

IDAHO GOVERNOR'S OFFICE OF ENERGY & MINERAL RESOURCES

BRAD LITTLE
Governor



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JOHN CHATBURN
Administrator

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June 30, 2021

Payette National Forest
McCall Ranger District
102 W. Lake Street
McCall, ID 83638

Re: St. Helens Mine Project Plan of Operations

Idaho supports responsible mineral exploration and development projects that work in a proactive manner to address potential impacts. The Governor's Office of Energy and Mineral Resources was created to coordinate state mineral resource planning due to the historic and important contribution of mineral production to Idaho's economy.

Thank you for the opportunity to provide scoping comments on the proposed St. Helens Mine Project. The following comments were developed in coordination with the Idaho Department of Environmental Quality, the Idaho Department of Lands, the Idaho Department of Parks and Recreation, the Idaho Department of Fish and Game, the Idaho State Historic Preservation Office, and the Idaho Governor's Office of Species Conservation. If you have any questions or require additional information, please feel free to contact me.

The State of Idaho requests the following items be fully analyzed and given due consideration in the project authorization process:

- Impacts of the project to bats, including little brown myotis, and silver-haired bat, which are classified as Idaho Species of Greatest Conservation Need (SGCN).
- Impacts of the project to nesting and breeding raptors, including Flammulated owls and great gray owls (SGCN) which are listed as sensitive species for the Payette National Forest.
- Impacts of the project to Thorn Creek and Little Goose Creek—including dust, stormwater runoff, and transfer of materials which are in the headwaters of the Little Salmon River (an anadromous species-bearing drainage).¹
- Impacts of the project to fish and macroinvertebrates.
- Impacts to water quality and incorporation of BMPs to avoid downstream impacts.
- Compliance of the Plan of Operation with the Idaho Administrative Code (IDAPA) *Rules Governing Mined Land Reclamation* IDAPA 20.03.02.

Sincerely,

John Chatburn, Administrator
Idaho Governor's Office of Energy and Mineral Resources

¹ Idaho Department of Environmental Quality. "Idaho's 2018/2020 Integrated Report".
<https://storymaps.arcgis.com/stories/740e317eebc546d0b3ebbed5419aba79>