



Serving the Great Basin area of California and Nevada

February 15, 2024

Re: Polaris Exploration Project #65353, comments submitted online
<https://cara.fs2c.usda.gov/Public//CommentInput?Project=65353>

Aaron Coogan
District Ranger, Bridgeport Ranger District
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Bridgeport, CA 93517
760-932-5801

Dear Aaron Coogan, Bridgeport Ranger District, and Forest Service,

Thank you for the opportunity to comment regarding the Scoping and Notice of Proposed Action and Opportunity to Comment for the Polaris Mineral Exploration Project. This is by no means a small project without impact. It is deserving of a thorough environmental impact statement as there are cultural and historical artifacts, which are documented, and there are environmental impacts. There are sage-grouse leks in the area and a healthy, old-growth juniper-pinon forest and ecosystem.

We encourage the Forest Service at the very least to select option 4 under the "Decision Framework" of the scoping document. That is to require an Environmental Impact Statement (EIS) rather than just an Environmental Assessment (EA). An Environmental Impact Statement would more adequately address the significant environmental impacts and mitigation of those thereof. The real question is why a minerals exploration project would be approved at all in a old-growth forest system,

the likes of which are essential to maintaining a balanced environment, one that supports life and biodiversity in a world threatened by mass extinction of species.



Clearly the proposed 10 years of activity would cause significant impact as would the proposed 25 miles of roads and 250 drill sites all within 7,540 acres of the project boundary. By comparison the entire Disneyland Resort in Anaheim occupies a mere 500 acres. That includes 2 theme parks, 3 hotels and Downtown Disney. Opening up this much acreage would be devastating to the old-growth forest.

The Forest Service in the request for comments state that they need to minimize adverse environmental impacts. The precursor exploratory drilling project to this proposal involved clearing roads and drill pads that resulted (or will result) in the loss of about 700 trees in a healthy, old-growth pinion-juniper forest and left these areas barren of vegetation and in an obviously disturbed state. In fact, part of the proposed project area was subject to exploratory drilling about 30 years ago and the road scars were clearly still visible even before they were recently re-opened. The picture to the left is a recent drill pad in the Sawtooth Ridge project (a precursor to the Polaris project) and shows the contrast between the existing old-growth forest and the clear-cut pad scraped into the dirt.

The existing Hecla mine located adjacent to the proposed project area provides a very real example of the devastating impacts and permanent scarring that is done to the land. The existing mining operations include a huge pit lake, ramshackle structures, and barren swaths of land devoid of forest or any vegetation. It stands in stark contrast to the lush green carpet of forest that surrounds it. The picture on the next page shows this. This "exploratory" project will only serve to further this devastation upon the natural environment. This is public land and the forest system manages it in trust as a guardian. The claims owners may have a right to extract minerals, but not at the cost of decimating the environment.

Another reason to require an environmental impact statement is the proposal does not include the all the specifications for the roads, pads, and drill sites. Phase 1 calls for 40 acres of disturbance, 9 miles of road, and 102 drill sites. The rest of the project is not scoped out. The plan of operations includes reclamation cost estimates for only 102 pads, not the rest. Therefore, the Forest Service would not really be able to determine the full impact of the project without this information and determine if the mitigation efforts necessary to counteract them are sufficient. It is not acceptable to give a for-profit company carte blanche access to ruin our public lands for their gain. How can the Forest Service approve a project it does not know the full scope of? So, if any approval is given, it should be limited in scope to the 102 sites for which detailed information was provided.



