - as shown in its Moose Fire Report. We Object to the failure to conduct a hard look analysis of the road network and authorized and unauthorized route density that already exists in this area of the Forest and across the Ranger District.

The SN stated: “... *there would be 8 crossings of intermittent, non-fish-bearing streams, which includes 7 crossing on existing closed roads and 1 on a proposed new temporary road. When possible, use of these crossings will be scheduled during periods of minimum flow (could be dry). If streams must be crossed when water is flowing, ICC will engineer and install crossings according to guidance and/or requirements of the Forest and Army Corps of Engineers*”.

Full detailed current surveys and detailed mapping of and measurement of flows, and full data on current aquatic and riparian habitat quality and quantity across all lengths of the affected streams must be prepared as part of the basis for any meaningful consultation under the ESA. We Object to the dearth of detailed baseline data and hard look analysis. There are sensitive, threatened and endangered species in the watershed. Are there headwater or other spring systems arising from a regional groundwater flow system? What disruptions to the surface and subsurface hydrology may result from this and other drilling activity in the region?

The FS stated:

“ICC will conduct exploration in a systematic manner that will subdivide the project into smaller phases based upon priorities. ICC will submit an annual operations and reclamation plan for each exploration phase to the Forest Service ...”.

This seems to mean that 6 drill rigs may be drilling away in a small area – generating large volumes of noise and disturbance, and rapidly puncturing possible shallow groundwater areas - irreversibly and before the UJSFS has any idea what is taking place. We Object that there are not adequate controls and monitoring required to prevent undue degradation and irreversible loss.

We Object that the FS failed to require new public comment and analysis at the level of a minimum an EA, before any more of the proposed series following “phase” of exploration activity occurs, and to allow for a course correction – and consider and analyze direct, indirect and cumulative impacts in a series of alternatives. This is even more essential with the stresses of climate change and the ever-increasing number of jeopardized wildlife and sensitive and ESA-listed species in this area.

We Object to the lack of a POO (Plan of Operation) for this significant forest land disturbance project. Why isn’t there one?

We Object that the FS has not effectively supported its lip service paid to “avoidance” of harms, and instead proposes loose and weak actions and would allow extremely harmful 24 hour a day year-long drilling and a huge number of drill holes and new route bulldozing disturbance in a remote area- but without necessary systematic multi-season pre-decisional surveys, cannot ensure that any promised avoidance will be feasible and/or effective.

The FS states:

“Temporary road locations and drill sites will be proposed based on avoidance of the following:

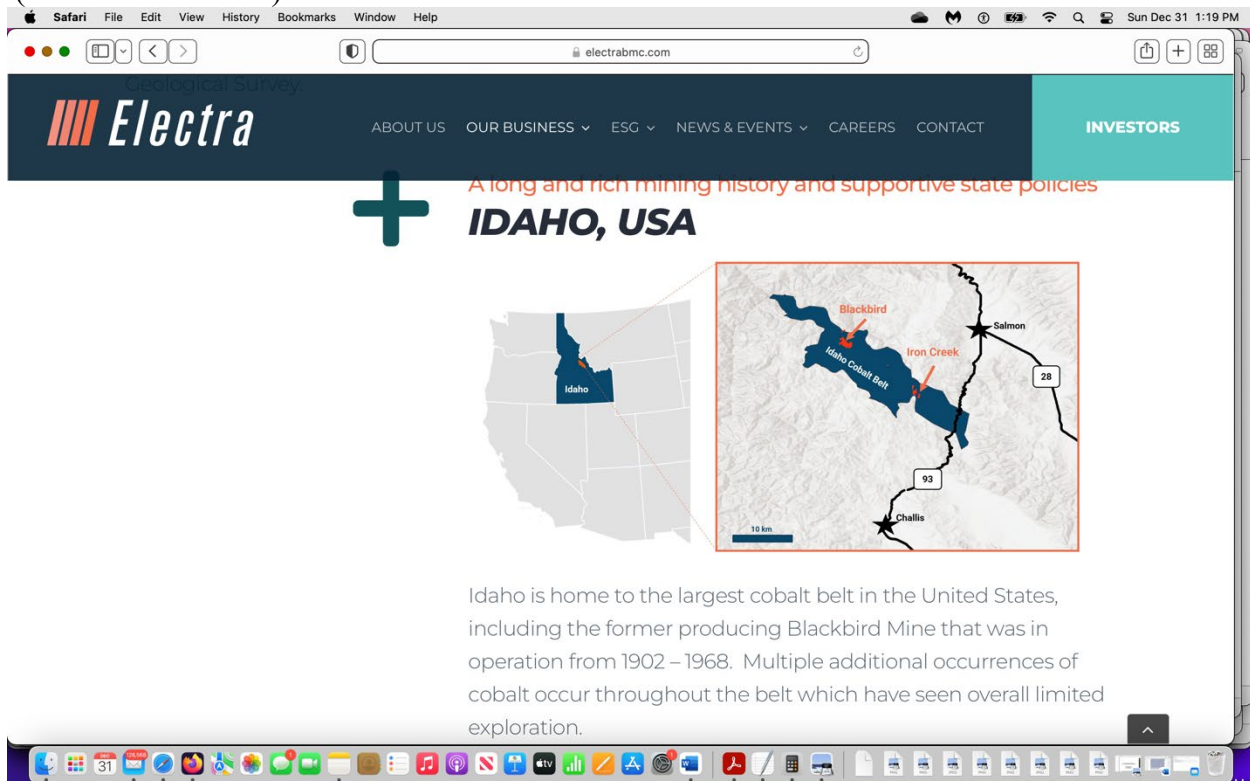
- *Eligible cultural resources*
- *Wetlands, springs, and streams, including wet meadows where soil is saturated throughout the growing season.*
- *Avoid known populations of sensitive plant species.*
- *Riparian Habitat Conservation Areas (RHCAs)”.*

We Object that there is not adequate baseline data and information provided on the location and ecological condition of springs, seeps, intermittent drainages and their flows in this area that could be impacted by 91 drill sites with 6 holes per site and horizontal drilling (without controls on how far that will extend or how deep drill holes will go) , nor cultural and historical resources; no mapping and analysis of water quality and quantity including flows and any changes in flows over time or of ecological conditions in all riparian zones; no analysis of ecological conditions in all terrestrial and aquatic systems; no information on the shallow or deep groundwater conditions; no information on the amount of mining exploratory drilling and drilling in associated with any past mining activity that has taken place in this landscape; and other gaping information deficiencies. This is despite both new road bulldozing, bulldozing of over 11 miles of closed “temporary” roads, the proximity of drill pads to riparian areas (including 2 drill sites right inside RHCAs). There is also no careful mapping of all riparian and mesic sites which may have high water tables. There is no analysis of the type of springs that are present, and no assessment of if they are dependent on deeper groundwater, snowmelt information and other essential baseline data. Moreover, BLM never explains the situation with the closed roads. Were these closed and supposed to be rehabbed for watershed and species protection following a previous mining exploration bout? Or were they built for logging/deforestation projects? If this is the case, doesn’t this destroy any “mitigation” that was claimed to accompany that rehab?

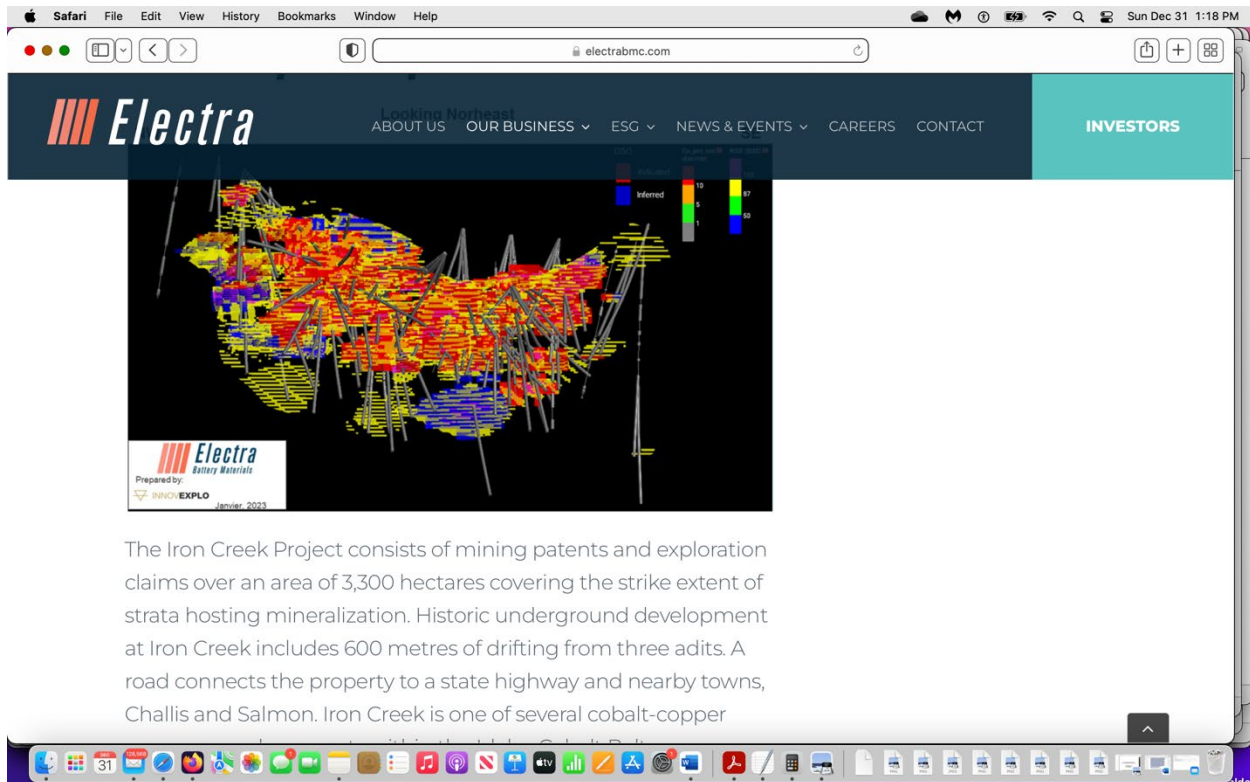
It is critical that baseline spring, seep and stream flows be monitored over the course of multiple years and that all historical data be used to determine trends in flows and to establish a pre-drilling baseline. This is also necessary to understand where past drilling and mining may have occurred, where past pollutants may be present, and the EA is greatly deficient in describing past mining drilling and development here in site-specific detail. It is also greatly deficient in mapping and providing details on all cobalt, copper, gold or other mining claims in this region, including across the land areas that is termed “the Idaho cobalt belt”.

From a bragging mining company website:

(Is ICC now Elctra?)



