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Title:

Comments: This letter is in response to your June 2, 2017 Notice of Intent to prepare an Environmental Impact Statement, and subsequent request for scoping comments on the proposed Stibnite Gold Project. Thank you for providing the Corps of Engineers (Corps) the opportunity to provide early comment. According to the information provided, and available to the Corps, we have compiled an initial summary of comments specific to the project as proposed within the Plan of Restoration and Operations (PRO), and in relation to our subject matter expertise and regulatory authority.

Our comments are separated into the following topics to address preliminary issues identified within Appendix F and G in the PRO: Proposed impacts within a Waters of the United States (WOUS), Compensatory Mitigation, and Proposed Alternatives.

Proposed impacts within a WOUS:

Comment 1: The anticipated impacts as described in Table 3-1 of Appendix F of the PRO, only describes direct impacts from construction of the operational facilities and associated infrastructure. The analysis should also include an evaluation of any potential secondary impacts to a WOUS that might occur from alterations in groundwater and/or surface water management and usage.

Comment 2: Impacts by facility listed in Table 3-1 of Appendix F of the PRO, appear to assume all WOUS within the facility boundaries will be impacted. The evaluation should include a review of what avoidance and minimization may occur within facilities to further reduce overall project impacts. For example, the Stibnite Lodge Facility lists a total of 1 acre of impacts. Are there alternative alignments or design changes such as additional levels to the complex that can further reduce or avoid a WOUS?

Another example would be the Reclamation/Stockpile/Borrow area within Meadow Creek Drainage. Impacts are expected to include 12.3 acres of wetlands. Area there alterations to the layout and/or sequencing which could further reduce overall project impacts.

Comment: 3 Table 3-1, of Appendix F, Subheadings East Fork South Fork Salmon River and Midnight Creek each identify a 0.1 acre PEM impact from the construction of the West End Pit Haul Road to the primary crusher. Is this the same impact counted twice? If they are different impacts, we suggest changing the naming convention to reduce confusion.

Comment 4: Table 11-2 of Appendix F, identified an impact in Rabbit Creek of P-29 and I-51. Discussion in Section 6.13 states the only impact to Rabbit Creek would be the installation of a single culvert associated with the construction of the access road. The stream cannot be both perennial and intermittent at the same location, this needs to be clarified. In addition, clarification is needed for why this loss is not being mitigated.

Compensatory Mitigation:

The Corps is aware and has been a part of the continued discussions regarding changes in the Mitigation Strategy as proposed in the PRO. The Corps expects the final mitigation plan to fully compensate for the loss of both open water, and wetland functions, as outlined in 33 CFR Parts 325 and 332, and to explain in those situations when no mitigation is being proposed to compensate for losses.

Comment 5: Table 6-1 of Appendix F of the PRO describes proposed mitigation sites by feature. As proposed,

the Tailings Storage Facility constitutes a large portion of created wetlands for compensatory mitigation, however given the need for operational and long term water management of this facility, how will these features be sustained to the extent described? This example can be carried to other proposed mitigation sites. The Corps expects the mitigation strategy, and subsequent plan, to address and include how the proposal will be accomplished in relation to spatial, operational, safety, and/or other regulatory requirements or restraints.

Comment 6: Table 11-2 indicates that no mitigation is being proposed for impacts to stream channel on Burntlog Creek; Riordan Creek and Sand Creek. Culvert installation on these streams total a loss of 2,955 linear feet of perennial channel and 4,615 linear feet of intermittent channel. The analysis needs to address the reason for not mitigating for this loss.

#### Proposed Alternatives:

Comment 7: The alternatives analysis as described in Appendix G, describes multiple processes for Tailings Dewatering Technology. What relation does the method of dewatering have to the TSF footprint (Embankment Height, Volume, Spatial Extent), and would an alternative process such as the Paste Tailings reduce impacts to a WOUS, specifically the PFO wetlands in the upper reaches of Meadow Creek.

Comment 8: The DRSF for the Yellow Pine Pit, as proposed in the PRO, is located within the Fiddle Creek Drainage, and the West End Pit DRSF is located within the West End Drainage. Criteria considered for placement of the DRSF include but are not limited to, haulage profile (500 vertical feet), handling (Cost), and distance from source (1 mile). The West End DRSF appears to meet this criteria in part for development rock from the Yellow Pine Pit, and the Yellow Pine DRSF appears to exceed these criteria in part for certain locations. Given the general proximity of these features to each other, what is the ability to consolidate DRSF's to limit impacts within each drainage, specifically what is the potential to consolidate the Fiddle DRSF in the West end Drainage? Is it practicable to split haulage routes to reduce the impacts, and better meet the described criteria (east side of the Yellow Pine Pit to West End DRSF)?

Comment 9: The PRO describes the need to limit rehandling of development rock to meet project purpose and need. Given the criteria for DRSF listed in the PRO, the Corps expects a review of potential rehandling opportunities that may meet other criteria such as Maximizing Restoration Opportunities and Area of Previous Disturbance. Specifically the Corps would like the proponent to address the feasibility of backfilling all or part of the West End Pit with the West End DRSF. This action would meet in part, certain criteria such as empty trucks moving up gradient, close proximity to pit etc., and would allow for less open water and maximize wetland restoration potential. In addition the Corps would like the proponent to address the potential to partially backfill the Yellow Pine Pit with the Meadow Creek DRSF. The Corps acknowledges the intended multipurpose as a buttress to the TSF impoundment, however the Corps expects a further evaluation to determine if a minor slope or volume reduction would affect the safety of the design. The potential reuse of the DRSF may have the same benefit as described above, and result in a reduction to permanent loss of functions and values.

Comment 10: Appendix G, Page 20, Footnote 7, is incorrect. The Corps provided an Approved Jurisdictional Determination for WOUS and adjacent wetlands identified within the project impact area. The Corps did not make a jurisdictional determination for WOUS or adjacent wetlands for waters within the project area that would not be affected by the project. The Corps provided a Preliminary Jurisdictional Determination for waters of the United States and adjacent wetlands identified with the various access roads and power line alignments. The jurisdictional determination for the logistics center is pending.

Thank you for the opportunity to comment. If you have any questions or need additional information regarding these comments, you can contact me at (208) 433-4470, by mail at the address in the letterhead, or email at [christen.m.griffith@usace.army.mil](mailto:christen.m.griffith@usace.army.mil).