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Comments: Attention: Linda Jackson, Payette Forest Supervisor
Date: Jan.6, 2023
From: Laura Bechdel, 771 Knights Road, McCall, Idaho 83638
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Please consider this a digital signature, or otherwise I am happy to verify my identity if needed: Laura Frances Bechdel, DOB 04/09/1983, Dated 1/6/2023

To whom it may concern:

I write to you now to formally submit my comments in response to the Supplemental Draft Environmental Impact Statement (SDEIS) for the proposed Stibnite Gold Project (SGP), dated October 2022. Please consider these comments as substantive formal comments, in firm opposition to the proposed Stibnite Gold Project.

Indeed, my concerns and objections to the SGP are diverse and extensive. However, for the purpose of this comment letter, I would like to speak specifically to the SDEIS findings related to the impact of the project on fish. The area of impact, found within the South Fork Salmon River ecosystem, is one that has historically supported thriving populations of fish species including steelhead, salmon, bull trout, and cutthroat trout. Yet, alarmingly, the SDEIS claims irreversible losses to these very species. This alone should negate the viability for the SGP in a fragile ecosystem with endangered and at risk native fish populations. Indeed, the SDEIS cites ample evidence to illustrate the negative impact of SGP for fish.

The risks to native fish populations are many, with impacts noted in the SDEIS (p.4-386), including:

Hazardous spill risk
This risk is acknowledged in the SDEIS (SDEIS p.13) yet fails to include comprehensive assessment of spill probability or severity.
The transportation analysis fails to include Hwy 55 nor Hwy 95, which should be included as full scope of the regions impacted by a potential hazardous spill. (SDEIS p.14)

Increased stream temperatures
The SDEIS shows that stream temperatures will reach lethal levels for salmon and trout (emphasis mine; SDEIS p. 2-146, 4-280)
As noted in SDEIS, "these warmer water temperatures and lower flows are expected to impact salmon, trout, and other coldwater fish (EPA 2016a). For species dependent upon cold water, such as the federally listed Threatened bull trout, even small rises in temperature can significantly reduce spawning success (Knowles and Gumtow 1996)" (SDEIS 3.4.4.10 Fish Resources and Habitat, p.68-69).

Decreased habitat (places for fish to live)
There will be a "net decrease in both quantity and quality of habitat for bull trout and westslope cutthroat trout" (SDEIS p.19)

Barriers to fish passage
As noted in SDEIS, "Barriers to fish passage can impact the natural movement (e.g., migration) of fish species and fish population dynamics by reducing, or completely blocking, potential habitat during certain life stages. Barriers can impact fish habitat connectivity and disrupt the natural movement of fish and block important habitat for fish during all life cycles, including spawning and rearing."
While access to the upper EFSF may be restored (which could occur only if proposed fish tunnels, trap/haul, channel rebuilding, riparian plant growth, stream shading, temperature cooling, liner integrity, adaptive management, etc. go perfectly), upper Meadow Creek, which is designated as critical habitat for both bull trout and Chinook salmon, will be blocked and inundated by millions of pounds of mine waste.

The Proposed Stibnite Gold Project will irrevocably and irreversibly harm special status fish. The SDEIS indicates that the Forest Service has preliminarily determined that this project will adversely affect fish including: bull trout, Chinook salmon, steelhead; and may indirectly impact Westslope cutthroat trout. Further, the SDEIS findings conclude that the proposed project will result in a dramatic, direct loss of habitat. 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 Burntlog Maintenance Facility) will 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.

The impacts outlined above, and within the SDEIS, are clear: they will have an immediate as well as long-lasting negative impact on the fish that spawn and live in these waterways. My comments in this comment letter focus closely on the direct impact to the fish, as highlighted in the SDEIS. 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.

As the SDEIS notes, the potentially affected area for the proposed project crosses boundaries of 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