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Proposed Stibnite Mine Comment

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Dear Mrs. Linda Jackson,

Please receive the following as a substantial comment to the Draft Environmental Impact Statement (DEIS) for the proposed Stibnite Gold Mine located in the East Fork of the South Fork of the Salmon River within the management area of the Payette and Boise National Forests.

Thank you ahead of time for the opportunity to comment on this complex proposed project. With the limited time allotted, I would like to again request for a full extension of 120 days to become more familiar with the document that was produced for this occasion. This document is vast, not easily accessible outside of the internet; which is also unreliable in the surrounding communities and contains many uncertainties. Those uncertainties make it difficult to address the negative issues associated with this proposed project. Knowing that, I am requesting extra time to critique the document at hand and also for the document to be re-released in its full form; whether that be through the use of a 'supplemental' DEIS or a better-prepared draft with full disclosure of information. I have also personally found the information located on the Forest Service website to be unavailable, inaccurate (your email for instance is wrong) or inaccessible several times over the past few weeks (which I have passed on to the Public Affairs Officer). When available, he has been receptive to my concerns; understandably he is busy with regular work assignments. As of right now, Chapter 3 is still unavailable.

As stated in the DEIS -

#### 3.23.1.2.1 WILDERNESS ACT OF 1964

The Wilderness Act of 1964 mandates that

"each agency administering any area designated as wilderness shall be responsible for preserving the wilderness character of the area (Section 4(b))."

As defined by section 2(c) of the Wilderness Act:

"A wilderness, in contrast with those areas where man and his own works dominate the landscape, is hereby recognized as an area where the earth and its community of life are untrammelled by man, where man himself is a visitor who does not remain. An area of wilderness is further defined to mean in this Act an area of undeveloped Federal land retaining its primeval character and influence, without permanent improvements or human habitation, which is protected and managed so as to preserve its natural conditions and which (1) generally appears to have been affected primarily by the forces of nature, with the imprint of man's work substantially unnoticeable; (2) has outstanding opportunities for solitude or a primitive and unconfined type of recreation; (3) has at least five thousand acres of land or is of sufficient size as to make practicable its preservation and use in an unimpaired condition; and (4) may also contain ecological, geological, or other features of scientific, educational, scenic, or historical value."

The Wilderness Act identifies five qualities of wilderness. Landres et al. (2008) defined four of

these qualities:

\* "Untrammeled" - wilderness is unhindered and free from modern human control or manipulation. Untrammeled areas are areas where the components or processes of ecological systems inside the wilderness are not controlled or manipulated by modern human activities. As defined by the Forest Service Manual 2320.5: "In the context of the Wilderness Act, an untrammeled area is where human influence does not impede the free play of natural forces or interfere with natural processes in the ecosystem."

\* "Natural" - wilderness ecological systems are substantially free from the effects of modern civilization. According to Arthur Carhart National Wilderness Training Center (2014), preserving this quality ensures that indigenous species, patterns, and ecological processes are protected and allows us to understand and learn from natural features.

\* "Undeveloped" - wilderness is substantially without permanent improvements or modern human occupation, such as the presence of structures, installations, habitations, or the use of motor vehicles, motorized equipment, or mechanical transport.

\* "Outstanding opportunities" - wilderness provides opportunities for people to experience solitude or primitive and unconfined recreation, including the values of inspiration and physical and mental challenges. Solitude is multi-dimensional and tends to be deeply personal. Wilderness managers often define solitude by the absence of others. Primitive recreation often refers to the types of recreation that require primitive travel and self-reliance without modern conveniences (Landres et al. 2008). Unconfined recreation refers to the types of recreation where visitors experience a high degree of freedom over their own actions.

Followed by -

#### 3.23.1.2.4 NATIONAL FOREST LAND AND RESOURCE MANAGEMENT PLANS

In 2003, the Salmon-Challis National Forest completed the Frank Church-River of No Return Wilderness Management Plan (Forest Service 2003b). Management direction in the plan is derived from the Wilderness Act and subsequent legislation that aimed to protect these special areas and preserve wilderness character.

