

To: Payette National Forest
ATTN: Forest Supervisor - Keith Lannom

Subject: Draft EIS - Stibnite Gold Project #50516 - Comments / Objections

Dear Mr. Lannom

Thank you to the Forest Service for the opportunity to provide feedback for reference and use by yourself, the United States Army Corps of Engineers (USACE), and the Environmental Protection Agency (EPA) regarding the Draft Environmental Impact Statement (DEIS) for the proposed Stibnite Gold project. My comments, warning, and strong opposition to the DEIS in its current state centers on a single, highly threatening risk the proposed project imposes on a specific fragile area outside the immediate footprint of the open-pit mine itself. The DEIS does not address risks to water quality stemming from heavy use of road salt during winter months - it does not describe or identify this risk, demonstrate that the risk has been considered and assessed, nor that the likely environmental impact will, or even can be, mitigated.

I believe this specific issue warrants focused investigation and consideration by the USACE and EPA, who will weigh grave risk to the environment imposed by the proposed Plan against the propriety of issuing Sec 402 and 404 permits under the Clean Water Act (CWA).

In their current state, the Draft EIS and project plan are insufficient to demonstrate that key environmental impacts around water quality have been addressed. Based on that shortcoming, Option 5 is the only viable conclusion for the Draft EIS at this point in time.

The Draft EIS is incomplete and does not address impacts on water quality necessary to support the project's applications for Section 402 or 404 permits under the Clean Water Act (CWA). The project's transportation plan poses a clear, detrimental impact to the water quality of Warm Lake. Unless the impact is addressed and the plan and DEIS demonstrate that the risks imposed can be mitigated so as to not destroy the quality of water flowing into Warm Lake, the application for Section 402 and 404 permits must be denied.

The Draft EIS (DEIS) does not address water quality to a uniquely sensitive, key waterway along the project's transportation route - Warm Lake and its tributary, Warm Lake Creek. The DEIS fails to identify impacts or provide clearly defined actions and countermeasures to sufficiently address spills of liquids, fuels, and hazardous materials into the waterway nor does the DEIS address the impact on water quality created by introducing tons of coarse road salt into the Warm Lake Creek canyon over the course of six months each year (November through April) that will run off into the lake's tributary and therefore, the lake itself.

Warm Lake - current state of a unique ecosystem reliant on clean, unpolluted water

Warm Lake is relatively small lake, 640-acres in size, but it is the **largest natural lake** within Boise National Forest. This makes Warm Lake extraordinarily unique.

The lake's abundance of wildlife makes it very popular for camping, fishing, and hunting. Large mammals present in the area include moose, mule deer, black bear, and elk. Large birds present in the area include bald eagles and osprey. The lake contains rainbow, brook, lake, and bull trout as well as mountain whitefish and Kokanee salmon. [source: https://en.wikipedia.org/wiki/Warm_Lake]

All these human activities and animal species are dependent on preservation and protection of current water quality of the lake and its tributary, Warm Lake Creek (which provides 90% of total inflow to the lake).

The native Kokanee salmon in Warm Lake are genetically unique. They are a beach spawning population. Other Kokanee subspecies spawn only in tributaries. [source: Population Genetic Structure and Life History Variability in *Oncorhynchus nerka* from the Snake River Basin, p. 729, <https://digitalcommons.unl.edu/cgi/viewcontent.cgi?referer=https://www.google.com/&httpsredir=1&article=1477&context=usdeptcommercepub>]

prepared and submitted: 10-28-20

Joel Drake

Risks Introduced on Water Quality:

Warm Lake Creek to Warm Lake - Warm Lake - Warm Lake outlet to its confluence with the S. Fork of the Salmon River

