



*West Mountain Snowmobile Club*

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P.O. Box 959 Cascade, ID 83611

Payette Forest Supervisor Linda Jackson

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500 North Mission Street, Building 2

McCall, Idaho 83638

Ms. Jackson:

On behalf of the West Mountain Snowmobile Club I offer the following comments on the DEIS for the Stibnite Gold Project. This is obviously a very large and complicated project. There are a host of considerations to be evaluated and considered. Our comments are focused on the winter access for snowmobile users in the Landmark/Johnson Creek area.

It is not easy to review the specifics that surround this issue given the volumes of information contained in the DEIS and supporting documentation. If we have missed something or interpreted critical points incorrectly, please know that is not intentional.

During construction of the mining facilities, access to the mine site would be on Warm Lake road to Landmark and down Johnson Creek road to Yellow Pine. These two sections of road have been the wintertime snowmobile route for decades. Snowplowing to provide for wheeled vehicle access for mining related traffic will disrupt and eliminate snowmobile trail use.

The effort to relocate and provide for that snowmobile use is appreciated. However, the only thing worse than an environmental impact that eliminates a traditional use is a mitigation measure that is poorly designed or not well thought through. We are strongly suggesting that is the case with the proposed mitigation of a "temporary 7-mile OSV route adjacent to Johnson Creek road".

Providing an OSV route along that section of roadway is much more complicated than leveling the snow berm with a wing on a motor grader. The trail as a minimum, needs to meet some critical safety considerations to avoid accidents and injury because a groomed system trail is used by riders of all abilities-beginners to expert. It is not possible to shape and maintain a trail in this location that has consistent, sufficient width and smoothness using a grader mounted wing topping the snow berm. For example, culverts and bridges do not generally allow for build-up of a snow berm that

can be leveled which will necessitate the snowmobile user to exit the berm to the road surface, cross the bridge/culvert and then jump back up on top of the berm. This maneuver is ripe for snowmobile accidents. In addition, the DEIS gives the reader a general impression that snow removal on the mine access route will be accomplished using motor graders with wings. Our observations over the years is that technique will not always be possible at all times and in all locations. There will be a need arise when a motor grader cannot move the volumes of snow back with a wing and a rotary plow/blower is the only option. The result of rotary plows is usually a large vertical cut on the roadside of the berm. This vertical cut spells danger for a leveled berm trail perched on top to users on snowmobile. Anyone who has observed snowfall accumulation in Johnson Creek will quickly point out the vicinity of Sheep Creek grade is the one section of the southern end of the Johnson Creek road that accumulates the greatest amount of snow during storm events which will make use of the blower more frequent.

The proposal to relocate the winter snowmobile access to the Cabin Trout road for the both the operational phase of the mine and the construction phase of the mine needs to meet some basic requirements. Without these considerations, it becomes easy to fall victim to designing a mitigation measure that will be ineffective. If these measures are not addressed prior to placing this route into the groomed network, damage to equipment and safety of users will be compromised. The following criteria are what we would suggest be used in this situation:

1. The Cabin/Trout route needs considerable upgrade prior to being used as an OSV route. Stream and water crossings need to be piped or bridged to eliminate reliance on snow bridges that either do not develop or are subject to melt out or collapse.
2. Numerous large rocks that have been side cast during the construction and maintenance of this powerline access road need to be pushed back to provide sufficient width for safe passage of both grooming equipment and snowmobile riders.
3. Several powerline tower structures need to be designed to accommodate safe passage of the grooming equipment so that sufficient clearance is afforded in each location. A half dozen or so existing towers and guy wires offer considerable obstacles to movement and safety of equipment and users. Design must take into account that the groomer will be operating on top of 8-12 feet of snowpack.
4. Large rock formations on the Trout Creek side need to be monumented to alert groomer operators to their location enabling the operator to avoid them. Design must take into consideration that 2 plus feet of snow can mask hazards thus necessitating monumentation.
5. There must be isolated patches of brush clearing completed so that brush does not interfere with grooming operations.
6. A technical survey to locate potential avalanche run out zones along this route must be completed during winter season and any potential zones need to be signed on the trail during the use season.



