Keith Lannom, Supervisor
Payette National Forest
500 N. Mission St. Bldg 2
McCall, ID 83638

Submitted Electronically

RE: Scoping Comments for Stibnite Gold Plan of Operations EIS

Mr. Lannom,

Trout Unlimited (TU) appreciates the opportunity to provide comments on the Stibnite Gold Plan of Operations EIS Scoping, and the Plan of Restoration and Operations (PRO) document submitted by Midas Gold. TU is a non-profit organization with a mission to conserve, protect and restore North America's coldwater fisheries and their watersheds. With more than 300,000 members and supporters nationwide and nine local chapters representing more than 2,000 members here in Idaho, TU has long considered it a priority to ensure the conservation of headwater tributaries of the Salmon River in Idaho.

While Trout Unlimited recognizes the efforts of Midas Gold in producing the Plan of Restoration and Operations documents, we have substantial concerns as to whether this project can be completed without detrimental impacts to native resident and anadromous fish, water quality, wildland values and the general serenity and pristine character of the surrounding area. We submit the following list of concerns as the NEPA process moves forward.

I. Impacts to resident trout and anadromous fish species

Three ESA listed species (Chinook, steelhead and bull trout) are present throughout the watershed, as well as in the immediate vicinity of the proposed project. Steelhead are located below the project area on the East Fork of the South Fork of the Salmon River (EFSFSR). Bull trout are present both below and above the project area on the EFSFSR and Chinook salmon are present below the project area on the EFSFSR as well as being outplanted above the project area. Additionally, Westslope cutthroat trout are present above and below the project

area on the EFSFSR as well as in Meadow Creek and Fiddler Creek, which could see impacts from mining operations. TU is concerned that the current plan of operations could have severe impacts to these important fisheries both in the immediate vicinity of the mine and the EFSFSR watershed. These impacts should be analyzed and discussed for all the alternatives in the DEIS.

The plan of operations proposes installing a 0.8 mile bypass tunnel in the EFSFSR to provide fish passage during operations. We know of no other tunnel of this scale being installed and are skeptical that it will work as planned. Although other alternatives are discussed in the PRO, further analysis of the efficacy of the bypass tunnel and its alternatives is warranted.

II. Impacts to water quality

Between 2012 and 2014, the United States Geological Survey measured concentrations of arsenic that exceeded human health standards (Etheridge, 2015). Elevated levels of antimony and mercury were also found in the watershed and attributed to past mining impacts. Current water quality issues should be addressed before operations begin.

Although restoration of the site is addressed in the PRO, TU has concerns over water quality during operations. We question whether safeguards are in place to mitigate the impacts of industrial scale mining and on-site processing and the possibility of catastrophic events and other risks in this remote, high-elevation location.

Further, we do not see adequate analysis or any detailed plans for waste treatment facilities to accommodate a resident staff of 600 people. The PRO only states that sanitary waste handling facilities will meet standards set forth by Valley County, IDEQ and Idaho Department of Environmental Quality. A detailed analysis of design and water quality impacts should be undertaken.

III. Impacts of transportation and road development

The remote location of the Stibnite Gold project as well as its close proximity to the Frank Church River of No Return Wilderness and inventoried roadless areas present difficulties for accessing and maintaining an operation of this scale.

The preferred route stated in the PRO would entail rebuilding and/or resiting portions of Burntlog and Thunder Mt. roads as well as the construction of new road segments to connect these routes through inventoried roadless areas (IRAs)

that fall under the Idaho Roadless Rule. The specific IRAs affected are: Burntlog, Black Lake and Meadow Creek, all of which are classified as Backcountry Restoration under the rule. TU is concerned that roadless values stated in the Roadless Area Conservation National Forest Systems Lands FEIS will be compromised by this project. A thorough analysis of impacts is requested.

Although the Idaho Roadless Rule does allow for "temporary" road construction within IRAs, TU questions whether the 20 year use of this road qualifies as temporary. The PRO does state that, upon conclusion of the project, new road segments will be obliterated and closed. However, TU is skeptical that this road can be closed after a generation of use. We ask that the Forest Service further analyse the proposals compliance with the Idaho Roadless Rule.

Impacts of the roads year-round use on the Frank Church River of No Return Wilderness and the Burntlog Creek eligible wild and scenic river corridor also deserve further analysis.

The other transportation alternative proposed in the PRO is an existing route adjacent to Johnson Creek. Johnson Creek holds populations of resident bull trout and provides spawning and rearing habitat for important anadromous species. The impacts of road related sediment, dust, the possibility of fuel and oil spills and other catastrophic events deserve further analysis. The Forest service should develop and analyze alternatives with and without the construction of the Burntlog route.

In closing, this project proposes a large-scale mining operation in a very remote location on the Payette National Forest in the headwaters of the Salmon River. Considering past impacts of mining across the West, it is incumbent upon the agency to conduct a thorough analysis of all aspects of this proposed project to ensure that our public lands are protected in perpetuity.

Sincerely,

Michael Gibson
Idaho Field Coordinator
Trout Unlimited