Forest Supervisor January 9, 2023

Payette National Forest

McCall, Idaho 83638

Ms. Jackson:

Thank you for the opportunity to provide comments on the Stibnite Gold Project. It is hard to imagine the lapse in time since the DEIS was released for comment, but it is not too much of a surprise. When I reviewed the DEIS, it just never seemed possible for that group of action alternatives to make the grade. The scope of development and the magnitude of land disturbing activities was just too great to make it through the entire process. Please recall that I am unique in terms of commenters given my nearly two decades as the Cascade District Ranger and having worked for Midas Gold Idaho both as a consultant and a public affairs employee and eventually as a member of the Board of Directors. I found the experience gained at these two employment arenas provides me with some valuable insight with regards to this project and this environmental review process.

Consequently, I responded to the initial call for public comments way back when. My comments were directed to provide the foundation for an important analysis done well so that there were no re-starts. While my comments were not fully appreciated by the Company, I was satisfied they might help the process. Unfortunately, that has not been what I have seen unfold. There has been a tendency on behalf of some agency staff to not engage in terms of advice to the Company by pointing out trade-offs and suggesting alternate ways to accomplish objectives. And likewise on the proponent side, there has been a level of frustration based in a large part to a fundamental misunderstanding of NEPA and all the trappings that go with it. I would describe the relationship to have been contentious at some points. Collectively, these elements have made progress challenging. What you have before you now was born of that difficult relationship.

I hard copy mailed my DEIS comments in on 10/24/20 as I had lost internet service. Upon returning from two weeks in Alaska, I checked your public reading file and did not find my comment letter. I recall speaking to Brian Harris about the absence and he indicated it does take some time for hard copy letters to be incorporated into the data base. He indicated that he would look into the matter. I never did hear back from him and am not certain whether it is in the data base at this point. Hence, I have included it with this letter.

The major concerns that I saw with the DEIS was the range of alternatives and the potential for jeopardy biological opinions. In my judgement, the range was far too narrow given the possibilities. The possibilities that exist with this project are not numerous, but are quite different in terms of effects. As I reviewed the SEIS, I arrive at the same conclusion. This project analysis will be subjected to a high level of scrutiny and will most likely undergo litigation. I honestly believe the range of alternatives will not pass the “robust analysis of a broad range of alternatives” test. The sophisticated character of some of the potential litigants is rather daunting and will play an important part of the judicial process. This project cannot move forward without a much improved analysis.

The initial Operating Plan was not put together in an interdisciplinary manner. It was a mine-perfect document with little to no understanding of the other resource values, land uses and stakeholders. That fundamental misunderstanding has contributed greatly to the near 3-year long replanning gap. It is also interesting to note that the three primary authors of the initial Operating Plan are apparently no longer with the current Company.

This project has effects that are beneficial and can be designed to make it thru the environmental and litigation phases. One deficiency that I noted early on when the Operating Plan was being developed was a lack of coordination and consultation with the Cascade District Ranger. Every time I asked the question of the company managers efforts to consult with the Boise NF, the answer was consistent: we are working through the Payette NF. That was difficult for me to understand given that the majority of the powerline and the access road is on the Boise National Forest. I suspect this lack of coordination and engagement has led in-part to the narrow range of alternatives. I hasten to add that recently departed Ranger Strohmeyer did engage on one of the issues, but the mold had pretty well been cast by the time he was able to do so. Fatal error? Not for a moment, but a costly one both in terms of money and time. There is some space between the SEIS and the FEIS to remedy. If you fix it prior to a Record of Decision, it will be a much smaller cost than if The Court(s) rule(s) you to fix it. I emphasize Courts because no matter what the decision of the US District Court in Boise is, it will be appealed to the 9th Circuit Court, which carries the reputation as the toughest in the land.