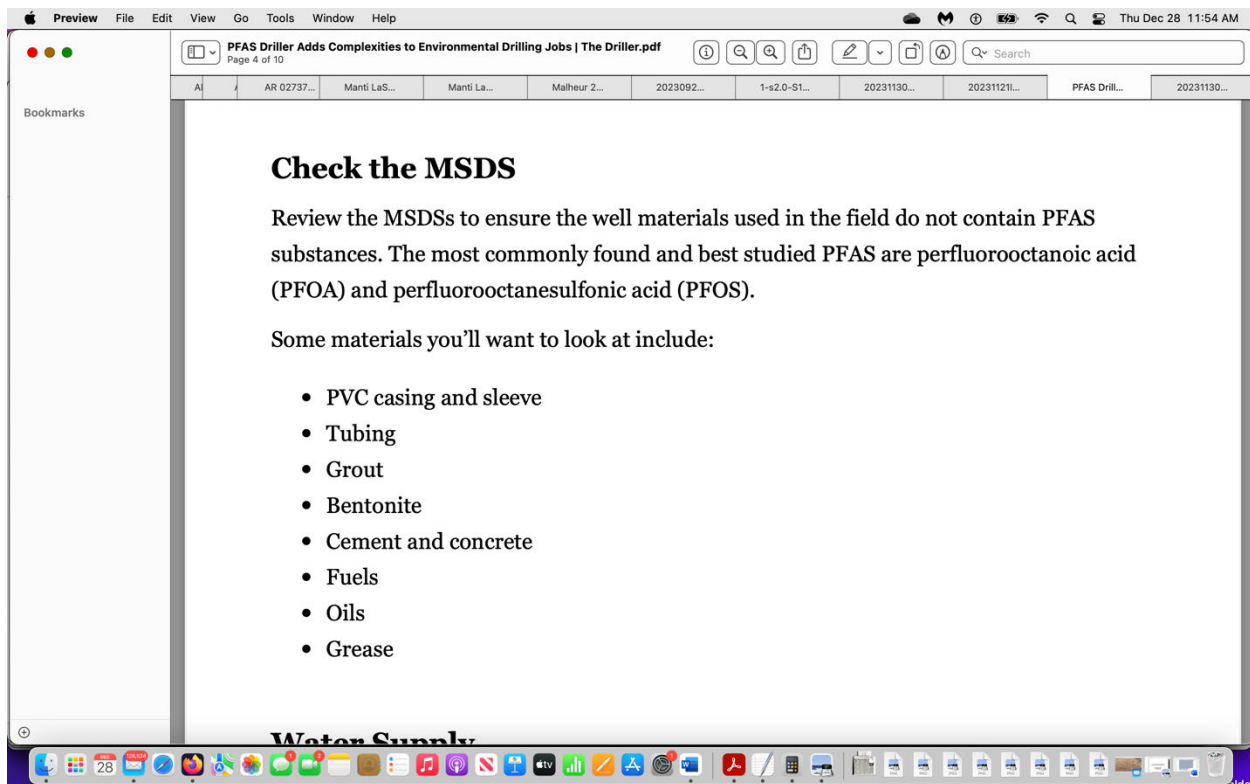
The screenshot shows the Electra website in a Safari browser window. The website has a dark blue header with the Electra logo on the left and navigation links (ABOUT US, OUR BUSINESS, ESG, NEWS & EVENTS, CAREERS, CONTACT) in the center. A teal button labeled "INVESTORS" is on the right. Below the header, a large green plus sign is followed by the text "A long and rich mining history and supportive state policies" and "IDAHO, USA" in bold. To the right of this text is a map of Idaho with a red box highlighting the "Idaho Cobalt Belt" region. A zoomed-in view of this region is shown to the right, with labels for "Blackbird", "Iron Creek", "Salmon", "Challis", and "Idaho Cobalt Belt". A scale bar indicates 10 km. Below the map, text reads: "Idaho is home to the largest cobalt belt in the United States, including the former producing Blackbird Mine that was in operation from 1902 – 1968. Multiple additional occurrences of cobalt occur throughout the belt which have seen overall limited exploration."



All of this ties into a proper assessment of cumulative impacts including foreseeable additional mining disturbance in the Iron Creek and surrounding watersheds tributary to the Salmon River and ESA-listed species habitats. impacts over the time period this that drilling may take, and to understand the severity of the footprint of mining disturbance in watersheds as well as a huge potential zone of displacement of Wolverine and other rare carnivores. There is a significant concern that drilling, road construction, and other exploration activity will impair or alter groundwater and surface expression of water flows.

We Object, and are dismayed, that the FS fails to provide any necessary seasonal and spatial avoidance for habitats of importance for all terrestrial animals of importance, all sensitive species, all ESA-listed species.

We Object that the EA has not considered and has failed to adequately reveal and assess the impacts of all potentially harmful polluting or hazardous substances that may be involved in this drilling operation and potential pollution (including by drilling in RHCAs and areas with high water tables or where erosional runoff may occur) if PFAS/PFOS “forever chemicals” will be used as any part of the drilling operation. If so, what may be the potential water pollution and contamination impacts of this – as drilling substances may use these chemicals – and pollute designated critical habitat for aquatic species. As the drilling trade journal “The Driller” reports:



We Object to the failure of the USFS to prohibit use of any PFOS/PFAS material in drilling in this very significant landscape.

We Object to the failure to reveal the direct, indirect and cumulative impacts of drilling 6 drill holes per drill pad. This sure seems like it will weaken underlying strata and any shallow water lenses or perched or other type of fragile aquifer layers, by drilling so many in close proximity and increase risk of failure to effectively plug drill holes., This means under the FD there will be $91 \times 6 = 546$ drill holes. We also object to the failure to reveal the depths any drilling will go, and to reveal in the EA if horizontal drilling may take place and to prohibit horizontal drilling. See: <https://miningmagazine.com.au/horizontal-directional-drilling-the-next-big-thing-in-mining/#:~:text=Horizontal%20directional%20drilling%20provides%20explorers,good%20news%20for%20the%20industry>

The FS stated:

“ICC would prepare 92 drill pads [now apparently 91], each to accommodate up to 6 drill holes, along existing Forest System roads (open and closed) and temporary roads. Drill pads will be approximately 40 feet by 60 feet each. Drill pads will be constructed within existing road disturbance to the extent possible, except where traffic passage, topography and drilling targets require additional disturbance to achieve objectives safely. Drill pads proposed on steep hillsides may be constructed with timber and wood to reduce grading and deposition of soil to build earthen pads”.

We Object that the EA analysis fails to specify dimensional size limits to drill site and drilling extent disturbance at each site showing on the mapping (both drilling depth as well as horizontal drilling if this is used path and extent), and ICC must be required to comply with this.

We Object that the EA does not adequately control drilling to both monitor and prevent groundwater contamination. See: <https://ausearthed.com.au/wp-content/uploads/2020/06/Mining-Impact-and-Rehabilitation-Presentation-Notes.pdf>. “Groundwater may be contaminated by gases and chemicals used in onshore drilling”.

We Object that the EA does not address the considerable seismic activity in recent years in the Salmon-Challis Forest and look at how that may affect the road expansion and drilling operation impacts, drill hole closures, or de-stabilize slopes cut into by bulldozers.

We Object that the rosy analyses in the aquatic BA and EA fail to effectively grapple with how steep and rugged this country is. How steep are all hillsides impacted? How erosion-prone will slopes be before bulldozing vs. after?

We Object that the USFS has failed to adequately address concerns that the drilling activity, cutting down trees, road maintenance, bulldozing and other activity will scar and injure trees so they produce copious sap that attracts forest insects and foster forest pathogens – creating large-scale new “forest health” problems that the SCNF then will use as justification to “treat” vast areas of the SCNF. Full baseline inventories of forest vegetation ecological conditions across this landscape must take place as part of a revised NEPA analysis. – so the USFS can understand how drilling disturbance and impacts to the forest ecosystem may make sites vulnerable to forest diseases and insects. Where are there currently forest pathogens and insect “problems”- as a baseline? We fully incorporate the ecological concerns raised in the attached series of our comments on the SCNF Prescribed Fire EA, the Stormy logging Project, the Bayhorse logging/treatment Project and other attached comments and documents into this Objection. These and many other drastic “treatment”/logging and roading disturbance actions are part of the welter of harmful cumulative effects that native salmonids, Wolverine, migratory birds and other wildlife face in the SCNF that has in recent years authorized and/or is contemplating a treatment frenzy.

The large-scale losses of habitats that the massive treatment projects the FS is proposing must be assessed for indirect and cumulative effect, and so must the effects of the moose Fire and other recent wildfires.

There are a host of mining exploration projects across the SCNF. We fully incorporate our comments on BTAC and other recent SCNF mining explo “boom” projects.

RE: Sumps. The FS states:

“Sumps will be constructed with escape ramps, flagged, and barricaded with fencing to prevent accidental falls, deter wildlife and prevent cattle entry until each is backfilled to the original surface grade. [It is highly likely cows and/or weather will break down this flimsy fencing, and heighten risk of wildlife drowning. See photo of

Typical state of orange drowning-prevention netting after its been up a little while - such this on WLD observed on Vale BLM lands Lithium drilling exploration project in 2022.





Also note vile discolored drill site water. As we describe below, the FS must fully analyze alternatives requiring all waste water be placed in an enclosed tank and hauled to suitable disposal site NOT on USFS lands, is a reasonable and prudent wildlife minimization and avoidance action.

We Object that the FS does not require that all drill water be contained in tanks, and not left to pollute soil, water, or drown or harm wildlife.

The FS states: Drilling procedures will be managed to control cuttings and prevent the discharge of drill fluids off the drill site with the use of berms and sumps. [Put this vile water in a tank and haul it away to a proper disposal site]. The duration of drilling at each site could vary by location and range between several days and one or two months. Drill sites may be utilized in more than one phase and will be reclaimed when drilling is complete. [This all must be clearly defined pre-decisionally – and a specific sequence of actions put in place. Given potential old mine adits, there is a likelihood of rare bats, which could drown in these vile sumps and/or be harmed by night-time drilling].

ICC would operate as follows:

1. Locate drill pads outside of sensitive areas such as riparian areas or wetlands except in 4 instances where effective mitigation measures will be used. [We Object that there is no information provided to date on baseline rare species surveys for all

important/sensitive/imperiled species, cultural and historical site, visual values, wild land values, water quality, historic mining impacts and potential site contamination, potential toxic minerals, etc. Sites were already laid out without any consideration for this all – the FS must go back to the drawing board and FIRST conduct baseline studies, then determine any drill site and road construction activity locations. We Object that this has not been done].

2. Manage surface water run-off by utilizing BMPs such as silt fencing, straw waddles, water bars, rolling dips, and sumps. [We Object that the FS has not taken a hard look at the pollution and other risks - as sumps fail, wattles fail, water bars can cause additional problems – a specific set of actions for each of the drill sites must be identified and mandated if effective adverse impact minimization is to occur]. These BMPs will be utilized on new construction areas and field fit based on topography, landscape, and the vicinity to surface water. Use erosion control products made from 100% biodegradable non-plastic materials that either does not contain netting, or netting is non-plastic and loose weave. [We Object that there has not been detailed site characteristic mapping for all drill sites and roads as part of the NEPA analysis].

3. Allow water collected in sumps to infiltrate or evaporate prior to reclaiming the excavated sump. [Again, we Object that the FS allows the mining company to pollute FS lands with vile water and does not require that it be hauled away, including not even considering this under an alternative action. This would reduce disturbance, pollution/contamination of soil/air/water and conflicts with wildlife exposure or drowning].

4. In the event of a potential overfilling of the sump of excessive drill water, contingency plans will be in place to address and mitigate the sump water balance. Drilling will cease until containment conditions in the sump improve. Contingency actions would include excavating another sump, adding one or more portable sumps, and/or using a portable water treatment system to recycle water back into the drill hole. [Solve this by requiring all water/liquid muck to be hauled away].

5. Avoid removing snag trees during drill site construction, when possible. [How many snag trees will be removed, how large are they and where are they located at each drill site or road bulldozing area – including any widening of closed temporary roads? Simply shift drill site locations a bit to preserve snag trees – the FS can't just sit back and let the mining company get everything they want. Why can't this be solved with adjustment of site location, and no removal of snag trees be allowed?? Please overlay the blank background map with aerial photos of forest, shrub or other cover and also please provide detailed mapping analysis of vegetation cover and forest types across the surrounding landscape, and assess how much fragmentation of all vegetation communities currently exists here. How many sites of mature or old growth forested and/or shrub veg will be disturbed, and can any drill sites including by reducing the number of sites be located in existing disturbed areas? Given the massive highly disturbing vegetation treatments the FS has authorized (such as the massive Fire EA) and/or is proposing, the FS must establish a baseline of the current degree of forest loss and loss of snag and mature and old growth forest habitats. What are the avian species, bats, native carnivores – that may use snag or hollow trees? We Object to this lack of careful hard look analysis].

