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Organization:

Title:

Comments: Hello, my name is Benjamin Koehler, and I am writing today to state my concerns about the Stibnite Gold Project. My concerns with the project are as follows;

#### Water Quality

Pg. 4.12-39, Chapter 4.12.2.3.3.1 ? Despite activities that would improve water quality for fish from the removal and reclamation of legacy mine wastes, exceedances of the NMFS and USFWS and other applicable criteria for antimony, arsenic, copper, and mercury are anticipated to extend indefinitely post-closure?.

#### FISH

Fish Facts from the DEIS which may be ?inconsistent ? with a "restoration" theme. REMIND THE USFS that to ensure viable and resilient fish habitat in the East Fork of the South Fork the most assured method is to "protect the best and restore the rest." Over half of the mine footprint is in undisturbed habitat. The USFS must analyze an alternative to minimize the mine footprint that is contained only to previously disturbed areas. OTHER SUGGESTIONS: 1. Don't put mining waste - new or old - or build new roads- in undisturbed habitat. 2. Don't conduct activities that are likely to mobilize additional arsenic such as blasting waste rock and grinding rock into tailings. 3. Don't bring millions of gallons of diesel fuel, cyanide and other chemicals to the site. 4. Do reconnect habitat, isolate historic mine waste from streams, and restore degraded riparian areas.

#### RECREATION IMPACTS

It is noted in the DEIS that the local communities rely heavily on tourism to support their economies" and that "[t]he analysis area is a popular area for a variety of recreation activities on both private and public lands," yet there is no report, information, or analysis on how the Stibnite proposal will affect tourism, recreation, or the related economic benefits to local communities. A supplemental report and information are needed accordingly. Sources are out of date (many are 2003 and 2010) in the context of Idaho experiencing a population boom, and its residents holding high value in recreation opportunities. Idaho's Recreation and tourism generates \$7.8 billion in consumer spending and support 78,000 jobs; 79% of Idaho's residents participate in outdoor recreation; and recreation opportunities is a recruitment tool for businesses used to attract and retain workers (Source: Bureau of Economic Analysis, 2018; Idaho Business for the Outdoors, 2020). Recreation and tourism are a big deal locally, state-wide, and nationally and thus, please provide the missing information on impacts to recreation and recreation and tourism economies as related to the Stibnite Alternatives and a management plan and contingencies for the recreation in the area per each alternative. Also, these stand out in the guiding ?Principles of the Forest. We use the best scientific knowledge in making decisions and select the most appropriate technologies in the management of resources. This report does not include the best scientific knowledge and therefore is insufficient for comment. - We follow laws, regulations, executive direction, and congressional intent. Specifics from the DEIS 1. In ?Section 3.4.3.3.17 SOCIAL AND ECONOMIC CONDITIONS? , the DEIS notes that "Communities near the analysis area are rural and rely heavily on tourism and the trade industry to support their economies" and yet the Recreation section of the DEIS (?3.19 beginning on page 603? ) does not include any information on the impact the project will have on local recreation. - Please provide an economic analysis of the local tourism economy and the Stibnite impacts including methods, sources, and data relevant to the most recent 2-3 years. 2. The cited recreation use on? pg. 603? "The analysis area is a popular area for a variety of recreation activities on both private and public lands." A summary statement of the importance and abundance of recreation in the analysis area is provided; however, the entirety of the recreation section does not mention or address how recreation will be impacted by the Stibnite project, nor does it provide recent sources in its descriptions of uses (sources are out of dates, esp. In the context of Idaho's booming population, noting its value of recreation (census.gov, 2020; Foy, 2020; Raphelson, 2017; Men's Journal, 2019). Please provide information on impacts to economic and social cultural benefits of recreation to local