The Payette National Forest Land and Resource Management Plan (Payette Forest Plan) and the Boise National Forest Land and Resource Management Plan (Boise Forest Plan) (Forest Service 2003a, 2010) also have standards and guidelines for designated wilderness and recommended wilderness areas. The desired condition for people visiting wilderness in the National Forest is to find outstanding opportunities for primitive and unconfined recreation, including exploration, solitude, risk, and challenge. Wilderness areas are primarily affected by the forces of nature, with human imprint being substantially unnoticeable.

The Payette Forest Plan and the Boise Forest Plan include management prescriptions and practices for specific areas, including designated wilderness (Management Prescription Category [MPC] 1.1) and recommended wilderness (MPC 1.2). The goal of MPC 1.1 is to "Protect wilderness values as defined in the 1964 Wilderness Act. Improve opportunities and experiences through the development of individual wilderness management plans, partnerships with permittees and user groups, and interpretive and educational opportunities."

Under MPC 1.2, actions must be designed and implemented in a manner that does not compromise wilderness values or reduce the area's potential for wilderness designation. The goal of MPC 1.2 is to manage recommended wilderness to protect wilderness values as defined in the Wilderness Act. Activities permitted in recommended wilderness must not compromise wilderness values or reduce the area's potential for wilderness

designation.

The operations proposed within the Stibnite Gold Project (SGP) area represent a direct threat to the characteristics of Wilderness listed above. There is also missing information within the analysis area and also, the analysis area should be expanded.

With access being blocked or delayed for an estimated amount of time of two years along the Big Creek and East Fork of the South Fork of the Salmon River Roads the public land access behind those hindrances should be included in the affected project area. Doing so would give a more accurate area that will be influenced by road closures and traffic delays during ALL alternatives for however long they last. For instance on the "Payette National Forest Table 3.23-2" it does not include the Marble Creek, Mosquito Ridge, Pueblo Summit, Missouri Ridge, South Fork, or Rattlesnake trail heads. Also, from the aforementioned trail heads public lands that lie within the current analysis area can be accessed, therefore providing more reason to include them and increase the analysis area size. I would suggest including the entire portion of the Wilderness areas that the three national forests manage; as it is a contiguous area, unbroken by roads. I will explain further while hitting key points to show other flaws within the DEIS that negatively affect Wilderness's character as described in italics above (and should also be unacceptable).

As stated above, Wilderness management by the Forest Service is directed to "Protect Wilderness values as defined in the 1964 Wilderness Act..." not degrade them; more importantly because the MPC 1.2 areas already lie within the current analysis area 'actions must be designed and implemented in a manner that DOES NOT COMPROMISE Wilderness values..."

With the influence of road closures and delays, it is stated that national forest users will be relocated or be pushed to other areas. It is my observation that forest users not only do this but they also adapt in different ways. With a decrease in road access and an increase in travel delays, national forest users will most likely adapt by choosing alternative methods of transportation to provide quicker/easier access. That being said, there will most likely be an increase in aviation traffic. Although that would be a positive thing for the local aviation industry, this would have a prolonged negative effect on the Solitude management characteristic of a user's Wilderness experience. This could be compared to data that already exists from the decade of Wilderness Solitude Monitoring Data that the Payette National Forest already holds.