7. In addition, the exact location of a temporary OSV trail along Johnson Creek road must be determined on the ground prior to adopting this mitigation. The running surface of the trail must closely meet what is currently offered on the Johnson Creek road. The trail must be cleared of standing and downed trees, stumps must be flush cut and rock hazards removed. Clearly defined creek crossings must be temporarily bridged with pipe or bridges. Relying on snow bridges, live stream crossings or routing snowmobiles to existing bridge/culvert structures on Johnson Creek road is not acceptable. In locations where terrain precludes an adjacent trail, the best cross-country route needs to be identified and cleared of obstacles.

We suggest the cost of designing and constructing an adequate temporary OSV trail is significant and is not justified. The snowmobile use levels on that temporary OSV trail are not likely going to be significant. The use of Warm Lake highway for an all-weather route to Stibnite is going to afford wintertime snowmobile users with the option to drive to Landmark and off load their snowmobile at that location. The result will be diminished use on Cabin/Trout and Johnson OSV. Secondly, a new trail will attract a number of first-time users who are curious, but riding a snow berm will not be a factor that will bring them back.

The bulk of snowmobile use in this area occurs between December 15 and March 15 with most of the use being on weekends. We suggest again as we did in our scoping letter, the best opportunity to mitigate the impacts to winter snowmobile use is for the mining company to provide funding to haul the groomer to Landmark the 5 to 6 times during each season. Doing a good job of grooming the remaining trails south and east of Landmark is of much greater value than a temporary OSV trail along Johnson Creek road.

We are surprised that in determining the alternatives to be considered in detail in the DEIS that this entire issue of displaced snowmobile trails did not give rise to consideration of diverting mining traffic to the South Fork road during the wintertime construction period. In addition to eliminating the issue, this option has a number of advantages. Besides providing snowmobile users with continued historic access to areas in Johnson Creek (north of Trout Creek) during the construction phase of the mine, this option provides sufficient time for upgrade of Cabin/Trout to meet OSV standards; it avoids all soil disturbance associated with cross country OSV locations; it eliminates one adverse grade for mining traffic during the winter; it avoids snowplowing costs on 30 plus miles of Warm Lake highway and Johnson Creek roads; it will be a financially beneficial for Valley County to have the mining company as a winter time cost share partner on the South Fork and East Fork roads; it results in wintertime mining traffic access at an elevation nearly 2000' lower in elevation; it has a 21 mile advantage of an all-weather surface over the Johnson Creek route; it results in a reduction of sediment associated with road maintenance and traffic use on the Johnson Creek road; it results in one wintertime access to Yellow Pine that is maintained to a high standard; and does not require one iota of construction to implement to point out the obvious.

Such an alternative should include design features to make it a solid proposal. These might include: 1) Fuel Haul on the South Fork road should be minimized and restricted to emergency considerations and should only occur in storm free conditions. The mining company should be certain their fuel depot at Stibnite is stocked to capacity on December 1. Strict transportation procedures must be in effect and monitored.

We know the choice to add an option to the analysis process is likely not an easy one to make. We make this suggestion because we believe it is better for the mining company, better for winter recreationists, and better for the Forest Service to have considered all the resources available to meet the project needs. The South Fork road during the winter time period is hard to ignore especially when it provides the project the option to divert traffic to a more reliable wintertime route, not disrupt any wintertime recreation, occurs during the worst travel times of the year, and spans a long holiday period when construction traffic is likely to be diminished. We trust you will give it strong consideration. By the way, thanks for the extra time to comment, we needed it! Thank you.

Sincerely,

A handwritten signature in blue ink that reads "Michael Blessing". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Mike Blessing

President