communities and state, national, and international visitors in a supplemental DEIS that can be reviewed. 3. Cited on pg. 615 "Recreation is considered a major use in the Big Creek area? of PNF MA 13 (Forest Service 2003a)," is cited using a 2003 reference (17 years out of date). Per the National Forest Management Act and ROS, the FS is required to provide recreation opportunities. As Idaho is currently the fastest growing state in the nation since 2016 and it is noted that current and inbound residents value recreation highly (a motivating factor in their move to this state) (census.gov, 2020; Foy, 2020; Raphelson, 2017; Men's Journal, 2019), please include and disclose more recent resources for recreation use analysis of this area in a supplemental DEIS in order to inform substantial and informed comments. FURTHER related to more recent data being taken into account is this: - Recreation is Idaho's outdoor recreation economy generates \$7.8 billion in consumer spending and support 78,000 jobs - 79% of Idaho's residents participate in outdoor recreation - Our outdoors are a recruitment tool for businesses used to attract and retain workers - Areas in the West with protected wilderness, national parks and recreational assets have higher growth rate and higher per-capita income - Medical savings and improved physical and mental health are associated with outdoor lifestyles (Source: Bureau of Economic Analysis, 2018; Idaho Business for the Outdoors, 2020) 4. Similarly to the above, cited on page 615? uses sources cited from 2003-2010, which are inadequate and out of date, especially in the context of Idaho's growing population, recreation interests, and general economic benefits to local Idaho citizens (census.gov, 2020; Foy, 2020; Raphelson, 2017; Men's Journal, 2019). Please provide more up to date information and analysis. "Recreation users in the analysis area are mostly locals, originating from areas in the analysis area such as Yellow Pine, Warm Lake, Big Creek/Edwardsburg, and areas just west of the analysis area including Cascade and Long Valley (Forest Service 2010). Users particularly in the western portion of the analysis area also are from populated areas further south including Treasure Valley and Boise (Forest Service 2010). As noted in the Payette Forest Plan for PNF MA 13, though most use is local, "users come through the area from all over the country to use the adjacent Wilderness [FCRNRW], especially during big-game hunting seasons" (Forest Service 2003a)." This section further presents information that needs clarification. Cited local areas such as recreationists being mostly local, but also from the Treasure Valley, Boise, and from all over the country, what effect will the Stibnite project have on these local, Treasure Valley/ Boise/ other Idaho, national and even international visitor's uses? There is no information on impact to visitors or the local tourism economies that depend upon them 5. The purpose of the Valley County Comprehensive Plan is to promote the health, safety, and general welfare of the people of the state of Idaho, and in part, to ensure the protection of "fish, wildlife, and recreation resources" (Valley County 2018). The Valley County Comprehensive Plan also includes a Recreation and Open Space goal "To promote and support a viable recreation and tourism program ..." (Valley County 2018). Objectives include creating improvements for more varied recreation opportunities, promoting development of new recreation facilities when compatible with land use goals, and protecting access to public lands (Valley County 2018). a. Note of this law denotes local work and law to protect recreation resources in Valley County. Again, the current DEIS does not provide information on how recreation in the area will be impacted and provides out of date sources on current use. b. Please provide information on impact including economic impacts to these local economies that rely on tourists, per EIS requirements. c. Please provide an economic analysis of the local tourism economy and the Stibnite impacts including methods, sources, and data relevant to the most recent 2-3 years.

**HAZARDOUS MATERIALS** The Stibnite Gold Project will require year-round shipments of thousands of tons of hazardous or toxic chemicals and explosives and millions of gallons of gasoline and diesel fuel. The transportation routes are along the Payette River, or the Weiser River, or the Salmon and Little Salmon Rivers. All shipments will travel through residential and commercial areas of McCall or Cascade, then along 75 miles of backcountry roads to the mine site. The Draft Environmental Impact Statement does not analyze the accident and spill risk anywhere on Hwy.'s 95 or 55 or in the towns of McCall or Cascade. The DEIS grossly underestimates the accident risk on backcountry roads. The DEIS contains no analysis of the effects of a spill and no plan to clean up a spill.

ACCESS AND TRANSPORTATION SPILL RISK. ? Haul of highly toxic reagents and fossil fuels at the mine site and on the haul route could result in spills with significant impact to fish (?Chapter 4.12.2.3.2.1? and ?4.7.2? ). Nearly the entire length of streams adjacent to both access routes (Burntlog and Yellow Pine) is within designated critical habitat for Chinook salmon, steelhead, bull trout, and westslope cutthroat trout (?Chapter 4.12.2? ). The spill risk modelling, spill probabilities, and # of potential spills in the DEIS (?Chapter 4.12.2.3.2.1? ) is 2 orders of magnitude less than that calculated by statistician Lubetkin pers comm 9/2/20. The assumption that 91 meters from access routes contain all important fish habitat potentially impacted by spills is arbitrary and capricious. ? 4.16.2.1.1 ? Yellowpine Route is planned to be used until Burnt Log Route Completion

! No geohazard analysis conducted for Yellowpine route ! No planned road modification ! Danger of this route is repeatedly elaborated with its proximity to water (Alternative 2 transportation section) ! No discussion of seasonal road narrowing due to snow conditions ! Traffic Analysis is not adequate ? Volume is analyzed, but not weight ? Effective road life/integrity not projected ? Over 150% increase on Johnson Crk and Stibnite Rd ! Clarify volume to public: ? 5 trucks per hour, 5AM-7PM, year-round, for at least 12 years ! ! Accident report not modeled for ? Increase in recreational traffic (ask for numbers from 2020) ? Numbers were averaged, rather than trended ? Factor that Midas drivers will have a % of failure ! Seasonal delays are not mentioned ? Nor evaluated in economic models ? Diminish + effect on economy ! 6% grade during winter; no truck runaway ramps planned ? 4.16.2.1.5 ! Air Traffic Details during the winter are not discussed, nor mitigated ? 4.16.2.1.5 ! Transportation route to Lewiston Barge Transportation ? Huge public health risk ? Drinking water and recreational water sources line the corridor of transportation ? One of the HIGHEST sections of road accidents in the state ? Planned 2 Trucks/day, year round ? 3.7.32 (p.142) ? Lack or incident plan for recreational interaction

ACCESS TO DEIS The Payette National Forest did not offer printed copies of the DEIS to the general public; the Forest made the DEIS available in electronic form only. The failure to provide printed copies arbitrarily excludes a significant portion of the public from participation in the DEIS process. If a person doesn't have a good computer, reliable Internet service, and enough computer skill to negotiate the document - the DEIS is essentially unavailable. Additionally, it is well-documented that Internet access is much more limited for families that are low-income, rural, American Indian/Alaska Native, Black , or Latino, compared to more affluent white families. The Payette National Forest's failure to provide printed copies hinders public participation and is an abuse of discretion, discriminatory, and unethical.