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The following are comments from Wilderness Watch on the draft environmental impact statement (hereinafter DEIS) and its associated attachments and appendices for the Stibnite Gold Project. Wilderness Watch is a national nonprofit wilderness conservation organization dedicated to the protection and proper stewardship of the National Wilderness Preservation System. While there are numerous other negative consequences that would result from construction of this mine, these comments focus on the impacts to Wilderness from this massive industrial project on the edge of the Frank Church-River of No Return Wilderness.

#### Introduction

The Frank Church-River of No Return Wilderness and the Gospel-Hump Wilderness<sup>1</sup> together form the largest single contiguous block of designated wilderness in the lower 48 states. It is a remarkable area, of world-class renown, made all the more important by the other large wildlands that are nearby, some of which are also designated as Wilderness. The DEIS admits that construction of this mine would damage the air quality in these two areas and other places designated as Wilderness in central and north-central Idaho as well.

#### DEIS Errors Regarding Wilderness

The DEIS makes a serious mistake adopting [ldquo]the five qualities of wilderness character[rdquo] as the way to analyze the impacts to the Wilderness (DEIS at 4.23-1). This ignores the fact that [ldquo]wilderness character must be defined as a coherent whole, in a manner that is not internally contradictory. It cannot be broken down into separate qualities.[rdquo] (Cole et al. 2015, emphasis

added).

Peter Landres and others developed these five characteristics, intended originally as a monitoring protocol and not a management policy, by dissecting the Wilderness Act. It was an exercise in reductionism. While this process to define wilderness character was undoubtedly a well-intended effort, as time has passed, it is clear it has serious negative unintended consequences for Wilderness. (See Landres et al. 2015 Keeping it Wild and Keeping it Wild 2). Other wilderness specialists and researchers recognize these failings in their pointed critique (see Cole et al. 2015). A prime example of a negative consequence is the erroneous idea that managers could trade off various components of wilderness character against each other, thereby reducing the Wilderness Act into a procedural process, rather than a substantive law. This DEIS makes a similar error because it does not discuss the substantive requirements of the Wilderness Act (including agency regulations and policy) in relation to the projected impacts on Wilderness.

The DEIS doesn[rsquo]t understand Wilderness and that may be, in part, due to this dissection into five attributes or qualities. For example, the night sky and noise impacts (page 4.23-4) and the ecological processes discussion (page 4.23-9) conflate natural and untrammeled. The wilderness analysis also conflates the impacts to roadless areas with Wilderness in some specific instances.

Perhaps nothing better illustrates the relative lack of understanding in the DEIS regarding Wilderness than the statement on page 4.13-108:2

Cumulative impacts from past and present projects have resulted in temporary and permanent losses of habitats

and ecological functions in the region, and future projects also would likely impact terrestrial wildlife species. However, the region is still somewhat remote and relatively wild, and the types of projects listed above are unlikely to significantly change this wilderness character in the near term, with the exception of additional wildfires reducing mature forest structure.

Natural processes, like wildfire, by definition, are ecological functions. They don't negatively affect wilderness character, especially in the way the DEIS suggests. Lightning fires are a natural part of the Frank Church-River of No Return Wilderness.

#### Impacts to Wilderness

The DEIS admits that the mine would create air pollution affecting several areas designated as Wilderness. Yet, the DEIS does not discuss the interplay between the substantive requirements of the Wilderness Act and the recognized impacts on air quality from this proposal.

The same is true for the sound impacts on the Frank Church-River of No Return Wilderness. The DEIS states construction of the mine would negatively affect the Wilderness but then seems to justify this damage by saying the impacts won't last into perpetuity because the mine has a finite life span. This is tantamount to agreeing to temporarily de-designate the Wilderness.

The maps are too small in scale to determine whether the expansion/construction of the Burntlog access road, proposed under some of the alternatives, would actually intrude on the Wilderness. Has the Forest Service looked at the official boundary maps and description and compared them with the engineering plans for the road to determine that the road won't intrude on the Wilderness?

The DEIS admits in several places that road construction under some alternatives could lead to increased use in the Wilderness, both legal and illegal (motorized trespass). However, none of this is quantified or discussed in terms of whether this construction of the mine would violate the Wilderness Act. Further, the DEIS also suggests that wilderness use might decrease because areas affected by the mine and its roads would be less desirable or because of access restrictions placed on the routes during construction or intensive mining activity

The DEIS also does not analyze impacts to the Frank Church-River of No Return Wilderness downstream of the project area. The lower portion of the South Fork Salmon River is within the Wilderness. For example, damage to the water quality or fish habitat in the portion of the South Fork Salmon River in the Wilderness has additional negative impacts on the Wilderness itself.

#### Summary

The DEIS doesn't explicitly reveal what the mine would mean for Wilderness. While the DEIS makes some vague statements--and in the instance of air quality, some numeric projections-- there are no conclusions as to how the Forest Service will fulfill its legally mandated wilderness administration duties in light of the projected impacts (see for example, FSM 2320.6). Rather, the DEIS turns the substance of the Wilderness Act into a mere procedural check box. The Wilderness Act constrains agency actions and approvals.

Constructing a huge industrial site on the edge of the Frank Church-River of No Return Wilderness would have significant impacts. It is hard to conceive of worse place to construct such a large mine.

1 A small portion of the Frank Church-River of No Return Wilderness is non-contiguous and isolated from the rest by a dirt road but that does not change the fact the contiguous portion of the Wilderness along with the Gospel-Hump Wilderness form the largest block of land designated as Wilderness in the lower 48 states.

2 The DEIS also errs when it uses the word pristine in context of the Wilderness Act. Pristine does not occur anyway in the Wilderness Act.