

Linda Jackson, PNF Forest Supervisor  
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To Whom it May Concern;

I am a 42 year resident of McCall and as a kayaker and river runner, have spent considerable time in most of the Salmon drainages and subsequent tributaries. I have come to recognize the unique pristine quality of this river system and am very concerned about the impact of the Stibnite Gold project on this delicate and fragile East Fork/South Fork area.

It's no secret this country is defined by steep rugged canyons and sandy granitic soil that likes to erode. It's known for frequent fire episodes and subsequent winter avalanches that send debris to temporarily dam the rivers. It's been deeply affected over the years by road building and timber harvests. And yet, it hosts this unique population of hardy bull trout, chinook salmon, steelhead and westslope cutthroat.

### Fish

The DEIS states that you have determined the Stibnite Gold 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 (pag. 4.12-93). Chinook Salmon habitat will be reduced 20.8 - 26%, and critical Bull Trout habitat reduced 27.5 - 69.5%, resulting in a significant loss of habitat for both these threatened species listed under the Endangered Species act.

The Stibnite Gold project plans to block off access to their spawning beds in Meadow and Fiddle creek and alter their migration patterns by creating a tunnel that fish will have to travel through, without successfully studying and determining the viability of this tunnel. Fish will also be affected by water temperature increases that will be potentially fatal in the summer to perpetuity. pg 4.12-26. (The data about rising water temperatures does not include adjustment for rising temperatures due to warming associated with climate change.) Water quality is expected to exceed accepted levels for antimony, arsenic, copper and mercury indefinitely post-closure, again potentially lethal for fish populations. Pg. 4.12-39.

How will this affect other animals as well as people?

Swimmers? Kayakers?

Has the DEIS completed a thorough analysis of water quality affects for all?

### Waterfowl/Migratory Birds

I am a volunteer for a local wildlife rehabilitation sanctuary in McCall and we have seen a substantial increase in bald eagles brought in this year who are suffering toxicity due to lead poisoning. I am wondering how the population of bald eagles in the Warm lake area, along the South Fork Salmon and at the Johnson Creek site (mentioned in chapter 3.13) will fare when feeding on fish and carrion exposed to the contaminants

mentioned in the previous paragraph. There appears to be no information about this in the DEIS. I understand that the Migratory Bird Treaty Act prohibits actions that kill birds on the list of migratory bird species. Bald and golden eagles are on that list, as well as osprey. I couldn't find an instance where osprey were mentioned in the DEIS. Osprey are almost always found where Eagles nest, why were they overlooked? Any SGP actions that kill migratory birds must be addressed; these include water contaminants, removal of nest trees and habitat reduction, etc.

Has anyone considered waterfowl that may land on the pit lakes? I'm reminded of the Berkeley Copper Pit Mine in Butte, Mt. where thousands of migrating snow geese landed on the pit lake and subsequently died in November 2016. Apparently not the first time for MBTA species fatalities there, 342 snow geese died there in 1995. Is that a scenario that could be repeated here? I've not seen anything in the DEIS that mentions this.

### White Bark Pine Habitat Destruction

In Table ES4-1 Pg. ES-26 you state White Bark pine removal and habitat conversion associated with SGP would impact seed production, dispersal and establishment of this species. Can you afford to allow this when 50% of this tree in the Northwest has disappeared due to a combination of Blister rust, Mountain pine beetle, extensive fire activity and lack of regeneration? In an adjacent table, considering Alternatives 1-4, there would be between 613-1027 trees cut in 2310 acres of habitat within the analysis area. The Boise and Payette National Forests do not allow removal of dead or living white bark pine. In 2011, the

U.S. Fish and Wildlife Service (USFW) designated white bark pine as a Candidate species for protection under the federal Endangered Species Act.

So shouldn't this be given more attention in respect to the SGP? Considering the relationship between the Clark's Nutcracker (a MBTA protected species) and the white bark pine? And it's subsequent bearing on species survival for the Idaho Northern Ground Squirrel and Black Bear within the analysis area? I would like to see a supplemental DEIS address this.

### Numerous Other Concerns

Other Wildlife Habitat Loss

Burnt Log Road Construction

Increased Traffic causing Loss of Recreational Access

Increased Traffic causing Increased Danger on Hwy 55/95

Loss of Tourist Revenue to Local Communities

On top of concerns I've already listed above, I wonder how the wildlife I've not mentioned will fare in this mining environment, the reclusive and endangered wolverine; fisher and mink families. Ungulate populations that will experience loss of summer habitat due to the 14+ miles of new construction of Burnt Log Road bordering the Frank Church Wilderness, along with its promise of increased erosion and sedimentation into Meadow creek, the Middlefork of the Salmon and beyond. The questionable approach the SGP plans toward avalanche mitigation for this road in winter. (Where they plan to use vegetative patterns that you state in the EIS are not always accurate).

I haven't begun to touch on the impact and loss of recreational opportunities in this area. For me personally, I have regularly backpacked in the Frank Church Wilderness, accessing it from Monumental Summit, Big Creek and Profile Gap. I don't relish the idea of risking my life dodging the large trucks that will be regularly traversing the way in and out once construction and mining activities begin and for the next 20 +- years. I'm sure I'm not alone, it will have a negative impact on tourism in this entire area. And dealing with that increase in dangerous traffic as it heads north or south on Hwy 55 and merges with the logging trucks and gravel/construction vehicles and regular heavy summer tourist traffic. The DEIS offers no analysis of this impact on Hwy 55 or 95, despite both being crucial corridors for recreation and tourist traffic.

McCall has just announced its largest year ever for tourist visits. I can't imagine this project will generate more jobs and more Valley County/Idaho State tax revenue than if we were to promote recreation in this area and encourage people to visit and enjoy this beautiful pristine backcountry. Not restrict access with mining activity. There is no mention in the DEIS on how the SGP will affect existing tourism, recreation, or the related economic benefits to local communities, I would like to see that addressed as well as other deficiencies outlined above in a supplemental DEIS.

As someone who regularly visits and recreates in the area that will be affected forever by this Gold mining project, I am grateful for the opportunity to comment on the SGP DEIS.  
Thank you for your work and consideration.

Nicki Humphries