



January 10, 2023

Linda Jackson  
Payette Forest Supervisor  
Stibnite Gold Project  
500 N. Mission Street, Building 2, McCall, Idaho 83638  
Comments submitted electronically via portal  
(<https://cara.fs2c.usda.gov/Public//CommentInput?Project=50516>)

Subject: Comments on the Stibnite Gold Project Supplemental Draft Environmental Impact Statement

Dear Ms. Jackson,

American Rivers appreciates the opportunity to provide the following comments on the Stibnite Gold Project Supplemental Draft Environmental Impact Statement (SDEIS).

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 in three out of the past five years.

The Stibnite Gold Project is extraordinarily complex and risks irreversible harm to one of Idaho's most cherished and ecologically important river ecosystems. The South Fork Salmon River watershed is vital for the recovery of Endangered Species Act-listed Chinook salmon, steelhead, and bull trout, and is also considered sacred homelands by the Nez Perce Tribe and other indigenous peoples.

As detailed below, we believe a project of this scale and impact warrants a more thorough review than has been completed in the SDEIS. American Rivers requests the Forest Service complete a revised SDEIS that: (1) considers a reasonable range of alternatives; (2) incorporates missing information and analysis necessary to make an informed decision among alternatives; (3) further considers impacts to eligible, suitable, and congressionally designated Wild & Scenic Rivers; and (4) provides sufficient time for public review and comment. Absent significant efforts to address these requests, we do not believe that the most basic requirements of the National Environmental Policy Act (NEPA) will have been met.

**The SDEIS fails to consider a reasonable range of alternatives.** The SDEIS only considers the applicant's proposed mine plan and a no-action alternative. This is not a reasonable range of alternatives. Please

evaluate an alternative that utilizes underground mining operations rather than open-pit mining. Underground mining operations would greatly reduce the most adverse environmental impacts and must be considered. At a minimum, the Forest Service should consider a third alternative that significantly reduces adverse ecological impacts.

**The SDEIS lacks key information and analysis necessary for an informed review as required by NEPA,** including basic engineering specifications and analysis of the tailings storage facility, sediment modeling, and detailed reclamation plans. The SDEIS also notably fails to consider climate change within modeling projections.

**Impacts to eligible, suitable, and congressionally designated Wild & Scenic Rivers have not been considered.** The SDEIS completely fails to address potential adverse impacts to the congressionally designated Main Salmon and Middle Fork Salmon rivers. Impacts to water quality in the South Fork Salmon River and its headwaters may negatively impact the Outstandingly Remarkable Values (ORVs) of the Main Salmon River. The Middle Fork Salmon River will likely be impacted, as the Burntlog access route uses significant portions of the high divide that separates the South Fork Salmon River and Middle Fork Salmon River watersheds. Light, visual, water, and dust pollution may impact the scenery ORV of the Middle Fork Salmon River. Additionally, three rivers within the project analysis area have been deemed to be eligible or suitable for inclusion in the National Wild and Scenic Rivers System: Burntlog Creek (eligible), Johnson Creek (eligible), and the South Fork Salmon River (suitable). While the SDEIS acknowledges that mining activities would adversely impact ORVs for water quality and fish, there is no consideration of mitigation measures to reduce impacts - such as graveling access roads to reduce sedimentation.

**The public was not given sufficient time for meaningful or lawful review as required by NEPA.**

Given the extensive scale and complexity of the proposal, it is understandable why it took more than three years to prepare the initial Draft Environmental Impact Statement (DEIS), followed by an additional year to evaluate the new mine plan with a SDEIS. The resulting SDEIS is voluminous and technical in nature, totaling nearly 6,000 pages. As noted in our request for an extension of the current 75-day public comment period, important information used to prepare the SDEIS was not made available when the Forest Service released the SDEIS for public comment on October 28, 2022. Numerous reports related to air quality, fish and aquatic resources, wetlands and stream functional assessment were uploaded to the [Stibnite Gold Project page on Pinyon Public](#) as recently as the second week of December 2022.

## **Conclusion**

We believe that in order for the “hard look” standard of NEPA to be met, the Forest Service must consider additional alternatives, incorporate missing information and analysis necessary to make an informed decision among alternatives, and better consider impacts to eligible, suitable, and congressionally designated Wild & Scenic Rivers, as well as opportunities to mitigate those impacts. Please provide this analysis as a part of a revised SDEIS and allow adequate time for public review.

Included with this letter is an attachment with the signatures of thousands of river advocates from across the nation – each of whom formally requests the Forest Service conduct additional analysis on this Stibnite Gold Project prior to the issuance of a Final Environmental Impact Statement.

Sincerely,



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