



January 10, 2023

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

RE: Stibnite Gold Project Supplemental Draft Environmental Impact Statement

Dear Forest Supervisor Jackson,

Trout Unlimited, Idaho Wildlife Federation, and the Idaho Outfitters & Guides Association appreciate the opportunity to submit these comments on the Stibnite Gold Project (SGP) Supplemental Draft Environmental Impact Statement (SDEIS) prepared by the Payette National Forest.

Idaho Wildlife Federation (IWF) is Idaho's oldest statewide conservation organization, founded by sportsmen and women in 1936. Today, we represent a nonpartisan voice of 28 affiliate organizations with 45,000 affiliate members and individual supporters who desire to sustain and enhance Idaho's fish and wildlife, conserve their habitat, and maximize sporting opportunity for current and future generations. Our efforts advance "made in Idaho" solutions to the modern challenges of wildlife management.

Trout Unlimited (TU) is the nation's oldest and largest non-profit coldwater conservation organization with over 300,000 members and supporters dedicated to conserving, protecting and restoring North America's coldwater fisheries and their watersheds. Since 1959, TU staff and volunteers have worked toward the protection of sensitive ecological systems necessary to

support robust native and wild trout and salmon populations in their respective ranges. Additionally, TU recognizes the high value of public lands and the role public lands play in providing habitat to coldwater fisheries, drinking water, and wildlife habitat. Trout Unlimited believes that the actions taken on public lands are ultimately reflected in the quality of fish and wildlife habitat and their populations.

In Idaho, TU plays a critical role in watershed conservation, restoration, and rehabilitation, particularly our public lands. Nine chapters with 3,000 members statewide actively participate in

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projects with the Forest Service, local communities, and private landowners in order to maintain the larger landscape that is so vital to the social and economic well-being of communities in Idaho. Trout Unlimited's Idaho chapters and staff have long-term relationships with the USFS and partnerships with many stakeholders to develop mutually beneficial solutions to land management problems.

The Idaho Outfitters & Guides Association (IOGA) is the nation's oldest formalized outfitting and guiding organization, a statewide, nonprofit business trade association established in 1954 in Salmon, Idaho—some seven years before outfitters persuaded the legislature to establish the Idaho Outfitters and Guides Board (now IOGLB) in 1961. The IOGA represents the overwhelming majority of the state's full-time, licensed outfitters and guides. IOGA members continue to be standard-setters for the industry. They are licensed and bonded and must meet high standards of safety and professionalism. They are committed to serving their clients while also conserving Idaho's land, water, and wildlife.

Our organizations have a keen interest in the landscape surrounding the proposed mine location. IWF and TU serve as members of the Payette Forest Coalition and have been in discussions about management of lands in the South Fork Salmon watershed. Additionally, TU serves on the Idaho Roadless Commission. Roadless lands are a key component in this SDEIS. Both of our organizations recognize the importance of this landscape, its wild and unique characteristics as well as its importance to Idahoans and all Americans.

We submit the following comments for your consideration.

I. Background, Revised Plan of Operations

The Forest Service received the original SGP Plan in 2016. Following the original plan, a revised Plan was submitted to the agency in 2019. In August 2020, a draft EIS evaluating five alternatives based on the submitted revised Plan was released to the public. A second modified Plan was submitted in late 2020 with a revised submission in October 2021. The SDEIS in focus has been prepared in response to the revised Plan of Restoration and Operations for the SGP.

The revised Plan submitted by Perpetua Resources Ltd (Perpetua) is reflected as the Proposed Action, also known as the 2021 Modified Mine Plan (MMP). The SDEIS eliminated two previous action alternatives from the 2020 draft EIS and now evaluates the Proposed Action, the Johnson Creek Route Alternative, and the No Action Alternative. The Proposed Action would consist of mine operations, including an open pit hard rock mine and associated processing facilities, located within Valley County on federal, state, and private lands. The SGP would produce gold and silver ore, and antimony concentrate, for commercial sale. The SGP would

have a life (construction, operation, closure, and reclamation), not including post-reclamation monitoring, of approximately 20 years, with active mining and ore processing occurring over approximately 15 years.

