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Salmon- Challis National Forrest
1206 So. Challis Street
Salmon, ID 83467

SUBMITTED VIA USFS WEB

RE: Salmon-Challis Forest Plan Revision #49464

The American Exploration & Mining Association (AEMA) appreciates the opportunity to submit unique comments provided herein represent AEMA's response to ongoing review and revision processes for Land and Resource Management Plans (LRMP) for the Salmon and Challis National Forests. The United States Forest Service (USFS) is seeking feedback on the Plan Initiation Package and Evaluation Phase of the Wilderness Process.

Salmon-Challis National Forest – Management Plan Revision

The Salmon-Challis National Forest initiated revision of existing management plans in January 2017. As part of Forest plan revision, the Salmon-Challis National Forest is required to complete a wilderness evaluation process. The purpose of this process is to review and consider lands that may be suitable for wilderness designation and inclusion in the National Wilderness Preservation System and includes four steps: inventory, evaluation, analysis, and recommendation. Wilderness designation will not be made as part of this plan revision since Congress has reserved the authority to make final decisions regarding all wilderness designations. However, if an area is recommended for wilderness designation in the Record of Decision for Forest plan revision, the Forest is required to manage the area in a manner that will not impair the area's wilderness characteristic. Therefore, submittal of public comments during the evaluation process is important for understanding characteristics of evaluation areas that may make them unsuitable for consideration beyond the evaluation stage.

Comments to the LRMP Wilderness Inventory and Evaluation Processes

1. Demonstrated Occurrence of Mineral Resources in Inventory and Evaluation Areas

The most recent Wilderness Inventory and Evaluation Process map, published in December 2018 provides a summary of Wilderness Evaluation Areas and Focal Evaluation Areas and is located at: https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fseprd606600.pdf.

Dr. Virginia Gillerman of the Idaho Geological Survey (IGS) prepared a memorandum for the State of Idaho Governor's Office of Energy and Mineral Resources (OEMR) which provides a comprehensive summary of the geological and mineral resource potential for the proposed evaluation areas (Gillerman, 2019). The IGS notes that the Salmon-Challis Forest "...is one of

the most mineralized areas in Idaho in terms of the geologic favorability, abundance of historical mines and prospects, and the amount of mining and exploration activity over the past 30 years” (Gillerman, 2018). This has included recent exploration activity principally focused on cobalt (Co), a critical mineral, and gold, and in the past 15 years, exploration directed at rare earth elements (REEs), another critical mineral commodity, copper, lead, zinc, tungsten, and molybdenum. Specific examples from the memorandum provided below underscore this assertion by addressing each of the evaluation areas and identifying documented mineralogic occurrence as well as historic and recent exploration and mining activity and/or the existence of mining claims.

1. Idaho Cobalt Belt:

- a. The formerly producing Blackbird mine site is still in a remediation phase, and it hosts an unmined resource of about 18 million tons.
- b. Other companies, including ePower Metals and International Cobalt, have announced promising grass-roots discoveries based on field-based soil and rock chip sampling.
- c. Putting the Idaho Cobalt Belt and surrounding access areas into potential wilderness will make it more difficult for any of these companies to raise capital, plan infrastructure needs, or conduct permitting, exploration, and environmental activities.
- d. The northwest section of the Idaho Cobalt Belt was designated as a “Special Mining Management Zone – Clear Creek” in June 1980 under the Central Idaho Wilderness Act of 1980 (Public Law 96-312, 94 Statute 948) wherein “prospecting and exploration for, and development or mining of cobalt and associated minerals shall be considered a dominant use of the land...”.

2. North Lemhi Range tract:

- a. Includes a significant number of active mining claims and historic mines hosting tungsten and molybdenum and base and precious metals. The area around Gilmore is well-mineralized and known for its rich lead-zinc-silver ores. ;
- b. With its favorable geology, the entire Lemhi Range block (area C) should not be considered for wilderness.

3. Copper Basin and North Slope Pioneers:

- a. Includes a number of both mineral resources and potential, some active mining claims and recreational campgrounds and use. The Wilderness Evaluation Area to the northeast abuts and includes the Empire mine project near Mackay and a number of active claims.

4. South Cabin Creek Peak Focal Wilderness Evaluation Area:

- a. Abuts the Yankee Fork mining district and includes the Basin Creek and other mineralized areas.

5. The South and North Motorway Wilderness Evaluation Area:

- a. Located east of the South Cabin Creek Area, includes the old Custer Motorway mine road, a state-promoted tourist attraction of the Idaho Parks and Recreation Land of the Yankee Fork historic site.

