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Organization:

Title:

Comments:

My name is Ryan Bailey, I am a resident of Garden Valley, Idaho. I recreate and work in the area that will be impacted by the Stibnite Project and would like bring up a few points for your consideration.

Warm Lake Road and the proposed changes to the road infrastructure will impact, Trail Creek, Johnson Creek, Burnt Log Creek, The E. Fork South Fork, The Upper S. Salmon, The Main Salmon, The Snake, The Columbia.

The Stibnite Gold Project DEIS, Doesn't Specifically Identify the questions outlined in the Payette Forest-wide Travel Analysis Report.

"Ecosystem Functions and Processes (EF)

What ecological attributes, particularly those unique to the region, would be affected by roading of currently unroaded areas? EF (1)

To what degree do the presence, type, and location of roads increase the introduction and spread of exotic plant and animal species, insects, diseases, and parasites? What are the potential effects of such introductions to plant and animal species and ecosystem function in the area? EF (2)

To what degree do the presence, type, and location of roads contribute to the control of insects, diseases, and parasites? EF (3) How does the road system affect ecological disturbance regimes in the area? EF (4)

What are the adverse effects of noise caused by developing, using, and maintaining roads? EF (5)" Payette Forest-wide Travel Analysis Report Appendix B - Ecological, Social and Economic Considerations Pg1,2"

"Aquatic, Riparian Zone and Water Quality (AQ)

Watershed and upper catchment processes

How and where does the road system modify the surface and subsurface hydrology of the area? AQ (1)

How and where does the road system generate surface erosion? AQ (2) How and where does the road system affect mass wasting? AQ (3)

How and where do road-stream crossings influence local stream channels and water quality? AQ (4)

How and where does the road system create potential for pollutants, such as chemical spills, oils, de-icing salts, or herbicides to enter surface waters? AQ (5)

How and where is the road system 'hydrologically connected' to the stream system? How do the connections affect water quality and quantity (such as delivery of sediments, thermal increases, elevated peak flows)? AQ (6) Affected values and lower catchment processes and influences

What downstream beneficial uses of water exist in the area? What changes in uses and demand are expected over time? How are they affected or put at risk by road-derived pollutants? AQ (7)

How and where does the road system affect wetlands? AQ (8)

How does the road system alter physical channel dynamics, including isolation of floodplains; constraints on channel migration; and the movement of large wood, fine organic matter, and sediment? AQ (9)

How and where does the road system restrict the migration and movement of aquatic organisms? What aquatic species are affected and to what extent? AQ (10)

How does the road system affect shading, litterfall, and riparian plant communities? AQ (11)

How and where does the road system contribute to fishing, poaching, or direct habitat loss for at-risk aquatic species? AQ (12)

How and where does the road system facilitate the introduction of non- native aquatic species? AQ (13)To what extent does the road system overlap with areas of exceptionally high aquatic diversity or productivity, or areas

containing rare or unique aquatic species or species of interest? AQ (14)

"Payette Forest-wide Travel Analysis Report Appendix B - Ecological, Social and Economic Considerations
Pg2,3

Until these questions are answered in greater detail and identified specifically, I hope you would consider a No Action Alternative.

SCALE OF THE ROADS

AS Outline in the DEIS Executive Summary

"New disturbances within the footprint of existing modifications would appear similar to existing modifications but at a larger scale.

Visual contrast would increase due to larger road width, more vegetation removal, and new retaining walls. New right-of-way for a new transmission line and wider right-of-way of the upgraded transmission line would introduce high visual contrast.

SGP components would result in a high level of change to the characteristic landscape during operations; permanent changes, although less than during operations, would result. "

The Various Plans outlined in the DEIS involve widening projects from a maintenance level of 2 or 3.

The Forest Service Road Maintenance Levels are defined by the Forest Service Handbook 7709.59 as the level of service provided by, and maintenance required for, a specific road which are consistent with road management objectives and maintenance criteria (Forest Service 2012). Maintenance levels are summarized below per Forest Service Handbook 7709.59 Section 62.32:

* Maintenance Level 3 - "Assigned to roads open and maintained for travel by a prudent driver in a standard passenger car. User comfort and convenience are not considered priorities." Roads in this maintenance level are typically low speed, single lane with turnouts and spot surfacing. Some roads may be fully surfaced with either native or processed material. Typically connect to arterial and collector roads or other maintenance level 3 roads. May include some dispersed recreation roads. ?

* Maintenance Level 2 - "Assigned to roads open for use by high clearance vehicles. Passenger car traffic, user comfort, and user convenience are not considerations. Traffic is normally minor, usually consisting of one or a combination of administrative, permitted, dispersed recreation, or specialized uses. Log haul may occur at this level." Typically, these are local roads that connect to collectors and other local roads and may not be passable during periods of inclement weather. ?

Management Prescriptions - Management Area 13 has the following management prescriptions Management Prescription Category (MPC)

3.1 - Passive Restoration and Maintenance of Aquatic, Terrestrial & Hydrologic Resources %43

3.2 - Active Restoration and Maintenance of Aquatic, Terrestrial & Hydrologic Resources %47

4.1c - Undeveloped Rec.: Maintain Unroaded Character with Allowance for Restoration %10

Chapter III

Big Creek/Stibnite Management Area 13

Facilities and Roads Standard 1339 Do not reopen classified roads in Level 1 maintenance status or Level 2 roads that have become impassable unless it can be demonstrated through the project-level NEPA analysis and related Biological Assessment that:

.a) For resources that are within their range of desired conditions, reopening these roads for use shall not result in degradation to those resources unless outweighed by demonstrable short- or long-term benefits to those resource conditions; and ?

.b) For resources that are already in a degraded condition, reopening these roads shall not further degrade nor retard attainment of desired resource conditions unless outweighed by demonstrable short- or long-term benefits to those resource conditions; and ?

.c) Adverse effects to TEPC species or their habitats are avoided unless outweighed by demonstrable short- or long-term benefits to those TEPC species or their habitats. ?

Where reopening these roads cannot meet these constraints, consider decommissioning. An exception to this standard is where reopening Level 1 or 2 classified roads is required to respond to reserved or outstanding rights, statute or treaty, or respond to emergency situations (e.g., wildfires threatening life or property, or search and rescue operations).

Once Again, until these questions are answered in greater detail and identified specifically, I hope you would consider a No Action Alternative.

CONCLUSION

I have concerns that the current infrastructure outlined in the The Stibnite Gold Project DEIS in it's current form, doesn't identify or meet the Payette Forest-wide Travel Analysis Report Ecological, Social and Economic Considerations. It also doesn't specifically what maintenance level the roads will be improved to or align with the Forest Management Prescriptions - Management Area 13, regarding facilities and roads should the project be approved and then abandoned.

Increased erosion and sedimentary impacts to critical salmon habitat from the 2020 Buck Fire along Johnson Creek are not included in the DEIS . Additionally, the most recent data for vehicles in the impacted area are from 2017. Idaho is growing, the DEIS needs to have current data and hazard analysis and mitigation identified.

The impacts to the forest and rivers from the road infrastructure alone outweighs the benefits from 'restoration' projects and mineral extraction by Midas. In it's current form, the Midas Gold DEIS doesn't meet the Boise National Forest management plan (2010), The Payette National Forest Management Plan or the Mission of the Forest Service, "To sustain the health, diversity, and productivity of the Nation's forests and grasslands to meet the needs of present and future generations. " I hope you would consider no action until other alternatives can be presented.

?Ryan Bailey