The SDEIS recognizes the mine plan outlined in the action alternatives are largely the same. The following mine components would be common to the two action alternatives:

- Mine pit locations, areal extents, and mining and backfilling methods

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- Transportation on existing and proposed roads
- Pit dewatering, surface water management, and water treatment
- Ore processing
- Lime generation
- Tailings storage facility (TSF) construction and operations methods
- TSF Buttress construction methods
- Water supply needs and uses
- Management of mine impacted water and stormwater runoff
- Stibnite Gold Logistics Facility (SGLF)
- A road maintenance facility
- Surface and underground exploration
- Worker housing facility

For access, the 2021 MMP would utilize Warm Lake Road, Johnson Creek Road, and Stibnite Road during construction of the proposed Burntlog Route; then once constructed, the Burntlog Route would be the primary access route during operations and reclamation. The Burntlog Route would be 38 miles total- requiring improvement of 23 miles of existing roads and construction of 15 miles of new roads.

The Johnson Creek Route Alternative would utilize the existing Johnson Creek and Stibnite roads to access the mine site. Although the Johnson Creek Route would require upgrading sections of the existing roads, it would not require new road construction.

II. NEPA

a. Reasonable Range of Alternatives

The National Environmental Policy Act (NEPA) mandates that federal agencies “...Rigorously explore and objectively evaluate all reasonable alternatives...” 40 CFR §1502.14(a). However, the SDEIS only considers two Action Alternatives, both of which have the same actual mine plan. The range of alternatives analyzed in the SDEIS is simply inadequate given a project of this size, both environmentally and its social impact. The Forest Service should go back and develop an adequate range of alternatives in compliance with the mandates in NEPA. Additionally, the Forest Service should provide adequate justification for the elimination of other alternatives previously studied that had substantive differences in the mining portions.

b. Lacking analysis of Direct, Indirect, and Cumulative Impacts

In addition to requiring a reasonable range of alternatives, NEPA requires agencies to analyze

direct, indirect, and cumulative impacts on “ecological...aesthetic, historic, cultural, social, or health” 40 CFR § 1508.1(g)(1) (1978). It is difficult for the public to analyze these impacts on a variety of topics due to a number of areas lacking in specificity, errors or discrepancies. The Forest Service should take the time to correct these errors in order to give the public better insight into the direct, indirect, and cumulative impacts of a project of this magnitude.

III. Forest Plan Consistency, Proposed Forest Plan Amendments

a. Forest Plan Consistency

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The Forest Service provides a brief overview of Forest Plan consistency requirements in Appendix A. However, Appendix A largely focuses on the proposed Forest Plan Amendments that would remove or modify certain Forest Plan components in order to allow the SGP to move forward. It does not adequately discuss the consistency issues between the proposed action and the Payette and Boise National Forest Plans as they are in place today. The Forest Service discusses how the MMP aligns with the forest-wide goals and objectives as the Boise and Payette National Forest Plans as they relate to minerals and geology resources, but recognizes that not all proposals would move towards or achieve desired conditions, goals, or objectives. Further, the Forest states that there may be tradeoffs between moving towards or achieving these for one resource or another.¹ From there, the Forest Service goes straight into the proposed Land and Resource Management Plan Amendments without going into detail of what desired conditions, goals, or objectives may be threatened by the proposed action. It is up to the reader to look into the proposed project-specific amendments to analyze what may be threatened by comparing the current language. At the very least, the Forest Service should disclose this information to the public about what Forest Plan standards, guidelines, objectives, and/or goals would be threatened by the SGP and how, if left as is, the proposed action would not comply with the Boise and Payette National Forest Plans.

b. Proposed Forest Plan Amendments

The Forest Service proposes four project-specific amendments to the Boise and Payette National Forest Plans. These amendments are proposed for the life of the SGP, or approximately 20 years, and would be required to approve the 2021 MMP. The SDEIS discloses that “impacts to aquatic, terrestrial, and watershed resource conditions would be expected to occur for the length of the proposed SGP.”² However, as outlined in Table 1.7-1, proposed Amendment 1 seeks to remove current Forest Plan components that state: “Management actions, including salvage harvest, may only degrade aquatic, terrestrial, and watershed resource conditions in the temporary time period (up to 3 years), and must be designed to avoid resource degradation in the short term (3-15 years) and long term (greater than 15 years).” The removal of this language to simply state that “Project implementation actions may degrade aquatic, terrestrial, and watershed conditions in the areas affected by the project,” is concerning. As it reads, the Forest Service outright acknowledges that the SGP will neither avoid resource degradation in the temporary time period (up to 3 years) nor avoid resource degradation in the short term (3-15 years) and long term (greater than 15 years).