6. Avoid drilling locations that impact known populations of sensitive plant species. [We Object that this and other project controls are not mandatory – and the FS must use mandatory language. Full and detailed current inventories for all sensitive plant and animal species, as well as all exotic plant infestations at present must be conducted and presented to the public in a report in this process so the public can effectively comment on this action, and so the agency can determine the significance of this disturbance. How will this project expand noxious and

flammable weeds in this landscape, and where do these species currently exist and in what density – for example, along or near access routes and drill sites and in the vicinity of sensitive species habitats. Note that many weeds are likely to increase under climate stress, and climate stress is also likely to make lands less resilient and less able to recover and be properly rehabbed – thus bond amounts must be increased, and disturbance minimized to the maximum extent possible. We Object that this essential hard look science-based NEPA analysis and information is lacking].

7. Notify the Forest Service if rare or sensitive plants including pink dandelion (pink agoseris), are encountered. The Forest Service will work with the Operator to avoid impacts to sensitive plant populations. [We Object that the necessary thorough pre-decisional surveys and prohibition on mining disturbance activity in pink agoseris habitat may not have taken place].

8. Locate staging areas in an area free of weeds and minimize travel through weed-infested areas. [We Object that the FS documents lack basic information on the current and foreseeable extent of weed species - noxious, exotic flammable annuals, etc. How will all site disturbance activity impact weed proliferation spread, and site dominance, and what will the ecological effects of all this prolonged 10 year road use and drilling disturbance actually be?]

9. Lighting would be shielded and angled downward. [Again, a full range of alternatives including prohibiting all night time drilling, must be assessed in this wild Dark Sky area. Lights will lure in and kill insects, and potentially lure rare bats to lighted areas near sumps where they may drown in sumps – including as bats attempt to forage on drowning insects. Lights have a very adverse effect on migratory birds as well].

10. Use environmentally friendly, non-toxic to aquatic organisms, drilling fluids. [WHAT are these, and how has the USFS verified they are non-toxic? We Object to the failure to specify in detail what specific fluids will be used, and all chemical components the specific drilling fluid to be used contain. Will any underground explosives or fracking-type actions take place? And again, will there be PFAS/PFOS in any drilling fluids? Or mixed in with bentonite?].

11. Cease all operations in the event a terrestrial or avian wildlife sensitive species or ESA species active den, nest, or maternity colony or individual is found in or near the Project Area during implementation and report to the Forest Service. [We Object that the FS has not defined what “near” is, and that thorough baseline multi-year surveys must be conducted over all periods of the year must be undertaken prior to any authorization and must be incorporated into an EIS-level NEPA analysis here. Full analysis of species current habitat occurrence, quality, quantity and degree of existing fragmentation in this landscape must occur as part of this NEPA process. Further, the FS allows bulldozing habitat during the nesting/birthing season for migratory birds and other native wildlife – so this whole claim of avoidance is a sham, and “take” is certain unless activity is prohibited in spring-early summer].

12. Notify the Forest Service, within 24 hours, if a Threatened, Endangered or Sensitive wildlife species, large carnivore, or large raptor including dens and nests is found in or near the Project Area”. [Again, intensive pre-decisional inventories must take place and exploration disturbance activity must be limited to fall day time activity only to protect rare species and to limit wildfire start potential. How much could activities listed in Scoping Notice Table 2 and project disturbance be reduced if helicopter drilling was authorized? We Object that the FS has not conducted a hard look NEPA analysis, and has not addressed alternative minimization and mitigation actions to protect sensitive and imperiled species, migratory birds, big game, rare native carnivores, watersheds, water quality, and public recreational uses and enjoyment].

The USFS stated:

“ICC will draft surface water according to the following requirements:

2. Use withdrawal rates that will not remove more than 25% of stream flow to reduce the possibility of stranding fish. We Object to the failure to provide current flow rates for all seasons of the year, and the failure to identify intermittent, ephemeral and perennial reaches in the systems where this water will be removed. We Object to the FS allowing water removal during spawning periods and when salmonid redds may be present in these drainage network stream systems. What is the spawning period for Bull Trout? For Chinook? For Steelhead? We also Object that the USFS places no limit on water removal during drought conditions].

3. Conduct water drafting activities in such a way that they do not physically block fish migration or reduce stream flows to the point that the activity prevents fish migration. [We Object that there is not adequate aquatic habitat and riparian baseline information provided on each specific site where water will be removed and on the current cobble embeddedness and other data on current aquatic habitat conditions at, and upstream and downstream from water removal sites].

4. Use water for drilling from the approved locations. Place pumps in approved containment with absorbent pads.

5. Adhere to National Marine Fisheries Service (NMFS) requirements for screening of water drafting equipment. The intake hose will be screened at 3/32-inch diameter and approach velocities will not exceed 0.2 feet per second according to NMFS fish screen criteria (NMFS 1996). Submerge intake screens to a depth of at least one screen radius. Attach screens to all pumps in Salmon-Challis National Forest waters even if listed fish are absent. Screen mesh must be in good condition and present a sealed, positive barrier effectively preventing entry of fish into the intake.

6. Place pump intake screens in locations with sufficient velocity to sweep away debris. Intake screens should be submerged to a depth of at least one screen radius (NMFS 1996). Larger surface areas are recommended where debris buildup is anticipated, and where stream depth is inadequate to fully submerge the screen. [We Object to the FS failing to assess potential churning or disturbance of sediment - damage to banks as well as disturbance to stream bottom sediment].

7. Configure water impoundments to allow for upstream and downstream aquatic vertebrate (i.e. fish and amphibian) passage around the structure”. [We strongly oppose allowing any water impoundments – as there is risk of violent storm runoff, sediment flushing downstream smothering redds or clogging stream substrates, etc.].

The FS must identify exact specific areas in streams with no sensitive or ESA-listed aquatic species present in the watersheds. Which streams are these? Why can't the miners alternatively be required to haul water from town? We Object to the failure to consider alternatives.

The FS now states that there will be 2 drill sites will be in RHCAs. There is no essential “need” for drilling in RHCAs. This will also result in veg clearing as well as contamination of ground water or surface water. Simply prohibit any RHCA drilling. The SCNF increasingly treats RHCAs - including in its scorched earth “fuels” and logging projects – as disposable sacrifice areas and subjects them to serious disturbance – and USFWS in consultation just goes along with this damage. Also, the USFS has never identified where significant deleterious cattle grazing

impacts may be present in these stream systems and watersheds. This must be fully assessed, and a full current ecological assessment of cattle impacts on both upland and riparian areas must take place – as actions associated with the project will expand areas of easy cattle access – for example, along all the project roading and all the flat bulldozed off drill site areas. We Object to the lack of hard look analysis at the baseline and foreseeably expanded and extended livestock grazing impacts, and lack of a hard look at the role of grazing in causing ecological degradation, part of the cumulative threats to aquatic and terrestrial biota in these watersheds.

While the FS refers to plugging drill holes – please conduct detailed analysis of the full range of environmental risks associated with the proposed actions in this very earth-quake prone region and how seismic activity may impact drill holes, impacts to water tables, foreseeable reductions or loss in surface flows – including from the combined effects, etc.

We Object to the failure to provide detailed hard look NEPA analysis information and am hard look at the foreseeable risk and environmental damage from this project (including by potentially polluting soil, water, veg with PFAS or drilling hole plugs or structure failing so surface expression of water flows connected to shallow groundwater are altered, or stirring up toxic sediments from past mining activity, etc. This is necessary so that a bond amount can be knowledgeably established. We propose several million dollars must be specified – including one that relies on worst-case scenarios and accidents, and this must be posted prior to any final decision under NEPA.

Where are all active cobalt and other mining claims in the Salmon-Challis Forest? Please provide detailed mapping and analysis. We Object to the failure to provide this information and to take a hard look at all the authorized, proposed and foreseeable drilling and mining activity during this “boom”. This includes a hard look analysis at all historical mine sites and hazardous pollution and other impacts – such as that of the Blackbird mine.

We Object to the lack of a hard look at the following: Where are all authorized and/or foreseeable cobalt, gold and other mining exploration projects in the Salmon-Challis Forest at present, and how much Wolverine habitat do they pierce, overlap and disturb? How close is this site large-scale new disturbance to the greenwashed current cobalt mining activity taking place? How has that activity already deviated from plans laid out in its POO and NEPA documentation? See for example:

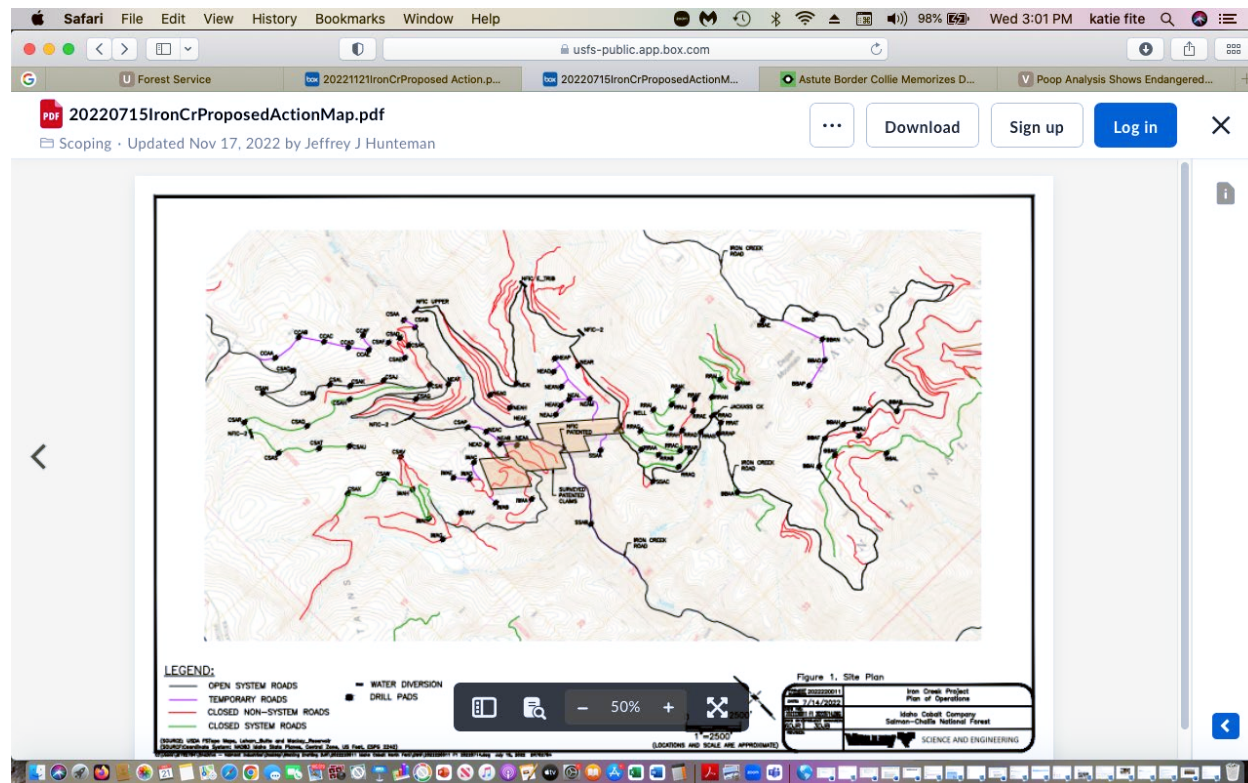
Cobalt mine located in region of Blackbird toxic mine and superfund site:

<https://www.ktvb.com/article/news/local/idaho/cobalt-mine-officially-opening-in-salmon-challis-national-forest-on-friday/277-97754b09-5fe2-4fd0-b1a4-83d274234e9d>

Where will all gravel and other material from roads leading to, or associated with, the project area come from? How much disturbance will that entail? What will be those adverse impacts on sensitive and important species habitats and populations, watersheds, clean water, public recreational uses and safety, visual setting, etc. of new or expanded gravel pits? Will ugly new permanent scaring “borrow pits” and gravel pits be developed on USFS land and if so, where? We Object the lack of NEPA analysis of these sites and their impacts.