Road Salt

The DEIS does not establish quantifiable measures or identify baseline values to assess proposed impacts to water quality on Warm Lake or its tributary Warm Lake Creek. Specifically, the DEIS does not identify the impact that introducing tons of salt into the creek through run off from Warm Lake Road between the Landmark Summit and Warm Lake each year will have on the creek or lake, nor the cumulative effect salt will have year-after-year during the consecutive 20+ year period proposed in the project plan. Road salt has never been used Warm Lake Road along the Warm Lake Creek drainage into Warm Lake - that section of road has always been closed during Winter months due to its treacherous nature and the frozen, icy, snow bound state it is in from November through April. Heavy introduction of tons and tons salt to make it passable on a daily basis by large transport trucks during the frozen, icy months of November through April each year would be unprecedented and the specific, measurable impact to water quality of the creek and lake is not identified in the project plan nor the DEIS. Neither the project plan nor the DEIS identify; projected impacts of salt leeching into the creek and then the lake, how the impact will be mitigated, nor how water quality of the creek or the lake will be impacted. The project plan and DEIS do not address how that impact will be measured, monitored, and reported nor does the DEIS or project plan identify the significant countermeasures that would be required to reduce impacts to an acceptable level to prevent increased levels of salt in the water from damaging the plants, fish, and animals dependent on water in the creek and in the lake.

At a minimum, before this DEIS or Section 402 or 404 permits could be approved for this project, the DEIS and project transportation plan would need to be revised to include requirements for; monthly sample testing of water in Warm Lake Creek at its entrance to Warm Lake by a federal agency or independent third party engaged by a federal agency, monitoring and follow up action by a federal waterways agency to enforce water quality compliance when excessive pollution levels are detected, and that test results must be formally published each month to provide for public review and ensure transparency. Test results should be published in table and graph form that evidence the absolute levels of pollutants in the water over time (salt, fuel, hazardous materials) and the historic trends in those levels month-to-month over the life of the project. Federal waterways agencies need this information to hold the project management's team accountable for mitigation and clean up actions necessary to protect and preserve the water quality of Warm Lake Creek and Warm Lake itself.

Spills of Liquids, Fuel, and Hazardous Materials

The remote location of the proposed mining site relies on extremely heavy, unprecedented use of transportation infrastructure corridor (roads and bridges) in the National Forest System (NFS). In many sections of the corridor, its location and configuration are not designed or constructed to accommodate the proposed level of use or prevent hazardous material spills from immediately flowing to fragile, pristine waterways which flow into the S. Fork of the Salmon River.

Under the Plan, **ALL** materials and supplies transported to the site and **ALL** minerals and antimony concentrate extracted from the site would be transported through a single treacherous and regionally notorious 5-mile segment of Warm Lake Road - from Warm Lake to the Landmark summit (Valley County road #10-579). The level of risk for accidents and rollovers and the direct impact hazardous spills would have within this road segment are self-evident when considering the natural terrain and configuration of the road. This road segment traverses and crosses over the primary headwaters of Warm Lake at numerous points. The road has extreme grade (8+%) through many tight, low-speed switchbacks through a steep, narrow canyon where all waters collected by Warm Lake Creek flow directly to Warm Lake. Warm Lake Creek is the primary tributary to Warm Lake, providing over 90% of all inflow to the lake. The hazardous features and location of this road segment are clearly insufficient to ensure reliable, safe, contained *daily* transport of the tons of environmentally destructive toxic mining chemicals. Fuels / oils / lubricants / solvents, and mining ore proposed for shipment to and from the mining site year-round through extremely severe weather conditions, over the extended

twenty-year period called for under the Plan. Risk introduced by the Plan on this fragile, unprotected water resource is not acceptable. Due to the unique, physical attributes of the canyon and the road, it is hard to comprehend how risks to water quality imposed by the Plan on this fragile, unprotected watershed can be sufficiently managed or mitigated - given any reasonable level of investment in the reconstruction / reconfiguration of the current road.

Illustrations of the canyon's configuration, road layout, and water crossings are displayed on the following page.

Valley County road #10-579 - Warm Lake to Landmark summit

5.1 miles

2,055 ft. elevation gain (from 5,336 ft. to 7,246 ft.)