Amendment 1 showcases the long term effects of the proposed action. Modeling shows elevated water temperatures will last over 100 years and may impact ESA-listed fish species.³ The construction of the Burnt Log Route will also contribute to long term resource degradation,

particularly for Roadless character and wildlife, even if the road is constructed for administrative and project use only.

Another concerning forest-plan amendment seeks to remove requirements of fish passage for new water diversions. The current PNF Standard SWST09 states: “In fish-bearing waters, do not authorize new surface diversions unless they provide upstream and downstream fish passage and,

¹ SDEIS, Appendix A, A-1

² Ibid

³ SDEIS, p. 4-386

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if needed, include either fish screens or other means to prevent fish entrapment/entrainment.” Proposed Amendment 4 would remove this fish passage requirement.

Our groups are concerned with these project-specific Forest Plan amendments, as they show a disconnect between how the SGP is portrayed to the public as a restoration effort and how it would measurably change conditions for the worse over an indefinite time period. Degradation of watershed, terrestrial, and Roadless resources should be avoided using the current Forest Plan components. However, it is clear that the proposed action cannot be accomplished with the current Forest Plan standards because of the difficulty or failure to meet component timeframes.

IV. Impacts to ESA-listed species

The South Fork Salmon River (SFSR) ecosystem is home for steelhead, salmon, bull trout, and cutthroat trout, of which steelhead, salmon and bull trout are listed under the Endangered Species Act (ESA). Even with past mining impacts and other stressors, populations of all 4 of these fish persist in the landscape impacted by the SGP. This is remarkable and is worthy of maintaining and stewarding for future generations.

While the SDEIS readily admits to anticipated, significant adverse impacts to listed species and critical habitat, it is unclear how the project could proceed without running afoul of the strict requirements in ESA.

To comply with Section 7 of the ESA, it is clear from the SDEIS and the proposed action that the Forest Service must engage in formal consultation with both FWS and NOAA Fisheries concerning the potential impacts to listed species, especially concerning the impacts to federally threatened Chinook salmon, steelhead, bull trout and their formally designated critical habitats.

V. Fish

a. Hazardous Spill Risk

Hazardous spills are certain to occur and the effects to fish from spills are underestimated. We question why project-specific spill risk calculations for number of spills and spill probability are not included in the SDEIS. This is an industry standard and should be calculated for the life of the project.

b. Increased Stream Temperatures

For a variety of mine-related environmental changes, stream temperatures will increase up to 6.8

degrees C (12 degrees F). This degradation does not include the effects of climate change. High elevation, coldwater habitat is becoming increasingly rare throughout the Intermountain West. Climate models show that only the highest elevation habitats will support bull trout and westslope cutthroat into the future. These changes will surely affect anadromous species that inhabit the drainage as well. Long term effects of this temperature change could push already listed species further towards extinction. At a minimum, hundreds of generations of salmon and trout are likely to perish over time. Shading from plantings is supposed to bring temperatures

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down, but only after 100 years. Even that could be an optimistic estimate considering the lack of growth media available for the project.

c. Decreased Habitat

Habitat will be decreased and made less optimal for bull trout, salmon, and cutthroat. Decreased and suboptimal fish habitat will result from mining activities, despite claims of mitigations, including removal of passage barriers and an increase of lake habitat for bull trout. For bull trout, given their temperature sensitivity, they are losing in all aspects. Following closure and reclamation, there will be a "net decrease in both **quantity and quality** of habitat for bull trout and westslope cutthroat trout." Even though the SDEIS states that there will be MORE habitat available for Chinook salmon, it will be considered "less optimal habitat." Chinook may be temporarily or permanently displaced from several mine streams.

