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Comments: I formally submit my comments in response to the Draft Environmental Impact Statement (DEIS) for the proposed Stibnite Gold Project (SGP), as well as the project-specific plan amendments. Please consider these comments as substantive formal comments, which are [ldquo]within the scope of the proposal, have a direct relationship to the proposal, and include supporting reasons for the responsible official to consider[rdquo] (36 CFR 219.62).

I have lived in McCall for 28 years, and have a deep professional and personal connection to surrounding public lands, in particular the South Fork Salmon River. My husband (wildlife biologist), late husband (fish biologist), son (fish biologist and Salmon River guide), and daughter (stream ecologist) live with the Salmon River as a life force, workplace, and sense of place. We camp, hike, hunt, fish, ski, float rivers, and watch wildlife in the South Fork Salmon River watershed. I worked for either the Payette or the Boise National Forest as a fish biologist or District Ranger from 1993-2015. Throughout my career I was responsible for understanding and interpreting the effects of Forest Service land management on fish, and for managing a Ranger District, the majority of which is within the South Fork Salmon watershed. I have snorkelled and studied Stibnite fish and streams, worked with Stibnite miners, been part of a CERCLA team to restore Stibnite waters and lands, collaborated with the Nez Perce Tribe on watershed restoration, and written Environmental Assessments and Biological Assessments on effects of mining and other actions on South Fork Salmon River fish listed under the Endangered Species Act.

The DEIS confirms that the Stibnite Gold Proposal will cause net environmental degradation at a profound level. I have studied numerous parts of the DEIS, its appendices, technical reports, and references, and I believe I have the background to offer the following comments.

Draft EIS

Comment period is unnecessarily too short for a document that took four years and hundreds of contractors to compile. Please provide more time for this Draft, and 120 days for review of the supplemental DEIS that will surely be necessary given the volume of missing data and omissions from the current draft.

Failure to provide printed copies has hindered public participation and is discriminatory, unethical, and an abuse of discretion.

Thousands of [ldquo]Form Plus[rdquo] letters created by Midas Gold should be discarded, or at least be considered inferior to truly substantive comments. These Form plus letters are easy to detect; they are all around 6000 bytes, differ in only a few sentences, support Alternative 2, and end with the same sentence. Many appear to have computer-generated names.

The DEIS is unwieldy, intimidating, and difficult to negotiate. The logic is incoherent, due to much information stored in technical documents instead of being displayed logically by alternative.

Access to the DEIS and FS websites, especially essential without public meetings, has been frequently unavailable throughout the truncated comment period. Links have been broken on the Forest Service side, and websites have been [ldquo]down for maintenance[rdquo] during early evening working hours. The PAO was unavailable for much of the comment period due to fire assignment, and his voicemail inbox was frequently full.

Action alternatives do not differ appreciably. Alternatives 1-4 are a mix and match of access routes, tailings/waste rock dumps, and stream channel reconstructions. An alternative is needed regarding CERCLA that complies

honestly with the Clean Water Act.

Drop box disappeared after October 26. The Payette NF Supervisor's Office dropbox, in which to place written comments, was indicated as available in verbal communication from the Payette NF Supervisors Office. It was not available on the last days of the comment period, October 27-28, and the doors were locked.

Water Quality

Predicted exceedences of water quality thresholds are unacceptable for mercury, copper, arsenic, and antimony, especially with likely adverse effects to ESA-listed fish, and need to be rectified with adequate treatment throughout the project and post-reclamation. Degradation of aquatic, terrestrial, and watershed resources is not in compliance with many Forest Plan standards, and hence not compliant with NFMA.

Temporal variability of arsenic, antimony, mercury, and copper and its relationship to fish life cycles is not provided.

Toxicity of antimony to aquatic biota is not addressed.

The food chain/dietary pathways for fish and wildlife (contaminated stream sediment to macroinvertebrates to fish/birds to fish-eating wildlife) was not considered in the DEIS (Chapters 4.9, 4.12, 4.13). Evaluation of effects cannot be completed without this analysis. Best Available Science is available for this topic, but has not been tapped, which makes the DEIS non compliant with NEPA regulations.

Fish

Non-compliance with NFMA (Forest Plan standards) and ESA (Biological Opinions on Forest Plans, 2017 NMFS Recovery Plan). The following points demonstrate some of these non-compliances.

The DEIS concludes extremely negative impacts to ESA-listed Chinook salmon and bull trout habitat (Chapter 4.12). Every factor used to evaluate impacts (intrinsic potential, occupancy modelling, PHABSIM, streamflow productivity, barrier, Critical Habitat, and stream temperature models) show major shortcomings. They do so without consideration of climate change, accidents and spills, and the cumulative and synergistic effects of overall habitat simplification and degradation. Therefore, the negative impacts are underestimated. Specific mitigation for the shortcomings is not addressed in the DEIS.

Temporal loss of habitat and underestimation of impacts to steelhead. Proclaimed [ldquo]improvements[rdquo] to steelhead habitat rely on multiple embedded, erroneous models and neglect consideration of climate change and multiple other aspects of habitat complexity critical to the overall sustainability of steelhead populations.

Cutthroat trout would be negatively affected through the loss of suitable habitat. Despite some improvement to access, there remain potential effects which may cause injury or mortality to individuals and/or displacement of cutthroat trout. (DEIS 4.12.2.3.7.4, p. 4.12-93).

