

Data Submitted (UTC 11): 10/27/2020 6:00:00 AM

First name: Marilyn

Last name: Olson

Organization:

Title:

Comments: To Whom It May Concern:

My name is Marilyn Olson and I am a 40 year resident of McCall, Idaho. I worked for the USFS for 35 seasons, mostly on the Payette National Forest. I have a Biology degree emphasizing Botany. As a seasonal I worked in a variety of areas, including Timber, Engineering, Botany Surveys, Abandoned Mine Surveys, and Riparian Surveys, as well as long and short term vegetation monitoring for grazing. I spent several springs planting trees and shrubs along the South Fork and East Fork of the South Fork of the Salmon River, rehabilitating areas after wildfires. I have backpacked from Big Creek to Monumental Creek to Monumental Summit, and hiked several times along the South Fork of the Salmon River to Mackay Bar. The South Fork and East Fork of the South Fork of the Salmon River are very special to me as I have spent a lot of time hiking, camping, bicycling, and wildlife watching in this area. I know and love this area.

#### PLANTS AND RIPARIAN AREAS

Mud Lake occurs adjacent to the existing Burnt Log Road (#447) about 3.5 miles from Johnson Creek Road. Wetlands associated with Mud Lake are considered fens. [ldquo]Fens are permanently saturated wetlands that form where a thick layer of partially decomposed organic matter called peat accumulates.[rdquo] (Source: Affected Environment, Fens Stibnite Gold Project DEIS 3.11-20) 3.11.3.2.4 FENS. Idaho Department of Fish and Game considers the wetlands associated with Mud Lake to be poor fens (IDFG 2004a). Mud Lake and its associated wetlands are designated as a Class I site under the Wetland Conservation Prioritization Plan (IDFG 2012), which indicates that this area is in near pristine condition and likely provides habitat for high concentrations of state rare plant species (IDGD 2004a). Mud Lake includes extensive Poor Fen habitat including the critically imperiled rare *Carex limosa* plant association and a population of *Scheuchzeria palustris* (Rannoch-rush) which is an imperiled (S2) species of special concern (IDFG 2004).

Indirect impacts of road improvements (Burnt Log Road) and vehicle travel (i.e. increased dust and possibility of hazardous spills) are likely to impact this fen and degrade its function as habitat for a fen (Source 4 Environmental Consequences 4.11 Wetland and Riparian Resources SGP DEIS 4.11-16). Objective 2023 [ldquo]Consider establishing the Mud Lake and Shell Rock Peak areas as Botanical Special Interest Areas due to the presence of unique Wetland habitats and plant species of concern.[rdquo] (Source: Boise NF Revised Forest Plan 2010 Chapter 111-2003-2010 Integration Upper Johnson Creek Management Area 20 page 111-377 Botanical Resources)

Question:

Since this area along Burnt Log Road has unique wetland habitats, is it worth decimating a population of rare plants to reconstruct a road through this area? [ldquo]The Burnt Log Route, which includes alignment modifications and widening of existing portions (4 times wider than standard roads in this area) and 14.9 miles of new construction would most likely increase dust, change hydrology and species composition.[rdquo] (Source: 4 Environmental Consequences 4.11 Wetlands and Riparian Resources 4.11.2.2.1.2 Off-Site Focus Area).

Burnt Log Road goes right through the Chilcoot Peak Research Natural Area. This RNA is supposed to be [ldquo]managed in a way that allows natural processes to predominate with minimal human intervention.[rdquo] Source 3 AFFECTED ENVIRONMENT 3.23 SPECIAL DESIGNATIONS 3.23.4 Research Natural Areas 3.23.4.1 Introduction and Scope of Analysis and 3.23-46-47.

Whitebark Pine is present in this RNA and is a candidate for listing to the Endangered Species Act (ESA).

Question:

Has the USFS done a consultation with the US Fish and Wildlife service for the Whitebark Pine?

How is the USFS going to mitigate compromising the Chilcoot Peak Research Natural Area by building a 26 foot wide road through it and destroying its unique character?