d. Tunnel and Tailing Storage Facility

Upper streams will be blocked and inundated by millions of pounds of mine waste. The proposed, 1-mile tunnel is heavily relied upon to open up miles of habitat upstream of and around the mine that will supposedly compensate for the waste dump. The tunnel is highly engineered, has had a lot of money and good thought put toward its construction. But it is fraught with uncertainties and unproven success for Chinook salmon, steelhead, bull trout, and cutthroat. It is questionable that resident species of trout and salmon will use the tunnel when in operation. It is unclear where this has been verified to be successful for fish transport. Bull trout, for instance, have been known to not use short fish ladders that allow passage around water diversions, let alone a mile long tunnel. A detailed discussion of possible mortality and fish movement, including trap and haul, is necessary.

VI. Wildlife

The two action alternatives differ on their impacts to wildlife largely due to the access to the site. The 2021 MMP relies on the Johnson Creek route until the Burntlog Route is constructed, while the Johnson Creek route utilizes Johnson Creek road throughout the project lifespan. The Burntlog Route would add 15 miles of new roads in a currently unfragmented and roadless area, as well as upgrade the entire 38 mile route to accommodate for expected traffic. Both routes would remove around 3,000 acres of habitat, but their impacts are greater than the amount of habitat acreage that would be removed.

Big game are particularly susceptible to an increase in human development and presence, with

motorized access in areas that did not have such access being at the top of game managers' issues to sustain herds. Whereas human access into elk habitat has the potential to displace and disturb elk, motorized access (whether on roads or trails) generally has the greatest negative impact on elk movements, vulnerability, habitat security, habitat effectiveness, and therefore elk population levels.⁴

⁴Idaho Department of Fish and Game (IDFG). 2014. Idaho Elk Management Plan 2014-2024. Idaho Department of Fish and Game, Boise, USA. p.32.

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Idaho Department of Fish & Game describes the lasting impacts of disturbance of elk habitat and behavior associated with roads and trails in its' Elk Management Plan⁵:

“Displacement of elk away from roads and trails may cause substantial reductions in habitat utilization and habitat effectiveness. Human disturbance associated with roads and trails negatively influences elk behavior because elk vacate otherwise suitable habitat to avoid human activity (Lyon 1979, 1983; Naylor et al 2009). Displacement of elk into poorer habitat might be equally or more detrimental than increase energetic costs cause by movements (Hobbs 1989). When elk are displaced into poor-quality habitats, they may be forced to use poorer quality forage and expend more energy on thermoregulation (Cassirer et al 1992). Water and riparian areas are important to lactating elk (McCorquodale et al 1989), but in Idaho many roads and trails follow drainages, thus making these important habitats less available to elk. Research has shown quality of summer and autumn ranges largely determines condition of an elk heading into winter, and thus whether that elk can survive winter (Cook et al 2004).”

IDFG encourages state and federal land managers to continue to develop comprehensive access management programs that include multiple tools such as timing of use, limitations on use, appropriate density of roads and trails, and complete or seasonal closures of roads and trails to create large blocks of habitat with non-motorized access to benefit elk populations.⁶

a. Mountain Goats

The SDEIS is significantly lacking analysis on Mountain Goats. Mountain Goats are listed as a Species of Greatest Conservation Need by Idaho Department of Fish & Game (IDFG) and have been documented in IDFGs Upper South Fork Population Management Area (PMU).

IDFG describes the current and future pressures on Mountain Goats in its Mountain Goat Management Plan:

“Most threats facing mountain goats in Idaho are either direct threats to their habitats or indirect threats that could cause them not to use available habitat (Festa-Bianchet and Cote 2008). For example, road construction, timber harvest, mining, power infrastructure, oil and gas extraction, climate change, wildfires, and fire suppression are direct threats to mountain goat habitat and are likely to negatively affect nearby mountain goat populations... These disruptions may result in a variety of negative impacts, including habitat abandonment, changes in seasonal habitat use, alarm responses, lowered foraging and resting rates, increased rates of movement, and reduced productivity (Pendergast and Bindernagel 1976, MacArthur et al. 1979, Foster and Rahe 1985, Hook 1986, Joslin 1986, Pedevillano and Wright 1987, Dailey and Hobbs 1989, Frid 1997, Duchense et al.

