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Mrs. Linda Jackson
Proposed Stibnite Mine Comment
500 N. Mission St.
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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.

Again, 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 with clear direction to the pubic as to the difference in designation of the DEIS and the SDEIS and their purposes for consideration in the proposal (what weight each has in the final Record of Decision; whether that be through the use of a 'FULL' DEIS document or a better prepared draft with full disclosure of information.

I have also personally found the information located on the Forest Service Pinyon website to be unavailable at times and inaccurate with several updates on specialist reports that were not initially available for use during the full 75 day comment period. That can be be seen in the update history via the Pinyon Folder that is available to the public. To promote a fair commenting environment for everyone; it would be best to give each document equal opportunity to be studied.

Proposals of this caliber and complexity eliminate the validity of out National Forests as being 'Lands of Many Uses'. They negatively impacts historic Tribal grounds and Treaties, close or deter the need for healthy recreational uses and access to it, and directly threaten the current health of the ecosystems within and around the proposed project area; including those downstream of the headwaters of the East Fork of the Salmon River watershed (where this project is proposed). The DEIS and SDEIS clearly state and expectation of continuous net loss.

In its current form, this document shows there will be continuous irreversible impacts to mammalian and aquatic species, the Frank-Church River of No Return Wilderness area, and the human communities that surround them. It is a vast impact area encompassing more than one state and will negatively effect areas across the region of the Northwest. The decision made on this proposal will not only effect the Payette National Forest - it will effect all National Forest lands into the future.

This proposal puts the monetary gain of a multinational junior mining company against the health and longevity of the greater Salmon River Mountain Ecosystem - one that is irreplaceable. Environmental restoration projects leave net positive results. This proposal does not represent that and the evidence is found in the thousands of pages that have been produced. This isn't a restoration project - this a Gold Mine proposal. It introduces/adds thousands of tons of particulate matter into the atmosphere, creates countless pounds of rock, mine, fuel, and human waste in an area that is the largest contiguous clean water and air shed of the Continental United States. if it were a restoration project - there wouldn't be a drop of pollutants left behind. The elements of this document prove it is not. For those reasons I urge you to deny permitting this proposal.

As stated in the SDEIS and DEIS -

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 untrammeled 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 preserves 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 - in the DEIS and SDEIS

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 withing the Stibnite Gold Project (SGP) area represent a direct negative impact to the characteristics of Wilderness listed above. There is also missing information within the analysis area and the analysis area should be further 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 AND worded as such. All 'may's should be changed to 'will's. Doings so would give a more accurate representation to the area that 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 withing 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 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 relocate 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 users 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.'

By having a visual plume seen from how far away (still not clear in the SDEIS?) and at what mixing height before it 'dissipates'(Still not clear in the SDEID?) the visual characteristic of the ridge lines 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 and 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) and how many acres would it encumber?

Will it settle in Yellowpine community (withing the Analysis area) and are the potentials to create thick fog layered with particulates from operations?

Will it settle in the mine operations area affecting workers health while outdoors (dead center of the Analysis area)?

There are unknowns that are still not addressed in the DEIS. It seems drafted to show 'ideal conditions'. What is the baseline for this information at elevation and location within atmospheric sink zones? Can those be

designated to show the general public areas to avoid during weather conditions which could create them?

Could you address these outcomes with more specific data and the manner with which it is collected?

It will settle on National Forest System lands. How will the users recreating on the forest be influenced by the decrease in air quality produced by the proposed project? Relocation is not a preferred alternative, 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. Opportunities for recreation on National Forest Systems lands and WOTUS is equal to everyone.

Scenic 'values' are equally negatively impacted by the SDEIS proposals - Again, I'd like for the USFS to consider the viewpoint of its public land users. Imagine being on a ridge to the Northeast of the proposed operational area (the Idaho Centennial Trail, Lookout Mountain and Marble Creek areas).

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 unencumbered sky and natural landscape. Lights emitted from the proposed cell phone tower are not addressed in the SDEIS or are vague and inaccurate. This will also impact Wilderness experiences.

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 produced in the SDEIS, yet it is still not very specific to the imapcts to the entire group of indivuals 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 accurately if the proposed project is permitted. As an important 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, tribal use so they can each be studied individually.

Average daily traffic counts are not available in the DEIS (or SDEIS). 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.

A note on noise impacts that were not considered during analysis. Noise - A noise that is 100 db at one meter will

have an intensity of only 1/100 as much at ten meters. That's 2 bels, or 20 decibels less, since a bel corresponds to a factor of ten. So at 10 meters the sound is 80 db. At 100m the intensity is down to 60 db, and so on. An SPL of 0 decibels roughly corresponds to the softest sound a human with good hearing can hear. So that would mean a sound that is 10^10 softer than 100 decibels. Given an inverse square law, that would correspond to 10^5 times the original distance of one meter, or 100 km; much further than 1.5 miles or 5 miles which was used as a reference bubble to indicate potential sound impacts not only to Wilderness users but to any user of any type on National Forest Lands within and surrounding the project area - including all Wildlife species.