The proposed project is for 10 years. Approving such a lengthy project would essentially give the company free reign over public lands without detailed attention to the land management plan. Not only would it allow further devastation of healthy, old-growth forest and the ecosystem it supports, the restoration plan of seeding with 3 years of monitoring is inadequate to ensure that the pinyon trees are sufficiently re-established where they have been removed. "Old-growth pinyon and juniper woodlands have distinct characteristics that develop over centuries. Intervals between stand-replacement events in some woodlands can be hundreds of years, allowing for development of old-growth characteristics. Some juniper species can exceed ages of 1,500 years, and pinyon species over 900 years. The oldest known western juniper is nearly 1,650 years old. The working definitions developed by BLM and the Forest Service in response to EO 14072 define old-growth pinyon juniper woodlands to be 150-250 years old, depending on site productivity, the geographic location, and other factors." (Source: <https://www.fs.usda.gov/sites/default/files/pinyon-juniper-fact-sheet.pdf>). Pinyon trees produce cones every three to seven years. Trees usually do not start bearing cones before they are 35 years old and do not start producing good seed crops before 100 years. How can a 3 year mitigation plan to reseed ensure that the replanted trees cone as expected at 35 years old and reach the mature/old-growth status that they have now? What is in the seed mix? Can pinyon/juniper forests really be re-established from seed? It seems that the plan is to remove trees and

reseed with non-tree species such as sage shrub? Why even allow the removal of the trees in the first place? The project has estimates that 4,000 trees will be trimmed or removed. How many will be trimmed and how many will be removed? A mitigation plan to restore devastated forest land would need to be much more extensive and than what was presented to ensure that the harms done are remediated.

The Forest Service has already determined that the project area scope includes old-growth pinion-juniper forest in the Humboldt Toiyabe National Forest and there is a mandate that the Deputy Chief of the National Forest System review (and possibly not approve) any project that includes vegetation management in old-growth forests. The Polaris project must go before the Deputy Chief of the National Forest System for review before any approval is possible. The letter dated 12/18/2023 from the Deputy Chief of the National Forest System to regional foresters states: "Effective immediately, any projects proposing vegetation management activities that will occur where old growth forest conditions (based on regional old growth definitions) exist on National Forest System lands shall be submitted to the National Forest System Deputy Chief for review and approval."

<https://www.fs.usda.gov/sites/default/files/ReviewOfProposedProjectsWithManagementOfOldGrowthForestConditions-NFSDC.pdf>

Also the Hecla Sawtooth Ridge project, which was approved by categorical exclusion should be be suspended pending review by the Deputy Chief of the National Forest System for the same reasons, and no further work should be done.

The plan of operations cites a need for using as much as 10,000 gallons a day. Is the intention to drill and pump water from the existing aquifer within the project area? Extracting water from forest lands, especially in dry and drought-prone areas, greatly increases the footprint of the project and the potential devastation to a balanced forest in an era of climate change. Reducing the aquifer and increasing erosion weakens healthy trees leaving them susceptible to disease, insect invasion, and die-off from lack of water, and potentially increases the tree loss count. If the intention is to truck in water, that could require several tanker truck trips a day, which would further increase the establishment of roads, turn-around and staging areas, and pollutants from exhaust emissions.

The 3 inventoried roadless areas, Aurora Crater, Mt. Hicks, and Larken Lake, should remain roadless. For 2 of the 3 areas there is not a discernible plan or map, but rather a vague description of the temporary road construction and tree thinning that would occur. Even "temporary" road construction leaves long-term scarring. The Environmental Protection Measures for nesting raptors should list the locations that will be subject to the August 30 restriction before the project starts. Also, the sage grouse and sage grouse habitat must be protected in accordance with the land management plan in order to prevent further decline of this bellwether species.

The reclamation cost estimate in the plan of operations says the estimate is for a total of 8.5 miles of road reclamation, yet the plan also says that there are 25 miles of road. Shouldn't the cost estimate include all road work, new and newly re-opened? Does this estimate include the roads in the portion of the project that hasn't been specified. The company has estimated total reclamation cost in the plan of operations is estimated to be \$278,300. I'm thinking this is a typo or maybe their projected cost to put together a mitigation study? \$2,783,000 might be more in the ballpark. Or maybe \$20,783,000 to undo the planned damage that will take centuries, not decades to reclaim. The plan refers to an appendix for the breakdown of cost, but there is no backup in the appendix to which they refer. This amount is insufficient to undo 10 years of road and pad usage, and damage done to the old-growth pinion-juniper forest and other vegetation. The plan includes hundreds of pages of material data safety sheets and toxicity reports on chemicals and materials that will be used. Since the plan is to introduce toxic chemicals and hazardous materials into an environment that is otherwise devoid of this pollution, the permit should be denied as there is no way to mitigate the damage done by introducing them into an otherwise pristine environment.

