

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

January 10, 2023

I am writing to ask that the Forest Service select the No Action Alternative for the Stibnite Gold Project or develop additional alternatives in a Revised Supplemental Draft EIS (SDEIS). There are too many significant problems with the current mine alternative and for the project to proceed.

I first paddled the East Fork South Fork Salmon River, Johnson Creek and South Fork Salmon River more than 20 years ago. I had worked as a river guide in North Carolina and Utah and was lucky enough to have kayaked in Pakistan, Nepal, Chile and New Zealand. I found that the East Fork South Fork Salmon River and the South Fork Salmon to be fully as remarkable and outstanding as world-renowned rivers. Since my first visit there, I have returned to the area to paddle, camp, hike, bike, backcountry snowboard, fish, birdwatch, and enjoy hot springs.

I had also driven up to Stibnite in the early 2000's and was appalled to see the degradation that mining had left on our public lands. I became increasingly concerned about how activities in the Stibnite area might increase pollution there or disperse pollutants farther downstream or downwind. I have kayaked several rivers that have been damaged by historic mining and the negative impacts include public health risks and greatly diminished or non-existing fisheries. As a result, I avoid rivers with mining impacts and prefer to paddle more pristine rivers with administrative or Congressional protections. The South Fork Salmon River, Johnson Creek and other rivers in the area are suitable for protections under the Wild and Scenic Rivers Act which would largely protect their Outstandingly Remarkable Values from degradation by mining activities.

I am concerned that the Stibnite Gold Project as proposed, will have adverse impacts on my ability to safely enjoy that area with my family. First, I am worried about the safety of driving with my family with the large numbers of trucks carrying hazardous materials on Highway 55, Highway 95 as well as the backcountry roads to the mine site. The Forest Service needs to analyze the accident risks and develop additional measures to reduce risks. These include posting times for truck traffic, requiring pilot cars, organizing vehicles into convoys, and placing spill kits along state and federal highways.

Second, I am worried about effects from mining activities to water quality and diminished fisheries from habitat loss and unsuitable temperatures. Even if I don't fish near the mine site, these fish are highly mobile throughout the system and a "mortality sink" at the mine site could mean reduced fishing opportunities for me along the SF Salmon, EFSF Salmon, and Johnson Creek. The Forest Service should develop another alternative that avoids impacts to fisheries

and reduces the time until full recovery can occur. No Forest Plan amendments should be allowed.

Close the site, I am also concerned about air quality, particularly arsenic levels in the dust. The Forest Service should require additional design features to control dust and have real time monitoring of arsenic levels around the Operations Area Boundary and along the public road through the mine site to Thunder Mountain.

At the site, I am deeply disturbed by the proposed conversion of the Upper Meadow Creek stream and wetland complex into a Tailings Storage Facility filled with toxic mining waste. I am also concerned about the century that it will take for the water to be cold enough to support fish, if everything goes according to plan. An engineered stream underlain by a liner and displaced from the nearest stream reach by 400 vertical feet does not seem like a restoration project to me. The Forest Service should examine additional alternatives such as utilizing dry stack tailings to avoid these impacts.

I greatly enjoy unroaded, undeveloped backcountry areas and am opposed to the 15 miles of new construction related to the Burntlog Route. Selection of this route will lead to additional human disturbance in this remote area and displace wildlife like wolverine. The Forest Service appears to make every excuse to permit this road and ignores that fact that this road increases impacts to wildlife, whitebark pine, non-motorized recreationists, botanical resources, Wilderness character, and outstandingly remarkable values for Burnt Log Creek, an eligible Wild and Scenic River.

On the eastern end of the project area, I am concerned about how mining activities will affect my wilderness experiences in the Frank Church River of No Return Wilderness on the Middle Fork of the Salmon River. Sunset is one of my favorite times and I am worried that a plume of pollution will mar the skyline or drift over my camp. I also seek out Dark Sky experiences and I am concerned that the lights from mining activities will degrade this experience. The Forest Service needs to develop additional design features to address these visual impacts.

The fact that the document fails to account for Climate Change is unacceptable, as climate change will likely exacerbate many of the negative effects of the project. Models exist that the Forest Service can use to disclose these risks.

I was extremely disappointed that the Forest Service issued such a short comment period over the Holidays and refused to offer an extension, despite the fact that the gold isn't going anywhere. I am so concerned about the effects of this mine that I spent much of my Christmas Break reviewing the SDEIS.

The Story Map was also exceedingly disappointing. Instead of tying to the wording in the SDEIS, the language seemed to be written by a public relations firm. The wording downplayed the environmental impacts and highlighted the restoration aspirations, misleading the public. For example, the Story Map says this regarding bull trout:

- Habitat reduced during operations and post-closure
- Occupancy probability increased during operations and post-closure
- Habitat available for occupancy increased during operations and post-closure

However, the Specialist Report in the SDEIS says this:

“Post-closure, a net decrease in quality and quantity of bull trout habitat would occur despite removal of passage barriers and an increase of lake habitat for bull trout...” (SDEIS Fisheries Specialist Report p. 150).

These two conclusions are at direct odds with each other and mislead the reader.

The Story Map does describe the link between riparian vegetation recovery and meeting fish habitat requirements:

- - "Stream temperature increase post-closure until riparian shading effects return to baseline conditions."
 - "Stream Temperatures Sensitivity to Riparian Shading - The effectiveness of stream restoration on restoring fish habitat would depend on the effectiveness of re-establishing riparian shading on the restored stream channels."

However, the Story Map fails to convey the 100+ year time lag for this recovery, the fact that half the growth media needed to meet these restoration goals has not yet been identified and that the growth media that is available has high levels of heavy metals.

The Story Map also uses the term "affect" several times but without the important positive or negative qualifiers. The wording fails to disclose the predicted environmental degradation to the public .

- Individuals would be affected by dewatering, salvage, and relocation
- Altered stream structures affect occupancy and habitat during operations
- Indirect effects would include dust emissions and modification of groundwater levels that potentially affect wetlands water sources.
- Access to several over-show vehicle routes would be affected by winter plowing of mine access route

It is also not at all clear that "impacts" are negative changes when compared to the existing condition.

With respect to understanding the environmental impacts, the public may have been better informed had the Story Map not been produced at all.

I also note that there may have been a miscalculation with the deadline of January 10. For other projects, day 1 of the comment period begins the day after a project is posted in the Federal Register. If this is the case, the Forest Service should reopen the comment period.

I am including by reference all scoping, DEIS and SDEIS comments submitted by the Idaho Conservation League and the Nez Perce Tribe.

Given all the shortcomings of the SDEIS, the Forest Service should select the No Action Alternative and develop a Revised Supplemental DEIS with additional alternatives and additional design features and safeguards to protect public health and natural resources.

Sincerely,

John Robison