

October 18, 2024

to: Objection Reviewing Officer, Stibnite Gold Project  
USFS Intermountain Regional Office  
Room 4403  
324 25th Street  
Ogden, Utah 84401

from: Earl Dodds



**Objections to the FEIS and ROD for the Stibnite Gold Project, Payette National Forest**

**My standing to make these objections**

I am a full time, year round resident of Valley County, Idaho. I have participated in the public process for the Stibnite Gold Project since its beginning. I submitted comments on scoping and on the Draft EIS.

**I object to the FEIS and the ROD for the following reasons. I suggest withdrawing this FEIS and ROD until each of these deficiencies and violations of NEPA is remedied.**

**Long-term water treatment**

I object to the reliance of long-term water treatment to mitigate adverse impacts on water quality. Long-term water treatment unfairly and unjustly saddles the taxpayers with unknown costs long after the miners are gone — likely into perpetuity. The effectiveness of long-term water treatment to mitigate adverse water quality impacts in the long term is unknown.

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### **Long-term water treatment** - continued

I suggest analyzing a mine plan that does not result in further degradation of water quality in the drainage and does so without relying on long-term water treatment. If such a plan cannot be formulated, the the USFS must deny a permit to mine.

### **Acid mine drainage**

I object to the FEIS's cavalier dismissal of the potential for acid mine drainage. The capacity for carbonate rock in the mine area to buffer low ph drainage in the long term is unknown. The claim that "There has never been acid mine drainage there before...." is a false assurance. There has never been large scale mining and processing of sulfide ores at Stibnite. The proponent's testing of a handful of (likely cherry-picked) rock samples to determine acid generating potential is inadequate. This is not the "hard look" required by NEPA.

I suggest testing multiple samples of all rock types present at the mine site, taken from all depths of planned mining, for acid generating potential. I suggest determining whether quantity of carbonate rock present is adequate for long-term buffering of all potential acid-generating materials. A valid analysis of environmental effects of the proposed action cannot occur until such testing is done.

### **Impacts on ESA listed salmon, steelhead, and trout**

By its own admission, the proponents' plan adversely affects ESA listed salmon, steelhead, and trout. Given the perilous situation of these fish throughout the Snake River basin, this is totally unacceptable.

I suggest formulating and analyzing a mining plan that does not adversely affect ESA listed species. If that cannot be done, then a permit to mine must be denied.

## **Amendments to the Forest Plan**

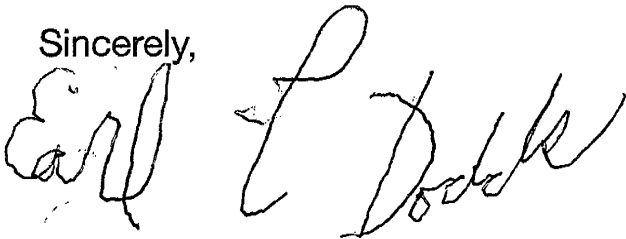
I object to the approval of any mine plan that requires amendments to the Payette Forest Plan. The Plan was adopted after years of work and thousands of public comments. It is not fair or right to summarily dismiss the result of that process simply to accommodate the proponent's wishes.

I suggest formulating and analyzing a mine plan that does not require amendments to the Payette Forest Plan.

## **Conclusion**

The remedy for these deficiencies is for the Forest Service to withdraw the FEIS and DROD and not issue any decision or take any action based on the inadequate FEIS. The Forest Service must not take any action until a revised FEIS and revised DROD demonstrates full compliance with each and every law, regulation, policy, Treaty. The Regional Forester must withdraw the FEIS and DROD with instructions to the Payette National Forest to correct all errors noted herein before the Agency can consider approving or taking any actions.

Sincerely,

A handwritten signature in black ink, appearing to read "Earl Dodds". The signature is written in a cursive, somewhat stylized font.

Earl Dodds  
District Ranger, retired  
Big Creek Ranger District  
Payette National Forest