2000, Phillips and Alldredge 2000, Dyer et al. 2001, Frid 2003, Gordon and Wilson 2004, Keim 2004).”⁷

The use of the Burntlog Route may pose risks to Mountain Goats that are not analyzed in the SDEIS, particularly with initial road construction and continuing operations such as avalanche

⁵Ibid p. 33-34.

⁶Ibid p. 35

⁷Idaho Department of Fish and Game. 2019. Idaho Mountain Goat Management Plan 2019-2024. Idaho Department of Fish and Game, Boise, USA. p. 7

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control. If motorized equipment and explosives are used to control avalanche risk along the proposed Burntlog Route, the SDEIS needs to consider the negative impacts these activities could have on this sensitive species. Additionally, SDEIS must disclose how changes in winter travel access along the Burntlog Route may lead to increases in over-snow recreation, which has shown negative impacts to Mountain Goats. We ask that the Forest Service keep in mind the Travel Management Rule when proposing new Over-Snow Vehicle (OSV) routes, specifically its requirement to “minimize harassment of wildlife or significant disruption of wildlife habitats.”

b. Bighorn Sheep

Rocky Mountain Bighorn Sheep are a Forest Service Region 4 Sensitive Species and a Species of Greatest Conservation Need by IDFG. IDFG collaring data (2017b) verified several existing herds (Pinnacles, Big Creek, Monumental herds) and lambing areas within proximity to the SGP area. Approximately 59,405 acres of summer habitat and 10,306 acres of winter habitat is modeled within the wildlife analysis area, including some habitat on the Salmon-Challis National Forest.⁸

The SDEIS summarizes impacts to Bighorn Sheep below:

“The 2021 MMP may directly and indirectly impact Rocky Mountain bighorn sheep individuals and habitat but would not likely contribute to a trend towards ESA listing or loss of viability of the species within the planning area. However, due to their value as a big game species in Idaho, impacts may include potential changes in abundance and distribution of bighorn sheep, and therefore impacts to bighorn sheep hunting opportunities in the surrounding region. More summer habitat would be directly and indirectly impacted than winter habitat. Therefore, based on the impact analysis for the bighorn sheep and its habitat, the 2021 MMP would result primarily in localized, short-term, long-term, and permanent, moderate impacts to the bighorn sheep.”

Our groups are particularly concerned about the action alternatives’ impacts on this iconic Western species.

IDFG disclosed potential impacts to bighorn sheep due to increased human pressure in its’ Draft Bighorn Sheep Management Plan⁹:

“Bighorn sheep may respond to human disturbance (including recreational activities) by temporary or permanent abandonment of the area (Wilson et al. 1980, DeForge 1981, Legg 1998, Papouchis et al. 2001, Keller and Bender 2007, Longshore et al. 2013, Lowrey and Longshore 2017). These movements may displace bighorns into less

optimal habitats, thereby decreasing foraging efficiency (Horejsi 1976, Hicks and Elder 1979, Legg 1998, Bailey 1999, Courtemanch 2014, Sproat et al. 2020), increasing energy expenditures (MacArthur et al. 1982, Legg 1998), and increasing their risk of predation (DeForge 1981, Papouchis et al. 2001). Human disturbance may also increase stress levels in bighorn sheep (Legg 1998) and lower resistance to disease (Spraker 1977, Foreyt and Jessup 1982, Spraker et al. 1984, Schwantje 1986)...Because fitness of individual bighorn sheep often decreases with increase disturbance levels, it is important

⁸ SDEIS, Wildlife and Wildlife Habitat Specialist Report. p. 90.

⁹ Draft Idaho Bighorn Sheep Management Plan, 2022-2027. Idaho Department of Fish and Game, Boise, USA. p. 42-43.

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to limit potential negative effects of recreation and human disturbance during critical times of the year (e.g. lambing season and on winter range; Boyle and Samson 1985, Papouchis et al. 2001, Courtemanch 2014).

While the SDEIS concedes that under both alternatives, moderate impacts are expected to big game species, it does not go into enough detail into the direct and indirect disturbances or mortality associated with each alternative. Our groups feel that the Forest Service underestimates the impacts of the action alternatives on wildlife and focuses too much on the acreage reduction in wildlife habitat around the mine site rather than the lasting impacts of human disturbance on the way to the site.

