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Organization:

Title:

Comments: TO: Objection Reviewing Officer, 2023 CuMo Exploration Project, USFS Intermountain Regional Office, Room 4403, 324 25th Street, Ogden, UT 84401

Hello,

I submitted comments against the 2023 CuMo Plan exploratory mining project and wish to object to the project as a whole as well as the Environmental Assessment (EA) finding of no significant impact related to impacts of this project. Significant impacts will occur if this project is approved and implemented.

First, the exploratory mining project will itself pose risks to environmental impact, but is also a pre-requisite to an even greater impact should exploration discover precious metals. Any environmental assessment that fails to consider impacts of the full scope of work is short sighted. In the same way that an environmental impact study for a transportation project must not only consider the impacts of the planning phase of a new road, but also its construction, an EA on only the exploratory phase of a mining project completely ignores the implementation phase of the same mining project, which may remove an entire mountain, leaving a toxic leech pit, and displace all of the wildlife, soils, and water quality listed in your supporting documentation. Please ensure this environmental approval properly assesses impacts not just on the preliminary exploratory phase, but the full extent of the project. Breaking a project up into segments does not remove the end result. In fact, doing so suggests a lack of good faith on the parties involved in submitting such project materials as it seeks to remove the public from outcomes, disenfranchises the public from feeling heard about their real concerns as residents living adjacent to a destructive process, and silences opposition by slowly eroding their will to speak up against something they know will impact their lives and would otherwise wholly reject. How many more times must the public get notices before their tangible opposition and concerns are relieved?

Second, I would like the Wildlife Report reviewed in terms of justification for why the specific listed animals were included while others were not listed or assessed. A more thorough assessment is needed. Many impacted animals existing in the project area provided in my original comments are missing from this list and I object to their not being properly assessed for impact. Such issues also not reviewed may involve the migratory nature of certain species of fauna, where they may not be included in the study due to their migratory nature, yet will be impacted by environmental impacts on their migratory habitat should this exploratory project be approved and move forward. Furthermore, I object to the EA finding of no significant impact when many of those listed do in fact show impact, but just not trending towards being federally listed as endangered or extinct. If the base line for impact is endangerment or extinction, as a nation we need to find a better approach to measuring impact, as anything short of total destruction would receive a ruling of "no significant impact". The report clearly shows impacts to flora and fauna, soil, and water and these immediate impacts also portend greater "downstream" impacts not properly assessed in the report. This sounds very similar to the segmentation of "exploration" and "open pit mining". You'd think there was no association or relationship between the two. That may be convenient for someone completing a report, but is extremely inconvenient to the populations being studied and the people surrounding a future open pit mine. This represents a bureaucratic hurdle to the will of free people to proper protection of undue impacts to their health, safety, and way of life, particularly in an area where the environment around them on which they depend is directly under assault from this project. As such, I object to the approval process negating impacts found in the agencies own assessment.

Finally, in my original comments I requested that a "cost-benefit analysis will be performed before approval comparing short-term economic benefits and costs to the local community of exploration (local, not international) and mining to the long-term benefits and costs of no action". I do not see a cost benefit analysis of any type in the

supporting documents. I've heard in public meetings from the company and their paid help that there are many millions of dollars to be made from this project and touting economic prosperity to the local community. I first question whose pockets those millions of dollars will go into, theirs or the local community most effected by the project, but they raise an even greater point. What is the value of this land and the minerals beneath it and how is that value sustained, increased, or devalued by the project today and for future generations? Are the minerals as valuable today as they will be in say fifty years, or perhaps 100 years, given it's a finite resource, adjusting for inflation? Would the project be more profitable then or now? At what opportunity cost to local tourism, Idaho Fish & Game hunting/fishing tags, permits, and fees, the timber industry, etc. will this project have? A proper cost benefit analysis would give the public information on this investment and whether or not it is a wise one today, versus later. A proper cost benefit analysis also measures the opportunity costs of not performing this exploratory and associated open pit mining project to extract minerals from our community. This information is invaluable and necessary when measuring impact and I object to it being ignored in my original request.

I will close with my best wishes for everyone involved in this project and that they treat the decisions made surrounding this project as though their family had to live with the outcome of the decision made, as ours will have to on our property not far from the possible open pit mine and leech field that is really under review. We have enough of those in our mountains, we are not in need of another. I await your objection to my objection so I can submit another objection to your objected objection objectively.

Sincerely,

Joseph Schueler