It is challenging for an environmental impact statement and record of decision to weather the changes that grow out of organizational and personnel changes in the project proponent arena, the agency arena and political arena. One or two changes can often have some huge influence. The Stibnite Gold Project has been ongoing long enough that it has encounted just about every conceivable change imaginable. The USFS changes include the Chief, Regional Forester and the Forest Supervisors on both the Boise and Payette (Responsible Officials) and staff turnover, not to mention the much needed change of contractor for the analysis. The name-change and associated turnover in Company managers has had a major influence on the process. The necessary changes to the proposed action mid-stream was a major curve ball. In addition, a change in the White House is also a factor. It will take a crisp and superb analysis and an A effort document to overcome all that change. Nothing less will suffice in the South Fork of the Salmon River.

I don’t know how you overcome the challenge presented by the quantity of information spread out through hundreds of documents over a span of years. I can only imagine you will continue to receive thousands of “votes” for or against the project. That is good and necessary background noise but it is not substantive and should not enter into the decision. The planning laws and accompanying regulations do not describe this work as referendum in character. I encourage you to enhance the “robust analysis on a broad range of alternatives” so that you are highly informed as the Responsible Official and that the regulatory process can withstand the test of adequacy it is surely going to receive. For example:

1. Develop a design feature that employs the SFSR road as the mine access for the winter months for the construction period of the mine. It completely eliminates the need to construct the parallel snowmobile trail along upper Johnson Creek Road. No short-term effect on existing wintertime recreation. Winter loads during the construction period on the SFSR Road will generally be non-hazardous in nature and consist mainly of building supplies and plant construction products. The SFSR Road offers an all-surface road during the winter months that will minimize potential vehicle accidents and it is mostly located in a low snowfall belt which translates to a lower cost to maintain. Design features such as requirements for convoys with pilot cars all mining traffic on a predetermined and advertised schedule; the fuel depot at the mine site should be full-to-the-rim come December; any use of the SFSR route for hazardous loads would be minimal and restricted to blue bird weather and ice-free road surfaces. The average winter season would be December thru March. The SFSR Road can easily handle that amount of freight and traffic. The benefit to Valley County would be the mining company taking over the cost of wintertime maintenance and the likely use of a motor grader instead of the 1-way plow currently used by the County. Note: the jurisdiction of the road rests with the USFS so a motor grader with a wing could be specified in the Road Use Permit. The additional time could be used to identify an alternative route for the snowmobile trail that might employ the use a portion of the Lunch Creek Road network and other suitable terrain away from the JC Road.

1. Develop an alternative that upgrades the Johnson Creek Road (versus full reconstruction) to provide additional turn outs, passing lanes and include a mining traffic management plan\* that addresses a schedule for inbound and outbound traffic, driver experience, vehicle configuration, and pilot cars. That road moved a great deal of mining traffic in the last burst of mining activity in the late 90’s and early years of the new century. Design features could include paving the road through the town of Yellow Pine; paving or crushed aggregate along areas adjacent to streams and selected areas of dust abatement; reconstruction window for the lower reaches of the road during the winter months. There would be a similar but smaller scale need to upgrade the EFSR Road from YP to Stibnite. The possible development of the Antimony Cut by a separate mining company in the lower Johnson Creek area may be a foreseeable need that may fit well with this alternative. This alternative would provide quite a contrast on costs and disturbance quantities to the Burntlog route. The effects analysis would likely demonstrate a long-term need for a parallel snowmobile route that could be constructed in the same timeframe as the road improvements. In addition, there is time to evaluate alternative locations for the snowmobile route that may employ some of the road system in Lunch Creek and suitable terrain away from the JC Road. This alternative will provide quite a contrast in terms of the number of days it is far too stormy for any mine traffic on any roads in this area. It will likely show that the JC Road route is far more dependable than the Burntlog route that lies partly in the heaviest snowfall belt for miles around this part of Idaho. The deepest snowpack lies along the Pistol Ridge that towers over the Burntlog drainage. Note: I see no mention in any of the documents of the solution that will be employed when the Burntlog road is snowed-shut and unavailable for 5-7 days. The reader must conclude that the only other snow-free route is the SFSR road. This situation can and will occur every winter on more than one occasion.