VII. Transportation

a. General impacts

We are concerned about the dramatic changes to public access proposed in the SDEIS. Increases in motorized use seem inevitable and the risk for illegal use could have major impacts to both the roadless character of the area and wilderness characteristics found in the Burntlog, Black Lake, Meadow Creek and Horse Heaven Inventoried Roadless Areas, all of which are classified as Backcountry Restoration under the Idaho Roadless Rule. Additionally the close proximity of the Burnt Log route could affect wilderness characteristics in the Frank Church - River of No Return Wilderness area.

The SDEIS proposes closing 14,221 acres of public access in the project area. These acres provide important public access for outdoor pursuits, such as hunting and fishing, and we question why the closure area proposed is so large.

b. Burntlog Route

While the Idaho Roadless Rule does not prohibit road building in roadless as needed for access to claims related to the Mining Law of 1872 (36 CFR 294.25 (b)), the question of whether the proposed Burntlog route can be accessed by the public or be closed to administrative use only falls to general mining laws and should be considered by the USFS before approving this alternative. Additionally, any new claims for mineral development (i.e. gravel pits) within the four roadless areas affected by this alternative would seem to run contrary to restrictions to new mineral development set forth in the Idaho Roadless Rule for areas designated as Backcountry Restoration.

Further, we have serious concerns about impacts to roadless characteristics that a road of this

length and size will have if used for mining and/or public travel for the life span of the project. Additionally, the opportunity exists for the illegal pioneering of routes in such a remote area without a serious enforcement presence.

c. Johnson Creek Route

The Johnson Creek route parallels Johnson Creek, a known bull trout stronghold. While disturbances to roadless character associated with the Burntlog route are not preferable, the Johnson Creek route could prove deleterious to resident bull trout. The SDEIS seems to downplay the risks of spills and sediment load associated with needed road improvements, would impact bull trout that are using this stream.

VIII. Recreation and Public Access

The Boise and Payette National Forests and the South Fork of the Salmon River watershed as a whole provide tremendous recreational opportunities for Idahoans. Access routes proposed from either alternative are adjacent to or on public lands, for which a large and diverse group of recreationists uses throughout the year. Many of our members and supporters hunt, fish, hike, backcountry ski, ride OHVs, and horseback ride in this area.

Hunting and fishing is a significant economic driver in Idaho. In 2011, 534,000 resident and non-resident hunters and anglers recreated over 9.7 million days in the field, spending \$1.02 billion. Abundant hunting and fishing opportunities also generate 15,261 jobs in the state. Breaking this down further, Idaho Sportsmen and women support \$2.8 million in spending per day, \$442 million in salaries and wages, \$105 million in federal taxes, and \$97 million in state and local taxes¹⁰. More specifically, visitors to the South Fork Salmon River and the Wild and Scenic Salmon River spend \$13.5 million annually in the region. These impressive statistics are a result of high-quality, in-tact public lands administered by the Forest Service and other federal agencies. Hunters and fishermen spend their time and money in rural Idaho, where many of these communities have embraced and become reliant on this financial source year after year.

Our groups raised concerns about the threats to existing recreational opportunities in previous comments. Additionally, the State of Idaho requested that future studies include “an assessment of the potential effects of new roads and road closures on hunting, fishing, and trapping including effects of new roads on stream channel and wildlife habitats.”

In general, our groups feel that the SDEIS lacks analysis on the impacts to existing recreational opportunities and public access.

Both alternatives will result in a significant increase in mine related travel along Johnson Creek Road. Given that the Preferred Alternative uses Johnson Creek Road as the primary access route to the project area throughout the construction phase, we expect a significant increase in mine related traffic, travel delays, and road closures. Realizing that recreationists utilize Johnson Creek Road extensively throughout the Summer, our groups are concerned about the potential for negative experiences with a significant increase in mine related travel. Recreationists may avoid these delays or closures by seeking different routes into the area, possibly via the South Fork Salmon River Road and Lick Creek Road. Both of these routes lead to many public access points that are also popular for recreationists. The SDEIS does not seem to analyze this

prediction in traffic and recreational patterns. The SDEIS also does not consider how large of an impact the SGP would have on adjacent lands used for recreation, as current recreational opportunities would be eliminated with the 14,211 acre operations boundary closure, shown in Figure ES-1.

