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Keith Lannon, Forest Supervisor

Payette National Forest

500 N. Mission St., Bldg 2

McCall, ID 83638

RE: Stibnite Gold EIS Scoping Comments

Dear Supervisor Lannon,

Please accept the following scoping comments for the proposed Stibnite mining project.

**Access roads**

Need complete assessment of access options, including expenses for development, maintenance, and rehabilitation after mining is ceased, impacts to wildlife (both terrestrial and aquatic), impacts to established roadless areas, and impacts to and by recreation activity. Include the following alternatives in all assessments.

1. Using existing Johnson Creek / South Fork Salmon River / East Fork South Fork Salmon River roads. With this alternative, no new roads must be built. Analyses must address management of public vs. mining related use; safeguards and response plans established for potential spillage of fuel and mine related chemicals into roadside streams.
2. Developing Burnt Log / Thunder Mtn Rd: Need to include comparative costs for snowplowing/grading. Need to be transparent about what is factored into the preferred alternative.
3. Justification for new roads not needed for mining, and at what cost for maintenance and impacts to fish and wildlife (Trout/Cabin road also could impact listed fish). New road past Riordan Lake would impact both wildlife and aquatic resources (bull trout), costs to maintain and rehab after mining. Clarify the purpose and need of this road. Need an honest evaluation of the likelihood of new roads being maintained after the project is finished. Evaluate the impacts to roadless area and possibility that a new road through the existing roadless area will jeopardize its future status.

Road Analysis must include inventory (miles) of existing roads and trails by class (full-size vehicle, ATV, motorcycle, non-motorized trails) and how each alternative would change that inventory. Analyze all road and trail maintenance costs by alternatives. Potential for wildfires, noise, air pollution, spread of invasive species, with more road miles.

Analyze visual resources for each road/trail alternatives. New roading through a roadless area should be considered as impacting the landscape character at a higher level than improving existing roads.

Explain exactly how roads will be decommissioned following cessation of mining. Will all landscapes be obliterated with full re-contour of slopes, or simply gated, or something in between?

**Hanger Pit Lake**

The proposal to develop a long-term pit lake containing mine waste is of concern. Such a water body must be monitored and actively managed in perpetuity to remain isolated from the South Fork Salmon River watershed downstream. Thoroughly explain how this will be accomplished, and explain how contamination of wildlife (birds, aquatic, and terrestrial) will be prevented. Present alternatives for reclamation that do not include pit lakes.

**Economic cost and benefit to local community**

Need thorough disclosure of new jobs created throughout the duration of entire project. Specify the skill level requirement by job category, pay rates, and duration of job. What proportion of jobs within each job category will realistically be filled by individuals already residing in Valley County vs. commuters from elsewhere?

Provide specific federal, state and local tax revenues expected by project, by phase.

All alternatives, including no-action, should include comparative costs to MIDAS, USFS, other agencies and Valley County.

**Bonding**

This is a very long-term project, scheduled to end with complete reclamation 20-30 years from beginning of “redevelopment and construction” phase. Bonding must accommodate projected inflation. How will the public be assured that bonding is adequate to fully reclaim all impacts from this activity, and that MIDAS will not forfeit their bond, leaving reclamation incomplete?

**Fish Contamination and Connectivity with downstream river reaches**

How will connectivity of the EFSFSR above and below mine site affect the greater aquatic community with respect to productivity of populations, given potential increased movement of contaminated fish? How will risk to human health be mitigated by potential consumption of contaminated fish? Plan emphasizes that establishing fish passage to Meadow Cr and upper EFSFSR is a high priority, both in importance and urgency. Provide analyses that puts this restoration activity within the context of impacts to all wildlife resources across alternatives (i.e., alternatives that weight pros and cons of no new roads and may provide public passage through mine in lieu of fish friendly tunnel would remove potential impacts to wildlife in roadless area). There has been no fish passage upstream from Yellowpine Pit for more than 75 years, what’s the hurry now? Present an alternative of waiting to establish fish passage when all stream rehabilitation is complete and water quality is adequately improved throughout upper watershed.

**Wetlands**

Present an inventory of all wetlands (size and quality) by alternative. Plan claims to create wetlands, but will also destroy existing natural wetlands.

**Amendments to 2010 Forest Plan**

The Federal Register notice states that amendments to the current Forest Plan may be necessary. Would this require a separate public process? Seems that it should.

Cordially,

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