* A mining traffic management plan must be developed and be included in the environmental review and supporting documents as a design feature. As a minimum, it will address and define the following: vehicle configuration such as triple axel flatbed, semi-trailer, pup trailer that will be used to haul to and from the mine (fuel trucks with pup trailers are not appropriate on these roads). Approved trucking operator standards (you simply cannot have unfamiliar drivers hauling random freight to the mine in over-the-road tractor/trailer combinations). A schedule for pilot car convoys and a predetermined and advertised inbound/outbound schedule. Further if the size of mine site overburden trucks at 200 tons is driving the access road standards to the mine, then the utility of 85 ton overburden trucks needs to be evaluated.

1. There are a couple of alternatives for the location of the electrical service line from the floor of Johnson Creek to Stibnite that deserve a look. The Riordan/Horse Heaven route that was used in the 1940’s certainly was the shortest and was likely selected for that very reason. However, the circumstances we have today should not automatically opt for that route simply because one official at Idaho Power insists they still hold a permit for that location and convinced Midas managers that has to be the location of the line. That war-era line was decommissioned decades ago and there is no existing permit for a power line for that location. Again, lack of engagement by the land manager and the proponent coordinating with the Payette NF.

* 1. One alternative location would be to build the line from Yellow Pine to Stibnite in the EFSR canyon. It is likely many of the tower locations could be accessed with short spurs off of the EFSR Road. The ground disturbance and costs would be quite a contrast to the Riordan route.
  2. A second alternative location would be to upgrade the 138KV only to the junction area of the Thunder Mountain Road (Twin Bridges on the BNF) and then follow a route adjacent to the TM Road to the Stibnite area. The TM Road is in a very depleted condition due to the 2007 high intensity wildfire in the headwaters of the drainage. This road with some reconstruction and rehabilitation work would offer very suitable access for powerline construction and maintenance vehicles. Recall, if the Burntlog route is chosen as the mine access route, much of the TM Road will be upgraded to a 28-foot roadway and that will greatly facilitate powerline access. There is sufficient terrain to locate the necessary switching station/transformer configuration in the in the Twin Bridges location. This alternative would eliminate the 138KV upgrade to the 11-mile line from Twin Bridges to Yellow Pine (as described in the preferred alternative).

1. It is only prudent to look at the decision to feed the upgraded 138KV line from the single line that comes into Valley County from the power complex on the Snake River. Idaho Power’s Comprehensive Study identified the need for a second line into the County that would feed in from the Ola area to the south. If the need for the loop is valid, there is no better time to look at that route in terms of time and cost. The astronomical figure that is being poured into the substation upgrades on the existing line (by Perpetua) is more than enough reason to question the wisdom of the northern route. That is potentially a lot of funding that could be put towards mine site design and mitigation. If nothing else, the disclosure requirement in the NEPA regulations would require the rationale for not opting for the south loop feed. This may seem like a minor detail but it is issues like these that are “eye candy” in the litigation process.
2. It was a bit of a surprise to me to not see an alternative in the SEIS that provided less processing of the ore bodies at the mine site which resulted in a “concentrated slurry” that contains all the various precious metals. During my time associated with Midas Gold, the Company pursued this option in great detail and preliminary results looked promising. The less-processed concentrate would be trucked out of the mine site to be refined in another location. The possible benefits to this alternative may have required less demand for electricity which may have negated the upgrade to 138KV and less processing etc. at Stibnite. It would seem to enhance the range of alternatives if this alternative received mention and consideration. I know sometimes that proponents view NEPA as something that has to be completed rather than a process that analyzes alternatives to quantify effects and help guide the decision process. I’d be curious if this work was ever disclosed to your office.
3. The old nemesis of effects on the social and economic environment has a place in this analysis. It very well may be that it is much more important given the scope and influence this project will have on the local area. The need to have a strong analysis is great. While hard to quantify the effects, there has to be a strong effort to do so. Aside from the effect this project will bring to the business climate in the adjacent area, the effect it will have on local taxing districts must be identified. I do not see a strong analysis on either sector. I am not aware of a high level of coordination and projections of effects between the Company and the various taxing districts. Again, eye-candy stuff. I am certain you will be visiting this portion of the analysis prior to the FEIS and am hopeful you will be successful at bringing it up to defensible status. I might hasten to add that you may be able to do nothing more than identify and disclose the effects simply because you alone cannot mitigate undesirable effects in those sectors.