The maps that are included in the plan of operations show that there were about 26 previously approved drill sites in the Sawtooth Ridge project. This is inaccurate. The decision memo only approved 16 drill pads. Source: Hecla Nevada Sawtooth Ridge Exploration Project, Plan of Operations No. 02-21-01.

The scoping document mentions the proponent's purpose to collect information regarding economic gold resources "that can support the United States economy and bring to market needed commodities." This is a myth that the United States needs companies to mine for gold. The Department of the Interior published a list of 35 mineral commodities critical to the economic and national security of the United States. Gold is not on that list. (<https://www.usgs.gov/news/national-news-release/interior-releases-2018s-final-list-35-minerals-deemed-critical-us>) The real reason for the company to mine for gold is purely for profit of the company as the price of gold is at an all time high. This is a for-profit venture, without concern for the long-term health of forests and the benefits that they provide. Judging by the lines drawn by the project boundary this is clearly a land-grab by the company. There is no need to approve this venture.

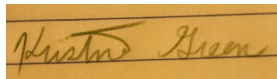
Graph of Gold Prices Over Time



We should not forget that the Earth needs forests for a variety of reasons. Forests produce oxygen and absorb the carbon dioxide we exhale providing us with quality air to breath. Carbon dioxide contributes to global warming; forests help counter balance the effect and keep areas cool. Carbon dioxide is stored in wood and soil. Forests provide habitat for species and complex ecosystems and help keep water in the ground and aquifers, and help prevent run off and erosion. Pinion provide a food staple that is still gathered by tribal entities.

Please consider all these factors in the Polaris project when making a decision, which could be to deny the project on grounds that the mitigation plan is insufficient to replace the trees in an old-growth forest that would take a minimum of 150 years to restore old-growth status and because of the planned introduction of toxic chemicals and hazardous materials, which once introduced would not be able to be sufficiently mitigated. Mining companies should not be given a 10-year lease to monopolize and destroy public lands where it takes nature hundreds of years to create. As per presidential executive order 14072, we should be strengthening our national forests, not destroying them. We need forests more than we need gold.

Sincerely,

A rectangular area containing a handwritten signature in cursive script, which appears to read "Kristine Green". The signature is written in dark ink on a light-colored background.

Kristine Green

Eastern Sierra Broadband

Great Old Broads for Wilderness

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(818) 726-0410

cc: Christopher B. French, Deputy Chief, National Forest System, chris.french@usda.gov; Ecosystem Management Coordination Director, Linda Walker, linda.walker@usda.gov;

Attachments:

Executive Order 14072 of April 22, 2022 Strengthening the Nation's Forests, Communities, and Local Economies

<https://www.federalregister.gov/documents/2022/04/27/2022-09138/strengthening-the-nations-forests-communities-and-local-economies>

Review of Proposed Projects with Management of Old Growth Forest Conditions

<https://www.fs.usda.gov/sites/default/files/ReviewOfProposedProjectsWithManagementOfOldGrowthForestConditions-NFSDC.pdf>

Pinyon-Juniper Woodlands

<https://www.fs.usda.gov/sites/default/files/pinyon-juniper-fact-sheet.pdf>

FACT SHEET: Biden-Harris Administration Advances Commitment to Protect Old Growth Forests on National Forest System Lands

<https://www.whitehouse.gov/briefing-room/statements-releases/2023/12/19/fact-sheet-biden-harris-administration-advances-commitment-to-protect-old-growth-forests-on-national-forest-system-lands/>

Hecla Nevada Sawtooth Ridge Exploration Project

Plan of Operations No. 02-21-01

20221214_Final_HeclaSawtooth_Decision_Memo.pdf