January 5, 2025

Elizabeth Toney, Silver City District Ranger
Gila National Forest
3005 E Camino del Bosque
Silver City, NM 88061

Dear Ms. Toney:

On behalf of the 13 local and statewide conservation and community organizations listed below, we are writing to you regarding mineral exploration in the Gila National Forest. Some of us have received numerous calls and emails from concerned citizens and private property owners about mineral claims found on Gila National Forest (GNF), Bureau of Land Management, and private lands in the vicinity of Pinos Altos. Local residents are very concerned and worried about the impacts of exploration activities on the forest's natural resources and wildlife, recreational opportunities, property values of homes located adjacent to the forest, and the local economy.

It is our understanding that there are no Plans of Operation submitted yet to the GNF for any of these claims. We have conducted research on Pinos Altos Exploration and its parent company Ivanhoe Electric, Kennecott Exploration/Rio Tinto, and Celatus Copper USA that have all staked claims on Gila National Forest lands over the past year.

From our research, we understand that Ivanhoe Electric, parent company of Pinos Altos Exploration LLC, is furthest along in its planning. To date, Pinos Altos Exploration, through its agent Burgex Inc, has staked 642 claims totaling 13,264 acres on the Gila National Forest, BLM and private land around Pinos Altos, 8 miles north of Silver City. Ivanhoe staff and contractors have communicated with local residents while in the field and have provided a small amount of information on their plans.

Although the public does not have any information other than what is available online and in public records, this letter outlines our concerns with Ivanhoe Electric's exploration proposal as it is understood to date.

We strongly urge the Gila National Forest to provide public notice, public review, and public comment on the Ivanhoe Electric/Pinos Altos Exploration proposed exploration plan. The GNF must consider the direct, indirect and cumulative impacts of any exploration project in its decision making.

- <u>The publicly-available information about how Typhoon™ induced polarization and electromagnetic geophysical survey technology work lacks adequate detail.</u>

  Ivanhoe Electric has developed a proprietary technology called Typhoon™ to survey the subsurface for mineral deposits. This technology uses a high-powered electrical pulse and data interpretation software that can gather and visualize data 1.5 km deep (.93 mi) and 20 km (12.4 mi) across the land surface. Given the proprietary nature of the technology, there is not much information available online to understand the potential safety and environmental impacts of this mineral exploration technique.

  In order to understand the potential impacts of this type of an exploration project on the Gila National Forest and its natural resources, the Gila National Forest and the public need information on the following:

  - How does the Typhoon technology work?
  - How is the high-powered transmitter powered? Will generators be used?
  - Ivanhoe Electric's website states that the technology uses a "voltage output of up to 10,000 volts." What voltage level will be used on the Pinos Altos Exploration?
  - How are the transmission lines laid out? Will vegetation need to be cleared to lay the transmission lines? Will overland, off-road travel be required?
  - Where will the transmission lines be laid out? Is there a map available to the public?
  - How many receiver pits will be excavated and how many receivers used? How much land will be disturbed to excavate and install the receivers?
  - For what span of time is Typhoon™ operated – days, weeks, months? What are the daily hours of operation? Will the generators be operational at night? If so, are lights required for night-time operation?

- <u>The Pinos Altos exploration project poses a risk to worker, resident, visitor and livestock safety.</u>

  Lack of specific information about the Typhoon™ induced polarization technology raises concerns about worker, resident, visitor, and livestock safety during the exploration activities.

  For example, Ivanhoe Electric's website states: "On-board intelligent electronics instantly shut down the system if potentially hazardous situations are detected," but these

conditions are not defined. What are these "potentially hazardous conditions," and how often do they occur, on average?

Online research indicates that there is a low to moderate risk of electrocution to workers and other people in the surrounding area, as well as to livestock. Similarly, online information indicates that the Typhoon technology could temporarily interfere with electronic devices e.g., pacemakers, defibrillators, and cell phones.

- Exploration activity poses a wildfire risk to the Gila National Forest given extreme drought conditions.

  Since 2012, the Gila National Forest has experienced the largest wildfires in its recorded history. Residents of rural communities adjacent to the forest, including the town of Pinos Altos, have been evacuated several times since 2012, and this is only expected to increase as climate change progresses. The town of Pinos Altos and part of the Pinos Altos Exploration project lie within a Wildland Urban Interface (WUI) that is highly vulnerable to wildfires, and at all times of year. "Climate change is also increasing the length of fire seasons and the number of days of extreme fire weather." (Gila National Forest Land Management Plan, July 2024 p. 28).

