UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
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OFFICE OF
ECOSYSTEMS, TRIBAL AND
PUBLIC AFFAIRS

February 23, 2015

Anthony Botello
District Ranger
Krassel Ranger District
500 North Mission
McCall, Idaho 83638

Re: U.S. Environmental Protection Agency Comments for the Golden Hand No. 1 and No. 2 Lode Mining Claims Project Final Environmental Impact Statement.
EPA Project Number: 08-062-AFS.

Dear Mr. Botello:

The EPA has reviewed the final Environmental Impact Statement and draft Record of Decision for the Golden Hand No. 1 and No. 2 mining claims. Our review of the FEIS was conducted in accordance with our responsibilities under National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act. Under our Section 309 authority, our review of the FEIS considers the expected environmental impacts, and the adequacy of the EIS in meeting procedural and public disclosure requirements of NEPA.

The FEIS discloses the effects of the proposal to allow the proponent access to Golden Hand No. 1 and No. 2 claims to prove claim validity. The claims lie within the Frank Church River of No Return Wilderness Area on the Payette National Forest approximately 19 miles north of Yellow Pine.

In our September 17, 2012 letter we assigned an Environmental Concerns – Insufficient Information (EC-2) rating to the preferred alternative in Draft EIS- Alternative C. We were primarily concerned with impacts to water quality and ESA listed fish species, and we believed that the DEIS lacked sufficient detail regarding water quality monitoring and financial assurance. The draft ROD identifies Alternative C as the selected alternative and the environmentally preferred alternative. Alternative C allows fewer motorized trips into the FC-RONR Wilderness Area than the proposed action and moves fuel storage and facilities outside of the wilderness boundary.

The EPA supports the USFS's level of documentation, which is atypical of an exploration project because of the sensitivities of the project area (wilderness characteristics and ESA species). The EPA agrees that the required mitigation should be protective of water quality and that improving degraded roads will result in sediment load reductions to fish bearing streams. We appreciate the response to our comments and additional information such as the biological opinion/terms and conditions, water quality conditions, and monitoring plan components. However, we believe that additional detail regarding the monitoring plan is needed to provide assurances that mitigation is implemented and that a feedback mechanism exists to inform site management over the life of the project.

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The monitoring plan described in Appendix C includes useful details outlined for each resource. These include objectives, parameters, frequency, cost, and responsible individuals. We appreciate this level of detail; however, we believe that the plan would benefit by including additional information to support a more comprehensive plan. Components such as thresholds, triggers, and corrective actions would aid in understanding how the feedback from monitoring will be used, and more clearly direct personnel to take specific actions to address issues. For example, while most of the plans do not appear to include specific thresholds, the fisheries monitoring plan includes triggers for turbidity (not to exceed 50 NTUs) although corrective actions are not described. CEQ guidance[1] states that monitoring can improve the quality of overall decision making by providing feedback on the effectiveness of mitigation techniques. The plans should include information on type and location of monitoring devices, sampling parameters and frequency, analytical methods, reporting procedures, and procedures to respond to adverse monitoring results. We encourage the USFS to further develop a comprehensive monitoring plan for the project.

The FEIS indicates that USFS staff will conduct frequent monitoring tasks (e.g., daily observations) over the life of the project – anticipated to last three field seasons. However, it is unclear how staff will conduct this frequency of monitoring given the remoteness of the site. Will staff reside at the camp (Werdendorff)? We support the USFS design for frequent monitoring and the presence of agency staff to conduct observations. More information about staffing and access will provide assurance about the efficacy of this measure. We recommend that the final ROD include a discussion about the logistics of staff's daily access to the site.

Thank you for this opportunity to comment on the FEIS. If you have any questions or concerns please contact me at (206) 553-1601 or by electronic mail at reichgott.christine@epa.gov, or you may contact Lynne Hood of my staff at (208) 378-5757 or by electronic mail at hood.lynne@epa.gov.

Sincerely,

Christine B. Reichgott, Unit Manager
Environmental Review and Sediment Management Unit

[1] CEQ. 2011. https://ceq.doe.gov/current_developments/docs/Mitigation_and_Monitoring_Guidance_14Jan2011.pdf