8.1% grade (average slope)

4 crossings directly over Warm Lake Cr. - road runs parallel to the creek for several miles

Hazardous spills within the narrow canyon would rapidly find their way directly to the creek, the lake, and the river

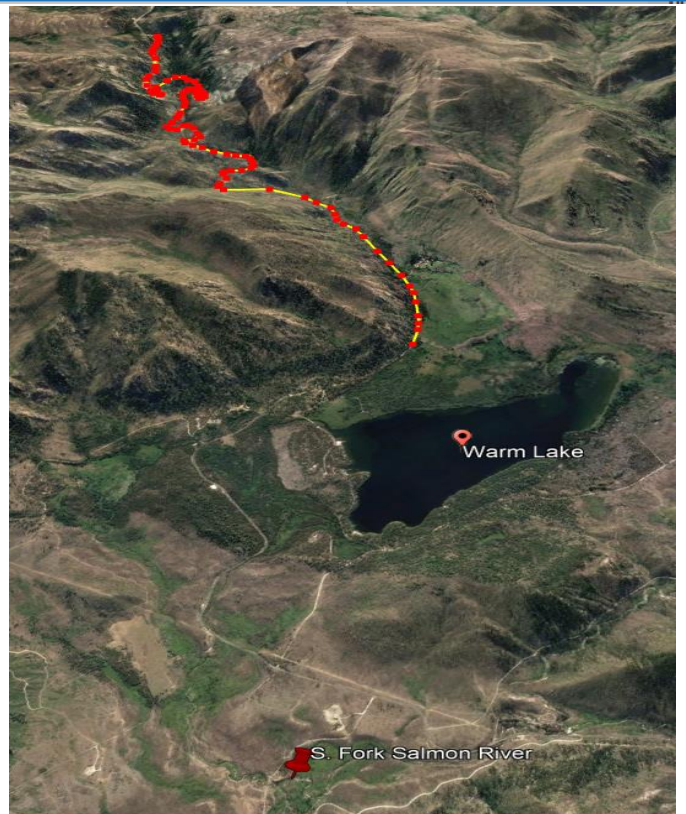
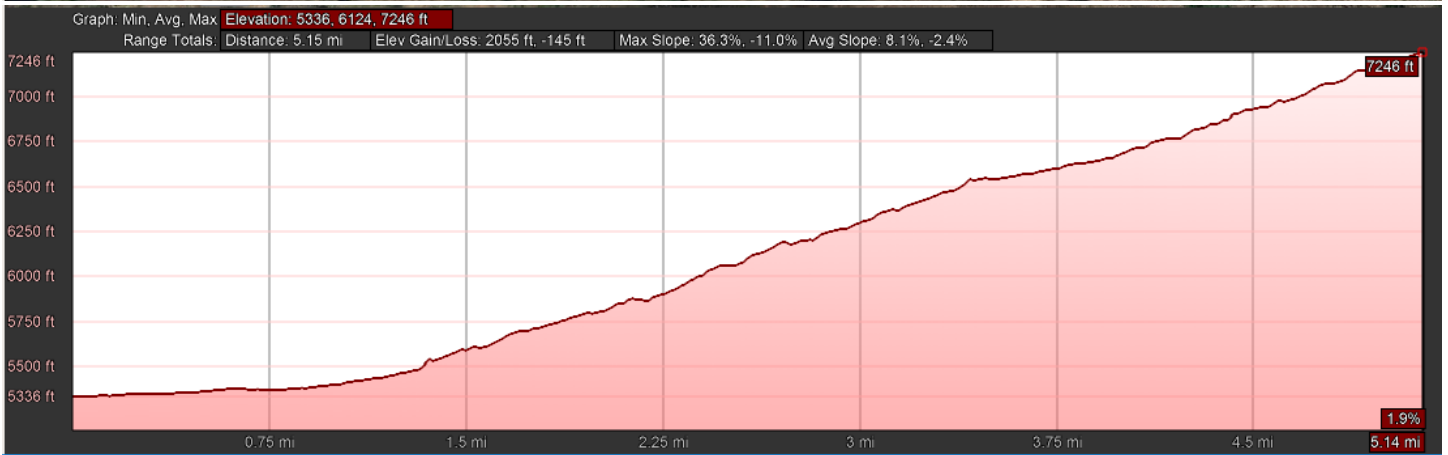
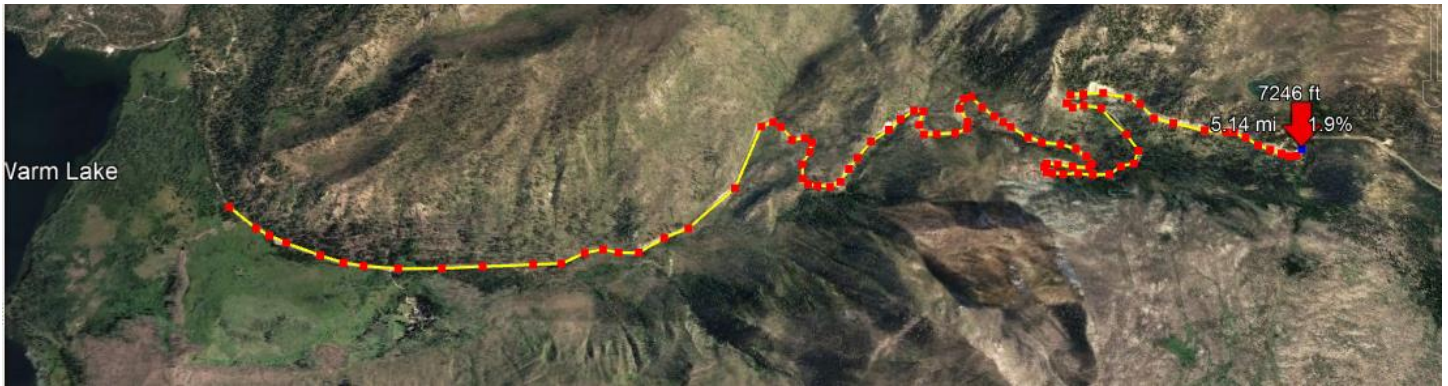


