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First name: Audrey

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Organization:

Title:

Comments: October 25, 2020

Linda Jackson

Forest Supervisor

Payette National Forest

500 N. Mission Street, Building 2

McCall, Idaho 83638

Re: Stibnite Gold Project EIS #50516

Dear Linda Jackson,

My name is Audrey Hopkins and I am a full-time resident of Valley County, Idaho. For my family, Valley county encompasses the image of wildness. That's one of the many reasons we live here. We consider ourselves stewards of this rugged and complex landscape and the flora and fauna that have lived here long before humans arrived. We understand that mining has a prominent place in the history of this area. Mining scars are visible today within the potentially affected area described in the Draft Environmental Impact Statement (DEIS) for the proposed Stibnite Gold Project (SGP). The mine site is located in the East Fork South Fork Salmon River (EFSFSR) drainage basin (SGP DEIS ES-1).

Citizens, states, tribes, and government have a responsibility to look after our National Forests. In 2018, Idaho and the U.S. Department of Agriculture (USDA) signed a historic agreement to improve forest health. Part of the strategy is said to "continue to focus on reduction of fuels and wildfire risk to communities, improvement of forest health and watershed conditions (US Forest Service 2018). I support and appreciate this kind of interagency collaboration, especially when it comes to protecting, preserving, restoring, and wisely managing our forests and grasslands as part of the overall mission of the agency (US Forest Service 2020). The Valley County Comprehensive Plan, revised in November 2018, includes as part of its purpose to, "ensure the protection of fish, wildlife, and recreation resources" (Valley County 2018). I value the opportunity to provide the following comments for consideration by the US Forest Service in preparation of the Final Environmental Impact Statement (FEIS) on the SGP. Alternative 5, the No Action Alternative, best minimizes adverse environmental impacts on the National Forest System (NFS) and negates the significant issues identified (SGP DEIS ES-7).

My interest in the EFSFSR drainage basin began about 14 years ago when I worked in the area assisting with the installation of instream Passive Integrated Transponder (PIT) Tag Detection Systems as part of the Integrated Status and Effectiveness Monitoring Program (ISEMP). ISEMP was established to implement a regionally standardized in-stream monitoring program that created tools to help inform agencies for management decisions about habitat and ESA-listed fish populations in the Columbia River basin (ISEMP 2018).

I was involved in some of the site selection for this project and there is an understanding that, "you don't go to Yellowstone without a chainsaw!" The area is remote, it takes hours to drive from Warm Lake Rd. near Cascade to Yellowstone. The site selection phase of the project was intensive as the agencies involved assessed the most appropriate and scientifically constructive monitoring locations within the Sesech, South Fork Salmon, and East Fork South Fork Salmon River reaches. The permitting process was daunting with complicated and restrictive conditions required to minimize impacts under the National Environmental Policy Act (NEPA). Reading through the SGP DEIS makes me cringe, especially considering the rigorous permitting process conservation based projects face.

There are many features of the SGP DEIS that I find deeply concerning. As a public land owner, I trust that the Forest Service will very carefully consider the alternative that minimizes adverse environmental impacts while operating within the standards of existing Forest Plans without specific amendments for the SGP project (DEIS Appendix A). A recent article in the October issue of High Country News titled Grand Disjunction by Paige Blankenbuehler predictably states...land that could be managed for recreation, wildlife or conservation will end up under the control of energy companies. At best, it will remain idle, but be inaccessible to the public. At worst, it will be immediately developed and directly contribute to greenhouse emissions in a world that is already nearing the critical threshold for the climate crisis (High Country News 2020).

Nez Perce Tribe Treaty Land

The Nez Perce Tribe (NPT) Department of Fisheries Resource Management (DFRM) is responsible for operating, maintaining, and analyzing data associated with the SFSR among many other watersheds in Nez Perce ancestral homeland. The locations of many of these important fisheries monitoring activities are located directly along proposed hauling routes associated with the SGP. Not only that, the SGP is entirely within the tribe's aboriginal territory. Critical and sacred resources, like Chinook salmon in the upper East Fork of the South Fork of the Salmon River have already been extirpated by past mining operations. As managers of treaty-reserved resources, the Nez Perce Tribe has committed an incredible amount of time, money, and resources to the recovery and restoration of resources within this sacred area and the SGP would undoubtedly undermine this decades long effort.

Critical Habitat Damage and Loss for Fish and Wildlife

The DEIS indicates that the Forest Service has preliminarily determined that the SGP will adversely affect bull trout, Chinook salmon, steelhead, and their critical habitats (DEIS 4.12-87, 69, 75). This is inevitable in and around the mine site, what about additional detrimental impacts that will occur downstream? And how far downstream does the DEIS account for? Why has the SGP proposed a Forest Plan amendment to, "Suspend the requirement of new surface diversions to provide upstream and downstream fish passage within the footprint of mining operations (DEIS Appendix A)? The DEIS modeling indicates that arsenic, antimony, mercury, and other metals will contaminate water for many years to come. Uncertainty and lack of model sensitivity were noted regarding hydrologic models but developing alternative models was dismissed as unrealistic (DEIS 4.8.8.2.1.4). Alternative 5 is the only alternative that wouldn't result in loss of habitat for fish and wildlife.

