



## Action Alert!

Comment on the USFS

### Federal Hardrock Mineral Prospecting Permit Draft EIS (DEIS)

**NOTICE: The comment period has been extended to June 30, 2011.**

#### Federal Hardrock Mineral Prospecting Permit Draft EIS (DEIS) - USFS

Broad scale analysis to address FS consent and BLM issuance of federal hardrock mineral prospecting permits and operating plans (present and future).

***The USFS is accepting comments on the Draft Environmental Impact Statement for the Federal Hardrock Mineral Prospecting Permits Project on the Superior National Forest, Minnesota.***

[Link to the Forest Service project website](#)

Comments must be sent to:

#### **Written comments:**

Forest Supervisor

Attn: Federal Hardrock Minerals Prospecting Permits Project

Forest Supervisor

8901 Grand Avenue Place

Duluth, MN 55808

#### **Faxed comments:**

Forest Supervisor

Subject: Federal Hardrock Minerals Prospecting Permits Project

FAX: (218) 626-4398

**Email comments:** To: [comments-eastern-superior@fs.fed.us](mailto:comments-eastern-superior@fs.fed.us)

Subject: Federal Hardrock Minerals Prospecting Permits Project

### Comment Suggestions

The Agency should choose the "No Action Alternative". The Forest Supervisor should find that issuing the prospecting permits is not in the public interest, and the applications should be rejected. The Federal Hardrock Prospecting Permits Draft EIS, as written, does not address the cumulative effects of road density patterns that will become established in the Superior National Forest, if all 33 permit applications are allowed.

The DEIS is too narrowly focused and fails to address the cumulative effects from all mineral exploration on state, private lands and the mineral exploration on all federal lands-including where the USFS doesn't own the mineral estate .

Since the ultimate purpose of mineral exploration is to create a sulfide mining district throughout the Duluth Complex of mineralization, the USFS must address potential cumulative impacts to the forest of both proposed exploration and the potential for mining.

## **Missing Information**

Due to the lack of information regarding the specifics of operating plans, etc., this DEIS is incomplete and premature. With so many unknowns and decisions yet to be made, it is virtually impossible to comment on this "project". How can comments from the public become meaningful input to the Forest Service, when so little information is provided in the DEIS? If so many specifics are withheld, until the Final EIS, how can public comments be adequately considered and what relevance will they have in shaping the project?

No permits should be issued since it cannot be assured that planned exploratory drilling can be conducted in an environmentally sound manner without violating the goals, objectives and standards of the Superior National Forest Plan. After review of the very limited information included in the DEIS, it does not appear possible for the proposed plans to adequately protect forest resources.

This important information, i.e. location of roads, drill sites, sumps and water resources to be used during operations, should be included in the DEIS. As should an in-depth analysis of how these operations and their chosen locations may affect important resources such as water, soil, wilderness areas, heritage sites and sensitive species.

The DEIS lacks an economic analysis regarding potential losses to the tourism industry, for the benefit of tenuous mineral exploration. An economic analysis is also needed to analyze the economic effects to the area's real estate market. Leasing and exploration are already de-stabilizing the area's real estate market. Before the USFS approves more discretionary mineral exploration permits, they must analyze the negative effects from doing so.

The DEIS is lacking many important details and specifics regarding this project. Without crucial details there is little discussion of effects on the environment. The DEIS fails to comply with the National Environmental Policy Act (NEPA). The DEIS does not take a hard look at this project, nor does it carefully consider detailed information regarding environmental impacts.

## **Wildlife**

How will this project affect plant and animal species? With so many unknowns, concerning how this project will be implemented and where project activities will take place, it is impossible to make predictions as to which species will be affected. The DEIS, Biological Evaluation (BE) and Biological Assessment (BA) are all missing crucial pieces of information.

The greatest impact to lynx and wolves will probably come from the hundreds of miles of roads to be built for this project. From the DEIS: "Effects from temporary roads in this project are expected to be greater than from other temporary roads because they may stay open for more years (1 to 15 years) than those predicted by the Forest Plan FEIS for resource management such as timber harvest (1 to 5 years)."

The project could have a detrimental effect to the already declining moose population and is inadequately addressed in the DEIS.

Available evidence implicates human caused noise as a threat to wildlife sexual communication, spatial distributions, and predator/prey interactions, and thus to animal populations.

Research shows that many species would avoid high background sound levels. This response could exacerbate habitat fragmentation and connectivity. Mineral exploration may disturb a limited area of vegetation, but the noise footprint is much larger. Additionally, it is believed that the quiet spaces within an exploration area may be too small and too far apart to support species that are sensitive to noise. Loud areas may also form barriers to migration and dispersal.

## **Water Resources**

The DEIS does not address the potential for Acid Mine Drainage (AMD) and heavy metal contamination from disturbing sulfide bearing rock.