6. Spring Basin Squaw tracts:
 - a. Includes major historic mines, and is adjacent to the Thompson Creek mine, and near the Bayhorse ghost town and Bayhorse Lake, major tourist destinations.
 - b. The Thompson Creek molybdenum mine, partly on patented ground and on care and maintenance, is either within or adjacent to the Forest Service's Spring Basin Squaw Wilderness Evaluation Area and hosts a large resource.
7. Stein Mountain block north and east of North Fork:
 - a. Have major roads and some mineral prospects and a few claims.
8. Lost River Range:
 - a. There are few mineral prospects present here, and the crest of the range, including Borah Peak, is a more reasonable candidate for wilderness evaluation.
9. West Fork Morgan Plus tract:
 - a. A downsized tract that does not include prospects or areas of mineral potential and may be suitable for wilderness evaluation.
10. Phelan Mountain:
 - a. A small Focal Wilderness Evaluation Area that is probably too small, too close to the main population center and highways, and too close to rare earth prospects to justify wilderness evaluation.
11. North Fork/Ulysses Mountain/Leesburg/Mineral Hill District:
 - a. A very large Wilderness Evaluation Area that spans both sides of the Salmon River and includes a number of rare earth occurrences (plus critical commodities niobium and titanium in rutile) in the Mineral Hill district west of North Fork near the Ulysses Mountain tract.
 - b. On the south side of the Salmon River, the area surrounds and appears to include the high priority precious metal project at the Beartrack mine and Arnett Creek areas at Leesburg, as well as gold deposits of the Ditch Creek area north of North Fork and smaller occurrences.
 - c. The historic townsite of Leesburg is also a major tourist attraction.
 - d. The northern area contains major roads that cross into Montana as well as provide general transportation for forest management and multiple use activities. The Goldstone Mtn. and Upper Flume Creek wilderness evaluation areas and the Diamond Creek region host rare earth and thorium deposits explored in recent years.
 - e. The area around Leadore has been explored for base metals and is well-mineralized.

Based on these data, the memorandum concludes that: *“The mineral potential of the great majority of Focal Wilderness Evaluation Areas and the Wilderness Evaluation Areas (proposed for) the Salmon-Challis Forest plan revision is simply far too great and the amount of current or recent mining and exploration activity too significant to justify transferring these large areas of multiple-use lands into wilderness”*. (Gillerman, 2018). These data do not appear to have been considered in the inventory phase of Wilderness Review but should be factored into subsequent

evaluation of the Wilderness area proposal. In short, the information provided in the IGS memo indicates that most of these areas should be significantly reduced in size or removed from consideration for Wilderness designation altogether.

2. Historical Wilderness Evaluation Efforts

The removal of vast areas of Idaho from mineral resource exploration and development potential was also addressed in Technical Report 79-1 (TR-79-1) prepared by the IGS in response to the United States Forest Service (USFS) Roadless Area Review and Evaluation Program (RARE II) in the 1970s. The RARE II Final Environmental Impact Statement describes a review of the potential for allocating 62,036,904 acres of roadless National Forest System land (in multiple states) inventoried by the second Roadless Area Review and Evaluation (RARE II). Technical report TR-79-1 comprises several papers which categorically reviewed the areas under consideration, noting mineralogic potential as well as historical mining activity and the potential impacts that would occur by designating these areas as wilderness. Papers included in TR-79-1 include:

- The Mineral Potential of Lands Proposed for Wilderness Classification by the RARE II Program of the USFS (Bennett and Gaston, 1979)
- The Mineral Potential of Lands Proposed for Wilderness Classifications in Idaho with Emphasis on the Rare II Roadless Area (Bennett, Gaston and Smith, 1978a)
- The Mineral Potential of 32 RARE II Areas of Idaho to Accompany IBMG Open File Report 78-2 (Bennett, Gaston and Smith, 1978b)

Although the majority of the areas considered in TR-79-1 are not common to those currently under evaluation on the Salmon-Challis, a summary of the main tenets of the reports provide content applicable to the current Salmon-Challis Wilderness Inventory and Evaluation Process:

1. The demands of the U.S. and global economies for mineral resources will continue to increase;
2. Limiting mineral resource development domestically will increase dependence on foreign sources;
3. Occurrences of mineral resources in the western United States are not unlimited; areas with favorable geology and demonstrated mineralogic potential should be considered when evaluating suitability for wilderness designation;
4. Wholesale removal of vast tracts of land from mineral exploration and development limits our potential for domestic mineral production (including production of critical minerals) and disregards the socioeconomic benefits those resources provide;
5. Mineralogic potential of areas considered for wilderness evaluation must be considered when assessing the suitability of those areas for removal from development.

The Final Environmental Impact Statement (FEIS) for the RARE II was published in January 1979. In the discussion of the decision-making process for identifying the selected alternative, the following is noted:

Resource tradeoffs were compelling reasons for allocating a roadless area to either the wilderness or nonwilderness category. ...Roadless areas, in most cases, have been allocated to

nonwilderness or further planning when mineral and energy potential is high. In areas with proven or producing resources, the area was usually allocated to nonwilderness. (FEIS, p. 95). In the response to comments section of the FEIS, the incorporation of mineral resource potential on candidate wilderness areas into the agency decision-making process is noted in one response as follows:

Current information regarding minerals and energy has been compiled to develop a numerical rating system for potential. The system is more fully explained on page 22. It updates knowledge of the resource and permits use of a more precise evaluation tool in reaching decisions for allocation of roadless areas. Due to its very nature, not all can be known of mineral and energy potential contained within the RARE II areas. The resource was a factor used in the decision-making process and normally, roadless areas with proven, producing, or high potential mineral or energy resources were not recommended for wilderness. (FEIS pp 104-105).

