

To: Linda Jackson, Payette National Forest Supervisor

Subject: Stibnite Gold Project Supplemental Environmental Impact Statement

From: John Humphries, McCall ID

Date: 01/08/2023

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.

I personally hunt, fish, hike, collect firewood in the vicinity of this Project. I also love to raft the South Fork Salmon River. To me, this Gold Mine Project is simply a disaster waiting to happen.

### FISH

According to the Executive Summary (ES) page 19, “stream flow reductions would affect fish productivity during operations....” We already know that there are four special status native Salmonids which are currently struggling to survive and any reduction in fish productivity is unacceptable.

In the ES-pg. 32 it states that “the SGP would impact endangered Salmon, other fish species, and essential fish habitat. The Forest Service has therefore concluded that the SGP would have adverse impacts to Tribal rights and interests under either the 2021 MMP or the Johnson Creek Route Alternative.” This alone should be enough to stop this Project!

### VEGETATION

Whitebark Pine (*Pinus Albicaulis*) has just recently been proposed by the US Fish and Wildlife Service as a threatened species under the Endangered Species Act. As stated in the ES-pg. 16, both the 2021 MMP and the Johnson Creek Route would remove from 259 acres and 1,236 trees to 108 acres and 767 Whitebark Pine trees. The proposal is designed to identify actions necessary to conserve and recover the Whitebark Pine. Both of these alternatives would neither conserve or promote the recovery of this species. They do just the opposite.

### WILDLIFE

On ES-pg. 20 it states that “Under both alternatives impacts to wildlife would be moderate for big game and major for wolverines”. The 2021 MMP alternative has the road going right through known wolverine habitat. The wolverine is on the verge of being listed as an endangered species and any loss of habitat is unacceptable.

## TRAFFIC

I don't think the amount and type of traffic required for the SGP has been adequately addressed in the SDIES. On ES-pg. 22 it states that "During construction, mine traffic under the 2021 MMP and Johnson Creek Route alternative would generate an estimated Annual Average Daily Traffic of 65 vehicles (45 heavy and 20 light vehicles). Construction traffic volumes on Johnson Creek road and Stibnite Road would almost double and triple respectively." This Project will require year round shipments of thousands of tons of hazardous or toxic chemicals, explosives, and millions of gallons of gasoline and diesel fuel. The chances of a spill on these types of roads and going into a body of water or a stream are very high and I don't think a pilot car or spill containment kit will do much to mitigate a 500 gallon tanker truck spilling its load.

Another traffic question that seems to be missing is how it will affect tourism and backcountry access. 45 heavy truck loads a day is going to certainly discourage anyone from wanting to use those roads. I know there are alternative routes but they are considerably longer and on already poor roads.

## CONCLUSION

For the reasons outlined above, and many more, I urge you and the Forest Service to deny this project and choose the **NO-ACTION ALTERNATIVE**.

Thank you for accepting my comments.

John Humphries  
McCall, ID