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Organization:

Title:

Comments: I am writing this letter to comment on the Stibnite Gold Project Draft Environmental Impact Statement (DEIS), as provided for in the National Environmental Policy Act (NEPA). I am a resident of McCall, Idaho, and an avid outdoor recreationist. I feel lucky to be able to live in Valley County and take advantage of the many nearby recreational opportunities available. Much of this recreation takes place on the Payette and Boise National Forests, which I appreciate very much. I am also a retired Natural Resource Specialist, having worked for the National Park Service, the Bureau of Land Management, and the Bureau of Reclamation.

I am concerned about the potential adverse environmental impacts that would accompany the proposed Stibnite Gold Project (SGP) as analyzed in the DEIS. Thus, I offer the following comments on the DEIS.

#### Alternative 5 - No Action (2.7)

As described in the SGP DEIS, Section 2.7 (p 2-139), Alternative 5, the No Action Alternative does not include the ongoing stream and fisheries restoration work being conducted by the Forest Service and the Nez Perce Tribe. In response to adverse environmental impacts left by a century of mining, the Forest Service and others have and continue to spend millions of dollars on restoration in the Stibnite area and the East Fork South Fork Salmon River. Streams and riparian areas have been isolated from mine waste, salmon and trout habitats have been reconnected, unstable slopes have been secured, miles of unneeded sediment-producing roads have been improved or removed, and areas denuded by mining activities have been revegetated. The Nez Perce Tribe spends over \$2 million annually on fish research, watershed restoration, and hatchery supplementation in the South Fork Salmon River. These efforts and others would continue into the future under the No Action Alternative. However, the DEIS does not address them or consider them as components of the No Action Alternative. Nowhere in the DEIS have the beneficial (or adverse) impacts of these restoration activities been considered or analyzed. This is a serious oversight that must be addressed under NEPA.

#### Alternatives Considered (2.8)

One reasonably foreseeable alternative that is not considered in the DEIS is one that includes clean-up and restoration of legacy mining scars, site alteration, and contamination. There are numerous sources of funding available for such restoration of legacy mine sites, not the least of which is the EPA Superfund program. A Superfund project and funding has been successfully used to clean up and restore large portions of the legacy mining contamination and other impacts in Idaho's Silver Valley near Kellogg, Idaho. This same approach could be used in the Stibnite area, either with or without new mining such as that proposed in the Action Alternatives. This alternative should be carried forward and analyzed through the NEPA process and this DEIS.

#### Noise - Scope of Analysis (3.6.1)

The analysis area for noise impacts is limited in size and does not extend north along State Highway 55 to McCall (p 3.6-3). Thus, noise impacts from SGP-associated increased traffic passing through McCall have not been analyzed. There are numerous residences and other noise sensitive receptors in and surrounding McCall. It is likely that increased traffic directly and indirectly associated with the SGP would create increased noise in the McCall area. These impacts have not been analyzed in the DEIS.

#### Noise - Cumulative Effects (4.6.4)

The cumulative effects analysis in the DEIS fails to examine the reasonably foreseeable increase in visitation and population growth that has and will probably continue to occur in Valley County (p 4.6-51). Baseline ambient noise level measurements made in 2014 and 2016 (p 3.6-9) are likely already out-of-date due to increased traffic and use in much of the analysis area. Impacts of noise generated by mine-related traffic would be cumulative with noise generated by reasonably foreseeable increased traffic (especially along State Highway 55) associated with increased recreational visitation to Valley County and population growth. These impacts should be analyzed in the DEIS.

#### Wildlife and Wildlife Habitat (4.13)

None of the Figures (4.13-x) cited in the text describing the impacts to wildlife are included in the DEIS. These analyses are almost meaningless without the figures. The DEIS should be amended to include these figures.

Please enter my comments into the project record and address these oversights and weaknesses of the DEIS.

Sincerely,

Mike Wissenbach  
McCall, Idaho