

**SUPPLEMENTAL EIS
RESPONSES TO COMMENTS**

SCENIC RESOURCES

Scenic Resources SCR-1100

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1. *Tailings piled along the shores of the Clark Fork River would ruin that lovely scenic drive, one of the highlights of our western travels. (S1434)(S4354)*

Response: Agency-proposed mitigation measures that are discussed in Chapter 2 of the EIS for Alternatives III, IV, and V would help reduce project effects and restore a natural-appearing landscape to the permit area several decades following mine closure.

2. *I'm concerned about the fact that a 500 acre site would be extremely visible from the Wilderness. (S3293)*

Response: The impoundment would disturb 324 acres, not 500 under any action alternative. A total surface disturbance of the tailings deposit and associated facilities under Alternative V would be 368 acres. The agency-proposed mitigation under Alternatives III-V, that would begin tree planting sooner than Sterling-proposed mitigation, would help restore a natural-appearing landscape to the project area over the long-term but would be largely ineffective at screening mine facilities from Cabinet Mountain Wilderness (CMW) viewpoints during the short term. Under Alternative V with bottom-up construction of the tailings paste facility, tree planting on the top surface would be phased over years 21 through 33 of mine operation. Visibility of the top surface of the paste deposit from some CMW viewpoints would remain high for many years.

3. *Additional explanation of how visual quality objectives will be met at the tailings site, especially with the addition of a 100 foot high paste plant building is needed. (F1)(S4364)(S4891)(S4912)(S5051)(S5052)(S5054)(S5088)(S5555)(S5763)(S6613)*

Visual objectives must be met at the tailing site. How will this happen with the addition of a 100-foot high paste plant building? (S177)

Page 2-52. How is it possible to "visually blend" a 110-foot high building with trees and vegetation? (S3462)

Response: Due to the nature of the proposed activity, National Forest Service land within the permit boundary would not have a Forest Plan Visual Quality Objective (VQO) during mine operation (see Scenic Resources in Chapter 4 of the EIS). Following mine closure the long-term VQO of Partial Retention would be applied after reclamation. To help mitigate visual effects of the paste plant during mine operation, the measures described in Chapter 2 of the EIS would be implemented, including on-site evaluation by the Agencies and Sterling prior to final siting of the plant, selection of a hillside location to help reduce plant visibility, minimizing cut and fill slopes, painting to blend it with adjacent hillsides by using darker rather than lighter colors, and retention of surrounding trees and vegetation to the extent possible. These measures will help the plant 'blend' with the surrounding forest landscape, but may not completely hide it. Reclamation and decommissioning activities also would include removal of the plant and other life-of-mine facilities.

4. *Page 4-176 (Top-Down Option): In regard to the discussion that the Alternative V top-down option would more closely resemble natural landforms than the bottom-up option, with outer slopes of 5:1, we again draw attention to the Klohn-Crippen draft FMEA conclusion that the bottom-up option could be flattened to 5:1 and otherwise recontoured to reduce visual impacts. (S146)*

Response: The conceptual design for Alternative V with bottom-up construction, as described in the EIS, would have uniform outer slopes of 3:1. The Agencies' preferred alternative, as described in Chapter 2 of the EIS, would utilize bottom-up construction to help address stability issues and would also incorporate measures to meet visual mitigation and reclamation goals. These measures, include

flattening outer slopes, incorporating varying slopes ranging from 3:1 to 5:1, and pushing the crest of the deposit further from Highway 200. Agencies would review and approve a more detailed final design prior to implementation.

5. On page 4-189, the SEIS states, "The project would be visible from viewpoints in the Clark Fork Valley, NFS lands, and the CMW. The visual impact of the utility and transportation corridor, evaluation adit, and ventilation adit would significantly affect some viewers. The agency-proposed reclamation and revegetation plan, when completed, would decrease visual effects of mine components. However, the paste deposit for Alternative 5, both mill sites, and waste rock dumps for all action alternatives would irreversibly alter the natural landscape. Development of these projects components would be an irreversible commitment of these visual resources."

These impacts severely diminish the wilderness experience, detract from the scenic values of Highway 200 and the Clark Fork River, and alter the rural and remote qualities of the area. The economic and environmental importance of these relatively undisturbed ecological and scenic resources should be seriously and carefully considered by the agencies.

On page S-24 the proposed Visual Management System: Several decades is much too long for anybody to wait to have the Rock Creek landscape return to a visually acceptable level. (S3706)(S6312)

Response: The lead agencies will fully consider short and long-term impacts, including the importance of affected scenic resources and long-term restoration of natural-appearing landscapes, when making final decisions on approval or denial of the operating permit and plan of operations.