How much energy will this project consume? What will be the carbon footprint of this extreme amount of exploration activity? We Object to the lack of detailed hard look analysis.

Project mapping shows the activity will massively tear up, de-stabilize soils and expose soils to extensive erosion in wind and water over a large land area. These impacts will be permanent and irreversible. We Object that the USFS has not provided necessary visual, erosion, and other analyses necessary to understand the full scale of adverse impacts.



In the above mapping from the USFS, the reddish colors are very difficult to distinguish. Please provide much clearer mapping, and detailed information on the current status of all routes – new, old, closed, not closed. We Object to the failure to address significant concerns about route proliferation, road densities, how opening closed routes undermines any past mitigation for projects, compliance with travel plans pr route closures the number and location of unauthorized routes in the RD, etc. The SCNF released an initial Moose Fire report, and there are a huge number of unauthorized routes in that fire area - and this comports with our observations across much of the SCNF. This bodes poorly for the FS being able to close routes and gashes bulldozed as part of the exploration project – and is another reason why helicopter drilling must be conducted. We Object to the failure to effectively examine and control significant road-route-related environmental conflicts.

The FS documents are silent on past mine harms in this region. See for example:

https://www.idahogeology.org/pub/Staff_Reports/2014/S-14-4_Intro_Summary.pdf

Mitchell and Bennett Idaho abandoned mines Report.

Table 1-1 (continued). High priority mines in the Region IV forests.

Forest	Site No.	Name	Section in Report	Problems at Site and/or Comments
Payette	EC 827	Snowshoe Mine	5Di	open decline, tailings.
Sawtooth	HA 276	June Day Mine	8Aiii	open shaft.
Salmon	DI 140	Harmony Mine	6Bii	tailings.
Payette	GR 298	Copper Cliff Mine	5Ai	reclamation in progress; this should be monitored carefully.
Sawtooth	HA 108	Solid Muldoon Mine	8Avii	acid drainage.
Salmon	CH 1135	North Fork Iron Creek	6Biii	mine waste.
Challis	CH 840	Springfield Scheelite Mine	4Ai	acid drainage, mine waste, tailings.

We Object that the FS has not adequately addressed the situation with the North Fork Iron Creek mine waste – it’s toxicity, effects on ground and surface water quality, material erosion in wind as dust, the site’s stability, the materials it is contaminated with, etc.

https://www.postregister.com/messenger/news/comment-sought-on-improper-mine-discharge/article_6fbadc98-165d-53d8-b489-a1115747584c.html

The Idaho Department of Environmental Quality has prepared a consent order that directs Idaho Cobalt Co. to apply for a pollutant discharge elimination system permit or stop improperly discharging from the mine in Lemhi County. The consent order requires that the cobalt company develop an engineering report, a monitoring plan and a maintenance and operations plan related to any future discharges. The DEQ also fined Idaho Cobalt Co. \$95,110. The department reduced its original fine of \$169,840 by 20 percent “as a result of Idaho Cobalt’s unique factors and good faith efforts to resolve” the violations and prevent further occurrences.

According to the DEQ, Idaho Cobalt Co. had not applied for, nor been issued, a discharge permit when DEQ personnel found the discharge on July 17, 2019. DEQ personnel conducted an inspection after receiving a complaint about it on July 11, 2019”.

This appears to be the same ICC that the USFS seeks to reward with this major exploration project even allowing new road construction, roads that are supposed to be closed to be open, and 24 hour a day year-round major new disturbance, snow plowing that will allow increased

human disturbance to wildlife, all in Wolverine and other rare species habitats and designated anadromous fish habitats.

AND: *“The discharge directly into the creek was through a PVC pipe that runs in a ditch alongside a dirt road. It exits the pipe and flows in the ditch through several bales of straw to a culvert that flows into Iron Creek, according to the DEQ’s findings and conclusions in the matter.*

The second adit, a surface discharge, flowed from the mine via a PVC pipe which emptied on a hillside that flowed downhill toward the North Fork of Iron Creek. DEQ personnel “did not confirm whether the flow reached the North Fork of Iron Creek at the time of inspection,” the document states. When DEQ personnel inspected the site again on Oct. 6, 2020, they found an additional 50 feet of pipe had been added to the line, but it was still not clear if the discharge reached Iron Creek. Iron Creek is a tributary of the Salmon River.

DEQ officials spoke with Frank Santaguida, Idaho Cobalt’s vice president of exploration, on Oct. 24, 2019, about the alleged violations and served the cobalt company with a notice of violation in February 2020. “Due to circumstances surrounding the coronavirus pandemic, the first (notice of violation) was not received,” the DEQ report states. DEQ personnel then sent the notice to a different address which Idaho Cobalt personnel received on May 20, 2020 ...”.

At least three online meetings and phone calls were held between personnel from the DEQ and Idaho Cobalt between July 16, 2020, and June 2021.

Ultimately, “to resolve this matter without litigation or further controversy, and without admitting to any of the violations” Idaho Cobalt agreed to DEQ terms, the DEQ report states. Those include applying for a discharge permit, completing and submitting an engineering report that addresses and eliminates the violations, submitting a second engineering report that includes a schedule for completing all work by July 1, 2023, submitting a water monitoring quality assurance project plan and conducting sampling. The cobalt company is also required to submit annual reports by Jan. 31 of each year that account for the two adits, contain analytical results of sampling and update progress on the required wastewater treatment facility”.

This appears to be rather a scofflaw operation. What has been going on with treatment and other required actions since the ICC mining operation shut down?

We raised the issue of Iron Creek with the high priority FS project list – yet there has been no analysis of the potential pollution disturbance of older mine wastes, or the hazards of cobalt mining, the locations of all adits, the locations of all ditches running along dirt roads, etc. - including any in proximity to the 91 drill sites and routes. Much more detailed mapping and analysis of all existing mining impacts and their environmental effects – including the amount of underground potential de-stabilization.

Note that a much-ballyhooed and subsidized Jervois cobalt mine recently opened then quickly shut down in this region. This situation with ICC pollution and with the Jervois mine in the same

region further demonstrates the need for a very large bond for this drilling operation— lest the company “cut and run”.

ICC’s actions here demonstrate the need for a very significant bond in association with the proposed drilling activity. It also shows the need for all waste-water to be placed in tanks and hauled to a disposal site – not be left to soak in vile sumps (potentially also contaminated with PFAS/PFOS and other harmful substances associated with drilling operation) and pollute the forest soils and waters, and potentially drown rare bats and other wildlife.

Here is new information about the Jervois mine shutting down:

<https://www.npr.org/2023/12/14/1219246964/cobalt-is-important-for-green-energy-so-why-has-americas-only-coablt-mine-closed>

“ ... What wasn't so typical? To get to this ribbon cutting, people had to fly across the country and brave 30 miles of unpaved switch-backed roads, to get to a remote mine, 8,000 feet up in Idaho's Salmon River Mountains, near the border with Montana.

The Middle of Nowhere, Idaho.

"I'm really stoked to be here," said Arthur Sinodinos, who was Australian Ambassador to the US. "I'm out in the middle of nowhere in Idaho with some of my best friends for the opening of their cobalt Mine."

See also: https://www.postregister.com/messenger/news/jervois-shuts-down-idaho-cobalt-mine/article_efd97f32-d015-11ed-9424-bfb28220210c.html

“In a news release, Jervois officials blamed low cobalt prices, inflation and the mine’s remote location for the shutdown. The release said “Jervois expects to complete construction of and commission” the mine when cobalt prices recover.

Lay-offs of contract workers at the Jervois operation began immediately after the March 28 announcement. Before the announcement, there were about 75 Jervois employees and about 200 contract workers at the mine. When all the layoffs are completed, which should be within a week or so, 30 people will remain employed there, the release states. If a federal grant the company applied for is awarded, Jervois said “where practical,” laid-off Jervois workers would be rehired to do the work associated with the grant-funded projects”.

This major ICC exploration disturbance will also fragment and destroy wildlife habitats, and provide copious surfaces for invasive weeds. Forest clearing and other project disturbance activity will also result in hotter, drier, windier, weedier and more fire-prone sites – and fire danger is another reason that this drilling and all parts of exploration activity must be limited to fall. We Object to the failure to take a hard look at these risks, and prohibit activity in high fire risk periods.

The FS must fully consider alternatives to limit any activity to the fall time period only and to require helicopter drilling for all areas not immediately adjacent to/touching existing improved routes. Full scale visual, biological and other analyses must be undertaken, and given the scale and scope of this activity, an EIS is necessary to assess all direct, indirect, cumulative, additive and synergistic environmental impacts, and to take a careful and hard look at the combined effects of the plethora of cobalt, copper, gold and other mining explo and development proposals that are authorized and/or foreseeable in this region. We Object to the failure to conduct an EIS - given the speculation with the mining and exploration boom taking place – note that miners often use speculation on exploration to gain funds and exploration and speculation is now rampant in “the Idaho cobalt Belt” with uncertain effects on fish/wildlife/groundwater/surface water and a host of public recreational uses; the massive FS “treatment” disturbance footprint in the SCNF destroying and fragmenting rare native carnivore, sensitive species, migratory bird, anadromous fish and bull trout watersheds and other habitats, Wolverine ESA listing, and the added stresses of climate change on the area’s aquatic and terrestrial species and water sustainability and quality. We Object that the USFS has not conducted hard look analysis necessary to properly control and minimize this mining activity degradation.

Again, there is an absence of even the most basic information required for soliciting public comments – such as IRAs, ESA-listed species watersheds, current surveys for native terrestrial carnivores and nesting migratory birds, current information on the visual setting and visual qualities, current amount of grazing disturbance and degradation to these watersheds and species habitats, etc. We Object to this.

Full and detailed hydrogeological studies must take place: Is the groundwater system replenished annually through snowmelt with precipitation and run-off infiltrating through porous rock where it finds flow pathways through geological contacts and/or structural features? What are the characteristics of all springs, seeps, intermittent and ephemeral drainages in the affected watershed areas? What are the soil and rock types, and how porous are these materials? Is there waste from previous mining activity in this area or affected watersheds? We Object that these significant environmental concerns have not undergone a hard look analysis.

We are concerned that groundwater will be impacted by the disposal of drilling wastes in the drill pits/sumps. As the USFS admitted in its Caribou-Targhee Kilgore Exploration Project EA: “A common concern is the potential for high-sulfide drill cuttings contained in the mud to generate acid rock drainage and/or leach metals which might then migrate into shallow groundwater ...”.

We Object that the FS has not conducted detailed aquifer and runoff analyses to determine the effects of dumping drill waste and also of potential hazardous substances exposed by all components of this mining exploration disturbance to soils, veg, biocrusts and watersheds. Then it must use this information to reduce and/or eliminate any sumps and drill sites in contamination-susceptible soils, riparian soils, or other vulnerable sites. Drilling/sumps/explo disturbance must be prohibited in these areas. Impacts from the dumping of drill wastes on the surface have been documented. There is no research to definitively demonstrate that sumps either

do or do not contaminate groundwater supplies. The USFS must take a hard look to see if the material in the drill pits may contaminate surface or groundwater.

Fluids in the sumps would be permitted to evaporate and infiltrate prior to closure and reclamation. We Object that the USFS does not provide adequate water quality monitoring of the project area streams sufficient to provide regular checks on surface water quality.” This ignores that summer thunderstorm or other extreme storm events, winter snowmelt including rain-on-snow events, and other extreme weather events that are predicted to increase under climate change stress may cause contamination and pollution in surface and/or ground waters.

