Linda Jackson

Payette National Forest

McCall, ID 83638

January 9, 2023

Re: Stibnite Gold Supplemental Environmental Impact Statement review comments

To the Forest Service,

Thank you for this opportunity to provide comments on your Stibnite Gold Project Supplemental Environmental Impact Statement (“SDEIS”). I appreciate the time, effort and coordination required to refine the project to this point but feel there is more improvement necessary. Please recognize that most mining projects of this scope have many iterations and modifications to get to an acceptable level for implementation and this proposal still has a way to go.

As a resident of Valley County for nearly 30 years engaged in ecological issues, I urge the Forest Service to deny approval of this proposed mine by choosing the no action alternative for the following reasons:

* Permanent destruction of the upper Meadow Creek valley by the construction of the tailings storage facility;
* Risks to the upper East Fork South Fork Salmon River by diverting natural waterways into pipes or tunnels for unknown lengths of time thereby altering natural processes;
* Choosing a narrow range of alternatives without analysis of different mining operations;
* Adverse effects to threatened species: whitebark pine removal along the proposed Burntlog route, destruction of bull trout habitat by draining the Yellow Pine pit with unspecified locations for the displaced fish to go, increased temperatures in the river for all threatened salmonids;
* Unacceptable air quality monitoring boundary;
* Unvalidated mining lode and millsite claims which brings the outdated 1872 Mining law into question as the basis for the purpose and need of this proposal;
* Permanent loss of vegetation and soil productivity in the proposed project area;
* Unproven and unrealistic restoration practices in the Reclamation and Closure Plan such as expectations that the riparian zone will actually provide shading enough to cool streams within 100 years;
* Lack of climate change analysis throughout all aspects of the analysis in the SDEIS thus underestimating effects. There needs to be a quantification of reasonably foreseeable Greenhouse gas(GHG) emissions (including direct and indirect emissions) of the proposed action, the no action alternative, and any reasonable alternatives.[[1]](#footnote-1) There has been no disclosure of the GHG emissions and climate impacts associated with the 2 action alternatives and the no action;
* Unmitigated loss of wetlands and fens. The fens along the Burntlog road near the Landmark end are irreplaceable and rare landforms that need preservation;
* Insane increase of county taxes for Valley county residents;
* Questionable assumptions in most of the models, long-term predictions should not be used with much confidence;
* There is not enough water in the upper East Fork South Fork Salmon River watershed to support this water-intensive ore processing facility even after the undisclosed, necessary water quantity is revealed;
* Adverse impacts to wolverine habitat, especially sensitive denning sites will cause these rare mammals to relocate out of the upper Johnson Creek watershed;
* Rare limber pine in the project area along the proposed Burntlog route will be altered and individual trees could be destroyed;
* Vegetation in the transmission line right of way, along the new proposed Burntlog route and in the mining operations area will be severely and mostly permanently eliminated;
* Access to the Federal lands in and around the proposed project will be curtailed for over 14,000 acres or 22 square miles;
* The Payette and Boise Forest Plans project-specific amendments change the desired conditions direction in a negative, downward trend in perpetuity;
* Water treatment of contact water could be warranted in perpetuity (is that why Midas changed their name?);
* Lack of sufficient growth media (dirt) to accomplish reclamation plan. The idea of transporting cow manure to the site would greatly increase GHG emissions;
* The SODA contact pond below the tailing storage facility indicates a wet area to place an enormous embankment and buttress;
* Recreation as hiking, kayaking, camping, fishing, birding and hunting will all be directly and indirectly impacted negatively due to the visual, noise, traffic, vibrations from blasting and air quality from the lime plant spew;
* Risk of a chemical spill along the waterways including the riparian conservation areas is too high for threatened salmonids, aquatic organisms;
* Because irreversible and irretrievable impacts will occur to the fisheries. These include but are not limited to: direct mortality, incidental injury, temporal (more than 100 years in certain stream reaches) and permanent (upper Meadow Creek) loss of critical habitat, decreased suitable and designated critical habitat for steelhead, blockage of fish passage, decrease in thermally suitable habitat, permanent displacement of individuals, and net decrease in productivity;
* The SDEIS does not address traffic, housing, hospitals, schools, fire, police and other essential services in Valley County or Idaho;
* Antimony is way overplayed as an important byproduct of this proposed gold mine and the low-grade of the ore is not address nor is the transport beyond the Warm Lake highway. Antimony at the historic Stibnite site is not the only domestic source in the United States. Other gold mines have stockpiles of the mineral, but it has not been economical to process nor is there any refineries in the country. There are currently no processing facilities in the United States, so where would this concentrate be shipped to and how? The lack of analysis of the greenhouse gas emission from the transport of the supersacks of concentrate is a critical void in the climate change consequence in Chapter 4 of the SDEIS. A recent document by the Council of Environmental Quality interim guidance[[2]](#footnote-2) needs to be addressed in the final Environmental Impact Statement. This will make a substantive difference in the overall effects of this huge industrial proposal on the environment;
* A minority of Idahoans want infrastructure upgraded in the backcounty, that is why it is called the backcountry. The inventoried roadless areas and research natural area need to be left untouched as well, they are the buffer to the wilderness;
* Lack on any analysis on important species such as Pacific lamprey, mountain goats, Western pearlshell mussels. The access roads will have a negative human-induced effect on this sensitive species that need protection as their loss in the Johnson Creek subwatershed would be irreversible and irretrievable;
* The fact that opening up a new road with the Burntlog access route would have profound and irreversible impacts on inventories roadless areas and the Frank Church River of No Return Wilderness area.
* There is no guarantee the fish tunnel will work for reconnecting fish to spawning grounds, the fall back mentioned in the SDEIS is the trap and haul method, which is non-ideal;
* There were no analyses of downstream effects to the fisheries below Sugar Creek in the East Fork South Fork Salmon River, especially water temperature, water quantity and water quality; and
* Water quality will be decreased for at least 20 years during construction and operations. This is a big deal for aquatic organisms, human health, and downstream effects.

NEPA is designed to promote consideration of potential effects on the human environment[[3]](#footnote-3) that would result from proposed Federal agency actions, and to provide the public and decision makers with useful information regarding reasonable alternatives[[4]](#footnote-4) and mitigation measures to improve the environmental outcomes of Federal agency actions.

The following mitigation measure should be entertained by the Corps of Engineers for their pending 404 permit application: Fund, partner, engage, and/or implement removal of the four Lower Snake River Dams. Experts—ranging from Northwest US biologists, to Tribal scientists, and the Corps of Engineers—agree that the science is clear: the best way to ensure salmon restoration is removal of the four lower Snake River dams. It is the foundation of salmon recovery measures in the Columbia Basin (NOAA 2022, Rebuilding Interior Columbia Basin Salmon and Steelhead).

Sincerely,

Robyn Armstrong

1. See CEQ, GHG Tools and Resources, <https://ceq.doe.gov/guidance/ghg-tools-and-resources.html> . [↑](#footnote-ref-1)
2. CEQ–2022–0005. Fed. Register 1/9/2023. Vol. 88, No. 5. National Environmental Policy Act Guidance on Consideration of Greenhouse Gas Emissions and Climate Change. [↑](#footnote-ref-2)
3. 42 U.S.C. 4331(a) (‘‘[R]ecognizing the profound impact of [human] activity on the interrelations of all components of the natural environment . . . .’’). [↑](#footnote-ref-3)
4. 40 CFR 1501.9(e)(2) (‘‘Alternatives, which include the no action alternative; other reasonable courses of action; and mitigation measures (not in the proposed action).’’). [↑](#footnote-ref-4)