Downstream effects are not considered. Despite the described fisheries analysis area encompassing the entire transportation route and habitats downstream of the mine site, effects for these areas are not analyzed. Effects of increased temperatures, sediment, and exposure to chemicals are likely to extend far downstream to the lower SFSR. This would adversely affect Chinook salmon rearing for the entire SFSR watershed.

Baseline data characterizing population abundances and variability are not sufficient to detect population-level impacts. The DEIS claims that [ldquo]population-level impacts are not expected[rdquo](DEIS p. 4.12-23), are based on insufficient data.

Water temperatures are predicted to increase 4-9 degrees C, without considering climate change (Chapter 4.12), and downstream effects below Sugar Creek are not described. Small temperature deviations could result in drastic underestimations of mining impacts to salmonid populations.

Stream Channels

The Stream Function Analysis (SFA) is an unproven model, used in the DEIS to ensure mitigation for the SGP's unavoidable impacts on jurisdictional aquatic resources, and to assure the durability and ecological function of reconstructed streams (DEIS Appendix D-2). Other proven models exist and are used on the Payette and Boise National Forests and in the Pacific Northwest to characterize impacts to streams. Using a new, unproven, made-for Midas Gold model does not comply with NEPA's Best Available Science requirement. The DEIS provides no discussion of SFA results.

Spill Risk

The magnitude of impacts could be high to fish exposed to harmful concentrations of hazardous materials, and the duration of the risk of impacts would extend throughout the SGP (Section 4.12.2.3.2.2). The impacts that spills and accidents may have on the aquatic environment along the transportation corridor should be seriously and thoroughly considered further in a supplemental DEIS, analyzing specific impacts to species and life stages.

Roads and Sediment

No road sediment production data was gathered, and no project monitoring described, for road sediment generated during use by the SGP (Section 3.12.4.4.3). Sediment is a key characteristic of degraded salmonid habitat, this information is critical to the evaluation of effects of roads to fish and needs to be in the supplemental DEIS.

No geological hazard assessment was completed on the Johnson Creek or Stibnite roads (Section 4.2.2.1.1.3). Therefore, potential consequences are inadequately addressed. Mitigation is vague and does not fulfill potential risk.

The Burntlog Road is [ldquo]better[rdquo] for the watershed than the [ldquo]Johnson Creek Road[rdquo]. (DEIS 4.7.2.4.4). The Johnson Creek/Stibnite roads already exist, where 15-20 miles of the Burnt Log road needs to be totally constructed, and the existing 20 miles needs to be re-constructed to a 20 ft running surface, creating additional sediment to headwater streams feeding bull trout, westslope cutthroat trout and finally to Chinook habitat and spawning reaches in Johnson Creek.

No monitoring of fish habitat or other water quality parameters is specified on the non-minesite parts of the project area (access roads, Burntlog Route, utility routes). Cobble Embeddedness, free matrix particle, and PIBO fisheries habitat data are available for the Fish Analysis area in the DEIS supplementary reports: HDR, 2016; MWH, 2015-2017; Great Ecology, 2018 and others. These data and sites should be used as fish habitat baseline and monitoring references to adequately understand effects of the SGP proposal.

Forest Plan Amendments (Appendix A)

Many additional Payette National Forest standards would also need amendments to implement the SGP. These standards apply to the SGP mine site area, along the access route, and downstream from the minesite throughout the fisheries analysis area described in DEIS (3.12-3).

Unmet FOIA request. I cannot make substantive comments without the information I have requested with the

Save the South Fork Salmon group (and not received) under the FOIA.

The DEIS does not disclose effects of the proposed amendments. Any amendment requires disclosure of the effects the amendment is going to generate (36 CFR 219). There are no details given in the DEIS anywhere of the effects of this amendment, violating the Planning Rule 36 CFR.

Timeframes and scale of impact are inadequate and may exceed rationale for a project level amendment. The DEIS describes project actions which degrade aquatic and terrestrial conditions indefinitely, in perpetuity. Therefore, indefinite and [ldquo]in-perpetuity[rdquo] time frames for these actions should be included in the timeframes for the proposed amendment, which could cause significant environmental effect. The SGP will affect aquatic and watershed resources in addition to and beyond the management areas proposed for amendment. Anticipated impacts cannot reasonably be limited to those management areas proposed for amendment, therefore additional management areas need to be included in the Forest Plan amendments.

Proposed Forest Plan amendments are not compliant with 36 CFR 218 and 219. The amendments rely on unsubstantiated mitigations which the DEIS claims to reverse degradations, and render the amendments compliant with 36 CFR 218 and 219. Rationale includes: [ldquo]The mitigations and reclamation actions developed for each resource are created to maintain and restore ecosystem integrity[rdquo], and [ldquo]The mitigations and reclamation actions are developed to minimize impacts to fish and wildlife and maintain and/or restore terrestrial and aquatic habitat.[rdquo] The DEIS is explicit on multiple degradations. The DEIS needs to include analysis of the specific mitigations that allegedly [ldquo]correct[rdquo] specific aquatic and watershed degradation.

Best Available Science was not considered. Multiple models used to describe various aspects of habitat are flawed oversimplifications of salmonid ecosystems, and/or rely on model inputs generated by other flawed and inaccurate models. This renders their utility for predicting and measuring impact questionable at best.

Species of Conservation Concern need to be identified.

Amendment does not meet planning rule substantive requirements. The following substantive requirements of 36 CFR 218 and 219 are not met:

218.8(a)(1)(2)

219.9(a)(1)(2)

219.9(b)(c)

219.10(a)