Ms. Jackson: I don’t bring these points forward to embarrass or put anyone in a difficult position. I certainly do not want to cause you more work. But I think it is imperative that you must improve on the analysis presented. You inherited many of the problems and really cannot fix the history. What matters is having the difficult task of analyzing this project be supported by what the law and planning regulations mandate be done. Thank you and good luck.

RF Julian

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2 Attachments

Forest Supervisor Keith Lannom July 19, 2017

Stibnite Gold EIS

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Supervisor Lannom:

I greatly appreciate the opportunity to comment on Midas Gold’s Operating Plan proposal as part of the Stibnite Gold EIS process. The contents herein are my personal comments and have no connection to any other group or organization. I do hope you get many substantive comments to help guide your analysis of this project.

My comments are centered around my belief that this project has numerous benefits. The source of a scarce mineral, substantial gold reserves, rehabilitation of some past mining activity, job creation and stimulation of a local and statewide economy are the big ones. The accomplishment by Midas pioneers to consolidate the ownership of claims and royalty interests was the key action that changed everything at Stibnite and presents our society with an opportunity here-to-fore unthinkable. It has made it possible to evaluate the combined potential of all the properties and develop a comprehensive plan to extract the resources and accomplish rehabilitation on historic workings. I support this project moving forward with some conditions that may enhance the likelihood of obtaining permits.

I was fortunate to have been the District Ranger at Cascade from 1987-2005. To say I learned a lot about all activities associated with land and resource management in the South Fork of the Salmon River would be an understatement. It is not an easy drainage to manage and get projects through the regulatory process. Easily my proudest and greatest disappointment from a management perspective occurred in the South Fork. The Thunderbolt wildfire in 1994 scorched 27,000 acres of the Cascade and Krassel Ranger Districts. Myself and my staff were given the assignment to develop a post-fire recovery project. That we did and it included salvage logging on a portion of the fire area. We spent countless hours attempting to convince those that opposed the project. We were litigated-won and survived an appeal in the Ninth Circuit Court of Appeals. Other federal agencies did not concur. It finally came to a conclusion 2 years later when the Heads of the Federal Agencies in Washington DC were to make the final determination. To his credit, USFS Chief Jack Ward Thomas, who had taken the time to come to Idaho and review the project on-the-ground, convinced his counterparts this project needed to move forward. That was my proudest day. The most disappointing day came a little over a year later when the Chief lost his job for supporting his managers.

The group of managers at Midas is a solid crew. They do care about trying to do the right things to get this project permitted. If they have a shortcoming, it might be inexperience with the South Fork and some elements of the regulatory process. That said, I have some reservations about some of the items in the Operating Plan. I expect the analysis of the proposed action to show undesirable effects or unacceptable risk for those elements. The biological consultation process is going to be a very difficult avenue to navigate and likely will result in a jeopardy opinion. That will make it difficult for the Operating Plan to move forward and could subject the decision to litigation. In addition, there is some popular belief that in this current political climate, problem maker government employees will be fired or transferred. This project cannot succeed if either a jeopardy opinion or purging employees occurs.

The use of a third-party contractor to do the EIS analysis has distinct advantages and disadvantages. It will save your staff a lot of time and allow the project to stay on the timeline. However, I don’t feel the contractor has a high level of knowledge of the ground. It is going to take a lot of time on your part to proof their work. And it comes at a time when fire season is just beginning.