Rainfall/snow/snowmelt will perpetually infiltrate this material. Some leaching of the material in these pits will be inevitable. The FS must fully assess and act to require taking drill cuttings for offsite disposal, as has been employed at many exploration drill sites over the years. Covered water storage containers must be used instead of sumps, particularly in areas with steep hillsides where sumps could compromise hillside integrity or where accidental sump overflows could result in drilling fluids reaching streams, and all water hauled to a toxic material disposal site. We again Object to the failure to conduct necessary analysis and to effectively control harms. Baseline Water Quality and Quantity Studies must be conducted. Mineralized areas often contain naturally occurring contaminants of concern such as arsenic. There are very serious pollution concerns associated with cobalt mining- as evidenced by the Blackbird mine situation. These contaminants may be securely bound within the surrounding rock matrix/material or may be leaching into groundwater.

Exploration drilling can affect groundwater resources. Aquifers can be vulnerable to degradation during and following exploration drilling in many ways:

- Contamination through open boreholes by run-off water from the surface
- Separate aquifers could become interconnected through drillholes. [This is a major concern and the USFS fails to effectively address it – and instead would allow 6 drill holes per drill site, and horizontal drilling it appears.]
- Cross-flow between aquifers may be induced by natural pressure differences or pressure differentials induced by pumping.
- Contamination by certain types of drilling fluids.

The pressure from a water column in deep drill holes may be sufficient pressure to cause hydraulic fracturing, especially with fractures already present in the rock. If water loss occurs in the lower part of the hole, it is unclear which aquifers it contaminates.

We Object that the EA does not effectively address and take a balanced hard look at all of these preceding concerns about drilling effects on groundwater that we have raised.

Comments submitted to the SCNF on the SCNF BTAC EA included “... *high pressurized drilling activities in the vicinity of the Glory Hole at the Stibnite area on the Payette National Forest resulted in at least one case in drilling fluids moving laterally through fractured bedrock, exiting the sides of the abandoned mine pit, and entering the East Fork South Fork Salmon below. The close proximity of the Salmon River to the drill sites and steep terrain raises*

concerns that a similar event could occur here and the Forest Service should incorporate additional design features to address this”.

The SCNF must ensure no adverse changes or impacts to groundwater as a result of drilling operations and, as a result, that there is a need for a groundwater baseline study. We Object to the failure to do so.

Please require detailed analysis of the depth all drill holes will be drilled to – and place limitations on this, and potential strata, water tables, aquifers, mineral types (including potentially toxic minerals like arsenic), etc. that may be encountered, and please deny any drill sites in areas of concern for degradation and/or contamination. Please require drill logs tracking the depth to bedrock, the water table and losses in drilling fluid from bedrock fractures.

Is the USFS assuming that well closing would eliminate groundwater contamination issues? If so, how has the FS factored earthquake effects in this very seismically active area into its assumptions? Note that the SCNF has claimed that past earthquakes have significantly altered surface expression of springs – and some have dried up entirely. Earthquake activity could wreak havoc on separation of drill holes, cause seepage through strata, harms to aquifers, and ultimately adverse effects to springs, seeps, streams and habitats they provide in this ESA-listed species watersheds. We Object that the FS has not adequately addressed and controlled all the significant risks we raise about drill holes strata, water tables, contamination, etc.

Further the crazy year-round 24 hour a day drilling activity will also result in snow plowing and further disruption of precipitation infiltration, and so will new “temporary” route construction.

How will the FS effectively monitor and prevent contamination that could occur during drilling operations and before bore holes are sealed?

The Forest Service is required to “describe the environment of the areas to be affected or created by the alternatives under consideration.” 40 C.F.R. § 1502.15. The establishment of the baseline conditions of the affected environment is a fundamental requirement of the NEPA process: NEPA clearly requires that consideration of environmental impacts of proposed projects take place before [a final decision] is made.” [LaFlamme v. FERC, 842 F.2d 1063, 1071 \(9th Cir.1988\)](#) (emphasis in original). Once a project begins, the “pre-project environment” becomes a thing of the past, thereby making evaluation of the project's effect on pre-project resources impossible. *Id.* Without establishing the baseline conditions which exist in the vicinity ... before [the project] begins, there is simply no way to determine what effect the proposed [project] will have on the environment and, consequently, no way to comply with NEPA. *Half Moon Bay Fisherman’s Mark’t Ass’n v. Carlucci, 857 F.2d 505, 510 (9th Cir. 1988)* (emphasis added). “In analyzing the affected environment, NEPA requires the agency to set forth the baseline conditions.” *Western Watersheds Project v. BLM, 552 F.Supp.2d 1113, 1126 (D. Nev. 2008)* (emphasis added). “The concept of a baseline against which to compare predictions of the effects of the proposed action and reasonable alternatives is critical to the NEPA process.” Council of Environmental Quality, *Considering Cumulative Effects under the National Environmental Policy Act* (May 11, 1999).

The Forest Service must: Conduct baseline surface and groundwater water quality sampling upgradient of, within and downgradient of the project area; determine and describe all monitoring locations; require frequent comprehensive testing; fully assess and vet the efficacy of any testing methods to be used; identify specific sideboards and triggers for additional actions and specific required steps and actions if environmental triggers are tripped.

The FS must conduct baseline water quality sampling as part of this NEPA process. It must require comprehensive groundwater studies – and map and sample groundwater and springs/seeps/intermittent and perennial drainages and flow rates. The FS must require any changes in water chemistry, water quantity and water quantity be addressed and information provided to the public in a timely manner.

How will the FS ensure adequate and effective state of the art minimization and mitigation of project harms? What irretrievable and irreversible impacts could foreseeably result? What happens if a spring or springs dries up completely as a result of this drilling activity?

Please provide three or more years of this baseline sampling in all drainages where drilling is occurring, prior to proceeding any further with the NEPA analysis. We Object that this has not been done.

The Forest Service consultation with U.S. Fish and Wildlife Service and NOAA Fisheries to evaluate the effects of this exploration project on fish and amphibian species inhabiting this watershed, and impacts to Wolverine (now listed as Threatened under the ESA) and Canada Lynx, other rare native carnivores is required. The info to date in the aquatic report is greatly deficient in addressing the myriad ecological concerns about mining drilling and other cumulative disturbances in these watersheds and habitats. We Object to this, and the lack of sufficient baseline data and analysis jeopardizes these rare and imperiled species.

What tributary streams may be potentially impacted? What is the potential for spills, for drilling contacting waters, or sediment to enter Iron Creek or the Salmon River? How will all impacts be effectively mitigated to eliminate harmful impacts to ESA-listed fish species?

We are very concerned about removal of water from stream segments under climate change stress, high temperatures, and drought conditions.

How will any water intake effectively prevent incidental suction of aquatic organisms, fish eggs/disruption of redds, amphibian egg masses, etc. when acquiring water for this project? Full and detailed current inventories for all aquatic biota of concern, and full ecological studies of aquatic habitat conditions must be conducted as part of this NEPA process and provided to the public for comment.

How will any and all activities associated with this project impact sediment, cobble embeddedness, etc.? When has the FS monitored for sediment, cobble embeddedness, etc. in all drainages impacted by this exploration project and access routes? What has been found? How is grazing affecting sediment and other water quality parameters in these watersheds? What

trampling, herbaceous stubble height, browse and other standards are in place in all project area streams? Where and when have these standards been monitored in recent decades, and what have the monitoring results been?

Constructing new temporary routes, road improvements, RHCA drilling and other project activity will increase cattle access to drainages and increase des-stabilization of the watershed weed spread, and worsen water quality and quantity problems. The FS must fully consider removal; pf livestock from the affected watersheds for the duration of the project and until any project disturbance is recovered.

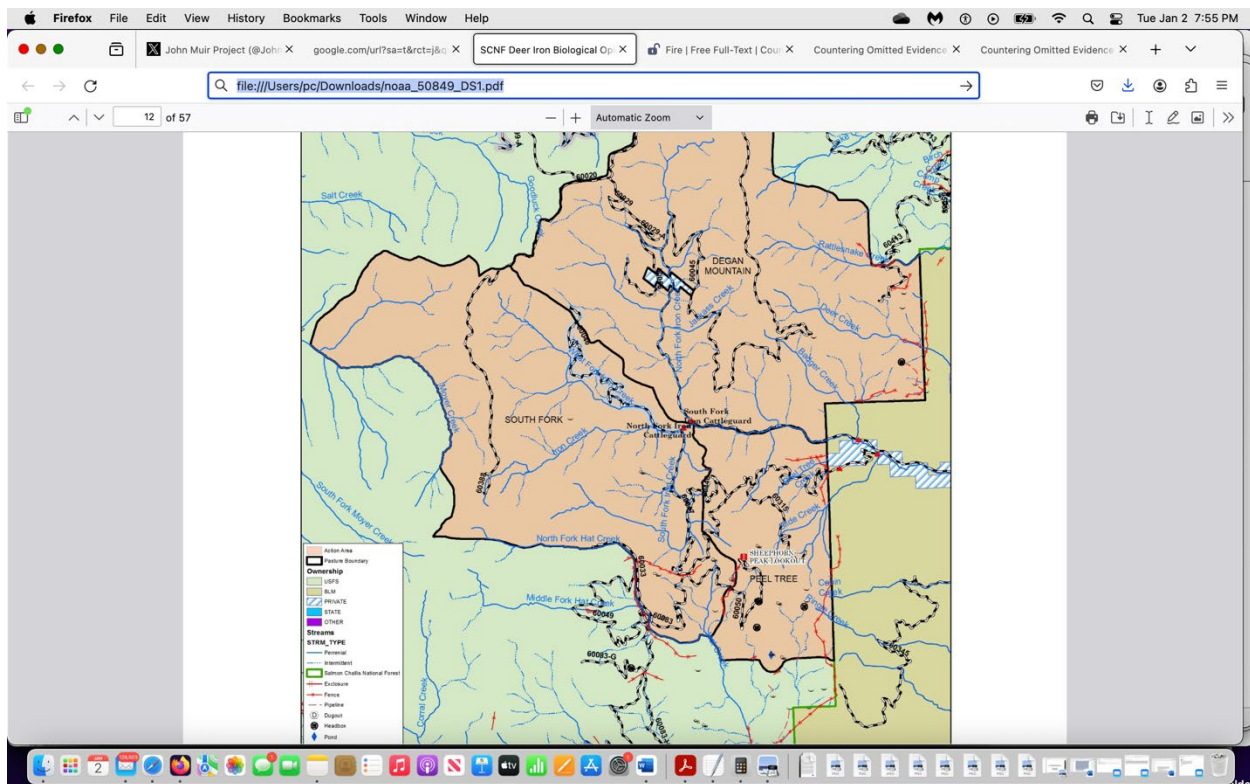
What have actual cattle use Head Months/AUMs been in all units of the affected FS allotments, and how does this compare to active/permitted use/Head Months/AUMs? How does grazing destabilize soils, pollute waters, cayuse ad stir up sediment, churn up potential toxic material from past mining activity, etc.? See for example:

file:///Users/pc/Downloads/noaa_50849_DS1.pdf

This Allotment contains several streams that have ESA-listed SRB steelhead and SRB steelhead critical habitat present: Iron Creek, South Fork Iron Creek, West Fork Iron Creek, North Fork Iron Creek, an unnamed tributary to North Fork Iron Creek, Moyer Creek, Hat Creek, and North Fork Hat Creek (Table 6). Iron Creek has approximately 3.71 miles of unoccupied Snake River spring/summer Chinook salmon DCH (USFS 2023).

Table 6. Miles of Snake River Basin steelhead occupied habitat and miles of designated critical habitat by stream and Unit within the Deer-Iron Allotment. Adapted from the final Biological Assessment.