## PLANTS

I assisted the Forest Botanist conducting surveys for *Astragalus vexilliflexus* var. *vexilliflexus* (Bent-flowered milkvetch), which is a Forest Watch species on the Payette National Forest and is critically imperiled in the state of Idaho. According to Mancuso 2016 the 3 occurrences of this species in Idaho all occur in the Payette National Forest planning area. (Source: 3 AFFECTED ENVIRONMENT 3.10 VEGETATION Bent-flowered milkvetch 3.10-26).

Question:

Since this subpopulation grows in the largest contiguous area of occupied habitat and is at present located in a relatively undisturbed area which Midas Gold plans to disturb, does the USFS plan to collect seeds and repopulate this plant in similar habitats and who will oversee and monitor the status of this regeneration? I know it grows in rocky, barren ridgetops and wonder how well it will survive with this devastating disturbance.

I have concerns about the plant *Leuisia sacajawean* (*Sacajawea*'s bitterroot) as it is rated sensitive in both the Payette National Forest and the Boise National Forest and is ranked globally and state imperiled. It occurs 300 feet above the Warm Lake Road and an existing transmission line. Potential habitat occurs along Johnson Creek Road, Burnt Log Route and the proposed Stibnite Gold Project site. (Source: 3 AFFECTED ENVIRONMENT 3.10 VEGETATION *Sacajawea*'s Bitterroot 3.10-27-28 34 SGP DEIS).

Question:

Will Midas Gold do more surveys for this imperiled species in the analysis area and will this be included in the Stibnite Gold Project EIS?

## PROVIDE CRITICAL MINERALS

The primary purpose of the Stibnite Gold Mine is the production of gold. According to their prefeasibility study of 2014, 95% of their projected revenue is from gold. The USA is not reliant on gold production. In fact the Department of Interior (DOI) does not include gold in a list of 35 mineral commodities [Idquo]considered critical to the national security of America[rsquo]s dependence on foreign minerals.[rdquo] The USA is actually a net exporter of gold since 1996.

Question:

Why do we need to mine gold at Stibnite?

Is Midas Gold actually hoping to produce antimony as a by-product of the gold mine, which is included on DOI[rsquo]s list of 35 mineral commodities critical or strategic to the USA?

Is the USA able to refine Antimony or does it need to be sent overseas?

## SUPPLEMENTAL EIS

We need a Supplemental EIS to address the treatment of Alternatives 3 and 4 which were minimal at best and adverse impacts are implied but no mitigation is offered.

The DEIS is lacking critical analysis and sufficient alternatives for the public to weigh in.

According to the USFS website, the South Fork of the Salmon is designated as critical Chinook Salmon habitat.

Question:

Does the USFS have to avoid actions that destroy or adversely modify that critical habitat?

## ACCESS TO DEIS

The Payette National Forest did not offer printed copies of the DEIS to the general public; the USFS made the DEIS available in electronic form only. The failure to provide printed copies arbitrarily excludes a significant portion of the public from participating in this process. Without a computer, reliable Internet service, and skills to negotiate the document on-line, the Stibnite Gold Project DEIS is essentially unavailable to many people.

Question: Why didn't the Payette National Forest have printed copies available for the public at the McCall Public Library or at the PNF office?

## TRIBAL RIGHTS AND INTERESTS

Source 3.24 Tribal Rights and Interests (3.24.1 Introduction and Scope of Analysis 3.24-1 SGP DEIS)

We need to recognize the indigenous people (the Native People) of this area which includes the Nez Perce Treaty Rights. The Stibnite area will be closed to all people for 15-20 years. The proposed project is on land subject to a federal treaty from 1855 that protects the tribe's rights to fishing, hunting and medicinal plant collecting. The Nez Perce, Shoshone-Bannock, and Shoshone-Paiute Tribes have used this area for thousands of years.

As someone who uses the areas that will be impacted by the proposed mine (not only the mine site, but McCall, Cascade, New Meadows, HWY 55, HWY 95, Payette and Boise National Forest back country roads and trails, and Salmon River and tributaries.), I am grateful for the opportunity to comment on the DEIS.

Question: How are you going to protect everything I care about as stated in my above comments?

Thank you.