So, what to do? It will take a lot of effort to develop a range of workable alternatives that are responsive to the issues. The alternatives cannot be superficial. They must be very viable and be ground-truthed and tested. The Company and the stakeholders need to be engaged. I suggest this is where you should spend the bulk of your time early on. Such will then make it possible to have a solid range of alternatives to weigh against each other. The analysis must be robust. This project will result in two unclaimed mining pits, the loss of a historic access road, a waste rock dump, and a tailings pond that will remain after mining. Restoring fish passage, processing tailings, retarding sediment from Blowout Creek and environmental cleanup may not be sufficient gains to get it permitted. The reconstruction of the Burnt Log and Thunder Mountain roads, a bigger powerline corridor off-site and the short-term loss of a snowmobile trail add a whole dimension to what needs to be approved.

It is important to remember that both the Johnson Creek and East Fork drainages have experienced a significant amount of high intensity wildfire in the last decade plus. Streams and lakes have received large contributions of sediment from runoff events where the fires occurred. The most striking example of this condition is the roughly 250 cubic yard sediment plume at the inlet/tail waters of Riordan Lake. In addition, the upstream reaches are plugged with new sediment deposits. The point needs to be made that some of these watersheds are severely stressed and fragile. Management activities such as road building and powerline construction will generate a new source of sediment. We must be mindful of the effects on aquatic species and take all reasonable measures in an attempt to avoid a jeopardy determination.

Elements of the proposal that I encourage you to explore for alternative development are:

1. The design standard for the Burnt Log and Thunder Mountain roads needs to be questioned. It is a major undertaking. Can a single lane road with turnouts along with managed industrial traffic (in-bound/outbound schedule, pilot cars, single company transporter) provide a significant safety dimension to a lower standard road? Construction costs would be less, the number of detrimentally disturbed acres would be less and the small drainages of Trapper and Riordan Creeks would be less effected. In addition, there is a lot of rock in that part of the mountains, but much of it is incompetent in terms of hardness for a road running surface. Borrow sources need to be proven to the desired hardness or basalt based gravel must be imported.
2. Extending the powerline to very near the Town of Yellow Pine appears excessive. There is a lot less ground disturbance and clearing if the switching station/transformer was located just downstream of Ditch Creek and the mine powerline were to exit the Johnson Creek valley floor near the intersection with the Thunder Mountain road. This would also have an added advantage of having the access road and powerline corridor in close proximity to one another. It avoids all the clearing, road building and ground disturbance in the Horse Heaven area. Locating the powerline where it was for the WWII era simply because that is where it was last time is weak rationale.
3. It is also confusing as to why the feed for the powerline comes from Lake Fork. The logic employed by Idaho Power in their Future Facilities Forecast seemed to be that there was great utility in feeding in a second 138kv line to Valley County from the High Valley area. If society is going to invest a lot of money into power for this project, it should be done with the greatest gain in mind. Not choosing the south feeder line because it will take too long is like saying we don’t have time to do this right. I think we owe it to all the rate payers in Valley County to have the most reliable infrastructure set-up, even if it takes longer.
4. Construction of a parallel snowmobile trail from Trout Creek to Landmark to serve recreation traffic while the Johnson Creek road is used for 3-5 years for mine construction isn’t a realistic approach. The impacts from that construction could be avoided. There will be some loss of recreation opportunity that cannot be avoided.
5. The investment and associated effects as a result of pioneering a new access to Stibnite along with the powerline/corridor for a mine life of 15 plus years will be improvement that deserves strong consideration to be treated differently than an automatic removal tag post mining. Returning the Thunder Mountain road to its present condition would be a step back and result in a whole new round of sediment. The value of a good standard road to the Thunder Mountain area needs to be given fair consideration. I urge you to look at this alternative. Perhaps the final resolution on the powerline and road would be best if left up to the management scenario and managers present in 2030-35-40. Who is to say this will be the last mining activity in the historic Stibnite Mining District?
6. I believe it would be very desirable to develop a construction schedule and forecast that identifies the sequence of construction that must occur to reach the build out of the mine project. Such a schedule will go a long way to avert conflicting activities and rapid development that so often bring unnecessary resource impacts and social issues. For example: it would seem prudent to avoid road building and powerline construction at the same time within the same drainage in order to minimize sediment contribution and congestion.