Table - calculated volume: hazardous liquid deliveries during period of proposed Operations using: values and information published in the Plan

Estimated Deliveries during Operations source: Table 12-4			Estimated Deliveries during period of Operations	
Hazardous Liquid	Gallons per Delivery	Deliveries per Year	Years of Operation*	Total Deliveries during Operations
Diesel Fuel	10,000	580	13.5	7,830
Gasoline	5,000	100	13.5	1,350
Lubricants (oils)	3,000	99	13.5	1,337
Antifreeze	3,000	13	13.5	176
Delivery of Hazardous Liquids		792	13.5	10,692

* average of the Plan's stated range of Operations (12 to 15 years)

During the Plan's proposed period of operations, approximately 11,000 truckloads carrying environmentally hazardous liquids would navigate through the precarious 5.1 mile section of transportation corridor described in pages 1 and 2.

Within the Plan (section 12.3), Midas discloses that fact that they experienced a reportable spill in 2012. They do not specify what substance was spilled. Given the much lower volume of transports conducted prior to and since that date, the incident reported in 2012 represents a spill rate per delivery much greater than 1/11,000. Given the high volume of proposed delivery instances which would occur during all weather and road conditions over the course of each year, one or more catastrophic spills of liquids damaging to water quality are inevitable. As noted earlier, spills within the constricted canyon would rapidly flow to Warm Lake and then to the S. Fork of the Salmon River.

Acting within their authority and responsibilities called for under the CWA, the USACE / EPA / USFS are compelled to weigh this information and assess the great risk imposed on water quality in this pristine area by the Plan. The probability of and damaging impacts from spills are supported by information disclosed in the Plan itself. Extensive use of road salt during six months each year threatens water quality of Warm Lake Creek and Warm Lake itself. The DEIS clearly cannot be accepted as drafted, and calls for action to impose restrictions which sufficiently mitigate this risk or a decision to deny the Sec 402 and 404 permits sought by the Plan must be made.

Sincerely,



Joel Drake
10429 West Rockwood Street, Boise, Idaho 83704
October 28, 2020