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Title:

Comments: To Whom It May Concern:

I write to you now to formally express and submit my comments and concerns in response to the DEIS for the proposed Stibnite Gold Project and the project-specific plan amendments. Please consider these comments as substantial formal comments and sit within the scope of the proposal and have a direct relationship to the proposal itself.

My concerns and objections to the proposed Stibnite Gold Project are not only extensive but run deep with concerns of the numerous potential impacts on the environment in the proposed area and downstream impact probability.

I would like to speak specifically to the DEIS findings related to the impacts of this project on fish including species, rise in water temperature, water quality and barriers.

The DEIS indicates that the Forest Service has preliminarily determined that the 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 (pg. 4.12-93). It states that there will be a direct loss of fish habitat over all the alternatives, including Chinook salmon, a 20.8-26% decrease and bull trout, a 27.5-69% decrease, both which are listed under the Endangered Species Act. Also, the changes in water temperature, water quality and migratory fish patterns due to barriers such as; fish tunnels and the Tailings Storage Facility (TSF) and Development Rock Storage Facility (DRSF) occurring in and near Meadow Creek and Fiddle Creek would negatively impact these critical areas that support native fishes.

Fish

DEIS p. 3.12.1 describes the 4 special status fish: The South Fork of the Salmon is a wild free flowing river wild, largely within public lands, undeveloped, and supports native fish. While all fish are of management interest, four special status native salmonids (i.e., fish in the family which includes salmon and trout) are of particular interest because of their status as federally listed fish or fish of management concern. These all require cold, clear, clean, running water and varying unobstructed migration pathways to complete their life cycles.

DEIS findings demonstrate the ways the project will hinder the viability of fish habitat:

? Bull trout: [ldquo]Total habitat availability for bull trout decreases along the timeline of the SGP. Post-closure, and a net decrease in quality and quantity of bull trout habitat would occur[rdquo] (DEIS p. 4.12-83 and 4.12-87).

? Chinook salmon: [ldquo]Following closure and reclamation, the overall net effect would be a loss of both quantity and quality of habitat for Chinook salmon[rdquo] (DEIS p. 4.12-69).

? Western cutthroat trout: [ldquo]Stream channel changes, direct effects to individuals, and changes to habitat indicators would negatively affect cutthroat trout in the analysis area through the loss of suitable habitat[rdquo] (DEIS p. 4.12-93).

? Steelhead: [ldquo]Negative effects [hellip] are expected to be less intense for steelhead trout than those for Chinook salmon. Despite some improvement to access, 1.91 km of habitat in upper Meadow Creek would be blocked in-perpetuity, and potential effects may cause injury or mortality to individuals. The net effect would be an increase in both the quantity and quality of habitat for steelhead trout[rdquo] (DEIS p. 4.12-75).

(DEIS Appx J3, pg. 6) clearly states that the tunnel's ability to pass fish is in question. "Even after close collaboration with NMFS, meeting passage criteria, and executing all adaptive measures, there exists a reasonable probability that the project will not be able to volitionally pass fish safely, timey, or effectively."

(DEIS p.4.12-17) states about 100,000 fish could be "potentially affected" by injury or death for 1.6km of channel changes in the EF South Fork Salmon River.

Water Quality

(DEIS Pg. 3.9-42) All waterbodies in mine site area are impaired by arsenic or antimony, or mercury, do not meet their beneficial uses, do not meet applicable water quality standards, and beneficial uses are all salmonid spawning and cold-water communities.

(DEIS Pg. 4.12-39, Chapter 4.12.2.3.3.1) Despite activities that would improve water quality for fish from the removal and reclamation of legacy mine wastes, exceedances of the NMFS and USFWS and other applicable criteria for antimony, arsenic, copper, and mercury are anticipated to extend indefinitely post-closure.

Water Temperature

(DEIS Appx J2) Bull trout and Chinook salmon would be the most negatively affected species by water temperature changes, because they migrate and spawn in the summer and fall, when lower flows and higher air temperatures would amplify the impacts of the project on stream temperatures.

(DEIS 4.12.2.3.3 pg. 4.12-26) states that Meadow Creek downstream of the EF Meadow Creek would have potential water temperatures that are lethal to Chinook salmon during the summer.

Relocation/Barriers/Tunnels

Reference to (DEIS p.4.12-15) states that relocating fish is stressful and has the potential to cause injury and mortality. Once captured, fish can suffer injury or mortality during removal by getting caught in screens, traps, dipnets, seines, electrifying during transport and at relocation site, predation, lack of food, disorientation and competition; and from increasing temperatures, decreased dissolved oxygen, and predation from being stranded in partially dewatered areas. All four species would be affected. The Meadow Creek diversions and then construction and operation of the TSF & DRSF would create new barriers to natural fish movement that would be permanent. These creeks are part of the headwaters of the EF of the South Fork of the Salmon and are crucial ecosystems that support the survival of fish species, wildlife species, healthy habitat and water quality. The impacts outlined above, and within the DEIS, are more than clear. The impacts of the Stibnite Gold Project will have an immediate, immeasurable and long-lasting negative impacts on the fish that spawn and live in these waterways. My comments focus closely on the direct impact to the fish, as highlighted in the DEIS and prove to be substantial concerns. These rich natural ecosystems have existed for eons and continue to support the survival of Idaho's fish species, some whom have been on the planet for 40 million years.