  Vehicular access, use of chainsaws, camping in remote areas, in addition to generator use, all increase fire risk, particularly in remote, rugged areas that don't see a lot of human activity and that are hard for firefighters to access or install preventative measures.

- The exploration activity could significantly disturb soils and land within the Gila National Forest.

  The exploration activity will presumably consist of clearing vegetation, transporting transmission line and remote sensing equipment via vehicles through the forest- possibly on existing roads or overland - digging pits for the receivers, and laying the transmission line. Given Pinos Altos Exploration has staked claims to more than 13,000 acres, the exploration activity is likely to cause significant disturbance to soils and the land within the Gila National Forest, potentially exacerbating erosion.

  Moreover, operating generators within the forest raises the risk of fuel and oil spills that can contaminate the soil and bring about secondary water quality impacts. It is

unknown if the Typhoon technology's high electrical pulse itself will cause damage to soil health.

Because soil health is the basis of functioning ecosystems and watersheds, it is essential to minimize bare soil and maximize vegetative cover. As climate change accelerates, "Precipitation is expected to come in fewer, but more intense storms. Minimizing the extent of bare soil and maintaining or improving soil properties that enhance water capture was always important and is now more so." (Gila National Forest Land Management Plan, July 2024 p. 28)

Reclamation of land disturbance will be critical to mitigating natural resource damage caused by exploration activities.

- <u>Pinos Altos Exploration must comply with the Gila National Forest's Travel Management Plan.</u>

  Unmanaged, off-road motorized travel causes harm to soils, streams and rivers, watersheds, native plants, birds, wildlife, and quiet recreation. In 2005, the Gila National Forest, along with all national forests in the country, was mandated to manage motorized vehicle use on the forest. In accordance with the provisions of the Travel Management Rule and 36 Code of Federal Regulations (CFR) parts 212, 251, and 261, the Gila National Forest spent several years developing a system of designated roads, trails, and motorized areas. 36 CFR 261.13 required that the forest prohibit motorized cross-country travel off the designated system. The Gila National Forest Travel Management Record of Decision was signed in 2013 and is currently in effect. As part of the Travel Management process, the Gila National Forest developed Motor Vehicle Use Maps (MVUMs) to inform the public about open roads where motorized travel is permissible.

  In order to prevent natural resource damage, the Gila National Forest should prohibit off-road motorized transport of exploration equipment and transmission lines in accordance with the Travel Management Plan.

- <u>The exploration project must avoid Inventoried Roadless Areas.</u>

  "Inventoried roadless areas were established under the 2001 Roadless Area Conservation Rule (36 CFR Part 294)." (Gila National Forest Land Management Plan, July 2024, p. 248) "Inventoried roadless areas are large, relatively undisturbed landscapes

that contribute to biological diversity and the long-term survival of at-risk species. They serve as safeguards against the spread of invasive plant species and provide reference areas for study and research. Inventoried roadless areas appear natural, have high scenic quality, and provide opportunities for dispersed recreation." (Gila National Forest Land Management Plan, July 2024, p. 250)

"The Roadless Area Conservation Final Rule (Roadless Rule) prohibits road construction [and] reconstruction…" (Gila National Forest Land Management Plan, July 2024, p. 249). The Gila National Forest Land Management Plan, July 2024, contains standards, defined as "mandatory constraints on project and activity decision-making, established to help achieve or maintain desired condition or conditions, to avoid or mitigate undesirable effects, or to meet applicable legal requirements." (Gila National Forest Land Management Plan, July 2024, p. 3) The standard for Inventoried Roadless Areas states: "All management activities conducted within inventoried roadless areas must maintain or improve roadless characteristics." (Gila National Forest Land Management Plan, July 2024, p. 250)

The Gila National Forest has 29 Inventoried Roadless Areas (IRAs), two of which would be impacted by Pinos Altos Exploration.

The Gila National Forest must prohibit motorized vehicle use for this exploration project within Inventoried Roadless Areas.

