



Linda Jackson
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October 28, 2020

RE: Comment on Stibnite Gold Project Draft Environmental Impact Statement

Dear Ms. Jackson,

On behalf of American Rivers, I am requesting that the Forest Service conduct a Supplemental DEIS for the Stibnite Gold Project in order to address missing analysis and unresolved data gaps. We believe the current environmental review is unlawful because it fails to adequately analyze environmental impacts resulting from construction of the proposed Stibnite Gold project or consider a reasonable range of alternatives.

Founded in 1973, American Rivers is the leading conservation organization working to protect and restore the nation's rivers and streams. Our mission is to protect wild rivers, restore damaged rivers and conserve clean water for people and nature. Currently we have more than 355,000 members, supporters and volunteers throughout all 50 states, thousands of whom live, work and recreate on or along the rivers and streams that flow through the Payette National Forest. Due to the threat posed by the Stibnite Gold Project, we included the South Fork of the Salmon River in our America's Most Endangered Rivers® report each of the last three years.

The South Fork Salmon River is a national treasure that provides critical spawning habitat for chinook salmon and steelhead as well as world-class whitewater recreation opportunities and fishing. If allowed to proceed, the Stibnite Gold Project would not only harm water quality in the South Fork Salmon River, but it could also contaminate the Main Salmon River into which it flows – one of the most sought after permitted multi-day river runs in the country.

As detailed below, we believe a project of this scale and impact warrants a more thorough review than has been completed in this Draft Environmental Impact Statement. Please conduct a Supplemental DEIS that (1) considers a reasonable range of alternatives; (2) incorporates missing information and analysis necessary to make an informed decision among alternatives; and (3) further considers impacts to eligible, suitable, and congressionally designated Wild & Scenic Rivers. Absent additional analysis, we do not believe that the most basic requirements of the National Environmental Policy Act (NEPA) will have been met.

Please consider an alternative that utilizes underground mining operations

Among its most serious flaws, the DEIS fails to consider underground mining operations as an alternative to massive open-pit mining. Underground mining operations would greatly reduce the most adverse environmental impacts and must be considered. At minimum, the Forest Service must explain why such an alternative is infeasible. Absent additional analysis or explanation, we do not believe that the Forest Service has considered a reasonable range of alternatives as required by NEPA.

More time is needed to incorporate missing data and analysis

Critically important data and analysis is missing entirely or inaccessible to the public. Table 4.1-1 of the DEIS outlines two full pages of incomplete or unavailable information which has been “deemed essential to a reasoned choice among alternatives.”

As written, we do not believe the current DEIS adequately considers potential impacts to water quality and wildlife. Table 4.4-1 includes missing information related to the efficacy of the leak detection liner for the tailings impoundment; flush chemistry for development rock storage facilities; mass loading inputs from some Idaho Pollutant Discharge Elimination System; consideration of atmospheric mercury deposition; water balance and related groundwater management protocols; prediction of ammonia concentrates; and hydrologic properties of pit backfill.

While we recognize it may not be possible to fully remedy all items listed on Table 4.1-1, we request that the Forest provide additional analysis, information, and explanation of these topics prior to issuing a Final Environmental Impact Statement (FEIS).

As acknowledged on Table 4.1-1, the Forest Service plans to incorporate significant new information in the FEIS including:

- “Additional clarification on handling of development rock, particularly how potentially acid generating (PAG) rock will be handled. This could change the analysis of alternatives and the predicted water quality impacts.”
- “Additional details on the functionality of the MicroDrain liner will be considered by Idaho Department of Environmental Quality and, if available, incorporated into the Final EIS.”
- “Data acquired from RIB testing were not available for inclusion in the Draft EIS; however, this information will be included, as appropriate, in the Final EIS.”

Please allow the public to review new and updated analysis of Table 4.1-1 topics through a Supplemental DEIS prior to issuing a Final.

Impacts to eligible, suitable, and congressionally designated Wild & Scenic Rivers warrant additional analysis

In accordance with Section 5(d)(1) of the Wild and Scenic Rivers Act (PL 90-542, 1968) and the USFS 2012 Planning Rule (36 CFR Part 219), the Forest Service is required to assess rivers under its management jurisdiction and determine whether these rivers are eligible for inclusion in the National Wild and Scenic Rivers System (NWSRS).