Evidence from the DEIS states that SGP project will harm stream quality, stream temperature, both of which are critical and sensitive components of fish health and population stability. Additionally, the fish tunnel creation, barrier, and removal will disrupt natural fish migration patterns, and do not promise the ability to even pass fish, beyond the greater implications (Appx J3, p. 6).

As the DEIS notes, the potentially affected area for the proposed project includes approximately 3,500 acres on federal, state, and private lands located in Valley County, Idaho. This is a vast tract of land that is currently rich in diversity of flora and fauna, despite historical impacts. I am deeply concerned for the health and survival of our native fish, as well as their future, should the Proposed Stibnite Gold Project move forward.

4.12.2.6.4.5 Integration of Species/Habitat Effects for Chinook Salmon

The combination of physical stream channel changes, direct effects to individuals, and changes to many of the WCIs would negatively affect Chinook salmon in the analysis area. These effects may cause injury or mortality to individuals and temporary displacement of Chinook salmon from several mine site streams (e.g., Meadow Creek) where habitat conditions may become unsuitable due to streamflow volume or water temperature, or where fish passage is impaired. Such environmental conditions would cause a temporal to permanent loss of Chinook salmon habitat. Following reclamation, the net effect would be a loss of both quantity and quality of habitat for Chinook salmon.

The activities and infrastructure of Alternative 4 that have the potential to affect fish and fish habitat are very similar to those described in Alternative 1, with a few exceptions related to the Meadow Creek pipeline diversion, the EFSFSR Tunnel without fish passage, and Blowout Creek surface diversion enhanced with step pools. Specifically, for Alternative 4, the potential effects to Chinook salmon include:

- [bull] Risk of direct effects to individuals in 102.03 km of important fish habitat within 91 meters of the Yellow Pine Route for all SGP phases;

- [bull] A new temporary passage barrier at the Meadow Creek pipeline diversion; and

- [bull] A permanent passage barrier at the Meadow Creek TSF/DRSF that prevents access to critical habitat.

The Forest Service has preliminarily determined that Alternative 4 will adversely affect Chinook salmon and their critical habitat. Informal Section 7 ESA consultation is ongoing with the NMFS.

4.12.5 Irreversible and Irretrievable Commitments of Public Resources

4.12.5.1 Alternative 1

Irreversible Commitments [ndash] A commitment of resources is irreversible when the impacts of the proposed action or alternatives would limit the future options for use of the resource. This applies primarily to non-renewable resources or to processes or resources that are renewable over long periods of time.

Certain biological resources that would be affected by the SGP are renewable only over long- time spans including mature vegetation, seedbanks, and topsoil. Loss of these resources would be considered irreversible. Soils would be stockpiled and reused to the greatest degree possible, but there would still be some irreversible commitment of soil to this SGP.

The direct mortality of fish would be an irreversible impact that could occur under Alternative 1. Although fish exclusion barriers and trap and transfer activities would be incorporated to minimize fish mortality, incidental injury or mortality is expected to occur. These [ldquo]takes[rdquo] of fish in the mine site would be considered irreversible. Species subject to potential irreversible losses include the threatened Snake River spring/summer Chinook salmon, steelhead trout, bull trout, and cutthroat trout.

Irretrievable Commitments [ndash] A commitment of resources is irretrievable when the impacts of the action alternatives would result in a loss of production, harvest, or use of renewable resources. An irretrievable commitment of resources occurs when a resource that is renewable over a relatively short period of time is consumed during the life of the SGP and is therefore unavailable for other uses until the use ceases and it is renewed and once again available. It is the temporal loss of resources that is considered irretrievable.

This includes resources that are renewable over a short time, such as riparian vegetation and streams. While the loss of the resource itself is reversible (through mitigation), the temporal loss of the use of the resource or habitat is irretrievable. The SGP would cause a temporal loss of fish habitat for fish species inhabiting certain stream reaches, as described in the following subsections.

Portions of Meadow Creek upstream of the southern extent of the TSF would be irretrievable and unavailable to downstream fish within Meadow Creek during construction and operations.

any populations of bull trout and cutthroat trout which are known to inhabit the upper reaches of Meadow Creek. After closure and reclamation, this habitat would be re- connected through construction of Meadow Creek over the TSF/DRSF and is expected to allow fish passage throughout Meadow Creek.

The loss of existing fish habitat in the Yellow Pine pit lake may constitute as an irretrievable commitment of resources.

A portion of Fiddle Creek would be irretrievable and unavailable to fish during construction and operations due to the presence of the Fiddle DRSF. The known cutthroat trout inhabiting Fiddle Creek would be displaced during this process. Stream channel changes to Meadow Creek around the proposed Hangar Flats open pit also would constitute as an irretrievable commitment of resources. Changes in fish habitat due to altered streamflows and temperatures that would persist post-closure also would be an irretrievable commitment of resources.

4.12.5.2 Alternative 2

The irreversible and irretrievable commitment of fish and aquatic habitat resources under Alternative 2 would be the same as under Alternative 1.

4.12.5.3 Alternative 3

The irreversible and irretrievable commitment of fish and aquatic habitat resources under Alternative 3 would be similar to that described under Alternative 1, except the location of the TSF in the EFSFSR rather than Meadow Creek would change the location of the fish habitat that would be lost.

4.12.5.4 Alternative 4

The irreversible and irretrievable commitment of fish and aquatic habitat resources under Alternative 4 would be the same as under Alternative 1.

4.12.5.5 Alternative 5

Under the Alternative 5 there would be no irreversible or irretrievable commitment of fish and aquatic habitat resources.