- <u>Exploration activities have the potential to impact critical water resources.</u>

  Over 600 claims have been staked by Pinos Altos Exploration throughout the upper Silver City, Cameron Creek, Mimbres and Gila watersheds. We are very concerned that the exploration project has the potential to impact municipal water supplies and other important water resources such as Bear Creek, a tributary to the Gila River. Cameron Creek recharges groundwater for municipals wells for the Village of Santa Clara and Fort Bayard, and any water pollution generated by this exploration project would directly impact this low-income, majority Hispanic community.

  Numerous creeks flow throughout the 13,000+ acres of Gila National Forest land claimed by Pinos Altos Exploration for mineral exploration and development. These are the headwaters to important surface water resources that are used by people for municipal water supply and agriculture, as well as by wildlife.

Laying Typhoon transmission lines in and across waterways could damage streambanks leading to water quality impacts that affect aquatic species. Spills of fuels and chemicals used to operate generators can contaminate streams in the vicinity of the exploration project. It is unknown if the high-powered electrical pulses used by Typhoon could impact aquatic life, including macroinvertebrates, amphibians, reptiles, and fish. The public needs more information on the impacts of the technology.

- <u>The exploration project is very likely to adversely impact native plants.</u>

  The Gila National Forest's Land Management Plan (Forest Plan), dated July 2024, lists twenty-one Species of Conservation Concern, defined as species other than federally recognized threatened and endangered species known to occur on the Gila National Forest. Of these, nine have been observed in the Pinos Altos Exploration area or could occur there, based on habitat type.

  These nine plants and their habitat descriptions, listed in the Gila National Forest Land Management Plan, Appendix G, are as follows:

  1. Arizona crested coralroot (*Hexalectris arizonica*) occurs in heavy litter in oak, pine, or juniper woodlands in mesic to dry soils, often in limestone from 5,000 to 7,000 feet elevation.
  2. Davidson's cliff carrot (*Pteryxia davidsonii*) occurs on moist, rocky places on sheer north-facing cliffs in woodland Ecological Response Units between 6,500 and 8,000 feet elevation (New Mexico Rare Plant Technical Council 2023). Threats are not well known but may include mining or mineral exploration and wildfire.
  3. Metcalfe's penstemon (*Penstemon metcalfei*) occurs in cliffs and steep north slopes of montane conifer forest from 6,600 to 9,500 feet elevation.
  4. Mimbres figwort (*Scrophularia macrantha*) occurs on north-facing slopes in pinyon-juniper woodlands to dry mixed conifer between 6,500 to 8,200 feet elevation (New Mexico Rare Plant Technical Council 2023). Threats include mining or mineral exploration, fire, road construction or maintenance, and collection.
  5. Mogollon clover (*Trifolium neurophyllum*) occurs in wet meadows, springs, and along riparian corridors in montane coniferous forest from 6,500 to 9,000 feet elevation.
  6. Pinos Altos flameflower (*Phemeranthus humilis,* synonym *Talinum humile*) occurs in pine oak woodlands on rocky, south-facing slopes, usually on shallow, gravelly, usually clayey soils overlaying rhyolite. Pinos Altos fameflower is known to occur adjacent to Hwy. 15 near the trailhead to Ben Lilly overlook, as well as other sites.

7. Porsild's starwort (*Stellaria porsildii*) occurs in shady and partially open understory of mixed conifer stands between 7,900 and 8,200 feet elevation. Porsild's starwort has been observed in the last two years near Meadow Creek.
8. Wooton's hawthorn (*Crataegus wootoniana*) occurs in riparian habitat in montane conifer forest at an elevational range of 6,500 to 8,000 feet. Wooton's hawthorn has been observed in 2024 in Cherry Creek Campground, along Cherry Creek outside of the campground, and nearby along Hwy. 15.
9. Wright's catchfly, or campion, (*Silene wrightii*) occurs on cliffs and rocky outcrops in conifer forests between 6,800 and 8,000 feet in elevation.

