Valley Soil and Water Conservation District
209 N. Idaho Street, Cascade, Idaho

October 18, 2024

Payette Forest Supervisor Matt Davis
matthew.davis@usda.gov
RE: Stibnite Gold Project EIS #50516

Dear Payette Forest Supervisor Davis;

The Forest Service has recently issued a Final Environmental Impact Statement and a Record of Decision for the proposed Stibnite Gold Mine. The mine lies within the jurisdiction of the Valley Soil and Water Conservation District. As supervisors of the district, stewards of the soil and water and elected officials we feel it is our responsibility to express our concerns for the project. Our concerns are as follows:

Water Quantity

- We are concerned about the amount of water needed by the mine and how it will affect public waters, including streams, seeps and springs that may be eliminated because of the pumping of surface water and groundwater.
- Critical wetlands, riparian areas and groundwater dependent ecosystems may be severely impacted by mine dewatering.
- There is a need for a quantitative analysis of the impact of pumping large amounts of groundwater including possibilities of pollution.

Water Quality

- As was stated in the FEIS there will be significant impacts to surface water quality in both the short and long term.
- Regarding the movement of mine polluted waters into both ground and surface waters: It is inadequate to assert that BMPs can address pollution impacts.
- We are concerned that the water quality monitoring to describe existing conditions of surface waters crossed by access roads is too vague, too general, too qualitative , and inadequate. It cannot provide the baseline water quality data to characterize streams that have potential to be very impacted by sediment, dust and airborne toxins. All of

which will have significant impacts to aquatic life and the health of the streams. Without this data it will be impossible to determine potential impacts.

- A TMDL may be required for all 303 (d) listed streams including the East Fork of the South Fork . Where TMDLs are already developed no impairment should be allowed.
- The Forest Service is required to demonstrate that the mine will comply with the Clean Water Act, and cannot defer this obligation to another agency.

Invasive Weeds

- Constructing 75 miles of new transmission lines, building new SPG facilities, construction, and 15 years of maintenance on the Burntlog route will increase opportunities for introduction of non-native plants . The Forest Service needs to reexamine its BMPs and extend monitoring for noxious weeds throughout the life of the project, in all areas of disturbed soils and vegetation including closure and reclamation.
- Concrete measures to reduce or prevent the spread of noxious weeds is necessary and great care needed to ensure weed spread is minimized.

Sediment

- We are concerned about the release of sediment and other pollutants that will be discharged from road culverts and along access roads. These may be considered "point source" pollution and consequently would have to be covered by a permit.
- The estimation that sediment from the Burntlog road to Burntlog Creek would increase from 13,450kg./year to 40,306kg/year and last 25 years until reclaimed would certainly have an impact downstream.
- The mile and a half of soil nail wall proposed for the Burntlog Road on porous old granite soils is a risk and the failure would be a severe impact to streams.

Reclamation

- We are concerned with the possibility of failure with the reclamation. The lack of available soil is a challenge combined with the poor quality and arsenic concentrations of soil that may be used. We are concerned with the potential impacts to surface and ground water due to metals leaching. The EPA raised concerns about impacts to water quality with soils that had elevated concentrations of antimony , arsenic and mercury. In addition the lack of good soil would delay any rebuilding of riparian banks on impacted streams leading to more rise in water temperature.

- A financial guarantee is needed to protect clean water and fish. We are concerned about the cost to taxpayers and the impact to the environment if the bond is insufficient to cover mine reclamation closure. The EPA and others raised concerns about the lack of a transparent process to determine the financial assurance bond for the mine. Public disclosure of the methods the FS is using for calculating the financial assurance bond and a chance to review it by the public would be appropriate, especially considering the need for long term water treatment.

Climate Change

- Climate change will change precipitation amounts and timing and that will strongly affect water balance, water quality and water availability. Yet climate change was not considered in any meaningful way in forecasting impacts from the mine or in designing mitigation. It is no longer accurate to use the past climate record to predict future climate conditions. Data/analysis of climate change forecasts were readily available but not used in the FS analysis. This could lead to mitigation failures and safety concerns. For example, climate change may require mine facilities to be redesigned to withstand larger storms to avoid overtopping and the movement of toxic waters into surface and groundwater. In addition climate change will have an impact on any attempts to revegetate the site as well as erosion and sediment generation.

- Given the urgency of climate change and NEPA's important role in providing critical information the FS should incorporate CEQ"s recent guidance (Jan. 9, 2023) on climate change and analyze the mine's projected impacts and mitigations with appropriate modeling that accounts for climate change.

Thank you for reviewing our comments and concerns,

Art Troutner, Chairman
Valley Soil and Water Conservation District