When in season, anglers flock to the South Fork of the Salmon River to pursue adult returning hatchery-origin chinook salmon. Upstream, anglers can encounter westslope cutthroat trout and bull trout along Johnson Creek and the East Fork South Fork Salmon. In addition to local users and tribal interests, many recreationists come from the Treasure Valley (Boise, Nampa,

¹⁰http://congressionalsportsmen.org/uploads/page/EIR_Idaho_final_low.pdf

Caldwell), about 100 miles to the south.¹¹ We believe the Forest Service fell short in its analysis on the impacts to recreational fishing that the surrounding area currently provides.

We appreciate the brief synopsis on hunting as a recreational value in the SDEIS. We ask that you continue to utilize IDFG's expertise to understand how the SGP may impact hunter opportunity, hunter success, and hunter satisfaction in IDFG Game Management Units 24, 25, and 26 over the long term. As noted in the SDEIS, much of the hunter opportunity in this area is possible through the purchase of over the counter general tags. This experience is becoming increasingly rare throughout the West and in Idaho. The overwhelming majority of Idahoans rely on this opportunity to pursue elk and deer each year through this system. Risk to this general tag structure is heightened by increased human pressure and access as well as over harvest. Hunting is a large part of Idaho's culture- we ask that you seriously consider the long lasting threats to this culture. Additionally, we ask that you consider the direct and indirect impacts to Bighorn Sheep (summarized above), and how these impacts may change the already extremely limited opportunities for sportsmen and women to pursue these animals if they draw a tag.

a. Burntlog Route

The 2021 MMP would add additional year-round motorized access onto a landscape that is roadless. We are concerned that the construction of the Burntlog Route would significantly increase illegal offroad motorized use in this remote area, impacting the recreational experiences that currently exist. Additionally, we still do not have a clear picture on public access to the Burntlog Route, as the Forest Service and Perpetua have given conflicting answers.

IX. Outfitter Impacts

a. Outfitter Review

The Forest Service provides a brief overview of the impacts to outfitting in the SDEIS: "The IOGLB issues state licenses to commercial outfitters and guides in the state of Idaho and is responsible for the administration of the Idaho Outfitters and Guides Act (Title 35, Chapter 21, Idaho Code), while the Forest Service authorizes outfitter/guide services and facilities on NFS lands. There are 24 outfitters and guides permitted in GMU 24, 14 permitted in GMU 25, and 37 permitted in GMU 26 (IOGLB 2020a-c). GMU 26 is primarily in the FCRNRW and includes a portion of PNF MA 13. Only BNF MA 17 is in GMU 24. BNF MAs 19, 20, and 21, and most of PNF MA 13 are in GMU 25. In all three GMUs, activities permitted by the IOGLB, which vary by outfitter, include trail

rides/pack trips, mountain bike touring, backpacking, photo trips, day hikes, snowmobiling, and fishing. In GMUs 24 and 25, permitted activities also include llama packing and skiing/snowshoeing. The IOGLB also has permitted kayaking and float boating in GMUs 24 and 26. In GMU 24, wagon/sleigh rides, zip line tours, mountaineering, and power boating also are permitted. In the three GMUs, several of the permitted outfitters also are permitted for hunting (five in GMU 24, nine in GMU 25, and 26 in GMU 26). In all three GMUs, outfitters are permitted to hunt bear, cougar, predators, wolf, elk, deer, moose, and forest grouse (species vary by outfitter). In 2019, there were several recreation-related special use permits issued by the Forest Service for the PNF and BNF portions of the analysis area. Appendix A of the SGP Recreation

¹¹ https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/stelprdb5042689.pdf

Specialist Report (Forest Service 2022m) describes each of the current recreation-related special use permits that have been issued within the analysis area.”

