

To: Linda Jackson, Payette Forest Supervisor
Stibnite Gold Project

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 the 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.

"Fens are permanently saturated PSS or

PEM wetlands that form where a thick

layer of partially decomposed organic

matter, called peat, accumulates." (Source:

Affected Environment, Wetlands, Fens, Stibnite

Gold Project (SGP) Supplemental Draft

Environmental Impact Statement (SEIS)

3.11.4.3, 3-249) Idaho Department of

Fish and Game considers the wetlands

associated with Mud Lake to be poor fens (IDFG 2004).

Mud Lake and its associated wetlands are designated

as a Class 1 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 (IDFG 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 4.11 Wetlands

and Riparian Resources SGP SDEIS 4.11.2.2

4-308). Objective 2023 "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." (Source: Boise NF Revised Forest Plan 2010 Chapter III-2003-2010 Integration Upper Johnson Creek Management Area 20 page III-377 Botanical Resources)

Question:

Where is the Burntlog Maintenance Facility site going to be located? Will it be near this fen adjacent to Mud Lake and decimate the rare plants at this location?

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?

"The Burntlog 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." (Source 4.11 Wetlands and

Riparian Resources 4.11.2.2 2021 MMP

Off-Site Focus Area 4-308 SGP SDEIS)

Burntlog Route is adjacent to the Chilcoot Peak

Research Natural Area. This RNA is supposed

to be "managed in a way that allows natural

processes to predominate with minimal human

intervention." (Source Affected Environment 3.23.4

Research Natural Area 3.23.4.4 SGP SDEIS 3-496)

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

The 2021 MMP would remove an estimated 259 acres of occupied Whitebark pine habitat totaling 1,236 trees (23 would be mature,

cone-bearing). Additionally, the 2021 MMP

would impact a greater amount of modeled potential habitat (3,991 acres) for sensitive and forest watch plant species than the

Johnson Creek Route Alternative (3,204 acres).

SGP SDEIS ES-16.

Question:

Has the USFS done a consultation with the

US Fish and Wildlife Service for the Whitebark Pine?

(7)

How is the USFS going to mitigate compromising the Chilcoat Peak RNA 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 Botanical Resources 3.10.4.2 Bent-flowered Milkvetch SGP SAEIS 3-227)

(8)

Question:

Since this subpopulation grows in the largest contiguous area of occupied habitat and is at present located in a relatively undisturbed area which Perpetua 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 Lewisia sacajawean (Sacajawea's bitterroot) as it is rated sensitive in both the Payette National Forest and the Boise National Forest and is ranked globally (9)

and state imperiled. It occurs 300 feet above the Warm Lake Road and an existing transmission line. Potential habitat occurs along Johnson Creek Road, Burntlog Route and the proposed Stibnick Gold Project site. (Source Botanical Resources 3.10.4.2

Sacajawea's bitterroot SGP SDEIS 3-229)

Question:

Will Perpetua do more surveys for this imperiled species in the analysis area?

Finally, the SGP will negatively impact the treaty-reserved rights of the Nez Perce and other indigenous peoples of Idaho.

The SDEIS clearly states "Adverse impacts to tribal rights and interests under either

alternative, including preventing access to traditional lands, harming traditional fishing and hunting rights, impacting endangered salmon and concerns that it would harm the tribe's salmon restoration efforts." SEP SDEIS ES-32

For these reasons, I urge the Forest Service to protect the Salmon River watershed and support the No Action Alternative.

Thank you for your time and consideration.
Marilyn Johnson