Sound studies should be more plentiful, robust, in-depth, and be designed to represent accurate impacts caused by tools used while commencing mining practices - large pneumatic drills, trucks/vehicles of varying sizes and the required back up beeping sounds they create, idling equipment, generators, transmission lines, transformers, large capacity bull dozers and all associated equipment in building and maintaining roads during all weather conditions. Sounds travels different during different atmospheric conditions and seasons therefore requiring higher levels of consideration and analysis to see honest representations of sound impacts stemming from this proposal.

These sounds level impacts degrade not only the Natural Wilderness characteristic the USFS is tasked to maintain and improve but also those to the associated National Forest System and Tribal Lands. They also negatively impact the Undeveloped character quality by introducing human caused sounds of machinery and literal developmental activities. They are not localized and minimal because of the frequency they will occur; the extended period of time. These sounds will become 'normal' and therefore 'acceptable' and 'expected' when traveling within or around Wilderness areas where those sounds are in reality - not normal or natural. They are caused by the act of development and human caused devices/machinery.

For example. When traveling in the Wilderness if I were to hear one airplane, helicopter, explosion, or large truck go by - that would be one impact at a low frequency. But, if I were to hear airplanes, helicopters, explosions, or large trucks (or any combination of them) for all times during the day (including times at night) there would be much larger and substantial impact - Which is exactly what this project is proposing.

A longer frequency of impacts that are not isolated to one exact time or place. Just think - there goes another one, and another one, and … you guessed it, another one. Where could I go if not the largest contiguous Wilderness in the continental United States evade these sounds? This removes the choice of establishing a place to remove ones self from the burdens of modernity and development by humans. It will become normal; which is exactly the opposite of Wilderness designation, Wilderness Management guidelines listed prior, and above all - the Wilderness Act. The quality of the Wilderness impacts of this proposal is in great need for reevaluation...

According to the SDEIS - anyone recreating or using NFS lands within 1.5 miles of the proposed project area will be exposed to the sounds of day/night mining operations. How many acres is that compared to the actual acreage of the closed project mining area? Knowing this will represent a comparable percentage table of land impacts used by mining and those not being used by mining activities that are directly impacted at a 24 hour/7 days a week/365 day time frame.

Availability of information - For reasons of inadequate availability of information to the public, I am requesting that this proposal should be at least reevaluated again from the start or even better - denied. Examples are as follows - concerning Air Quality * recently updated to public viewing in November and December - quite some time after public commenting was already open, White Bark Pine Survey information dated in 2020 *recently updated to public viewing Pinyon application on December 30th - NOTE the most recent designation as a threatened species on National Forest Lands by US Fish and Wildlife service (https://www.fws.gov/press-release/2022-12/whitebark-pine-receives-esa-protection-threatened-species) which would require further

biological assessments and research to determine the final level of impacts that proposed operations would introduce during the lifespan of the project (up to 40 years including 'reclamation', 'restoration', and 'further monitoring activites') Please remember, and take seriously, the associated impacts that will be left behind on our tribal and public lands that we all steward as citizens of this country) Please find these quotes helpful in your reflections and reevaluations on the impacts of the proposed action to permit this Gold Mine - again for these reasons this proposal should reevaluated from the start or be denied in its current form.

"Whitebark pine is the center of an important web of life and provides valuable ecosystem services in western high-elevation forests." said Diana Tomback, Whitebark Pine Ecosystem Foundation policy and outreach coordinator and professor of integrative biology at the University of Colorado Denver. "But it is facing an unprecedented convergence of lethal threats. We have the tools and capability to make populations more resilient to these threats. Given the scale of this effort, we are approaching restoration both collaboratively and strategically. One promising work in progress is the National Whitebark Pine Restoration Plan, a roadmap for restoration being developed collaboratively between the Whitebark Pine Ecosystem Foundation and American Forests, in consultation with the US Forest Service, the National Park Service, Bureau of Land Management, and several northwestern tribes."

"The Confederated Salish and Kootenai Tribes' of Montana commend and honor the USFWS decision listing Whitenbark pine as a threatened species, said the Confederated Salish and Kootenai Tribes Forestry Department. "Native Americans continue to be stewards of the land and understand the need for balanced ecosystems. CS&KT does this by utilizing our traditional ecological knowledge taught from story and songs and applying it to western science techniques. Whitebark pine is not only a keystone species for this balance, but it is also part of our first foods and culture. CS&KT supports the listing Whitebark pine to help ensure the protection and restoration of the land and of our culture."

Keystone species are labeled as keystones for the reason - that if they did not exist or are impacted beyond healthy ecological and biological levels that are unstable then other species follow.

Can you please elaborate on how the USFS intends to reevaluate managing this designation considering the negative impacts? Net loss; which is shown in this proposal would degrade the current habitat conditions which exist in the proposed project area. This is connected to the air quality impacts on natural species that require consistently clean air. I would like to ask this -

What impacts to White Bark pine and other tree types will be seen in 10-year increments for up to 100 years after mining operations cease?

Can the USFS please provide data modeling what species will thrive and what species will decline within this time frame shown on a map of the project area and areas that are listed to have adverse impacts on air and water quality?

Have there been any studies to show the expanse of acid rain impacts from particulate pollutants released during operations - if not can you please provide this to the public?

This information would assist the public in seeing long-term impacts from the proposed mining operation to the varying tree types found throughout the area of concern.