Our groups are concerned by the implications of the outfitter effects enumerated in the SDEIS (p. 4-552) associated with “construction and operation of all the 2021 MMP components,” including but not limited to *construction and operation of the new transmission line to the Operations Area Boundary, road improvements along the Burntlog Route, closure of Stibnite and Thunder Mountain roads through the Operations Area Boundary, communication facilities, and Operations Area Boundary facilities*, in particular as they stand to [negatively] impact those outfitter operations identified by the SDEIS (Elks Springs Outfitters, Idaho Wilderness Company, and Juniper Mountain Outfitters).

As a result of the aforementioned construction and operations, said outfitters stand to lose access to between 25% and 50% of their operating areas, while simultaneously providing unprecedented access to non-outfitted recreationalists in the remainder of their respective operating areas. Given the strictly limited nature of hunting outfitter operating areas in the State of Idaho—as licensed by the Outfitters and Guides Licensing Board (OGLB)—which precludes the expansion or creation of new hunt operating areas, such restrictive impacts to outfitter access combined with expansive impacts on non-outfitted access, could deliver irreparable and irreversible harm to those impacted outfitter operations.

The SDEIS also acknowledges impacts to East Fork South Fork fish habitat and water quality that have the potential to negatively affect outfitted angling well downstream of the proposed project site. According to the Idaho Outfitters and Guides Licensing Board, there are 57 businesses permitted to conduct guided angling for steelhead and salmon below the confluence of the South Fork Salmon and Salmon rivers: this includes the Wild and Scenic section of the Salmon River, the Lower Salmon, and Hell’s Canyon of the Snake River. These outfitters contribute a significant amount of economic activity to their local, largely rural municipalities. High-quality spawning habitat and thermal refugia are critical to the abundance and resilience of these outfitters’ target species, and as such are often factors that limit availability of returning fish stocks. Due to the SDEIS’ aforementioned spill risk of hazardous materials, increased stream temperatures, decrease in high-quality habitat, and questionable efficacy of an untested bypass tunnel, it is reasonable to expect a negative impact on the abundance of migrating adult

fish in the river sections downstream of the South Fork Salmon, and a subsequent negative impact on outfitted angling.

In addition to the concerns regarding the impacts to outfitted hunting and angling operations, much of the recreational use in this area of the FCRNRW is concentrated along the Middle Fork Salmon River corridor and as such stands to negatively impact State Licensed river-based outfitters with Special Use Permits for the Middle Fork of the Salmon River and the Main Salmon River. A Middle Fork permit is often considered to be the “Holy Grail” for whitewater boaters with over 17,000 applicants competing for just 387 permits in 2020. While most river runners travel in outfitted or private groups, there is still the expectation of a primitive wilderness experience with no lights, sounds or impacts of civilization imposed on the group. The SDEIS fails to describe how a river trip and guiding services may be impacted by the Stibnite Gold Project. For example, the Supplemental SDEIS needs to analyze which camps along the Middle

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Fork Salmon are most likely to be affected by noise, light pollution and by plumes. There is also likely to be a compounding effect at night by which dust clouds exacerbate light pollution by reflecting the light back downward that warrants more discussion. (This comment and concern bears on the [models used to calculate] visual effects to the wilderness, which are insufficiently developed in the SDEIS.)

X. Mitigation and Monitoring

A much more thorough discussion is warranted regarding mitigation. While mitigation and monitoring is referenced throughout the SDEIS, details seem to be lacking.

XI. Reclamation

A long standing mantra for Midas Gold/Perpetua has been to “Restore the Site.” And while improvements are needed and necessary to repair historic mining impacts, the current SDEIS proposes to drastically increase the footprint of SGP with a project life span of 15-20 years. A full restoration of the site would leave behind a functioning hydrological system with groundwater connectivity. Studies show that groundwater upwelling and springs are an important attribute that helps anadromous fish key into spawning areas. The proposed reclamation of tributaries running through the site would entail building a large lined trench over the top of tailings piles and then building a stream bed on top of this trench. Without connectivity to groundwater, this channel would become nothing more than a migration corridor if repopulated by trout and salmon.

XII. Conclusion

Thank you for the opportunity to provide comments. We remain concerned about the impacts of the proposed action on fish wildlife and outdoor recreational opportunities that our groups cherish. We look forward to working with you in the future.

Respectfully,

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