In addition to the Gila National Forest's Species of Conservation Concern, New Mexico's Energy, Minerals, and Natural Resources Department has designated Important Plant Areas throughout the state, with rankings of B1 to B4, with B1 being highest in conservation priority. The entire Pinos Altos Exploration area falls within the Pinos Altos Range Important Plant Area, which encompasses 155,200 acres and is ranked B1, Highest Conservation Priority. The rare plant species in the Pinos Altos Range Important Plant Area, as identified by the New Mexico State Botanists, are:

Draba mogollonica
Packera neomexicana var. *metcalfei*
Grindelia arizonica var. *neomexicana*
Stellaria porsildii
Phemeranthus humilis
Crataegus wootoniana
Astragalus cobrensis var. *cobrensis*
Sclerocactus papyracanthus
Cymopterus davidsonii
Silene wrightii
Physaria gooddingii
Scrophularia macrantha

Five of these rare plants appear on both lists. In total, there are sixteen rare plant species that have been observed or are expected to occur in the Pinos Altos Exploration claim area. At least two of these plants, *Phemeranthus humilis* and *Scrophularia macrantha*, are endemic to the Gila, meaning that they occur nowhere else. Any harmful impacts to these imperiled species could bring them a step closer to extinction.

A rare plant survey must be conducted prior to any exploration activity to ensure that plants are not destroyed by heavy equipment or foot traffic.

- <u>The exploration project is likely to affect threatened and endangered species.</u>

There are a few categories of imperiled animal species in the Gila National Forest, including: federally listed as threatened or endangered under the Endangered Species

Act; state of New Mexico listed species; and the Gila National Forest's species of conservation concern. (Plants are covered above). The Pinos Altos Exploration project is likely to affect the following species.

Birds

The Mexican Spotted Owl, a federally listed endangered species, is known to occur in the ponderosa pine forests of the Pinos Altos area. Also federally listed as endangered are the Southwestern Willow Flycatcher and the Western Yellow-billed Cuckoo, riparian species that could occur along the streams in the area of claims staked by Pinos Altos Exploration.

The Gila National Forest Land Management Plan, July 2024, considers Mexican Spotted Owl and Northern (or American) Goshawk as "focal species," indicators of ecosystem health. (Gila National Forest Land Management Plan, July 2024, p. 309)

Bird species of conservation concern include Gila Woodpecker, Lewis's Woodpecker, and Pinyon Jay, all of which have been observed in the Pinos Altos area.

State-threatened species include Common Black Hawk, Peregrine Falcon, Bald Eagle, Gila Woodpecker, Bell's Vireo, Abert's Towhee, all of which have been observed in the area of staked claims.

Mammals

The Mexican gray wolf (*Canis lupus baileyi*) which is both federally and state endangered, has a wide-ranging territory, and may be found in the Pinos Altos area. It occurs above 4,500 feet elevation in ponderosa pine-Gambel oak, riparian, and juniper woodlands, which can all be found near Pinos Altos.

The New Mexico meadow jumping mouse (*Zapus hudsonius luteus*) is federally listed as endangered with no designated critical habitat on the Gila National Forest. This species occurs in mid-elevation riparian areas (wetland, forest, and shrub riparian). (Gila National Forest Land Management Plan, July 2024, p. G-17)

Mammalian species of conservation concern include the Arizona Montane Vole and the lesser long-nosed bat, both of which frequent ponderosa pine forests and may occur in the area of staked claims.

Fish

Spikedace and loach minnow are small fish, listed as federally and state endangered fish. They may occur in the small streams of the Pinos Altos Exploration area, especially Bear Creek, a tributary of the Gila River, where they are known to occur. Rio Grande Sucker and Roundtail (headwater) chub are Gila National Forest species of conservation concern, and may occur in streams within the area of staked claims.

Amphibians and Reptiles

The Chiricahua leopard frog, federally listed as threatened, may live along the small streams and pools in the Pinos Altos area. Likewise, the narrow-headed garter snake, which is federally threatened and state endangered, is found in riparian areas.

There are also a number of invertebrates that the Gila National Forest has identified as species of conservation concern.

(Information about federally listed and species of conservation concern is from the Gila National Forest Revised Forest Plan Final Environmental Impact Statement, July 2024, p. G-19. State-listed species information is from Bison-M, the New Mexico Department of Game and Fish's database. Bird occurrence information is from Bison-M and eBird at the Cornell Lab of Ornithology.)

Biological surveys must be conducted to determine if threatened or endangered species or species of conservation concern will be impacted by the exploration proposal.

- <u>Noise from project activities could impact wildlife.</u>

  Wildlife and birds are very sensitive to noise in their surroundings. As human activities encroach upon wildlife habitat, animals are forced to abandon their homes in search of more suitable areas. Noise is especially damaging during breeding seasons, when disturbances affect breeding success. Combined with other stressors, such as disease, food shortages, and severe weather, noise can be life-threatening.