Pollutant emissions in the form of a plume - As stated in DEIS would degrade the air quality by not only increasing harmful particulates into the air but also sacrifice even further the Undeveloped management characteristics the Payette National Forest is tasked to uphold. This plume (along with all vehicular emissions will negatively impact the "Undeveloped" characteristic of Wilderness by showing 'modern human occupation, such as the presence of structures, installations, habitations, or the use of motor vehicles, motorized equipment, or mechanical transport.' Remember the statement above about "Protecting Wilderness character"? By having a visual plume seen from how far away (?) and at what mixing height before it 'dissipates' (?) the visual characteristic of the ridgelines will be hindered for the entire operation of the proposed analysis area. On a clear day, one can easily observe a smoke plume on the Nez Perce National Forest clear across the Salmon River from the heights of Sugar Mountain (just above the proposed site of operations and in the Wilderness). That is approximately 40 air miles. What would be the outcome if there were an inversion or wind event? How often and for how long would they occur? Where will the plume settle? How far from the site? Will it settle into the private property of the Monumental drainage (within the Wilderness and Analysis area)? Will it settle in the nearby Edwardsburg Community (Surrounded by the Wilderness and within the Analysis area)? Will it settle in Yellowpine community (within the Analysis area)? Will it settle in the mine operations area affecting workers' health while outdoors (dead center of the Analysis area)? There are unknowns that are not addressed in the DEIS. Could you address these outcomes with more specific data? We do know where it will settle - on National Forest System lands, how about the users recreating on the forest? How will they be influenced by the decrease in air quality produced by the proposed project? Some will be horseback, how will it affect the livestock? Most will

relocate, not only because of air quality or because of the 'visual' influences on developed characteristics from the proposed mining activities but also because of the increase in traffic, on all routes. On the subject of scenic value - Imagine being on a ridge to the Northeast of the proposed operational area (easy enough - the Idaho Centennial Trail, Lookout Mountain). Imagine wanting to watch the sunrise or tired at the end of the day trying to enjoy the sunset and twilight sky, then the milky way, only to have that interrupted by constant artificial lighting not only from the area of proposed operations but by vehicle traffic proposed along the Meadow Creek Lookout/Monumental Summit and Proposed Burnt Log road area. There are countless locations to watch the sunrise and sunset within the Wilderness, countless. This to me is an obvious intrusion on all of the characteristics of managed Wilderness; hindering any ability within sight to enjoy and unincumbered sky. Lights emitted from the proposed cell phone tower are not addressed in the DEIS or are vague and inaccurate. This will also impact the Wilderness experience.

Add the sounds of explosions and other operational noise originating anywhere within at least 4.5 miles from the proposed project area (as stated in the DEIS). More negative impacts on Wilderness characters. This information on blasting sounds shouldn't be so vague.

There should be restrictions if and when blasting can occur. Studies should be done on how will that affect elk calving and migration, and avian life within that "operational bubble" of extreme noise. Not to mention any other species within the impact area. By saying 'wildlife encounters will decrease because of noise or wildlife will relocate because of noise the DEIS is performing a disservice to science, much less the ecosystem that depends sounds science for proper land management. This is another example of an uncertainty that waits for something negative to happen only to have an explanation after the fact. How is nature supposed to remain in an area that is unlivable? This is degrading to the Natural ecological process which the Payette National Forest is tasked to protect.

24 hour/7 days a week ambient noise within 1.7 miles of the surrounding Wilderness area degrades managed characteristics as well.

Outfitter and Guide data is not produced in the DEIS, yet it is available. The forest does keep record of outfitter and guide use as required by law. Therefore it should be available for viewing and consideration as this project clearly states will have negative impact on access to National Forest System lands. By omitting that information the forest is not acknowledging the impacts that will face them if the proposed project is permitted. As an important user group operating within the current analysis area, they should also be included in the user groups listed in Recreation; along with Kayaking/boating/floating and aviation.

Average daily traffic counts are not available in the DEIS. There should be data available on this subject within the document. Road counter data would show current user trends on country and forest service roads within the analysis area. It could also be used in reference to the use proposed on new or improved routes in the analysis area. For instance.

6 inches of growth media for road reclamation is not enough to produce timely natural regeneration of native plant species which encumbers wildlife even further. The roads surfaces should be returned to their natural state or at least have 1.5 feet of growth media replaced. Stockpiled dirt though should be analyzed first for contaminants and live organic material as to prevent further spread of heavy metals and maintain quality soils at high elevations.