

inclusion. One resource was located outside of the permit area boundary is recommended as potentially eligible for NRHP inclusion under Criterion C. This resource is a mid-century ranch home constructed in 1950. Though currently abandoned, the integrity of the structure is intact and its architecture is significant as a representative example of a mid-twentieth century ranch house. The cultural resource survey recommended avoidance of this property. Additionally, the house is currently located near an existing chip mill and railroad tracks and is currently exposed to heavy audible effects. Due to avoidance measures the historic resource will not suffer adverse visual and audible effects as a result of the proposed mining operations. The house will not be impacted by the project.

### 3.6 Alternative 6

Alternative 6 is the No Action Alternative. The No Action Alternative would be to allow the site to remain in its current land use and condition. The current land use of the site is industrial forestry. Implementation of the No Action Alternative would entail the continued active industrial logging of the site. Currently, the site is being managed for forest resources. Implementation of the No Action Alternative would entail the continuing of practice of non-sustainable forestry at the site.

Alternative 6, since it would not involve mining for mineral sands, does not meet the criteria of suitable reserves of heavy mineral sands containing the target minerals suitable for mining. Implementation of this alternative would not allow the applicant to meet the requirements of its contracts with customers to supply the amount of heavy mineral sands required. The criteria of reasonable distance to the port of Jacksonville is met but is not relevant to this alternative, since heavy mineral sands would not be mined. Public services and facilities required to support the mine and protect public health, safety and the environment are available, but is not relative to this alternative. Alternative 6's location within approximately 0.25 mile from a rail line, which links to the port of Jacksonville is not relevant since logging currently occurs with the use of trucks. The implementation of Alternative 6 is not expected to have a beneficial economic impact on the adjacent community because without the heavy mineral sands mining, the employment of 150-200 people for 8 years would not occur.

Implementation of Alternative 6 would not impact any additional wetlands or streams on the site, other than those that are impacted by ongoing mining of forest resources. The industrial logging of the site is, in and of itself, a degradative use of the property. Google Earth and aerial images dating back to 1970 (Figure R) show continuous industrial forestry activity on the site.

There is currently past evidence of intensive mechanical disturbance (shearing, windrowing and bedding). Additionally, there is evidence of intensive herbicide use (site prep and release/mid-rotation).

The prior ownership of the site has not practiced sustainable forestry. None of the tracts have been certified as sustainable forestry by the Sustainable Forestry Initiative (SFI). There is significant on-the-ground evidence that vegetation on the site has been severely negatively impacted by industrial forestry activity. This evidence includes:

- >18" beds (in most drier areas, in all low-lying areas including wetland ecotones and entire area of shallow wetlands)
- Windrows/piles
- Lack of stumps and stump holes
- Low plant diversity, vegetation dominated by 'weedy' old field species (e.g. *Andropogon virginicus*, *Rubus sp.*, etc.)

There are many peer-reviewed studies on the effects of mechanical and chemical treatments on