The selected alternative of the RARE II FEIS:

...recommends addition of 15,088,838 acres to the National Wilderness Preservation System. It will permit development of the 36,151,558 acres allocated to non-wilderness use and will hold 10,796,508 acres in further planning pending completion of land management plans...Through the allocation of roadless areas to non-wilderness use and the potential remaining in those allocated to further planning, the National Forest System commitment for resource and commodity outputs will be met. The proposed action represents the combination of roadless area allocations that will best provide for both wilderness and non-wilderness needs of the Nation. (FEIS p. 96).

In summary, the importance of demonstrating historical mining activity, historical and recent mineral exploration and/or favorable geology indicative of the potential for economic mineral resource occurrence appears to have been a considerable factor in the RARE II evaluation and decision-making process. These factors should also be considered as revisions to LRMPs for the Salmon-Challis National Forest are assessed.

3. Significant Financial Impact

The USFS has failed to take into consideration the serious financial implications of managing new, additional areas as Wilderness. Currently, USFS is struggling to meet the duties of managing the public lands with the limited resources provided them by the U.S. Congress. To undertake additional responsibility with limited staff and resources is irresponsible and unfair to the multiple users of public lands. Furthermore, areas managed as wilderness increases the risk and cost of potential wildfires.

No one single entity will feel the impacts of limiting the economic growth of the rural areas of the Salmon-Challis Forest more than the local governments that represent the people that live and work in the area. We believe that great consideration needs to be given to the listening to those local voices, with much more deference than those that are driving the wilderness process from offices in cities far from this area of impact. The USFS further stretching its limited

resources with a Wilderness scope impacts the communities of Salmon, Challis, Leadore, Mackay and others much greater than the offices of activists in Boise, Idaho and other states. Those local voices deserve to be heard the loudest.

Summary and Conclusions

The inventory and evaluation phases of Wilderness review on the Salmon-Challis National Forest include many areas that have demonstrated historical and/or recent mining activity, have or are undergoing exploration for economic mineral resources, or have claims and prospects in areas of favorable geology for mineral occurrence. If these areas, as proposed, progress through further stages of the Wilderness Review, the Responsible Official has discretion to implement a range of management options that could include continuing, altering, or eliminating existing uses, except those subject to valid or existing rights (USFS Region 4 Wilderness Evaluation Process, 2016). These decisions should not be made without first considering socioeconomic benefits that these areas have the potential to, or may prove to, provide.

It is not in the best interest of the local economy, USFS, nor multiple users to allow the LRMP to categorize new lands as suitable for Wilderness. We request that the USFS review and complete the required due diligence with all available information regarding the mineral resource potential of these areas and incorporate that information into agency planning, specifically the Wilderness Review inventory and evaluation processes with the conclusion that new wilderness characteristic areas are not appropriate.

Who We Are

AEMA is a 124-year old, 1,700 member national association representing the minerals industry with members residing in 42 U.S. states (including Idaho), seven Canadian provinces or territories, and 10 other countries. AEMA is the recognized national voice for exploration and access to public lands and represents the entire mining life cycle, from exploration to reclamation and closure.

Sincerely,

A handwritten signature in blue ink, appearing to read 'M. Ellsworth', with a long horizontal flourish extending to the right.

Matthew Ellsworth
Government Affairs

References

Bennett, E.H., and M.P. Gaston, 1979, The Mineral Potential of Lands Proposed for Wilderness Classification by the RARE II Program of the USFS, Technical Report 79-1, Idaho Geological Survey, University of Idaho, January 2019, 13 pp.

Bennett, E.H., M.P. Gaston, and H.T. Smith, 1978a, The Mineral Potential of Lands Proposed for Wilderness Classifications in Idaho with Emphasis on the Rare II Roadless Area: Idaho Bureau of Mines and Geology Open-File Report 78-2, 30 pp.

Bennett, E.H., M.P. Gaston, and H.T. Smith, 1978b, The Mineral Potential of 32 RARE II Areas of Idaho to Accompany IBMG Open File Report 78-2: Idaho Bureau of Mines and Geology Special Report for the office of John V. Evans, Governor, State of Idaho, 32 pp.

Gillerman, V., 2019, Idaho Geological Survey Minerals Information for Proposed Salmon-Challis Forest Wilderness Planning Proposal, memorandum prepared on behalf of the Idaho Geological Survey, January 2019.

United States Department of Agriculture Forest Service, 1979, Final Environmental (Impact) Statement 78-04: Roadless Area Review and Evaluation (RARE II), January 1979, 755 pp.

United States Forest Service, Region 4 (Intermountain Region), 2016, Wilderness Evaluation Process, September 2016, 16 pp.