  Noise from the Typhoon generator is likely to be disruptive to wildlife, causing adverse impacts to populations of breeding birds and other animals.

- Noise from exploration activities could impact quiet recreation.

  The Gila National Forest has world class destinations for quiet recreation, such as hiking and backpacking. Its rugged, remote landscapes, far from large urban areas, hold ample opportunities for recreationists to explore and enjoy. The Gila National Forest Land Management Plan's "recreation opportunity spectrum uses the following classifications for recreation settings ranging from least to most developed: primitive, semi-primitive non-motorized, semi-primitive motorized, roaded natural, rural, and urban." (Gila National Forest Land Management Plan, July 2024, p. 219) The area within which Pinos Altos Exploration has staked its claims is designated as "Semi-Primitive Non-Motorized," which translates to an area that is very quiet, as it is largely undisturbed by traffic noise or other manmade disturbances. (Gila National Forest Land Management Plan, July 2024, p. 305) Recreationists enjoying quiet solitude, away from the stressors of modern life, relish the area around Pinos Altos as a convenient escape from Silver City, the Mining District (Bayard, Hurley, Santa Clara), and other communities.

  The exploration project is likely to be disruptive to quiet recreation while generators and other motorized equipment are in use.

- The exploration project may produce light pollution disrupting recreational experience.

  Dark skies are one of the hallmarks of the Gila National Forest, with tourists visiting from around the globe to experience the night skies. The Gila National Forest is home to the Cosmic Campground International Dark Sky Sanctuary, the first dark-skies campground in a national forest. Light pollution impacts the recreational experience and must be safeguarded.

  It is unknown if the exploration project will operate during night time and require lighting. If so, there is a very real possibility that dark skies recreation will be adversely impacted.

- The exploration project may produce light pollution that impacts wildlife.

  Artificial lighting at night is very disruptive to wildlife, birds, amphibians, reptiles, insects and plants. To cite just two examples, nocturnal predators are active at night, while their prey species use dark as cover. Birds who hunt or migrate at night navigate by starlight and moonlight; artificial lights can cause them to veer off course and toward dangerous urban or industrial sites.

The area around Pinos Altos has very dark night skies, according to a map created by CIRES at CU Boulder, in conjunction with NOAA. (https://cires.colorado.edu/Artificial-light)

It is unknown if the exploration project will operate during night time and require artificial lighting. If so, there is a very real possibility that wildlife could be adversely impacted.

- The Pinos Altos Exploration project could negatively affect recreation, a major economic driver in southwest New Mexico.

  Pinos Altos Exploration has staked claims in areas of the Gila National Forest that are heavily used by local recreationalists, sportsmen, and tourists for activities such as camping, hiking, birding, hunting, biking, sledding and cross-country skiing, picnicking, botanizing, photography, and more. Therefore, any exploration activity will have a significant impact on recreation opportunities. Any recreation closures will in turn have an impact on the local tourism and recreation-based economy. Hwy. 15, which bisects the area of Pinos Altos Exploration's claims, has been designated as a National Scenic Byway: the Trail of the Mountain Spirits Scenic Byway. The Continental Divide National Scenic Trail, an iconic hiking and backpacking destination attracting visitors from around the world, winds through the Pinos Altos Exploration claim area. This area is also considered the "Gateway to the Gila Wilderness," America's first Wilderness Area designated in 1924.

  Trail of the Mountain Spirits National Scenic Byway is a 93-mile loop that starts in Silver City, passes through Pinos Altos and the Gila National Forest on NM-15 and connects to NM-35 in the Mimbres Valley. The Scenic Byway is the most popular route to the Gila Cliff Dwellings National Monument. NM-15 between Pinos Altos and Signal Peak are within the Pinos Altos Exploration mining claim area. Shutting down this road for exploration would significantly impact tourism to the Gila Cliff Dwellings and other popular recreation sites.

