

**From:** Don Newberry  
**To:** [FS-comments-intermtn-payette](#)  
**Subject:** Stibnite Gold EIS Scoping Comment  
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**Attachments:** [Stibnite Gold EIS Scoping Comments.docx](#)

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Attached are my comments on the Scoping phase of the EIS for the Stibnite Gold proposed mining operation.

Donald D. Newberry

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## **Stibnite Gold EIS Scoping Comments**

1. The Plan of Operation (PoO) (p. 10.5) states that Antimony, about 60% concentrated, with about 15% moisture is proposed to be *“... transported by truck in one- or two-ton containers from the Project site for offsite smelting and refining. An estimated one to two truckloads of concentrate will be hauled off-site each day....”* What the PoO does not say is whether the antimony is in a valence state of +III or +V. Antimony in the +V valence state, (e.g. as Antimony (V) sulfide), is considered highly toxic to aquatic environments in MSDS sheets. What is also not explained is how the 1-2 ton shipping containers are or are not designed to contain their contents in case of a spill and roll –over situation. Clarify this in the Draft EIS and describe the processes to keep the antimony product out of aquatic systems.
2. Explain how the proposed construction of roads and powerlines for 138kV lines maintains the integrity of the Inventoried Roadless Areas (IRA) that predominate the drainages in Management areas 20 and 21 (Upper and Lower Johnson Creek)?
3. The Environmental Baselines for the Watershed Condition Indices do not appear to be available to the general public. Have they been updated since the wildfires of 2005-2010? If they have, then where have they been made public? If not, then this would be an opportune time to update them for the watersheds being assessed by this proposal and make them available to the public.
4. It is not clear in the transportation map whether the proposed new construction or reconstruction of the “Burntlog Road” is in the Chilcoot Peak Research Natural Area (RNA). If it is, explain how this meets the purpose of a RNA and General Standard 2105 of Management Area 21, Lower Johnson Creek?
5. It is not clear in the transportation map whether the proposed new construction or reconstruction of the “Burntlog Road” crosses the Wild portion of the Eligible Wild and Scenic River classification for Burntlog Creek. If it does, explain how this maintains the eligibility to its assigned classification standards, and preserve its outstandingly remarkable values and free-flowing status?
6. Explain how the proposed use of sand for winter traction on the Warm Lake highway (FH-22) in the South Fork Salmon River(SFSR) drainage (FH- 22 travels parallel to Trail Creek, Curtis Creek- both tributaries to the SFSR), and the crossing of the South Fork Salmon River (SFSR), meets the condition where the *“...sub-watersheds were listed in 1998 as impaired under Section 303(d) of the Clean Water Act. The pollutant of concern was sediment.”* In addition, the management area is within a TMDL-assigned sub-basin.

7. Explain how the proposed new construction of the Maintenance Facility immediately south of the Landmark Guard Station meets the Objective of *"Maintain the National Register status of Landmark Guard Station and other eligible properties"* from both a visual and a sound-generation perspective? How does this meet the need to *"... protect its historic character."*? An additional alternative can be developed that proposes this facility be relocated about ½ mile east, at the 447 X 447B junction- the Landmark Airstrip road.

8. During the construction phase especially, analyze the proposed additional amount of mine - related traffic on the Warm Lake Hwy (FH-22) from a load-bearing viewpoint. Does the current design of FH-22 stand up to the additional weight loads and number of loads to be placed on it? Who then will pay for the repairs/maintenance/upkeep of this road if it deteriorates from this proposed traffic? How does this project propose to deal with the many Forest users attempting to pass loaded semis and other slow vehicles on the many grades between Cascade and Landmark?

9. During both the construction phase and the operational phase, how much additional traffic will be added to an already over-used State Highway 55 between Cascade and Boise? What safety concerns to the public will need to be developed and implemented because of this project?

10. What impacts to Cascade and Donnelly and the surrounding area are expected from the estimated 1000 employees proposed for this project? How will County and City Police, Emergency Services, Medical Facilities, housing and various social services cope with this massive expansion of the local population? What efforts are being proposed by this project to help with this adjustment to the local communities?

11. In the South Fork Salmon River (SFSR) Chinook salmon, Steelhead trout, and bull trout are listed as Threatened under the Endangered Species Act, and Westslope cutthroat trout are listed as a Species of Concern. The Warm Lake sub-watershed was listed in 1998 as impaired under Section 303(d) of the Clean Water Act. The pollutant of concern was sediment." In the SFSR drainage, the management area is within a TMDL-assigned sub-basin. In Johnson Creek, no TMDL has been designated.

