

Stibnite Gold Project: Comments on DEIS

Submitted through the USFS website <https://cara.ecosystem-management.org/Public/CommentInput?Project=50516>

October 27, 2020

Ms. Linda Jackson  
Forest Supervisor  
Payette National Forest  
500 North Mission Street Building 2  
McCall, Idaho 83638-3805

Dear Ms. Jackson:

This letter is in response to the publication of the Draft Environmental Impact Statement (DEIS) for the Stibnite Gold Project and request for comments.

As an Idaho native and someone who frequently recreates (backpacking, fishing, hiking, and camping) in the Payette National Forest, and who has interest in the protection of our natural resources along with the utilization of those natural resources to benefit the economies of rural Idaho, this proposed project is of direct interest to me personally. Furthermore, in my professional environmental and natural resource work, several of the potential effects discussed in the DEIS I have direct knowledge of. My comments on this proposed project and the DEIS are focused on the areas of water quality, endangered species and mine access.

The Proposed Project Will Benefit Water Quality and Endangered/Threatened Species

The Stibnite area is long known for its history in mining. The ore from this mining area made valuable contributions to the production of armor and weapons needed to defeat the axis powers in World War II. However, this mining and subsequent mining left a mine site that contributes releases of hazardous substances (primarily metals and sediment) to local waters. Some of these waters are also habitat for threatened and endangered (T&E) salmonids.

The proposed project provides multi-faceted benefits, especially in relation to the natural resources that are currently degraded or exposed to hazardous substances due to the history of mining at Stibnite. The proposed project will result in the stabilization and proper management of decades of residual mining materials that have and continue to release hazardous contaminants to local waters. A reduction in these releases, and also of other pollutants such as sediment, will improve water quality over existing conditions in several of these stream reaches. The reduction of these contaminants,

especially sediment, will improve habitat conditions for aquatic species, including T&E species.

There has been publicity that this proposed project will pose a risk to water quality and T&E species. The reality is that just about most activities in a national forest can *potentially* pose risks to water quality and natural resources. [As an example, a car overturning into a stream and releasing gasoline and oil.] However, such publicity is misleading in regards to the Stibnite Gold Project. The current “state” at Stibnite results in contaminants entering the environment from historical mining operations. The proposed project provides the opportunity to reduce such releases.

#### Reasonable Access to the Mine Must Be Allowed

The Stibnite area is remote and as such is adjacent to or in inventoried roadless areas. The major applicable federal statute for this proposed project is the General Mining Law of 1872. Thus, reasonable access to develop the mine, transport personnel, equipment, supplies, and the mined/processed ore must be provided. This reasonable access includes road construction through inventoried roadless areas. The Idaho Roadless Rule does not prohibit such road construction. [See 36 CFR §294.25(b) – Nothing in this subpart shall affect mining activities conducted pursuant to the General Mining Law of 1872.] The Burntlog Route, as described in Alternative 2, provides this reasonable access.

#### Summary

I support the Stibnite Gold Project (Alternative 2) being approved. This project provides the opportunity to correct decades of environmental damage from historical mining operations while providing an important metal needed for American technology. Furthermore, this mine will provide significant employment and economic benefits to Valley County and nearby rural areas.

Sincerely,



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