Light Pollution

Section 4.19.2.1.1.2 in the DEIS discusses mine site facilities as it relates to operations. "The mine site also would change the landscape character of the night sky by increasing sky glow or light pollution." (DEIS 4.19-14). In late 2017, Idaho's Central Idaho Dark Sky Reserve, one of only two in North America, was established in a 1,416 square mile territory in neighboring Idaho counties (The Washington Post 2020). There aren't many places left to stargaze without the negative effect of light pollution. Idaho's wilderness provides some of the last tourist destinations where the night sky can be enjoyed in all its glory. Based on modeling results, the SGP DEIS describes an emissions plume that would be visible for 63 to 73% of post-sunset nighttime hours (DEIS 4.19-14). The DEIS goes on to say that due to changes in the recreation setting from mine site operations, some visitors may choose to participate in recreation opportunities elsewhere! Is this a mitigation measure? Please elaborate on the implementation of Midas Gold Idaho, Inc. and Forest Service mitigation measures specific to lighting that 'could' reduce sky glow (DEIS 4.19-15).

Rising Water Temperatures and Carbon Emissions

In 2017, the Congressional Review Science (CRS) determined that "...federal agencies need to consider the impacts that their proposed actions would have on the greenhouse gas..emissions and climate change." (Executive Order 13783 172-173). Complete analysis should be conducted to assess the amount of greenhouse gas emissions associated with the SGP proposed mine compared to the existing state of the site. For every ounce of gold produced in 2019, mines emitted an average of 0.8 tonnes of CO₂ (S&P Global). And open pit

mines emit about 2X as much CO₂ (per ounce of gold) as underground mines! Do you think it's morally responsible that the SGP would increase Valley County's emissions by 800% while the world faces the effects of climate change? Rising water temperatures as a result of climate change are estimated to impact as much as half of the suitable habitat of coldwater fish in North America if global temperatures increase by 8 degrees Fahrenheit (Land Trust Alliance 2020). In the DEIS, Alternatives 1-4 show that water temperatures will rise (DEIS Table ES4-1). Why isn't the factor of increased water temperatures due to climate change not included in calculating increased water temperatures as a result of SGP?

Hazardous Materials & Mine Generated Waste Disposal

Where will hazardous waste, industrial garbage, and trash be disposed of? What is the plan for recycling recyclable materials generated by the mine and associated mine activities? Valley County already struggles with basic recycling and waste management for residents. The proposed transportation routes for shipments of hazardous and toxic materials, fuel, and explosives encompass many miles of backcountry roads, crucial Idaho highways along Idaho rivers, and directly through the towns of Cascade and McCall. The SGP may cause accidental releases of hazardous materials or wastes, including diesel fuel, gasoline, lubricants, antifreeze, chemical reagents and reactants, antimony concentrate, mercury, lime, explosives and other substances during their transport, use, storage or disposal (DEIS 4.7.1). Please provide analysis of the potential effects of spills on Idaho roadways and in our towns including detailed clean-up plans.

Impacts on Recreation, Economy, Local Resources

Idaho is among the fastest growing states in the nation and in the midst of a population boom (Census.gov 2017). Idaho's population growth exceeds available housing. From 2010-2019, housing increased by 7.8% while the county population grew by 15.5% in Valley County (Idaho Department of Labor 2020). McCall is already dealing with pressure to our utilities including a proposed cap on new sewer hook-ups (The Star News 2020). The DEIS notes that local communities rely heavily on tourism to support their economies (DEIS 3.4.3.3.17). Many residents from cities experiencing increased growth recreate in the mountains of Idaho. Highways 55 and 95 are essential corridors connecting the Northern and Southern reaches of Idaho. The enormous disruption we experienced this very year after a huge rock slide on highway 95 is just one example of the increased danger and congestion our highways face. How will the SGP proposal affect tourism, recreation, and related economic benefits to local communities? Why is there no mitigation plan in the DEIS to account for additional affordable housing, telecommunications infrastructure, and impact on our school systems? Why are the sources in the DEIS related to Idaho's population boom out of date? How will each alternative impact recreation in the area? How will the pressure due to an increase in population growth be managed for each alternative? What direct impacts will the SGP have on local recreation?

I appreciate the opportunity to provide comments regarding the proposed SGP especially as it does not appear to be an opportunity afforded to everyone. Unfortunately printed copies of the DEIS were not made available to the public so that everyone who wants to can participate in this process. The Payette National Forest states in the letter to interested parties that public participation is encouraged yet only offered a 15 day extension to the comment period. The documentation associated with the DEIS for the SGP is lengthy and not easy to interpret. We are also in the midst of a worldwide pandemic and it seems many are unwittingly left out of this process.

In preparation of the Final Environmental Impact Statement (FEIS), I request that the Forest Service honor Payette and Boise National Forest Plan standards. Please, carefully consider the short and long-term consequences that gold production in this area will have on our community, our land, and our future and select Alternative 5.