How much additional sediment will be generated and how much is expected to be delivered to the SFSR and Johnson Creek drainages from the reconstruction of the existing powerlines and the new construction proposed in the changeover from 69kV to 138kV? The powerline in the Warm Lake (Management Area 19) area has been reconstructed more than once due to recent fires. Portions of this segment of the powerline deliver sediment directly to Trail and Curtis Creeks. New towers set at 600 ft apart will require new roads, and new "pads" on which the maintenance vehicles will construct the tower. The segment over the Cabin/Trail summit

delivers directly into Cabin Creek (Chinook spawning and rearing including a bull trout population). The powerline segment down Johnson Creek has many reaches that deliver sediment. The segment going to Horse Heaven appears to be new construction on exceptionally steep terrain. Are there other roads such as the FR- 440 road that would deliver less sediment directly to streams to be used for the powerline?

12. During startup especially, and after operations begin, how much water is expected to be lost from the streams directly in the mining area from wells pumping the aquifer- such as the East Fork South Fork Salmon River, Meadow Creek and other tributaries? Spawning and rearing of Threatened fish species will still occur downstream of the project site. What provisions are made for low water years when the fish will be affected not only by low flows from low snow fall, but compounded by the requested water rights withdrawals (ref. PoO Table 8.1 and Section 8.11)?

13. Table 12-4 of the Plan of Operation is a significant list of toxic materials proposed to be routinely delivered to the Project site. Some items as Cyanide, Sulphuric and nitric acids and Lime (CaO) appear to have satisfactory transportation methods. Others such as copper sulfate, sodium hydroxide, Hydrogen peroxide (70%), Lead nitrate and ammonium nitrate to not show how they will be contained against the possibility of an accident and roll-over into a stream course. How will these chemicals be treated during haul to protect them from entering a water course?

14. Oxygen is used in the Pressure Oxidation (POX) process displayed. Is it proposed to be generated onsite? If not, how is it proposed to be transported to the Project site- as a gas, or as liquid Oxygen? How is it to be stored onsite? Explain this in the Draft EIS.

15. The proposed reconstruction design of the Burntlog (FR- 447) roads with the construction of a new road between the FR-447 and the FR-440 road provides for a 20ft running surface plus 3 ft either side (26 ft + running surface). This does not account for the increase in cutslope or fill slope widths and concurrent sediment deliveries. This proposal appears to contradict TEST06 (2010 LRMP p. III-11) by not minimizing the road widths and associated increased sediment delivery from the widening of the cut/fillslopes in land types with moderate to high sediment delivery potentials and steep slopes of the existing road prism. Why create much more sediment during re-construction and then, 15-20 years later, recreate additional sediment by having to put a portion of the road back to grade? In an additional alternative compare the estimated sediment budget for the “wide” road proposal against a “standard” road width with turnouts.

16. The road design also appears to contradict MIST08 (2010 LRMP p. 51) where it says, “*Where no alternative to road construction in RCAs exists, keep roads to the minimum necessary for the approved mineral activity.*” Construct a standard road running surface that provides many turnouts where needed. This and the proposed radio communications network to be established can be used by the truck drivers to minimize potential conflicts. This alternative can also include a set of timing requirements for haul (e.g. 0700-1100 outbound; 1200- 1500 inbound, etc.). In addition, just having “a pilot car” in front of a semi does not eliminate accidents by drivers overdriving the existing conditions. Seasoned drivers, knowledgeable of the road and existing conditions have been used in the past to train non-local drivers until they understand driving these roads safely.

17. Consider in a different alternative, dropping the proposed winter snow machine trail over the Cabin/Trail summit to the Johnson Creek road. This summer-access road already handles the existing powerline (proposed to be upgraded to 138kV), and the buried Midvale telephone line to Yellowpine. This road has already had at least 2 slope failures immediately after the fires that burned through this saddle. The project proposes to maintain FH-22 and the FR-579 open all winter to Landmark. Consider a snow machine trailer parking area near the FR- 447 junction. Access will be available to the south (Lowman) and east (Stanley, ID through Bear Valley). The Landmark-to-Yellowpine road will be still available for access to Yellowpine.

18. The Plan of Operation, Figure 7-3, shows a “typical” of a culvert crossing. The metal culvert shown set at grade, does not pass fish. What is not shown is a “typical” of a fish passage structure other than a bridge. Who will designate which streams do/do not require fish passage structures, and how this will be determined? What fish passage structure type(s) are proposed to be used beside bridges?

19. How much of Riparian Conservation Areas (RCAs) will be affected by the proposed road construction/reconstruction and the reconstruction of the power corridor?

20. How will the proposed widening and clearing of powerline right-of-way (ROW) corridors for the 138kV line affect increased insolation therefore, increased stream temperatures? How will direct sediment delivery to streams at crossings, and placement of structures in wetlands/wet seeps be minimized?

Thank you for the opportunity to comment on this proposed action.

/s/ *Donald D. Newberry*

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