

Comment letter - DEIS - Neal McAdam

Attention: Linda Jackson, Payette Forest Supervisor

Date: Oct.27, 2020

From: Neal McAdam, 771 Knights Road, McCall, Idaho 83638

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To whom it may concern:

I write as a resident of McCall, father of children born and raised in Valley County, Idaho, as well as a seasoned outdoors person. The majority of my career, and thus livelihood contributing to my family's sustenance, has been through outdoor recreation and guiding. As a Middle Fork and Main Salmon river guide, I have seen firsthand the tourism brought to Idaho by visitors seeking to recreate in wild spaces, fish native salmon, and observe other wildlife in this area. The Main Salmon lies downstream of the South Fork Salmon, East Fork South Fork Salmon, and other creeks and headwaters, which would eventually flow downstream, and have a detrimental impact on wildlife and water quality. Should the Proposed Stibnite Gold Project carry forward, I believe tourism, and thus income and profit for Idaho businesses and workers, will be negatively impacted for the long-term. Beyond these very personal concerns, I would like to speak to several specific findings noted in the DEIS on the Proposed Stibnite Gold Project.

I am deeply concerned by the Proposed Stibnite Gold Project, as well as the project-specific plan amendments. The DEIS raises critical issues of concern on a number of topics. For the scope of this letter, I will focus on the impacts related to wildlife. Please consider this letter to be of 'substantive formal comments', with direct reference to the proposal (36 CFR 219.62).

FISH

The DEIS findings indicate that this project will adversely affect bull trout (pg. 4.12-87), Chinook salmon (pg. 4.12-69), steelhead (pg. 4.12-75), and their critical habitats; and may indirectly impact Westslope cutthroat trout (pg. 4.12-93). While all harmful impacts upon fish species should be alarming, we should be especially vigilant and concerned with harming the four 'special species native salmonids', due to their status as federally listed fish, with definitions such as threatened or endangered.

WOLVERINE

The wolverine is recognized as an Idaho Species of Greatest Conservation Need (SGCN) and has been proposed for listing under the Endangered Species Act (ESA) since 2010. As noted in the DEIS (Chapter 4.13.2.1.3.2), wolverine habitat would be directly and indirectly impacted to a substantial degree, totaling hundreds of thousands of acres.

GRAY WOLF

Recent USFS reviews of *canis lupus*, or gray wolf, in Idaho have concluded that some area numbers are worrisome for the future of the species. The BLM has listed the gray wolf as a

Type 2 Sensitive Species in Idaho, or species that are experiencing significant declines throughout their range with a high likelihood of being listed in the foreseeable future due to their rarity and endangerment factors. With monitoring and controlled hunting and trapping, wolf numbers can be maintained and potentially successful and sustainable. However, the BLM notes road densities through primary wolf habitat, such as the Proposed Stibnite Gold Project would create, can have negative impact for wolf viability. As such, road density can indirectly increase gray wolf mortality by increasing hunter/trapper access.

Additionally, the DEIS notes that direct impacts on gray wolves would include both direct and indirect impact to individuals and habitat loss (Chapter 4.13.2.2.4.1).

MIGRATORY BIRDS

First, it should be noted the DEIS does not closely or substantially examine all potential impacts to migratory birds as a result of the Proposed Stibnite Gold Project. Examples would include the effects of arsenic, mercury, and other mine-induced chemicals upon water birds that drink from or reside in pit lakes. Such a blatant omission is negligent and merits further study.

Additionally, the proposed mining project is inconsistent with standing legislation. The Migratory Bird Treaty Act of 1918 prohibits actions that kill birds on the list of migratory bird species, and is extended by Executive Order 13186, which directs executive departments and agencies to take certain actions to further implement the Act. Specifically, Executive Order 13186 directs the USFS to protect and conserve all species of migratory birds. The DEIS states that “incidental takes” of migratory birds are not prohibited (Opinion M-37050, 3.13.2.4). However, this was rejected by courts in August 2020, as the court noted it is unlawful to kill birds “by any means whatever or in any manner”, including incidental takes.

The Proposed Stibnite Gold Project, and proposed alternatives, must include actions which eliminate the potential to kill migratory birds, in order to comply with existing legislation and agency compliance responsibilities.

CONCLUSION

As noted in my comment letter, the habitat that encompasses the Proposed Stibnite Gold Project is rich in biodiversity, and unique in its abundance of protected and listed species, as I have described above. It is this very wildlife that attracts millions of visitors to our great state each year. The long-term economic impact of outdoor tourism will long outlive the temporary profits of this proposed mine.

Indeed, over half of the mine footprint is in undisturbed habitat. It is incumbent upon the USFS to analyze alternatives which would encompass only previously impacted and disturbed areas, and to consider provisions which preclude building new roads, storing of tailings, new blasting, building of pits, or other impact upon previously untouched habitat and lands. The USFS must go further to closely review alternatives which will protect the area’s precious and sensitive

animal species, to ensure that this project does no harm to their current populations, nor their forecasted survival rates.

I urge the Forest Service to take heed to the many concerned citizens, scientists, and experts weighing in now on the DEIS findings. We entrust our land, our families, and our futures in you.

Sincerely,

Neal McAdam