Rivers and streams on federal lands which are found to be eligible for inclusion in the National Wild and Scenic Rivers Act System must be preserved in their free-flowing state as well as have their water quality and ORV(s) protected until such a time as a “suitability” evaluation and subsequent decision is made.

From 1997-2003, the Forest Service inventoried all of the named streams on the Boise, Payette and Sawtooth National Forests and determined that three streams within the proposed SGP area are free-flowing, possess one or more outstandingly remarkable values (ORVs) -- making them eligible for inclusion in the NWSRS and granting them protections to safeguard these characteristics. These three streams deemed to be eligible in this study process are Burntlog Creek, Johnson Creek, and the South Fork Salmon River. The South Fork Salmon River was later deemed to be suitable for inclusion in the NWSRS.

Given the enormous uncertainties around potential impacts to water quality described above, it is not clear how the Forest Service will adequately protect water quality. Furthermore, the DEIS gives little to no explanation as to how ORVs will be protected.

Burntlog Creek was deemed to be eligible for inclusion in the NWSRS for having an ORV for fish: “This is a Pacfish/Infish priority watershed that supports spawning and rearing habitat for wild native chinook salmon and steelhead, cutthroat, redband, and bull trout.” (Appendix D, WSR Eligibility Report). Burntlog Creek would be crossed by all project related traffic that travels the Burntlog Route in all action alternatives and “may impact water quality, adversely impact ORVs, and adversely impact Wild classification of Burntlog Creek” (4.23-44 DEIS).

Johnson Creek was determined to have an ORV of heritage on account of ten prehistoric sites and examples of early mining development and settlement of the West. The DEIS gives no explanation as to how these cultural heritage sites will generally be protected from negative impacts from mining development. Most glaringly, DEIS action alternatives propose upgrading the existing Idaho Power Company transmission line built to service the Stibnite Mine during World War II. This line is explicitly recognized as a contributing Heritage resource for Johnson Creek (3.23-22).

The South Fork of the Salmon River is one of our nation’s premier multi-day whitewater rivers and was deemed to be suitable for inclusion in the NWSRS: “This river segment represents a premier example of a river with outstandingly remarkable values. As a major tributary to the already designated Salmon River, the South Fork supports whitewater recreation opportunities, supports populations of



anadromous fish, contains some of the most remarkable cultural and historic properties in Idaho, and has outstanding geological and botanical features through the river corridor” (FEIS, Appendix J).

Please provide additional explanation of how these outstandingly remarkable values of Burntlog Creek, Johnson Creek, and the SF Salmon River will be protected if the Stibnite Gold Project is developed.

Furthermore, the DEIS completely fails to acknowledge or consider potential impacts to the Wild and Scenic designated Main and Middle Fork Salmon Rivers. Impacts to water quality in the SF Salmon and its headwaters may negatively impact Wild and Scenic values of the Main Salmon. The Middle Fork of the Salmon will potentially be affected by activities conducted by the Stibnite Gold Project. The Burntlog access route uses significant portions of the high divide that separates the South Fork Salmon and Middle Fork Salmon River watersheds. Light, visual, water, and dust pollution are direct effects that could harm ORVs on the Middle Fork Salmon.

Conclusion

Missing information within the DEIS is significant and warrants additional analysis prior to issuance of a Final Environmental Impact Statement (FEIS) for the Stibnite Gold Project. We believe that in order for NEPA’s “hard look” standard to be met, a Supplemental DEIS must consider an underground mining alternative, incorporate missing information and analysis necessary to make informed decision among alternatives, and better consider impacts to eligible, suitable, and congressionally designated Wild & Scenic Rivers as wells as opportunities to mitigate those impacts.

Please provide this analysis as a part of a Supplemental DEIS and allow adequate time for public review and comment.

Included with this letter is an attachment with the signatures of nearly 4,500 river advocates from across the nation – each of whom formally request the Forest Service conduct additional analysis on this Stibnite Gold Project.

Thank you for considering our request.

Sincerely,

A handwritten signature in blue ink that reads "Zack Waterman".

Zack Waterman
Northern Rockies Conservation Director
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