  Two of the five stages of the annual Tour of the Gila – the Inner Loop Road Race and the Gila Monster - take place on NM-15 within the area of Pinos Altos Exploration's mining claims. Since 1987, Tour of the Gila has grown to become an iconic American stage race that is renowned across the globe. As a UCI-sanctioned road race, Tour of the Gila is known as the place for pros and elite amateurs to showcase their talent. Additionally, the Gila Monster Gran Fondo is a popular annual bike riding event from Silver City along

the Trail of the Mountain Spirits National Scenic Byway to the Cliff Dwellings and back, ending at the Buckhorn Saloon in Pinos Altos. NM-15 is also the route for the annual Tour Divide mountain bike race from Canada to the Mexican border and the Great Divide mountain bike route.

Pinos Altos Exploration's project could adversely impact recreation and tourism opportunities if road, campground or trail closures occur, which in turn have a direct economic impact on the tourism and recreation economy of Grant County.

- <u>The exploration project could have a localized impact on air quality.</u>

  The Gila National Forest and adjacent communities have very good air quality, especially in comparison with large urban areas. The Gila National Forest is obliged to comply with the Clean Air Act of 1977, as amended in 1990, which was enacted to protect and enhance the quality of the nation's air.

  Diesel generators produce fine particulate emissions that are harmful to breathe. People visit the Gila National Forest to escape urban areas with motor vehicle emissions and to breathe clean air while hiking or camping or engaging in other recreational activities. The exploration project could create a localized air pollution problem that would impact visitors to the area.

- <u>The exploration project could disturb important cultural resources</u>

  Numerous cultural sites are located in the Gila National Forest. Most of the area within the boundary of the Pinos Altos Exploration claims has not been surveyed. The ancient Mogollon culture and Mimbres people left behind cliff dwellings, pit houses and other artifacts. One rock art site is located in the claim area. More recently the Apache people used the Gila landscape for hunting and gathering. There are known agave roasting pit sites in the Little Cherry Creek vicinity. Early Spanish and American settlers also left their marks on the landscape of the Gila National Forest, including historic locations such as the Pinos Altos Historic District, listed on the National Historic Register since 1984; Arrastra Interpretive Site; Fort Bayard; and Civilian Conservation Corps historic structures.

  Cultural resource surveys must be conducted to ensure that the exploration project does not disturb known and unknown heritage sites.

Additionally, Tribal consultation must also be carried out before any exploration project is approved.

- The exploration project could impact the local economy of Grant County

  As discussed above, the exploration project could negatively impact the tourism and recreation-based economy due to reduced recreation and tourism opportunities. The exploration project could also cause longer-term impacts to Grant County's economy. The area to the north of Silver City and around Pinos Altos has experienced new home development. The exploration project could encourage people to move away and drive down housing prices given the negative impacts of mining exploration and the possibility of future mine development.

- US Forest Service Permitting Requirements

  We strongly urge the Gila National Forest to provide for public notice, public review and public comment of any exploration proposal given the potential for significant harm to natural resources, recreation opportunities, water supplies, wildlife and the local recreation and tourism-based economy.

  It is critical that the Gila National Forest evaluate the direct, indirect, and cumulative impacts of any exploration project given the importance of this area to Grant County.

  It is also important for the Federal Government to verify the validity and correctness of the claims staked by Pinos Altos Exploration LLC.

  Finally, any exploration project must have adequate financial assurance to cover the cost of reclamation once exploration is complete should the operator default. Therefore, the financial assurance must be in the form of a bond, letter or credit, or insurance policy. Risky self-bonding or third-party guarantees must not be accepted.

Thank you for considering our input. We look forward to hearing back from you regarding the Ivanhoe Electric/Pinos Altos Exploration project.

Sincerely,

Allyson Siwik, Executive Director
Gila Resources Information Project

Todd Schulke, Co-founder
Center for Biological Diversity

Donna Stevens, President
Gila Native Plant Society

Patrice Mutchnick, Board Chair
Heart of the Gila

Marcia Stout, Chapter Leader
Great Old Broads for Wilderness, Aldo's Silver City Chapter

CarolAnn Fugagli, Executive Director
Upper Gila Watershed Alliance

Joe Saenz, Tribal Council
Chiricahua Apache Nation

Mark Allison, Executive Director
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Camilla Feibelman, Executive Director
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Ann McCartney, Staff Attorney
New Mexico Environmental Law Center

Ava Curtis, Environmental Justice Coordinator
Multicultural Alliance for a Safe Environment

Cc: Camille Howes, Forest Supervisor, Gila National Forest