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Payette National Forest
800 West Lakeside Avenue
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Submitted to: comments-intermtn-payette@fs.fed.us

RE: Golden Hand 1 and 2 Lode Mining Claims Plan of Operations

Mr. Egnew,

Please accept these scoping comments on the proposed Golden Hand 1 and 2 Lode Mining Claims Plan of Operations (POO).

American Whitewater is a national non-profit organization dedicated to protecting and restoring our nation's whitewater resources and enhancing opportunities to enjoy them safely. Many of our members consider paddling the Wild and Scenic Middle Fork of the Salmon River a highlight of their lives. Others cherish opportunities to paddle Big Creek, a Middle Fork tributary that is immediately downstream of the POO. In total, about 10,000 lucky people each year descend the Middle Fork. In order to do so they must win a Forest Service lottery, because the demand exceeds the capacity of the river. It is widely recognized as one of the best multi-day river trips in the world. The Middle Fork lies at the heart of one of the most protected large watersheds in the United States and it shows. The wildlife, water quality, fish, and scenery are superb.

We are stunned that someone would consider opening major new mines in this Wilderness Area, which is one of the most intact ecosystems in the Continental US. Big Creek is a remarkably clean and healthy stream that has a sensitive salmon and steelhead run that is likely a shadow of its former size. Based on the exceptional recreational, wildlife, fish, botanical, water quality, and other values of this area, we urge the USFS to deny the POO outright as inconsistent with forest plans, designations, goals, and specifically Wilderness values. Should the USFS be legally mandated to consider this issue in detail or allow it under certain restrictions, we ask that you apply the most stringent possible controls on the POO. We ask that the following subjects be considered in the scoping document:

1. **Bonds:** The USFS has the authority to require a bond sufficient to pay for cleaning up and rehabilitating the area (36 CFR Part 228.13). In this case,

because of the Wilderness designation, and ecological and recreational values of the watershed, we ask that the USFS set the standard for “rehabilitation” as *full restoration* under 36 CFR Part 228.8(g). Such restoration should restore both the structure (ie topography and vegetation) of the landscape as well as the functions of the ecosystem. In addition to being sufficient to address the intentional impacts of the POO, the bond should be set sufficiently high to deal with any and all potential impacts to water quality for perpetuity. We ask that the USFS value this work in their EIS and require a bond for the full amount.

2. **Water Quality:** The USFS should analyze the certain *and potential* impacts of the mining exploration activities on the water quality of all the downstream rivers and streams, and groundwater. These analyses should address chemical impacts associated with the exposure of subsurface materials to water and air, as well as the increased sedimentation that will be associated with all ground disturbing activities including road building and use. The USFS should also require that all human waste, trash, debris, and construction materials be contained and removed from the project area if the project is allowed.
3. **Aquatic Organisms:** The USFS should compile a complete list of the aquatic organisms that are potentially impacted by the POO. This list must include at a minimum all species of fish, amphibians, and macroinvertebrates. The complete predicted and potential impacts of the POO to these species should be considered in detail. Of particular concern are the likely direct and indirect impacts to native salmonids like the bull trout, steelhead, and various species of salmon that can be severely impacted by excess fine sediments in spawning areas.
4. **Wildlife:** The full impacts of the POO on all wildlife should be analyzed. The physical footprint of the POO will eliminate wildlife habitat for decades and degrade it for centuries or millennia. The mining exploration activities will disturb and displace wildlife far beyond the boundaries of the POO itself while the activities and subsequent restoration activities are occurring. Sound, dust, and water quality impacts will have additional impacts that cascade across the landscape. Obviously the area should be surveyed for rare species, and potential impacts on those species that are present or potentially present should be analyzed in detail.
5. **Weeds:** The USFS should analyze in detail the impacts of the virtual certain introduction of invasive exotic plant species such as spotted knapweed to the proposed project area associated with the POO. We see no way that the ground disturbing activities in concert with the use of heavy equipment will not create both the substrate and seed supply for establishment of invasive species. The USFS should consider the effects that this introduction will have beyond the borders of the POO, since many invasive plants are readily spread by wind and wildlife once introduced.

6. **Native Plants:** The USFS should analyze the POO's impacts on native plants. The POO can be expected to physically destroy significant numbers of plants, prevent re-growth for the life of the operations, and to degrade substrate conditions for centuries post-restoration. The project area should be surveyed for rare species and potential impacts on those species that are present or potentially present should be analyzed in detail. The corporation should not be allowed to harvest any timber as part of their POO.
7. **Recreation:** Regarding recreation, we ask that the USFS consider the following potential impacts of the POO:
 - a. Impacts to hikers desiring to use the trail being converted to a road.
 - b. Impacts to hikers, hunters, and campers wishing to recreate within the physical footprint of the POO, and within visual or auditory range of the POO.
 - c. Impacts of potential and likely water quality impacts to downstream users on Big Creek and the Middle Fork Salmon, including boaters and anglers.
 - d. Impacts to recreational pilots and/or passengers in small planes exploring the area by air.
 - e. Impacts to the visual landscape (dust, smoke, vehicles, ground disturbance, road creation, infrastructure, etc) throughout the viewshed as well as the soundscape (vehicle noise and other industrial noises) which could be devastated by the POO. The USFS scoping request acknowledges that "Equipment proposed for use includes 4-wheel drive pickup trucks, a 3 cubic yard tracked or rubber-tired loader, tracked excavator, buggy or track mounted drill rig, D-7-size bulldozer, an air compressor, chainsaws, gasoline-powered generator, jackhammer, and hand tools." The soundscape footprint of these motorized vehicles and tools is unacceptable and must be studied in detail.
 - f. Impacts of the construction, operation, remediation, and post-project impacts that may be expected to last for centuries.

To many thousands of Americans, the Wilderness Area in which the POO is proposed is among the most treasured and *sacred* places in the entire country. The American people have entrusted this landscape to the United States Forest Service. The recreational impacts of allowing vehicular access, large scale industrial activities, and massive environmental impacts in this area are enormous and unacceptable.

Conclusion:

A private corporation has asked the USFS to allow them to engage in the equivalent of excavating in the Sistine Chapel with a backhoe. The Frank Church River of No Return Wilderness is owned by all Americans and is among the crown jewels of the Wilderness Preservation System. Recreation is appropriately and strictly managed in the Wilderness. Boaters must pack out their human waste, use fire pans, pick up micro-trash, and limit group size and numbers. We fail to see how the same agency that limits

recreation so strictly could justify allowing a massive mining exploration operation in the same area. Based on all of the above concerns we appreciate that the USFS is conducting an Environmental Impact Statement for this POO.

Thank you for considering these comments,

Sincerely,

A handwritten signature in blue ink, appearing to read 'K. R. Colburn', with a stylized, flowing script.

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