6. Figures 4-9 and 4-10: These simulations are pictures of trees and reclamation, not of the paste facility. Either change the titles or show a true representation of the proposed tailings impoundment. And why is the cute little term "Tailings Paste Facility" used here instead of the more honest and accurate "tailings impoundment?" (S417)

Response: For Highway 200 viewpoints, the paste facility would not loom directly overhead nor result in a total loss of view of the Cabinet Mountains. Near-foreground trees planted adjacent to the highway would effectively screen views of the tailings paste facility as they grow during mine operation. See also Figure 4-19, titled "Visual Simulation of Tailings Paste Facility with Bottom-Up Construction With No Tree Screening Mitigation (Viewpoint #1)," in Chapter 4 of the EIS that depicts the tailings paste facility without tree planting adjacent to Highway 200. The term 'tailings paste' has been used in the EIS to describe the dewatered tailings that would be applied directly to the ground for Alternative V. The term impoundment or tailings dam is more appropriate for Alternatives II through IV which would have slurried tailings contained behind a constructed dam.

7. Figure 4-17: This figure is a more honest attempt at a fair representation of what the impoundment will look like to the passerby. But from my observations and quick measurements from that same site, the proposed impoundment will totally obliterate any views of Engel Peak from Highway 200, a fact this Figure does not accurately reflect. (S471)

Response: This figure, Figure 4-19 in the final EIS, shows paste facility construction without tree planting along the highway, an agency-proposed mitigation measure for Alternatives III through V. Simulations were computer-generated from coverages for surrounding topography, paste facility conceptual design, and viewpoint locations. Although the south face of the deposit would rise approximately 320 feet to an elevation of 2680 feet, its crest would be located about 0.4 mile from Highway 200 and would not totally obscure views of surrounding peaks such as Engle Peak.

8. Page S-23 5th paragraph "The cut and fill ... would be visible for a long time." Change to 'Forever'. See CDA River Mining basin (Wallace area). (S4832)(S4833)

Response: Newly constructed mine access roads that are maintained during mine operation would be highly visible. However, with discontinued maintenance at the end of mine life, the initially strong visual contrast of cut and fill slopes along these roads would slowly diminish with the weathering of exposed soils and regrowth of trees and shrubs, and would not last forever.

9 Page 2-106 Issue 8: Why isn't the failure to comply with visual quality standards grounds for permit denial? (S4832)(S4833)

Response: Compliance with Forest Plan Visual Quality Objectives (VQO's) is addressed in Chapter 4, Scenic Resources of the EIS. See also Forest Plan Direction in the EIS. Following project approval, the current Forest Plan would be amended to create new management areas (MA-31 and MA-23). With the amendment, the project will comply with the Forest Plan; therefore, there will not be grounds for denial. Both MA-31 (mineral development) and MA23 (electric transmission corridor) would not have a VQO during mine life, but would have a VQO of Partial Retention following mine closure. This VQO would be met several decades after mine closure following the successful completion of reclamation activities, decommissioning and removal of above-ground linear facilities and regrowth of vegetation.

10. Page 4-131 under "Local Economy" "Mine operations ... would decrease general area attractiveness." Is this unavoidable impact? Do the locals approve of this? (S4832)(S4833)

Response: Probable effects of the proposed project that could not be avoided do include alteration of existing settings and landscapes in both the Clark Fork Valley and Rock Creek drainage during mine operation and for several decades following operation. Project operations would increase local population, traffic and associated noise, shifting the area's environment toward a more urbanized setting. Mines are an industrial type of land use and would reduce the area's rural character. This would be an unavoidable impact. Some local residents support this change. Others do not.

11. Page 4-164 Evaluation adit. Even more important than shielding the Clark Fork valley from obnoxious industrial lights is protecting the Cabinet Mountain Wilderness Area from light pollution. The agencies should make a policy of zero light pollution to be visible from within the Wilderness area from any portion of the entire proposed project. (S471)

Response: The evaluation adit would require nighttime lighting for the year of adit development. Sterling proposes to use shielding and strategic placement of lights, as well as new bulb colors. These measures should minimize light pollution from project facilities for nearby viewpoints as well as more distant viewpoints such as lake basins within the Cabinet Mountain Wilderness. Lights for nighttime operation of some project facilities would still be visible from some viewpoints on the perimeter of the CMW (see Table 4-65 titled "Project Facilities that would be Visible from Wilderness Peaks by Alternative" in Chapter 4 of the EIS). Wilderness designation does not preclude the presence of man's activities outside of the wilderness boundary. Congress did not authorize any buffer zones to preclude the sights and sounds of man.

12. Page S-23 6th paragraph: "Visual impacts ... significant." To whom? (S4832)(S4833)

Response: This comment refers to the summary of visual impacts for the Alternative IV and V confluence mill site, which states that visual impacts from the confluence mill site would be potentially significant. As discussed in the final EIS, this mill site would be visible to recreationists and other users surrounding National Forest Service roads and lands. The mill site's contrasting form and color, elevated location at the confluence of two drainages, industrial character, and lack of vegetation during mine operation all contribute to high contrast with the surrounding landscape and potentially significant visual impacts.