Unit	Species	Stream	Use Type	Miles	
				Present	Designated Critical Habitat
South Fork	Steelhead	Iron Creek	Spawning and Rearing	1.33	0.81
		South Fork Iron Creek	Spawning and Rearing	2.16	No
		West Fork Iron Creek	Spawning and Rearing	0.78	No
		Hat Creek	Spawning and Rearing	0.37	No
		North Fork Hat Creek	Spawning and Rearing	No	No
		Moyer Creek	Spawning and Rearing	3.38	0.14
		Total Steelhead Miles		8.02	0.95
Peel Tree	Steelhead	Iron Creek	Spawning and Rearing	0.09	No
		Hat Creek	Rearing	0.33	No
		Total Steelhead Miles		0.42	No
Degan	Steelhead	Iron Creek	Spawning and Rearing	1.83	1.83
		North Fork Iron Creek	Spawning and Rearing	1.68	No



The Deer-Iron BiOp p. 24 states:

“Major limiting factors affecting fisheries production within the action area include mining impacts and water quality problems, passage barriers, roads, introgression between native populations and hatchery stocks, and climate change. Fish passage to the headwaters of Moyer Creek is currently limited by a two-culvert crossing. A culvert on the private inholding on North Fork Iron Creek (outside of the action area) is also a fish passage barrier.

Historic and active drilling has occurred in the Iron Creek drainage. The North Fork Iron Creek was recently 303(d) listed for copper impairment, based on water samples that were collected directly below the patented claim in 2019 (USFS 2023). All seven samples exceeded both acute and chronic criteria for copper (USFS 2023). After the Idaho Department of Environmental Quality submitted the consent order to the mine to eliminate surface water discharge, the mine has started developing a discharge infiltration system, which will remove surface water outfalls (USFS 2023).

Cold-Water Aquatic Life use in North Fork Iron Creek is impaired by copper; salmonid spawning is a subcategory of Cold-Water Aquatic Life and Salmonid Spawning is not supported if Cold Water Aquatic Life is not supported (USFS 2023). Exposure to above-normal copper levels can cause wide-ranging effects to fish, from sublethal to lethal. Sublethal effects can include behavioral, (e.g., lethargy, incoordination, reduced feeding), morphological (e.g., skin include behavioral, (e.g., lethargy, incoordination, reduced feeding), morphological (e.g., skin and gill damage, swelling), and physiological changes (e.g., internal organ damage, blood thickening) (USFS 2023). The patented claim (outside of the action area) has waste rock piled within the RHCA, which artificially confines the channel and has not been tested.

The BA states that off-channel habitat is relatively limited within the action area, except for the beaver-influenced reaches near the confluence of South Fork and West Fork Iron Creeks. There

are several near-stream roads within the action area. The Iron Creek watershed has approximately 27.9 miles of motorized roads within an RHCA, which limits floodplain connectivity. Significant lengths of mainstem Iron Creek as well as its North Fork, are paralleled by roads, which have impacted large woody debris loading, pool frequency and quality, off-channel habitat and floodplain connectivity at locations within the action area. Near-stream roads

are less of a concern in Hat Creek, where the road is generally located well away from the stream aside from a few points.

Very low numbers of adult steelhead have returned to Iron Creek in recent years, and these returns have been dominated by hatchery-origin fish (USFS 2023). These hatchery fish originate from juvenile steelhead release programs that occur off-site (outside of the action area) and are designed to spread out the fishery effort and harvest in the upper Salmon River”.

All of this indicates the need for much greater control on any mining exploration activity that may occur in the North Fork iron Creek or other affected watersheds; much greater USFS minimization and mitigation actions, the need for helicopter drilling, significant limitations on drilling activities, and much more comprehensive baseline information on the connection of groundwater to surface water, potential for pollution from this project, analysis of all the drilling, adits, etc. and their discharge/associated pollutants/potential soil contamination that would be disturbed by project activities including old drill site or mining wastes, etc. – and full-scale analysis in an EIS. We ask again where is a POO for this for public review? We Object to the failure of the USFS to provide sufficient data and analysis, and the failure to even bother to prepare a Draft EA to allow for informed comment on significant pollution and habitat issues. We Object to the USFS allowing this project to slide through without considering all of these factors, and to the flawed BA that rubberstamps harm. This must include candid analysis of the threats that already exist to native salmonids – including threats due to mining roadiung, mine-related pollution, etc.

The Bi-Op continues:

Climate change is an escalating conservation problem. Warming trends in mountain headwater streams have been especially pronounced, driven by earlier and more rapid snowmelt in the spring and increased winter precipitation and flooding. These changes contribute to warmer summer water temperatures that reduce the amount of thermally suitable habitat (USFS 2023).

2.4.7. Snake River Basin Steelhead Presence in Action Area

The Pahsimeroi River steelhead population, which is part of the Salmon River DPS, uses the action area for spawning, rearing and migration. Using information presented in the SCNFs BA (USFS 2023), which was based on observed species distribution in the action area, it is possible that steelhead spawn in up to 4.39 total miles in Iron Creek, 3.31 miles in North Fork Iron Creek, 1.80 miles in South Fork Iron Creek, 0.78 miles in West Fork Iron Creek, and 4.70 miles in Moyer Creek, within the action area. These lengths reflect continuous mapping reaches and are likely significant overestimates of actual spawnable areas within the streams due to occurrence of high gradient reaches and the discontinuous occurrence of suitable combination of water depth, water velocity, and stream substrate composition within lower gradient reaches (USFS 2023). Much of the potential steelhead spawning habitat in the Allotment is inaccessible to livestock, as outlined further in Table 9 of the BA (USFS 2023). The only location on the

Allotment that has steelhead present and is potentially accessible to livestock is North Fork Iron Creek ... Deegan Mountain Unit. We Object that the USFS has not provide data and analysis on how opening of closed roads (there is not a shred of data on the condition of these roads and whether livestock currently use them), plus construction of new roads and flat drill pads for cow loafing will expand and extend damaging cattle trampling and enable increased access to the stream and drainage network. There also does not appear to be a current grazing capability analysis. Under the ESA, "effects of the action" are all consequences to listed species or critical habitat that are caused by the proposed action, including the consequences of other activities that are caused by the proposed action (see 50 CFR 402.02).

The Bi-Op also demonstrates there may not be up to date information on aquatic species use of the drainage network.

We Object to the very deficient wildlife and terrestrial species baseline and analysis, Impacts to wildlife need to be avoided, minimized and mitigated to the maximum extent. But that can't take place until an honest hard NEPA look moored in substantial baseline data and science on mining and other threats in this landscape is prepared and provided ot the public for review. We are concerned about displacement of wildlife due to traffic and drilling and other project activity noise, light, and an increase of human disturbance activity in the project area year round and around the clock drilling must be limited to daylight hours to reduce impacts to wildlife.

It is our experience that sumps should be surrounded by low mesh nets is very prone to failure and is not effective to prevent ground animals from falling into the sumps and contain. Numerus escape ramps must be place in each sump to facilitate the escape of any entrapped wildlife. But again, we urge the FS to require all drilling generated liquids be placed in closed tanks and hauled to a disposal site.

We had Attached comments on the Stormy, Bayhorse, Forest-Wide Prescribed Fire EA, BTAC drilling and other documents for inclusion of all ecological concerns, and we raised the associated ecological issues related to cumulative and indirect effects of ecological degradation, watershed integrity and important, sensitive and ESA-listed species habitats and populations.

From this electra Report (Attached), it appears that the ICC claims are one part of a much larger project:

<https://electrabmc.com/wp-content/uploads/2023/03/Iron-Creek-Tech-Report-2023-Final.pdf>

Note photos with the report show the steep, rugged, forested terrain and Wolverine habitat. We are greatly concerned about the cumulative effects of all of the drilling, exploration and/or development activity that may be taking place, and/or foreseeable. The USFS has greatly failed to address the indirect and cumulate effects of all the old, ongoing, proposed, new and foreseeable mining activity on this fragile mountain environment and its beleaguered terrestrial and aquatic species habitats and populations.

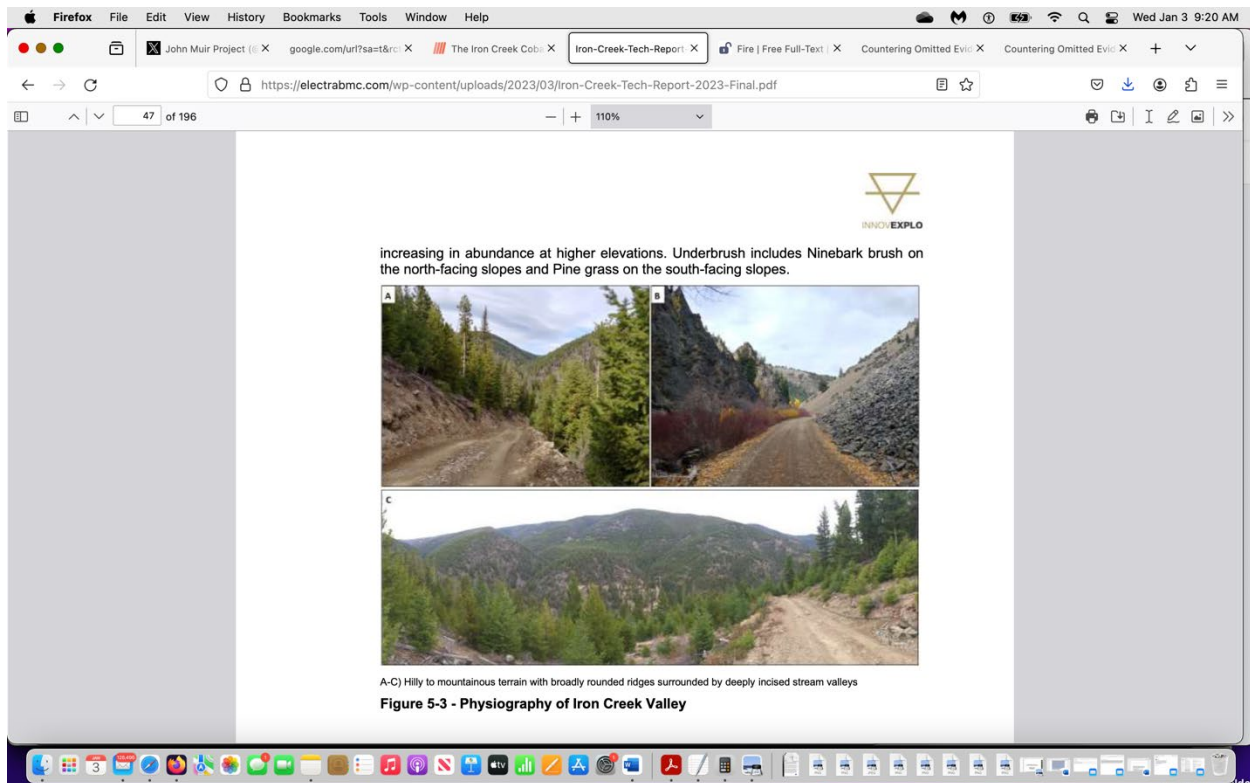
The Electra report states:

“The Issuer is a Canadian mining company trading publicly on the TSX Venture Exchange (TSX-V:ELBM) and NASDAQ (NASDAQ:ELBM). Its head office is located at 133 Richmond Street west, Suite 602, Toronto, Ontario, M5H 2L3. The Issuer changed its name from First Cobalt Corp. on November 8th, 2021. The Issuer operates the Project through a wholly owned subsidiary, the Idaho Cobalt Company of Boise, Idaho (“Idaho Cobalt”). For clarity in this Technical Report, any activity described on the Project by Idaho Cobalt is referenced as done by the Issuer ...”.