If this project can be designed to reduce the effects to the minimum so the Company can do the necessary work in a safe and prudent manner, then the positive benefits are within reach. Once the mine site work is obtainable, there will need to be a lot of work accomplished to collaborate with cities, towns, schools and taxing districts to lighten the impacts that this level of growth will bring.

Thank you.

Ronn Julian

COMMENTS ON THE STIBNITE DEIS October 24, 2020

Supervisor Jackson:

The draft DEIS for the Stibnite is a great start and a notable accomplishment given the events that have transpired over the last three years. However, in my judgement, it will take additional effort to address some deficiencies in the analysis/document in the short span of time remaining before a FEIS is released. The prudent choice is to muster the resources necessary to produce a document that will stand the test it will surely receive. Any effort less than that will very likely result in a re-do. And I submit that will be wholly unacceptable.

In the early stages of this proposal, I felt there was a strong likelihood that Midas would be successful at producing a plan that would be acceptable to the multitude of interests in the South Fork. If you read my initial comments on this project, my optimism shows as well as my suggestions to be very diligent to give strong consideration to the company proposal but also equal consideration to alternative actions that may result in a different environmental effect while still enabling the mining proposal to move forward. A broad range of alternatives adds to the overall strength of the analysis and aids in bolstering confidence in the decision process. I fully expected that the analysis would demonstrate a strong environmental justification for adjusting the company’s proposal in order to lessen the environmental effects. After review of the DEIS, I am concerned that is not the case.

The four action alternatives do not constitute the broad range of options available to the decision-maker on this project. I can only speculate that the most plausible reasons for this development is an incomplete familiarity of the physical and biological resources along with command of the recent mining industry history within the project area.

I do not see any of the DEIS action alternatives escaping a jeopardy biological opinion. That is a red flag. There are similar effects for all four. Another red flag. The similarity of effects is a clue that the range of alternatives is too narrow. The level of coordination between the agencies is commendable and appropriate. Thus, It would not be surprising to see the existing narrow range analysis effort proceed through the regulatory process with no changes simply because of the level of support and ownership in the range of alternatives. Another red flag. Therefore, I strongly caution that the regulatory process is not the ultimate test.

I was wrong on my initial prediction concerning possible litigation. This project will be litigated. The litigants will be overly-determined to stop this project. The narrow range of alternatives will creep into their argument. A jeopardy opinion coupled with a narrow range of alternatives is a combination I encourage you to avoid in the Nineth Circuit. I caution any project to position itself of relying on an attorney from the US Attorney’s Office explaining why the USFS did not consider xyz alternative.

Given the current trajectory displayed in the DEIS, the path I see going forward will result in a mandate from the Court to provide additional analysis including other alternatives in a Supplemental EIS. I encourage you to avoid that scenario at all costs. I trust your experience and judgement will lead you to that conclusion, but know that I would be very supportive of that pathway because of what it means to this project.

There has never been a time when decision makers have benefitted from the level of data and information currently available for the Stibnite project. Much of that credit goes to Midas. The consolidation of ownership is the most significant happening that mining district has ever undergone. It has presented an opportunity to look at the area’s resources in a comprehensive fashion. The company has done an incredible job at identifying the mineral resource. Baseline data and sampling efforts have never been so complete. The company has demonstrated a willingness to attract resources to the project for the long haul. The values to be gained are many. This large and complex project deserves a robust evaluation so it can stand the test of litigation.

Comments specific to the No Action Alternative

This is likely the most important alternative in the analysis. It needs to be much more than a required alternative. It clearly needs to identify the likely effect of not choosing an action alternative. It clearly needs to portray the recent events that have led to the opportunity available to make substantial progress on legacy issues. Stibnite has languished for a number of decades with insufficient progress to address legacy environmental issues. There is a chance that some of that work can now be chiseled away with an associated mining project. This alternative must clearly show what scenario might develop should the project not receive regulatory approval. This alternative also must be flagged as out-of-reach of the decision maker and the rationale given as to why. It is my observation the environmental description of the No-Action Alternative does not leave the reader with a good picture of the situation. Writer/Editing will cure this impression.

