

Oct. 26, 2020

To: Linda Jackson, Forest Supervisor, Payette National Forest

From: Robert Bryant (email: bobbryant44@comcast.net)

Subject: Comments and Concerns regarding the **Stibnite Gold Project**

I previously submitted comments with my significant concerns about the Stibnite Gold Project (SGP) plans as written in EIS #50516. My #1 point in those comments was that Johnson Creek Road should not be used by the SGP. These additional comments are related to the comments submitted on October 26, 2020, by Stephen Quin, President and CEO of Midas Gold. He makes a very strong case for NOT allowing the use of Johnson Creek road and the Yellow Pine route at any time by the SGP, consistent with my previously submitted comments. The following bolded notes are from Stephen Quin.

In Stephen Quin's comments, he states that **"the significant technical and safety risks associated with Alternative 3 (related to the major landslide within the footprint of the TSF) and Alternative 4 (the avalanche and landslide risks along the Stibnite Road) should be considered sufficient reason not to select these two alternatives as a preferred alternative."** In fact, in spring of 2019, there was a major landslide across Stibnite road that was so large that took months before it could be cleared. Had a vehicle been on the road at the time, people likely would have died, their load destroyed, and any hazardous fuel or chemical dumped into the East Fork of the South Fork of the Salmon River.

He goes on to say: **"As the DEIS [Section 4.21.2.4] notes 'the Yellow Pine Route's greater proximity to Johnson Creek and the East Fork South Fork Salmon River may be expected to increase the roadway development and use within both avalanche-prone areas and riparian conservation areas and thereby could result in increased public safety and environmental risks and impacts.' Overall, the Yellow Pine Route has more negative risks than the 'Burntlog Route' incorporated into the other action alternatives, including increased travel by vehicles, including delivery trucks carrying fuel and chemicals, closer to major fish-bearing waterways, and increased risk of traffic accidents due to interactions with locals and visitors using this route... This alternative would also degrade the quality of life of residents [DEIS Section 4.21.2.4.1] along the Johnson Creek and Stibnite Roads due to noise, dust, increased traffic, etc. as well as impacting enjoyment of campgrounds [DEIS Section 4.21.2.4.1] and other recreational activities along the route."**

He continues on: **"However the most compelling argument against Alternative 4 is that [DEIS Section 4.2.2.4.3 and also DEIS Section 4.7.2.4.4] 'the risk of damage, injury, or loss of life from mass wasting events along the Yellow Pine Route would be increased due to its location, particularly Stibnite Road (CR 50-412), because the route is within the runout zone for avalanches' which alone is sufficient reason to not select Alternative 4 as human safety should be the paramount consideration in the DEIS, especially as such risks are expected to increase with climate change. The DEIS states [Section 4.18.2.4] 'Overall, Alternative 4 could lead to greater public health and safety impacts compared to Alternative 1 through use of the Yellow Pine Route (increase traffic-related issues and increased geotechnical, landslide, and avalanche hazards). The possibility of impacts to public safety due to Alternative 4 is increased from "low" to "medium-high" and if a wildfire, avalanche, or landslide were to occur, the potential injury to the individual could be severe; therefore, the magnitude of effect is**

rated as “high.” This results in an overall public health rating of “major” for Alternative 4.’ Simply put, the potential for an avalanche that takes out a bus full of workers or fuel truck [DEIS Section 4.7.2.4.5 and DEIS Section 4.7.2.7 and 4.7.7.2] should be an unacceptable risk and provide the foundation for not selecting Alternative 4. Beyond that, the concept of hauling hazardous materials for many miles immediately adjacent to major fish-bearing waterways such as Johnson Creek and the EFSFSR should cause regulators to pause and consider these risks, especially given that the DEIS [Section 4.7.2.4.5 and DEIS Section 4.7.2.7 and 4.7.7.2] notes ‘The potential consequences from trucking spills would thus be greater along the Yellow Pine Route’.”

These comments by Stephen Quin, President and CEO of Midas Gold, make it very clear that the Yellow Pine route should NOT be used at all, not during construction nor during operation. It is clearly very unsafe and would have extensive environmental impacts. Alternative 2 needs to be amended to disallow the use of the Yellow Pine route.