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Payette National Forest
Attn: Linda Jackson
500 North Mission Street
Building 2
McCall, ID 83638

Re: Stibnite Gold Project

Dear Ms. Linda Jackson:

The Snake River Fund is a 501(c)(3) not-for-profit organization based out of Jackson, Wyoming. Snake River Fund has a dedicated mission to promote stewardship of and public access to the upper Snake River watershed with an emphasis on partnerships, education, and public outreach. Please accept the following comments as an indication of our deep concern for the potential consequences associated with approval of the Stibnite Gold Project (SGP). The Snake River Fund suggests the Forest Service adopts the “No Action Alternative” identified in the October 28, 2022 supplemental draft Environmental Impact Statement (SDEIS).

First, and foremost, the Snake River Fund requests that the Forest Service extend the existing public comment period by 45 days for a total public comment period of 120 days. The existing 75-day comment period is insufficient to adequately address the large number of stakeholders potentially affected by this project. Potential impacts from the Stibnite Gold Project extend far beyond the proposed 14,221 acre operational boundary and present concerns to all citizens living within or recreating upon the South Fork Salmon River watershed and the thousands of miles of river downstream.

The SGP presents numerous recreational, environmental, and sociocultural concerns. Perhaps the most immediately problematic of those concerns is the health of waterways adjacent to, and downstream from the operations site and of waterways that parallel proposed access roads. As a result of the SGP, stream temperatures are predicted to be elevated above baseline conditions for up to 100 years (SDEIS ES-15). The Forest Service’s own Climate Shield identifies these potentially impacted streams as being an indispensable cold water refuge for native trout. Furthermore, potential contamination from tailings and hazardous waste spillage along access roads carries the potential to irreversibly deteriorate designated critical habitat for ESA-listed Chinook salmon, Forest Service listed sensitive westslope cutthroat trout, steelhead trout, and bull trout.

The South Fork Salmon River, an eligible Wild and Scenic section of river, is situated downstream of the proposed SGP. Forest Service-identified eligible and suitable rivers must be protected sufficiently to maintain free flow and outstandingly remarkable values (FSH 1909.12; 84.3). It is no great stretch of the imagination to see how upstream activities on the

SGP could impact the Outstandingly Remarkable scenery, recreation, cultural resource sites, and fisheries of the South Fork Salmon.

For these reasons, Snake River Fund asks the Forest Service to adopt the No Action Alternative identified in the 2008 SDEIS under which no mining, ore processing, or related activities would take place. Please uphold the USFS motto of “Caring for the Land and Serving People.”