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Organization:
Title:
Comments: Attention: Linda Jackson, Payette Forest Supervisor
Date: Oct.14, 2020
From: Laura Bechdel

To whom it may concern:

I write to you now to formally submit my comments in response to the DEIS for the Proposed Stibnite Gold Project, as well as the project-specific plan amendments. Please consider these comments as substantive formal comments, which "within the scope of the proposal, have a direct relationship to the proposal, and include supporting reasons for the responsible official to consider" (36 CFR 219.62).

Indeed, my concerns and objections to the Proposed Stibnite Gold Project are diverse and extensive. However, for the purpose of this comment letter, I would like to speak specifically to the DEIS findings related to impact of the project on fish. The Proposed Stibnite Gold Project will irrevocably and irreversibly harm special status fish (DEIS p. 3.12.1). The DEIS indicates that the Forest Service has preliminarily determined that this project will adversely affect fish including: bull trout (p. 4.12-87), Chinook salmon (p. 4.12-69), steelhead (p. 4.12-75); and may indirectly impact Westslope cutthroat trout (p. 4.12-93). Further, the DEIS findings conclude that the proposed project will result in a dramatic, direct loss of habitat: 20.8-26% of Chinook salmon habitat (range amongst all alternatives), and 27.5-69.5% of bull trout. Both Chinook salmon and the bull trout are listed under the Endangered Species Act. Further, the proposed project will result in changes in migratory patterns of fish, being required to pass through a fish tunnel. The various storage facilities (ie Tailings Storage Facility and Development Rock Storage Facility), will occur in and near Meadow Creek and Fiddle Creek, which would negatively impact critical areas that support native fishes threatened under the Endangered Species Act. These creeks serve as headwaters to support fish locally, as well as stream ecosystems and water quality downstream.

DEIS findings are indisputable in the ways the project will hinder the viability of fish habitat:
Bull trout: "Total habitat availability for bull trout decreases along the timeline of the SGP. Post-closure, and a net decrease in quality and quantity of bull trout habitat would occur" (DEIS p. 4.12-83 and 4.12-87).
Chinook salmon: "Following closure and reclamation, the overall net effect would be a loss of both quantity and quality of habitat for Chinook salmon" (DEIS p. 4.12-69).
Western cutthroat trout: "Stream channel changes, direct effects to individuals, and changes to habitat indicators would negatively affect cutthroat trout in the analysis area through the loss of suitable habitat" (DEIS p. 4.12-93).
Steelhead: "Negative effects … are expected to be less intense for steelhead trout than those for Chinook salmon. Despite some improvement to access, 1.91 km of habitat in upper Meadow Creek would be blocked in-perpetuity, and potential effects may cause injury or mortality to individuals. the net effect would be an increase in both the quantity and quality of habitat for steelhead trout" (DEIS p. 4.12-75).

The impacts outlined above, and within the DEIS, are clear: they will have an immediate as well as long-lasting negative impact on the fish that spawn and live in these waterways. Well intentioned mitigation tabulated in Appendix D is not specific to the effects described above, is not analyzed in the body of the DEIS, and as far as I can tell, is largely without specific rationale for success. My comments in this comment letter focus closely on the direct impact to the fish, as highlighted in the DEIS. Further, the project will harm stream quality and stream temperature, both of which are critical and sensitive components of fish health and population stability. Additionally, the fish tunnel creation, barrier, and removal will disrupt natural fish migration patterns, and do not promise the ability to even pass fish, beyond the greater implications (Apx J3, p. 6).

As the DEIS notes, the potentially affected area for the proposed project includes approximately 3,500 acres on federal, state, and private lands located in Valley County, Idaho. This is a vast tract of land that is currently rich in diversity of flora and fauna, despite historical impacts. I am deeply concerned for the health of our native fish, as well as their future, should the Proposed Stibnite Gold Project move forward.

Sincerely,

Laura Bechdel

P.S. See attached PDF of this letter with improved formatting.