I am sorry but I was not able to determine if the effects analysis is partitioned so that the various components can be selected in the final decision making. If they are, great. If they are not, I would encourage that be done. In addition, I reviewed the alternatives considered but not developed, my impression was that portion of the analysis appeared to be dominated by alternatives dealing with a shop/storage facility for the snowmobile grooming program. If that section accurately reflects the alternatives that were considered but not carried forward, I suggest that further points out misplaced effort to consider reasonable alternatives to the proposed action. The various action alternatives include various components from a long list of choices. Without identification of the agency preferred alternative in the DEIS, it becomes a little daunting to really sort out what the final selection might be. Consequently, it becomes very difficult to address comments specific to the alternatives.

The alternatives menu that I suggested in my scoping comments covers the options that I could see at the time, but is worthy of mentioning again. These include:

1. An alternative that features the mine access road (from Landmark RS to Stibnite) standard to consist of a single lane road with turnouts complete with managed industrial truck traffic (pilot cars, convoys, inbound/outbound schedules, public closures as deemed necessary, single company logistics transporter). This alternative involves a much smaller amount of construction/reconstruction of existing roadway, is less costly, require less time, and proved very valuable during the 1990’s mining activity. The environmental effects of this approach would be a striking contrast to the two existing Alternatives in the DEIS. Note: There are no more important factors in any mining activity of scale in the back country than mining traffic procedures and protocols. This has been displayed over and over again. After three fuel spills involving 3 transport vehicles delivering fuel to the mines in the late ’80’s and ’90’s, the protocols developed at that time have proven to be tremendously effective at minimizing accidents. It is irresponsible to not regulate this particular activity to a high standard. Otherwise, the door is open for transport drivers who have no familiarity with the roads delivering loads on trucks designed to work on-highway.
2. An alternative that routes the powerline to the corridor adjacent to the Thunder Mountain Road to Indian Point and down the adjacent ridge to Stibnite. This location would require substantially less new road construction than the Hennessy Meadows/Horse Heaven route proposed in the DEIS. It would result in long overdue and needed improvements to the Thunder Mountain Road to mitigate multiple sources of road deterioration and sediment production. The degree of improvements would be dictated by the decision between Johnson Creek and the Burnt Log main access routes. This alternative would result in a net reduction in 138kv line upgrade.
3. There is a void in the analysis with regard to the power feed not being consistent with the Power Company Long Range Power Study.
4. An alternative that employees the use of the SFSR Road as the winter access for mining traffic during the project construction period. There are a number of desirable effects to considering this action over what is proposed in the DEIS. The attempt to maintain winter snowmobile traffic with a motor grader wing snow berm is not viable.
5. The final decision should defer any road decommission efforts to the conditions that exist post-mining. Improvements made to the Thunder Mountain Road to accommodate either the powerline or the haul route to the mine should be intended as permanent until such time it can be demonstrated that the road is no longer needed.
6. I would hasten to encourage you to consider an alternative to maintain historic access to the area east of the project that would follow the Sugar Creek route. This road would undoubtedly be in need of considerable upgrade to make it usable but to also address existing drainage inadequacies and resulting sediment production. There are some desirable benefits to not routing public traffic through an active mine as well as avoiding more land disturbance within the mine proper. Exposing some of the legacy issues in that drainage may also enhance the opportunity to obtain funding for cleanup (which is long overdue).

I noted in my review of the DEIS the map appendix displaying the “Existing Winter Routes East End” illustrates the Burntlog road as an OSV route. This route was a historic route but is currently no longer an approved route.

I offer these suggestions with the full-on intent to make this Environmental Statement as good as it can be to withstand the test that is about to come. I have spent the better part of three plus decades working and playing in this project area. While no activity can be risk free, this project can be completed only if it surpasses the test of environmental review. At this point, I would say you are only part of the way there. The remainder of the way is in reach, but it will take a renewed effort to make it. Thank you.

Ronn Julian

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