Also: “The Iron Creek Patents, and unpatented mining claims BCA1-43, BR1-110, and BRS1-129 are held 100% by Idaho Cobalt Company of Boise, Idaho, a wholly owned subsidiary of the Issuer. The NBR1-25 unpatented claims are held 100% by Scientific Metals (Delaware) Corp. (“SMDC”) of Midvale, Utah also, a wholly owned subsidiary of the Issuer. There are no royalties on all the above mining claims royalties”.

So what is going on with the Midvale Utah “Scientific metals” claims? Is there foreseeable separate exploration there?

Electra bills its project as being for cobalt and copper. Yet the watershed is already contaminated with high levels of copper, as shown in the NOAA Bi-op. And ICC has been polluting the watershed with unauthorized discharge.



And what does lithium have to do with this? “On March 12, 2021, the Issuer, through Idaho Cobalt, purchased the JA1 to 103 unpatented mining claims from with Arizona Lithium

Company (“Arizona”). Arizona retains a 1.0% NSR royalty, and the Issuer has the right to purchase one-half ...”.

AND: In 2019, 2021, 2022, and 2023 the Issuer through Idaho Cobalt staked 124 additional claims covering 9.22 km² including BCA1-43, BR59-110 and BRS1-29. No royalties apply to these mining claims except those that fall within the Redcastle area of interest (approximately 2.13 km²) and those that fall within the CAS area ...”.

This is an ever-shifting morass of speculation and switching ownership of claims and shifting responsibilities – which further demonstrates the need for a several million dollar bond for this exploration project.

Note that there already are alternatives to lithium-ion batteries, such as sodium ion batteries. China is already developing sodium-ion battery EV cars) so the whole EV material playing field is shifting – making some of the speculation involved here even more uncertain.

We Object to the failure to provide detailed mapping and hard look analysis of potential environmental impacts of exploration or development of all claims in the Iron Creek watershed and across the land area that is recognized as the Idaho Cobalt Belt. See for example this project:

<https://www.nwpb.org/2021/10/08/geological-survey-explores-idahos-salmon-region-for-cobalt/>

“Work to provide information on cobalt deposits in Idaho’s Salmon region is set to be completed this month as part of a public-private partnership. But there are environmental and tribal concerns about mining near the Salmon river.

The roughly \$600,000 project is being paid for by a combination of federal funds and monies from the Idaho Cobalt Company, New Jersey Mining Company and Idaho’s Revival Gold Incorporated, said Claudio Berti, director of the Idaho Geological Survey”.

Where is information on this report, and what did it determine? Instead of trying to rush this project through over the holidays with insufficient information on how to Object, and an extremely superficial analysis, the USFS must take a concerted hard look in an EIS at this project, and must provide a POO to the public for informed comment as part of this. Note we have requested the POO and specialist reports that are not on-line and reserve the right to amend this Objection if they are provided.

We Object to the failure of the USFS to address the full environmental situation, and the cumulative adverse impact of all of this barrage of ongoing and/or proposed mining and logging/treatment watershed and habitat disturbance and degradation on sensitive species as well as ESA-listed aquatic and terrestrial species habitats and populations, water quality, wild lands recreational uses, and other values of the SCNF.

As an example, the flawed Aquatic Species BA that we Object to greatly fails to address the host of disturbances to the affected population of Chinook salmon, steelhead and Bull Trout. We Object that the FS has not provided the public with a BA for Canada Lynx and Wolverine, despite the year-round noise, harassment, night lights 0- and activities ranging from drilling to

snow plowing disturbing, degrading and fragmenting their habitats 24 hours a day for 10 years throughout all seasons. And it is not just the foreseeable relentless exploration noise, traffic, human presence, night light, and other disturbances.

We are, frankly, dismayed at the FS attitude that there's plenty of habitat - so Wolverines can move elsewhere, and the agency reliance on "modeled" habitat for sensitive and rare species so it can lazily forsake any on the ground pre-decisional surveys. RE: Wolverine "Suitable habitat is present in the Action Area, and habitat would be altered due to project activities. Project activities would also result in displacement of individuals. Much of the area to the north and west of the project area burned in the Salt Fire in 2011, resulting in a loss of some wolverine habitat in the vicinity of the project area. Given that, there is still an abundance of alternate suitable habitat in the vicinity of the project that could be used by displaced individuals. Because drilling would be phased, with a maximum annual disturbance of 3 acres and 1 mile of temporary roads, impacts would be temporary in nature and small in scale. This of course, disregards the cumulative effects of all the project disturbance and other mining activities that may be taking place, winter and other recreational uses, and the "improved" and snowplowed access, and much else as discussed throughout. Also, in looking at the EA, we see the USFS has a novel category of long-term "temporary" roads. What are these? Roads that are claimed to be reclaimed but can be re-bulldozed at a miner's whim?

Chinook Salmon	Threatened	Yes	NLAA	salmon as well as their habitat. The proposed action includes measures specific to snow removal along the Iron Creek Forest Road (NFSR 045), a potential source of impacts, of which snow removal specific project design features are designed to minimize the potential for adverse effects to a negligible level.
North American Wolverine	Proposed Threatened	No	No Jeopardy	The home range of North American Wolverine in Central Idaho has been reported to be up to 610 mi² (USFWS 2018). The Action Area for this species was delineated by using a 13.93 mi buffer around the project location, which equates to an area approximately 610 mi² in size. The species has been documented within the Action Area, with 6 sightings being reported in the last 10 years. Suitable habitat is present in the Action Area, and habitat would be altered due to project activities. Project activities would also result in displacement of individuals. Much of the area to the north and west of the project area burned in the Salt Fire in 2011, resulting in a loss of some wolverine habitat in the vicinity of the project area. Given that, there is still an abundance of alternate suitable habitat in the vicinity of the project that could be used by displaced individuals. Because drilling would be phased, with a maximum annual disturbance of 3 acres and 1 mile of temporary roads, impacts would be temporary in nature and small in scale.
Sockeye Salmon	Endangered	No	NE	Sockeye salmon migrate through the Salmon-Challis via the Salmon River to the Stanley area. No spawning or rearing takes place within the administrative boundary of the Salmon-Challis. The project area does

The use of roads that are supposed to be closed as mitigation for some unspecified past project, the drilling project construction of new roads, and improvement of other access routes including even winter-long snowplowing will lead to expanded human access of all types on top of the disturbance from the drilling – as over 11 miles of now closed "temporary" roads will be

bulldozed open0 allowing all manner easy access to expand persecution of native predators including Wolverine, Canada Lynx, Gray Wolf, Fisher and other endangered wildlife This is particularly alarming given the Idaho state-sanctioned reprehensible barbaric trapping, hunting and aerial gunning slaughter of the Gray Wolf that is taking place.

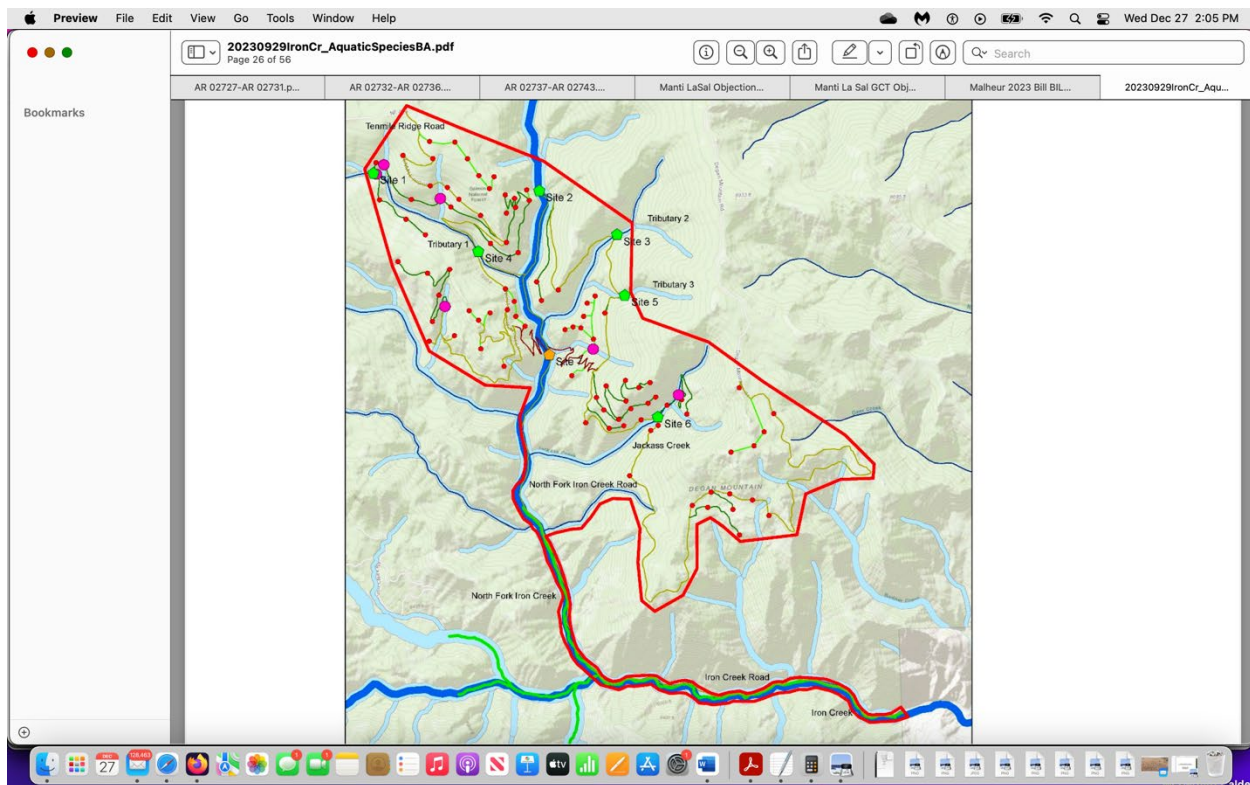
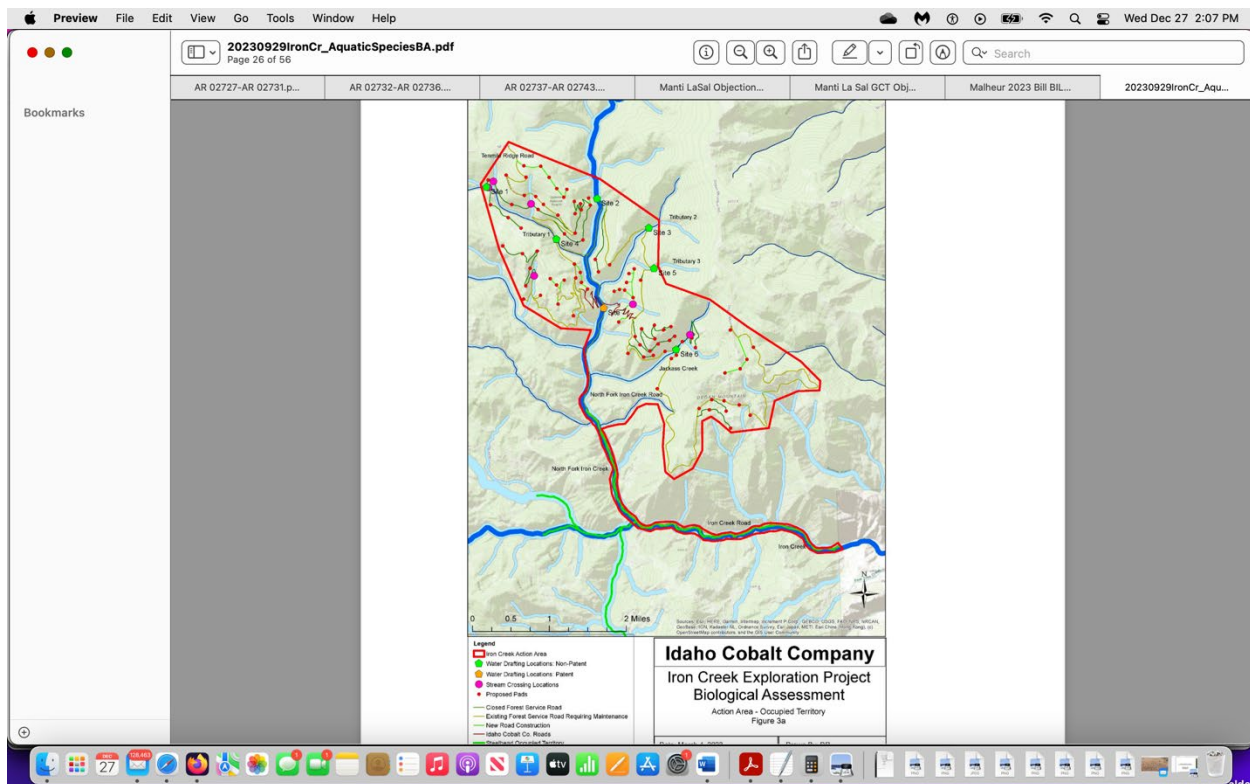
We Object to the minimal and deficient minimization and mitigation measures of the Aquatic BA, which even glosses over drilling in RHCAs. There is immediate downstream habitat for Bull Trout and Chinook salmon. And steelhead, and that is where runoff and pollutants from various aspects of this drilling. See BA info and maps:

