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Title: Idaho Director
Comments: July 14, 2017

Keith Lannom, Supervisor
Payette National Forest
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RE: Stibnite Gold EIS Scoping Comment

Dear Keith,

Please accept these scoping comments from the Idaho Office of The Wilderness Society on the Stibnite Gold Environmental Impact Statement (EIS).

The Wilderness Society's (TWS) mission is the protection of America's wild lands and inspiring Americans to care about them. TWS has been an active participant in numerous resource management issues on the Payette National Forest for over 30 years, including the development of the first and second generation land and resource management plans, travel planning, bighorn sheep restoration, and roadless area protection. TWS is committed to the wise stewardship of the resources of the Payette National Forest.

The Stibnite Gold project is a major project that will affect the surrounding national forest lands for decades. There is a significant burden on the Forest Service to conduct an exhaustive review of the potential environmental impacts of this project and to protect forest resources from the impacts of this mining project.

The proponents of the Stibnite Gold propose many restoration activities as part of the project. Nevertheless, this is a mining project amid an area of Idaho already battered by decades of mining. The promise of restoration, no matter how badly it may be needed, should not blind the Forest Service or the public to the fact that this is a mining project in Central Idaho and it will have environmental impacts.

While TWS has concerns over many parts of the scope and effects of this project, these comments will for the time being focus on two issues: the re-routing of the East Fork of the South Fork through a fish-passable tunnel and the proposed construction of the Burntlog road.

Re-routing of the East Fork of the South Fork Salmon River

The re-routing of the East Fork of the South Fork through a fish-passable tunnel must be thoroughly assessed in this EIS. The Forest Service must provide examples where this approach has proven successful for the public to have any confidence in the success of this kind of project. The Forest Service must make certain that components of the Stibnite Gold project like the re-routing of the East Fork do not further damage this already-hammered river.

Burntlog road

The construction of the Burntlog road to provide access to project site is of concern to TWS. Generally, TWS does not support adding more road mileage to the national forests, particularly in an area as erosive as the Idaho

batholith. The construction of the Burntlog road will change the character of this specific area and create impacts that may be impossible to mitigate. TWS also has concerns about the proximity of this proposed road to the Frank Church - River of No Return Wilderness. TWS has little confidence that this new road will be closed after the mining project is completed. Road closures in Idaho are difficult and controversial. Local pressure to keep this road open will likely be intense. Any way you look at this, the proposed Burntlog road is a major concern to TWS due to its potential environmental impacts.

While the Stibnite Gold proponents have proposed construction of the Burntlog road to move mining traffic away from anadromous fish-bearing streams, the overall result appears to be one of pitting aquatic species against terrestrial species. That is not a trade-off TWS finds acceptable.

The Burntlog road appears to be proposed through national forest roadless areas. Although difficult to discern, a review of the Idaho roadless area maps, the Boise National Forest land and resource management plan (LRMP), and the Payette LRMP maps, it appears that the Burntlog road will be affect or be constructed through the Burntlog, Black Lake, and Meadow Creek inventoried roadless areas (IRAs). These comments will proceed on the premise that these are the IRAs at risk by this project.

Consistency with the Idaho Roadless Rule is a matter associated with this project. It is not clear that road building through a roadless area to provide access to a mining effort should be allowed when access to the mining area already exists. The matter is not whether access should be allowed; access already exists via other routes. The matter is the environmental effects of road construction through roadless areas and whether those effects are acceptable. Also, the construction of this road is basically a mitigation action for the Stibnite Gold project, and as such it is questionable that it is consistent with the Idaho Roadless Rule.

The Final Environmental Impact Statement, Roadless Area Conservation National Forest Systems Lands in Idaho documents the following values for these roadless areas. The Forest Service must insure that these values are not compromised by the proposed Burntlog road and other actions associated with the Stibnite Gold project.

Burntlog IRA

About 700 acres of the 1,290 Chilcoot Peak Research Natural Area lie within this IRA. The segment of Burntlog Creek eligible for Wild and Scenic River designation lie in this IRA; an estimated 10.5 miles of river and 3,100 acres of river corridor. The IRA supports a mountain goat population and fishery resources such as westslope cutthroat trout, bull trout, and spawning and rearing habitat for chinook and steelhead. Over 70 percent of the IRA is potential lynx habitat. Region 4 sensitive species fisher occurs here. Chilcoot Creek and nearby Chilcoot Lake are areas of special recreational interest.

Black Lake IRA

About 100 acres of the Chilcoot Peak Research Natural Area lie within this IRA. The entire IRA is designated critical habitat for chinook. Spawning and rearing habitat for chinook and bull trout exist in this IRA. An estimated 88 percent of the IRA is identified lynx habitat. Fisher, wolves, wolverine, boreal owl, great gray owl, northern three-toed woodpecker, northern goshawk, flammulated owl, Townsend's big-eared bat, spotted bat and spotted frog are Region 4 sensitive species either known or highly likely to occur in this IRA. Potential wolverine denning habitat has been identified here.

Meadow Creek IRA

Streams in this area provide or may potentially provide spawning or rearing habitat for chinook, steelhead, bull

trout and westslope cutthroat trout. The entire area lies within designated critical habitat for chinook. Potential habitat for lynx occurs in most of the area and suitable habitat and travel corridors for wolverine and fisher are found here. Other species here include boreal owl, white-headed and northern three-toed woodpecker, great gray owl, northern goshawk, flammulated owl, spotted frog, and wolves.

All three of these IRAs support numerous resource values. The construction, maintenance, traffic and snow plowing during the winter of the Burntlog road to provide winter access to Stibnite will have an undeniable negative impact on these values. The Forest Service must rigorously identify the impacts these actions have on the values of these IRAs.

Similarly, the Forest Service must evaluate the impacts of road construction, maintenance, traffic, snowplowing and yearlong use of this road on the adjacent Frank Church - River of No Return Wilderness.

It is questionable whether the construction of the Burntlog road compiles with the management area direction for this area in the Boise Forest LRMP. Road construction in the Upper and Lower Johnson Creek management areas is allowed, among other factors, only to provide access related to reserved or outstanding rights. As stated above, access to the mining project, arguably the reserved or outstanding right in play here, is already provided by other routes.
The Burntlog road is being proposed essentially as an off-site (from the management area) mitigation measure to the Stibnite Gold project, and allowance for that kind of road construction does not appear in the Boise LRMP. Road construction is allowed in these management areas to support restoration activities, but the intent indicates these restoration activities occur within the specific management area, not elsewhere on the forest.

The Boise LRMP also requires preservation of the outstandingly remarkable values of the Burntlog Creek eligible wild and scenic river corridor.

In closing, the effects of the Stibnite Gold project are enormous, wide spread, cumulative and long lasting. The Forest Service EIS on this project will be one of the most significant efforts the agency takes on in the coming years.

Please keep this office informed of further developments on this matter.

Sincerely,

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