

SALMON-CHALLIS NATIONAL FOREST

WILDERNESS UPDATE

BLACKBIRD MOUNTAIN & LEACOCK POINT

The Salmon-Challis National Forest is conducting a wilderness evaluation as part of forest plan revision to determine what, if any, lands should be proposed for further analysis and consideration. The Salmon-Challis National Forest Supervisor is removing the Blackbird Mountain and Leacock Point focal areas from further consideration for analysis because of investor concerns and ongoing and expected cobalt exploration and production.

The Salmon-Challis National Forest began forest plan revision in January 2017. In November 2018, a draft wilderness evaluation map was made available for public review that included the Blackbird Mountain and Leacock Point areas. To date, an inventory and evaluation have been conducted in accordance with Forest Service Handbook 1909.12, Chapters 71 and 72, and the forest is receiving comment. A draft record of decision including any wilderness recommendation is expected in 2021.

These areas include the only cobalt belt in the United States, and previous exploration indicates it is a “proven area” with high confidence in profitable deposits of cobalt. The strategic importance of cobalt was recognized with the inclusion of the Special Mining Management Zone on the northern end of this cobalt belt in Idaho’s Frank Church – River of No Return Wilderness in the Central Idaho Wilderness Act of 1980, which allows for exploration for cobalt and associated minerals.

Further, Executive Order 13817, “A Federal Strategy to Ensure Secure and Reliable Supplies of Critical Minerals” addressed the United States' dependency on vulnerable limited and foreign supply chains of mineral commodities that are vital to the Nation's security and economic prosperity. Cobalt is on that final list of critical minerals.

Executive Order 13817 states, “It shall be the policy of the Federal Government to reduce the Nation's vulnerability to disruptions in the supply of critical minerals, which constitutes a strategic vulnerability for the security and prosperity of the United States ... by: ...

- (b) increasing activity at all levels of the supply chain, including exploration, mining, concentration, separation, alloying, recycling, and reprocessing critical minerals; ... and,
- (d) streamlining leasing and permitting processes to expedite exploration, production, processing, reprocessing, recycling, and domestic refining of critical minerals.”

Nine companies hold mining claims and are actively engaged or pursuing cobalt exploration and production. Four companies – Utah Mineral Resources, Ethos Geologic, ePower Minerals, and International Cobalt – have submitted plans of operation that are under evaluation. In addition, First Cobalt and Century Cobalt are likely to submit plans of operations and have filed notices of intent. Three companies – New World Cobalt, Quantum Cobalt, and eCobalt – currently hold approved mining plans of operation.

The next two years are a critical time for these companies, especially those with approved plans of operations. Companies are actively seeking investor funds to support their bonding, exploration, and production. For example, eCobalt has \$33M in available capital, has satisfied a \$7.2M surface reclamation bond, and is seeking investors to imminently support a water treatment bond and continued operations.

Investor support is influenced by many factors, including stable regulatory environments. Companies and stakeholder comment indicate that gathering investor support is becoming difficult due to the Blackbird Mountain and Leacock Point areas' current consideration in the wilderness evaluation. Companies also state in their plans of operation that they intend to conduct additional exploration and production beyond existing submitted and approved plans in these areas. These expansion opportunities are also important to attracting investment.

Forest Service Handbook 1909.12, Chapter 73, requires the Forest Service to document the reason for excluding an inventory area from further analysis. The forest supervisor has received public comment and has gathered enough information to fully understand supportable rationales for excluding the area. In addition to the factors described above supporting immediate action, the reasons to exclude are many and include:

1. Potential withdrawal from mineral entry.
2. The use of natural fire as the primary tool in these areas would be complicated with Blackbird mine and eCobalt mining within this area. Active remediation at Blackbird and eCobalt operations depend on power lines that split these areas.
3. Idaho Roadless Area currently provides protections in the area and requires that road construction or timber cutting meet specific exceptions.
4. The western most part has already been excluded from the Frank Church – River of No Return Wilderness as a cherry stem. Generally these areas would complicate management of the Frank Church – River of No Return Wilderness by effectively extending the boundary to less manageable locations near active mining, remediation, and associated infrastructure including power.
5. Active management is needed and includes active invasive plant management, prescribed fire, motorized scientific studies, wildland fire rehabilitation, commercial and non-commercial timber cutting. These activities may be foregone or hampered by wilderness recommendation.
6. The Blackbird mine is a private inholding and eCobalt operations form a cherry stem into the area and complicate manageability and solitude of the area. This includes active operations on high points that would compromise solitude in the areas and expansion prospects that would complicate balancing recommended wilderness while allowing statutory rights.

Based on the above considerations the Blackbird Mountain and Leacock Point area are removed from further analysis in the proposed action because it creates uncertainty for companies presently seeking investors for ongoing and expected cobalt exploration and production. Additionally, including these areas in further analysis is counter to direction in EO 13817 to reduce reliance on foreign sources of mineral commodities that are vital to the Nation's security and economic prosperity.