The screenshot shows a PDF document titled "20230929IronCr_AquaticSpeciesBA.pdf" on page 28 of 56. The document discusses NMFS listings and species occurrences within the Action Area. It includes a table titled "Table 5: Species Occurrences within the Action Area" with columns for ESA Species, Scientific Name, ESA Status, Species Present, ESA Designated Critical Habitat Present, and Magnuson-Stevens Act Essential Fish Habitat Present.

ESA Species	Scientific Name	ESA Status ¹	Species Present	ESA Designated Critical Habitat Present	Magnuson - Stevens Act Essential Fish Habitat Present
Snake River Sockeye Salmon ²	<i>Oncorhynchus nerka</i>	E	N	N	N
Snake River Chinook Salmon ³	<i>Oncorhynchus tshawytscha</i>	T	N	Y	Y
Snake River Steelhead ⁴	<i>Oncorhynchus mykiss</i>	T	Y	Y	N/A
Columbia River Bull Trout ⁵	<i>Salvelinus confluentus</i>	T	Y	N	N/A

¹ ESA listing status: E = endangered, T = threatened, C = candidate, P = proposed.
² Endangered: 70 FR 37160 (6-28-2005), Critical Habitat Designation: 58 FR 68543 FR 68543 (12-28-1993), Protective Regulations: ESA section 9 applies

There is designated Chinook salmon and Snake River Steelhead Critical habitat – yet the FS allows a project with 91 drill holes, and even perforation of RHCA habitat with 2 drill holes. This is absurd, and an abdication of the USFS duties to protect sensitive, endangered and threatened species habitats and populations, and to not jeopardize their existence.



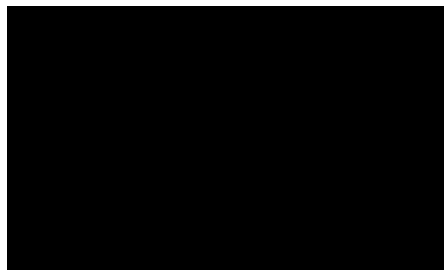
For example, the BA states:

The FS BA states: “Steelhead are known to spawn in Iron Creek, and the Idaho Department of Fish and Game annually operates a temporary steelhead weir near the confluence of Iron Creek with the Salmon River, approximately 4.5 miles east of the Action Area, to monitor returning adult steelhead (IDFG 2021). Steelhead enter Iron Creek from mid-March to early May, typically peaking in April (IDFG unpublished data). Returns at this weir have generally been low in recent years (**Table 6**). Fifty- seven total adult steelhead were captured at the weir in 2010, but more recent returns have been five fish or fewer (IDFG unpublished weir data, USFS 2023a, **Table 6**). Returns are typically composed of approximately 3/4 hatchery-origin fish and 1/4 natural-origin fish (**Table 6**). PIT tag detections at the weir reveal that at least some of the adult steelhead returning to Iron Creek originate from Magic Valley Hatchery fish initially released into the Pahsimeroi River as smolts (tag codes 3DD.00774362D8; 3DD.0077A9B961 (PSMFC 2015, USFS 2023a)). Steelhead redds have been observed in lower Iron Creek directly upstream of the weir location that was operated from 2010-2020 (IDFG unpublished data). The weir was located approximately 800 feet upstream from the Iron Creek confluence with the Salmon River. There is no documentation of steelhead spawning in the upper reaches of Iron Creek in the Action Area, but juvenile *O. mykiss* densities are high and there is suitable spawning habitat. Density estimates of *O. mykiss* derived from Forest Service electrofishing surveys are shown below in **Table 7**”.

We Object to the failure to conduct current studies necessary to understand the status and aquatic habitat conditions for rare aquatic species in the affected watersheds.

We Object to the lack of surface water flow data, as well as groundwater data and analysis necessary to understand the combined effects of all this disturbance activity. How might drilling in RHCAs alter or harm surface water expression, for example, how much will other drilling and/or cobalt mining activity harm or alter ground or surface waters?

Sincerely,



Katie Fite
Public Lands Director
WildLands Defense



[REDACTED]

/mg
Mike Garrity

[REDACTED]

/se
Sara Johnson

[REDACTED]

Jason Christensen

[REDACTED]

Attachment: CD with supporting documents

Appendix A – List of Some SCNF mining-related actions.

SCNF MULTI PROJECT LINK

We viewed FS projects at the link below, and listed the drilling and mining related ones. Below are mining projects and the massive BTAC geothermal drilling project found on the list. – and it is unclear if the list is inclusive. For example, where is the Jervois project with its expanded human disturbance footprint? Note that there are dozens of deforestation/thinning/logging/burning treatments on that list that also represent a serious blow to Wolverine, Canada Lynx, Gray Wolf, Fisher, Great Gray Owl, Boreal Owl, and other rare and imperiled forest species habitats that the Iron Creek ICC project will also harm.

<https://www.fs.usda.gov/projects/scnf/landmanagement/projects?archive=1&sortby=1>

Beartrack b<https://www.fs.usda.gov/project/scnf/?project=41115>

Big Creek <https://www.fs.usda.gov/project/scnf/?project=37800>

Black Pine <https://www.fs.usda.gov/project/scnf/?project=63262>

Bonanza drilling <https://www.fs.usda.gov/project/scnf/?project=57796>

Breccia Drilling <https://www.fs.usda.gov/project/scnf/?project=57489>

Bruno Creek <https://www.fs.usda.gov/project/scnf/?project=40748>

BTAC Drilling <https://www.fs.usda.gov/project/scnf/?project=59635>

24 miles of temporary roads, 300-400 drill sites, up to 4 drill holes per site and staging in phases spread across ten years.

Colson Creek: <https://www.fs.usda.gov/project/scnf/?project=58778>

This project proposes to conduct hard rock, exploration drilling to determine mineral potential adjacent to Long Tom and Colson Creek of the North Fork Ranger District, on National Forest System (NFS) lands open to mineral entry.

Colson Creek: Plan of Operations for
drilling <https://www.fs.usda.gov/project/scnf/?project=55276>

Colson Creek -Re-open road for drilling <https://www.fs.usda.gov/project/scnf/?project=53327>

Copper canyon Mine: <https://www.fs.usda.gov/project/scnf/?project=37280>

Copper Queen drilling

<https://www.fs.usda.gov/project/scnf/?project=59107>

Daly placer <https://www.fs.usda.gov/project/scnf/?project=30227>

Diamond Creek <https://www.fs.usda.gov/project/scnf/?project=39457>

Diamond Creek REE <https://www.fs.usda.gov/project/scnf/?project=60963>

Ditch Creek Freeman

<https://www.fs.usda.gov/project/scnf/?project=61173>

Dutcher drilling <https://www.fs.usda.gov/project/scnf/?project=39459>

East Boulder Creek -drill/augur/trench <https://www.fs.usda.gov/project/scnf/?project=41209>

East Boulder Placer <https://www.fs.usda.gov/project/scnf/?project=46508>

Empire drilling 26, 23

Flume Creek drilling <https://www.fs.usda.gov/project/scnf/?project=39458>

Gold Star drilling <https://www.fs.usda.gov/project/scnf/?project=40297>

Great Western drilling <https://www.fs.usda.gov/project/scnf/?project=41190>

Hawkeye Gulch trenching <https://www.fs.usda.gov/project/scnf/?project=45296>

2 Hughes Creek placer projects

Inception road for private land mining

Iron Creek <https://www.fs.usda.gov/project/scnf/?project=43036> 3 exploration trenches; 4 feet wide by 20 feet deep by 500-750 feet long, trenches to be left open long enough for bulk sampling, mapping & photographing ,trenches will be reclaimed using the excavated material that was originally set aside

Iron Creek trenching and drilling <https://www.fs.usda.gov/project/scnf/?project=53729> trench ~1,435 linear feet, drill on up to six drill pads, and remove up to 10 tons of sample material removed for further analysis. Less than 12 month operating season.

Iron Creek more trench <https://www.fs.usda.gov/project/scnf/?project=52261>

Lemhi Drilling at Ditch Creek <https://www.fs.usda.gov/project/scnf/?project=38742>

Lone Pine <https://www.fs.usda.gov/project/scnf/?project=60964> Ounces 29 drill holes

Moose Creek drilling Revival Gold <https://www.fs.usda.gov/project/scnf/?project=55062> 20 drill holes

Musgrove - <https://www.fs.usda.gov/project/scnf/?project=51159>. 14 drill sites, 42b holes

Navarre <https://www.fs.usda.gov/project/scnf/?project=61118>

North Fork Sheep trenching <https://www.fs.usda.gov/project/scnf/?project=42260>

North Fork Sheep sluice

Parker Mountain <https://www.fs.usda.gov/project/scnf/?project=47408>. 9 drillholes

Preen-Stuckey

Pope-Sheion <https://www.fs.usda.gov/project/scnf/?project=61018> NOTE that a POO was developed for "This Plan of Operation includes: 1) trenching and 2) drilling and 3) road maintenance. Trenching: It is anticipated that 10 to 12 trenches may be excavated Drilling: Neuma proposes drilling a total of 10 to 15 diamond core holes"

Prudent Man Agate. <https://www.fs.usda.gov/project/scnf/?project=50769>

Rabbit Creek Revival Gold <https://www.fs.usda.gov/project/scnf/?project=55063> exploration drilling on 27 sites, accessing the sites with a helicopter and 6 miles of new, temporary road, and drafting water from Napias Creek.

Rabbit Foot. <https://www.fs.usda.gov/project/scnf/?project=39826> drill at old mine site.

Rapps placer

Retrack Placer. <https://www.fs.usda.gov/project/scnf/?project=54572> 29 acres

Ruby drill. <https://www.fs.usda.gov/project/scnf/?project=59109>

Sandy J placer

Slippery Creek drill. <https://www.fs.usda.gov/project/scnf/?project=59109> . NOTE helicopter drilling. 20 and 22 800-1200%u2019 holes at up to 11 out of 23 proposed drilling locations using a diamond core helicopter portable drilling rig

Sunshine exploration. <https://www.fs.usda.gov/project/scnf/?project=63276>

Thompson Creek exploration and mine
expansion <https://www.fs.usda.gov/project/scnf/?project=29417>

Tormey drilling. <https://www.fs.usda.gov/project/scnf/?project=61017>

Wagonhammer drilling <https://www.fs.usda.gov/project/scnf/?project=39455>