

To: Linda Jackson, Payette National Forest Supervisor

Subject: Stibnite Gold Project Draft Environmental Impact Statement

From: John Humphries

Date: 10/27/2020

I am commenting because I am deeply concerned about the devastating consequences this project will have on the environment. Specifically to the whole South Fork of the Salmon River ecosystem.

WATER QUALITY

The DEIS analysis in determining water quality and quantity for up to one hundred years relies on certain assumptions that contain significant error. For example, the faults and fracture zones present in the area are acknowledged as having potentially significant influence on ground water movement and quality. However, they are not taken into account in the modeling. This omission is identified in Chapter 4.8.8.

FISH

The South Fork of the Salmon river system is home to four special status native salmonids which are currently struggling to survive and require cold, clear, and clean running water to do so. The DEIS indicates that the Forest Service has preliminarily determined that this project will adversely affect Bull trout (pg. 4.12-87), Chinook salmon (pg. 4.12-69), Steelhead salmon (pg. 4.12-75) and their critical habitats and may indirectly impact Westslope cutthroat trout (pg.4.12-93). Table 4.12-66 shows a direct loss of Chinook salmon habitat over all alternatives of 20.8 % to 26%, Bull trout habitat loss over all alternatives of 27.5% to 69.5%. These findings are very disturbing to me as someone who fishes and recreates throughout the whole Salmon River ecosystem.

The fish tunnel has gotten a lot of attention, as well it should. An abundance of stream and fish restoration claims are based upon the success of this tunnel. In Appendix J3, pg. 6, the DEIS clearly states that the tunnel's ability to pass fish is in question.

The stream temperature analysis used in the DEIS does not account for increased temperatures in the East Fork of the South Fork downstream of the mine site, even though the "Fisheries Analysis Area" encompasses downstream habitats. Fish are very sensitive to stream temperatures and these reaches should be included in the analysis.

WILDLIFE

Chapter 4.13.2.1.3.3 states that the Forest Service has preliminarily determined that the mine site, access roads, utilities, and off-site facilities would result in adverse effects to wolverines. On February 1, 2020 the USFWS declared the wolverine would finally be protected in the lower 48 states. Is this DEIS compliant with this declaration? Any wolverine habitat loss is too much.

In the DEIS, Opinion M-37050 (3.13.2.4) is noted saying that “incidental” takes of migratory birds are not prohibited. In August 2020, the above opinion was rejected by the court. The court stated that it is unlawful to kill birds “by any means whatever or in any manner”, including incidental takes. Therefore, project actions that have the potential to kill migratory birds must be readdressed to comply with the court ruling.

TRAFFIC/HAZARDOUS MATERIALS

I live in McCall and am very concerned that the DEIS does not specifically analyze the impacts to not only the volume of traffic but what hazardous materials will be transported through McCall. In alternatives 1-4 it is estimated that one third of all mine related traffic travels through McCall. Section 2.3.5.19 of the DEIS relating to traffic does not address the potential socio-economic, public health and environmental impacts to the McCall community.

The SGP will require year-round shipments of thousands of tons of hazardous or toxic chemicals, explosives and millions of gallons of gasoline and diesel fuel. All this has to be hauled over backcountry roads that traverse designated critical habitat for Chinook salmon, Steelhead, Bull trout, and Westslope cutthroat trout (Chapter 4.12.2). In fact, the DEIS states a spill(s) would have a significant impact to fish (Chapter 4.12.2.3.2.1 and 4.7.2). This is an accident waiting to happen and has not been addressed properly in the DEIS.

RECREATION

The DEIS states, in section 3.19, that the analysis area is a popular area for a variety of recreation activities on both private and public lands. The DEIS does not adequately address the impacts to recreation by the project or use up to date recent sources in its description of uses. I use this area frequently for recreational purposes and am certain this project will have a huge negative impact on my enjoyment of this area.

FOREST PLAN

The Payette and Boise Forests have proposed to amend their Forest Plans for the SGP. The size, scope and duration of the project does not justify a simple project specific amendment to the plans but rather a plan level amendment process.

In conclusion, my biggest concern with this DEIS is the lack of crucial information that is currently missing regarding potentially negative environmental effects. Table 4.1-1 contains two full pages of incomplete or unavailable information that are deemed “essential to a reasoned choice among alternatives”. I feel that if this information still has to be collected and analyzed, a Supplemental Draft Environmental Impact Statement is necessary so that the public fully understands the impacts of this highly complex and high risk mining project. This is not some gold mine project in the middle of the desert but in the headwaters of a sensitive and critical river ecosystem that supports not only wildlife but the people who depend on it.

Thank you for accepting my comments.

John Humphries