Proposed drilling operations could have disastrous effects on water resources and aquatic species. The DEIS states, "The withdrawal of water to use in the drilling process could have an effect on the surface water resources. Surface water removal can affect aquatic biota by simple desiccation, or cause stress and mortality to fish and other aquatic organisms by changes in the thermal and chemical properties of water. Excess rate of water removal can affect the stream biota."

Water resources may become contaminated as a result of this project. While efforts will be made to avoid contamination, accidents including leaks, spills and leaching can still occur.

Where will water landings be located? It is important to protect riparian areas. With the potential for so much damage, it is not appropriate to use water landings for this project. The DEIS does not discuss how these impacts can be prevented or what mitigation measures will be used.

## **Roads**

Roads, both temporary and permanent, affect overall forest health and contribute to the decline of certain species. Roads negatively impact water resources, lynx, wolves and other species and cause fragmentation of the forest. Roads left open for up to ten to fifteen years are not "temporary" nor will the impacts that result be "temporary".

With the hundreds of miles of roads that could be built for this project, there will surely be significant impacts to the forest. The DEIS does not adequately assess how planned roads will impact the environment, since it is unknown how many miles of roads will be built, when they will be built and where they will be built.

Road openings also open the forest to invasive plant species.

The Federal Hardrock Prospecting Permits DEIS does not address the cumulative effects of road density, from all mineral exploration on the Superior National Forest.

Roads should not be built near the BWCAW boundary. It is crucial to keep the BWCAW a wild and pristine place. Building roads near the boundary increases the potential of illegal motor vehicle trespass into the wilderness area.

## **Noise**

Noise from project operations will affect forest users' experience. Enjoying one's time in the forest is disrupted when noise from mining and drilling machinery and heavy trucks is present.

The BWCAW is the largest road less forest area east of the Rocky Mountains and a key component of the internationally renowned Quetico-Superior Ecosystem. The BWCAW is one of the most popular and heavily used wilderness areas in the entire Wilderness Preservation System. People travel to the BWCAW seeking solitude, peace, quiet, and a natural, untrammled and undeveloped environment. Noise from mining activities and road building is directly counter to this purpose. Conducting mining activities adjacent to and within one mile of the wilderness boundary leads to isolation of the BWCAW. Additionally, activity on the very edge of the wilderness increases the distance which people must travel to avoid the sights and sounds of mechanization, effectively reducing the size of the wilderness. This reduction in wilderness opportunity is magnified when the cumulative effects of other projects are examined.

One of the many unknowns of this project is whether or not helicopters will be used during exploratory operations. The potential and expected use of helicopters, during exploratory operations, should be further evaluated in the DEIS. The noise and wind disturbance caused by helicopters could have significant negative impacts on the forest. How will the

use of helicopters affect sensitive species? When will the public know if helicopters will be used? How can an EIS be submitted without knowing whether or not helicopter operations will be employed or where they will be employed?

Concerns remain regarding helicopter use and its impact on birds. How will helicopter operations affect birds and other species? Noise considerations are not adequate. What is the impact of 24 hour a day drilling on wildlife? What is the over-all effect on bird species, amphibians, reptiles, as well as wildlife in various stages of raising young? Because of the potential harm to wildlife species, all uses of helicopters in mineral exploration should be banned.

The use of helicopters would not only greatly affect animal species in the forest but would also interfere with the recreational experience of human visitors to the forest.

Beginning with exploratory drilling, mining activities, including helicopter operations, will interfere with recreational opportunities. It will also interfere with area land owners use of their own property.

### **Monitoring and Reclamation**

Concerns remain regarding reclamation and cleanup of drill sites. Mining legacy pollution remains at decades old exploration sites on Forest Service lands from INCO's 1970's exploration along the Kawishiwi River, near the BWCAW.

If cleanup is not performed thoroughly and adequately it could result in severe environmental damage. Companies must follow through on their responsibilities to reclaim drill sites. The permittees could have a staggering ten to fifteen years to permanently abandon drill holes and complete reclamation and cleanup of sites. Drill holes can be left open for the length of the permit, which can be six to ten years. Yet monitoring and reclamation is non-specific. How does this fit in with overall Superior National Forest policy?

How will the Forest Service assure that sites are properly cleaned up in a timely manner? More information is required regarding monitoring, both during exploration and reclamation. The DEIS leaves many questions unanswered.

### **Conclusion**

Again, the Agency should choose the "No Action Alternative" and the Forest Supervisor should find that issuing the prospecting permits is not in the public interest, and the applications should be rejected. All permitting should be halted until analysis can provide both specific site and total cumulative impact of the growing extent of mineral exploration that would damage the character and quality of the Superior National Forest.

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