

Data Submitted (UTC 11): 1/10/2023 4:38:42 PM

First name: Gabe

Last name: Saron

Organization:

Title:

Comments: To whom it may concern,

I write to you as a scientist, conservationist and concerned citizen. The Stibnite Gold Mine Draft Supplemental Draft Environmental Impact Statement (SDEIS) is rife with inconsistencies and omissions that shake confidence in the project. I have included several examples below. It is in the public interest that the Forest Service and the Project Proponent address these inconsistencies before the project may proceed.

#1. Forest Plan Amendments from SDEIS Appendix A, SDEIS Executive Summary pg ES-2-4, and SDEIS pg. 1-10. The amendments are explained in the SDEIS Appendix A, and NOT in the Table ES-1. Why are the amendments omitted from the body of the report?

#2. The SDEIS does not account for early closure at critical mining phases. Anticipated "back-filling" of both the Hangar Flats Pit and the Yellow Pine Pit, as well as other reclamation activities, rely on development rock mined from SGP's lowest grade gold deposits within the West End Pit. If mine fails to follow that which is proposed in the 2021 MMP, no alternative is proposed. Given uncertainty in gold, silver, and antimony prices, early closure is a reasonably foreseeable possibility for the SGP. Even if an early closure alternative is not developed, the SDEIS must address how long the mine will remain idle (i.e., in "care and maintenance") before the operator is required to enter a permanent closure phase. Why have these alternatives been omitted from the SDEIS? What would happen under a mine closure scenario before the West End Pit is developed?

#3. Geochemical testing. The selection of samples for geochemical testing did not consider hydrothermal alteration, which can substantially affect contaminant leaching and acid generation potential. Failing to use geochemical test units within each lithology means that the testing results are most likely not representative of the range of leachate chemistry that will develop at the mine. To my eyes, this falls short of the burden of proof necessary for demonstrating a non-significant impact. Why were geochemical testing efforts limited in this way?

#4. The SDEIS omits baseline data to characterize organic carbons or quantify the increase in organic carbon from the sewage treatment plant. Wastewater Discharge. The SDEIS (4-220) predicts 25,000 -50,000 gpd of discharge from the sewage treatment plant to the EFSFSR. However, it fails to provide detailed information about the sewage treatment plant, describe the potential effluent concentrations, or analyze the potential effects of these discharges to surface waters. Why was this omitted from the SDEIS analysis? Is there not a potentially significant impact to water quality and aquatic life from wastewater effluent?

#5. The SDEIS omits any consideration of climate forecasts in water quality simulations. Modflow 6 simulations looked out as much as 100 +/- years into the future, and were not informed by widely-available, science-based forecasts of climate change. Why were these forecasts omitted from the Modflow simulation? How would the simulation results change accounting for climate change forecasts?

#6. Mountain Goats. Impacts to mountain goats were not analyzed. Mountain goats are listed in Idaho's State Wildlife Action Plan as a high-profile species: "conservation of existing quality mountain goat habitat should be one of the highest priorities..., proactively managing access and travel will be critical to protecting mountain goat populations." Avalanche control activities, road use, and recreation could impact the species. The species has been observed adjacent to or within the SGP wildlife analysis area, particularly near to the proposed Burntlog route. What are the potential impacts to mountain goat as the result of project implementation? Why was this analysis omitted from the SDEIS?

#7. Migratory Birds. The project could include direct mortality of migratory birds. This does not meet the requirements of the Migratory Bird Treaty Act (p. 3-328, p. 4-448). The SDEIS states "The 2021 MMP may directly and indirectly impact migratory bird species, individuals and habitat... would result primarily in localized, short-term, long-term, and permanent, minor impacts to migratory bird species." What criteria are used to determine that these impacts are not significant?

#8. Canada lynx. Canada lynx are listed as threatened under the ESA. Lynx are not known to occur in the area and there is no known designated critical habitat in the SGP analysis area, but suitable habitat for lynx has been greatly reduced due to wildfire. Additional impacts to the remaining suitable habitat, particularly along the Burntlog Road, will fragment habitat and reduce the chance of lynx travel into the area. Snow compaction activities can allow other predators to enter lynx habitat and compete with lynx in winter. Potential impacts will stem from snow plowing along the 38-mile Burntlog Road and from proposed grooming of a new 10.4-mile OSV trail. The FS must address Forest Plan direction to not increase snow compaction in lynx habitat (TEST34). Why was this impact omitted from the draft SDEIS?

#9. Wolverine. The wolverine is proposed for listing under the ESA as threatened. Wolverines inhabit the project area, as documented by surveys and a major research study (Heinemeyer et al. 2017, 2019). The SDEIS failed to fully address risks to the species stemming from its low reproductive rate and large home ranges combined with specialized habitat requirements (i.e., persistent snow cover for denning.) These magnify this species' vulnerability to threats such as climate change and habitat fragmentation. The area supports high-quality wolverine habitat that is part of an interconnected landscape across south-central Idaho, and beyond (Aubry et al. 2007, IDFG 2014). The SDEIS makes no assessment of the importance of habitat in the project area to wolverine persistence in Idaho. The summary of wolverine occurrence is not complete (Table 3.13-3). A complete and accurate synthesis is important to establish a baseline for analysis. Why was a complete impact determination omitted from the the SDEIS? What are the potential impacts to wolverine accounting for management of Burntlog Route for public access, and increased over-snow recreation?

These are just a few examples of how the SDEIS falls short of reassuring the public about the risks to water quality and wildlife posed by the Stibnite Gold Mine project. It would be a breach of public trust for USFS to rely on the SDEIS in its current form as the basis for decision. Thank you for your consideration.

Sincerely,
Gabe Saron