Data Submitted (UTC 11): 10/28/2020 3:27:56 AM
First name: Amber
Last name: Armstrong
Organization:
Title:
Comments: Dear Ms. Jackson, Ms. Christiansen and the USFS,

My name is Amber Valenti Armstrong and I am a long-time recreational user of the South Fork of the Salmon River. I was raised in the beautiful state of Idaho and have been spending time in the uniquely wild public lands there for many decades now. As a young girl I was lucky enough to spend time exploring, hiking, fishing, and paddling in places throughout the National Forests of Idaho. As an adult, I continue to recreate in many of these unique places as a hiker and kayaker. I deeply value wild rivers for their societal and environmental importance. And after much travel I believe Idaho has some of the most valuable wild rivers in the country and the world. For this reason, any project that may alter the integrity or negatively impact the natural resources of any of Idaho's rivers is of interest to me-but especially the South Fork of the Salmon River, a treasure among treasures. This includes the proposed Stibnite Gold Project. Wild, free-flowing, and mostly intact rivers, such as the South Fork of the Salmon, are increasingly rare. And I believe, as such, have increasingly high societal, environmental and economic value.

MY REQUEST

In short, I am writing to ask the Forest Service to create a Supplemental Draft Environmental Impact Statement for the relative agencies and public to review and have the opportunity to comment on in order to address all of the missing and incomplete information in the current DEIS highlighted below.

There is an abundance of missing information in the current DSEIS, and the best way to capture that is with a supplemental DEIS. So as a responsible agency who is involved with managing public resources, such as water quality and quantity, I ask that you please provide the information noted below.

While I am also writing to support Alternative 5, the No Action Alternative outlined in the existing Stibnite Gold Project's Draft Environmental Impact Statement, the requested Supplemental Draft EIS is crucial for review and consideration.

CONCERNS WITH THE STIBNITE GOLD PROJECT DEIS

1) 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. A Supplemental DEIS should include these.

2) CONSISTENCY WITH FOREST PLAN
Both the Boise and Payette NF Forest Plans that are proposed to be amended for the SGP include: duration of fish and wildlife degradation (adverse effects), total soil resource commitment (ie soil disturbance), visual quality, and water diversions. (DEIS Appendix A) Forest Service Amendments: For a waiver of this geographical scope and time scale (as in the duration of fish and wildlife degradation), it should be a plan level amendment NOT a

project specific amendment. Project specific amendments are for short term effects like in the case of adding small amounts(0.6 miles) to a road system, nothing like what Midas is requesting. However, the process of a plan level amendment was not followed per 36CFR § 219 in the regulations. First, as you know, when an amendment is covering more than 15 years it needs to be under a plan level amendment process. Second, certain standards cannot be amended because they are tied into the endangered species act consultations and the USFS doesn't have authority to waive them. Finally, any waiver of these standards requires disclosure of the effects that the waiver is going to generate. There are no details given in the DEIS of these effects.

3) IMPACT ON SPECIAL STATUS FISH
The South Fork Salmon River is not pristine, but it is wild, free-flowing, largely within public lands, undeveloped, and supports native fish.
The DEIS indicates that the Forest Service has preliminarily determined that the proposed project will adversely affect bull trout (pg. 4.12-87), Chinook salmon (pg. 4.12-69), steelhead (pg.4.12-75), and their critical habitats; and may indirectly impact Westslope cutthroat trout (pg.4.12-93). These special status native fish all require cold, clear, clean, running water and varying unobstructed migration pathways to complete their life cycles.

According to the U.S.Forest Service, "The South Fork Salmon River contains the most important remaining habitat for summer chinook salmon in the Columbia River basin. The fish were once the largest, most valuable segment of the world's largest runs of chinook salmon."USFS, (2017).

"The National Marine Fisheries Service has designated critical habitat for chinook salmon. It includes all tributaries of the Salmon River presently or historically accessible to chinook salmon. This includes essentially the entire South Fork system. Within critical habitat, an agency must avoidactions that destroy or adversely modify that critical habitat. The Fisheries Service has recently proposed that steelhead trout be added to the threatened and endangered species list." - https://www.fs.usda.gov/detail/payette/home?cid=STELPRDB5160141#:~:text=The%20South%20Fork%20Salmon%20River,largest%20runs%20of%20chinook%20salmon

My concern here is that information provided in the DEIS regarding the impact the Stibnite Gold Project would have on these fish is inconsistent with what we know about how to ensure viable and resilient fish habitat that protects and supports these species. Just a few of the anticipated impacts on these keystone species that concern me: Undisturbed Habitat Impacts:

First, over half of the mine footprint is in undisturbed habitat. The USFS must analyze an alternative where the mine footprint that is contained only to previously disturbed areas.Water Quality Impacts: Second, 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 .

Stream Temperature Impacts: DEIS Appx J2. Stream Temperature Tech Memo. Ecosystem Sciences 2019. In general, the impacts associated with the proposed project on stream temperatures would be an increase in stream temperatures in various reaches in the mine site study area. Fish would be affected by these water temperature changes. In general, bull trout and Chinook salmon would be the most negatively affected species, because they migrate and spawn in the summer and fall, when lower flows and higher air temperatures would amplify the impacts of the project on stream temperatures.The SPLNT temperature models used in the DEIS stream temperature analysis do not account for changes to stream temperatures caused by changing climate conditions, and do not account for increased temperatures in the East Fork South Fork downstream of the mine site, even though the "Fisheries Analysis Area" encompasses downstream habitats and downstream temperature increases are probable and predictable. The NorWeST model, produced by the U.S. Forest Service Rocky Mountain Research Station, represents future stream temperatures, adding 1.1-2.0 degrees C in the years 2030-2059, and 1.0-3.0 2070-2099 to SPLNT modelled values.DEIS 4.12.2.3.3 pg. 4.12-26. Meadow Creek

downstream of the East Fork Meadow Creek would have potential water temperatures that are lethal to Chinook salmon during the summer, in perpetuity. Even at EOY 112 (112 years after mine operations begin), the EFSFSR (Mdw Ck ds to Sugar) has the potential to reach lethal levels during the summer. Water temperatures in this reach during the summer have the potential to adversely impact all four salmonid species.In the EFSFSR ds of Sugar Creek, maximum summer (19.3 ° C) and fall (14.4°C) temperatures and average summer temperatures (13.2°C) are still predicted to be as much as 4.8 degrees greater than baseline 100 years into the post-closure period (Table 4.12-5).

Creation of Barriers: The Payette and Boise NF Forest Plans have Standards (promises to the public about resource protection) to " not authorize new surface diversions unless they provide upstream and downstream fish passage" (DEIS Appendix A) . The Stibnite Gold Project has proposed a Forest Plan amendment to this standard, to " Suspend the requirement of new surface diversions to provide upstream and downstream fish passage within the footprint of mining operations." This would create new barriers to upstream and downstream fish.

4) ECONOMIC & RECREATIONAL IMPACTS
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.

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, social and cultural benefits of recreation to local communities and state, national, and international visitors in a supplemental DEIS that can be reviewed.

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.

More current data shows:
- 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)

Thank you for hearing my concerns and I appreciate you considering my perspective. I look forward to reviewing a supplemental DEIS.

Sincerely,
Amber Valenti Armstrong