

Data Submitted (UTC 11): 9/16/2020 9:07:55 PM

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Comments: Keith Lannom-

RE: Stibnite Gold EIS

Payette National Forest 500 N. Mission St., Bldg 2, McCall, ID 83638USFS-Supervisor, Boise-Challis NF

Dear Mr. Lannom,

This proposal contains three distinct opportunities for environmental impacts, both cumulative and possibly immediate. NEPA, the National Environmental Policy Act, requires that cumulative impacts as well as more immediate impacts be considered. I am commenting on two of the former and one of the latter.

A significant component of the Stibnite Gold Project (EIS #50516) is construction of multiple roads along tributaries to the EFSF Salmon River. Some of these roads lead from the mine to a bus pick up station, some from the truck shop to the mine and some ancillary roads within the project area. During the construction phase, contractors, presumably not the operators, will be responsible for all of the runoff and maintenance controls. The mine operators would manage to similar maintenance activities, post construction. These additional components include removing or adding culverts, removing trees, dynamiting rocks, etc. some of which bound and potentially intrude into the Frank Church wilderness area. While contractors will typically utilize a general stormwater permit, there is scant review of these documents at the programmatic level. Several blanket approvals of the Construction General Permit under section 404 of the Clean Water Act have already been litigated. It is likely that failure for the forest to carefully scrutinize these permits will result in well-deserved contests.

During road construction phases, oil leaks from heavy equipment, spills from accidents both from sub-contractors and employees, can add to the Total Petroleum Hydrocarbon (TPH) load to the EFSF of the Salmon River. A river that has so little TPH in it, it is not listed in the TMDL for this river or relevant downstream waters. There are many other aspect of the construction phase that require a more careful explanation, including assurances that the tax-payers will not pay for compliance enforcement of the Clean Water Act. There are cumulative impacts from the proposed constructed roads as well.

Anyone who has travelled a USFS constructed road knows that the typical design of un-surfaced roads in most of Idaho include an up-slope ditch known as a "borrow pit." So named by grader operators who would "borrow" excess soft material from the ditch to help make the road smoother. Because these borrow pits collect the runoff from the road, a large portion of their function is to collect and "discharge" leaves, twigs, gravel, fine sediment, oil and grease, soft drink cups and cooler lids. In short, they are de-facto sewers and as it turns out, much more efficient at moving sediment and water than they are vehicles (On a per ton basis). These discharges would occur naturally during their construction phase, but their most significant impact is cumulative.

Day after day, week after week, year after year, these roads concentrate and transport not only the disturbed sediment created during construction, but any extra loads delivered by storm events or wash out from the near continuous grading of the proposed Burn Log due to heavy truck traffic to the mine. USFS may comment that it's construction standards account for sediment discharge by construction sediment capture basins, but they do little good unless they are maintained. As nearly anyone familiar with road construction will tell you, these capture basins can fill in during one season. The Service must re-consider standard practices in general but specifically in these cases where the proposed road crosses so many tributaries critical to survival of Idaho's iconic steelhead and Chinook Salmon.

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With regard to the operation of the mine, will there be an EPA permit for project runoff (at all facilities) and wastewater treatment? Will it be an IPDES or EPA permit? This EIS summary seems to leave the question open. We know that both the IDEQ and the IDL will have some say in the operation of the mine due to their respective jurisdictions, but with regard to the discharge permit, I believe that the IDEQ has neither the expertise nor the resources to adequately manage a permit of this scope. As with having the Idaho Miners Association and the Operator writing vast portions of the mine operations regulations, it becomes a case of the "Fox watching the hen-house" I request that the Service specify which agency will be responsible for issuing discharge permits. Without that knowledge, none cannot accurately comment on any advantages or disadvantages of one or the other.

Finally, the Service must fully engage the operator and the state agencies involved in the storage of the cyanide leachate. Stating that the synthetic liner has a specific durometer, thickness, torsional rigidity, or tensile strength says nothing about the integrity of the finished product. The liner must be tested in-situ to verify that the integrity is maintained after a test load is in place and routinely thereafter. Piezometers have limited value after a leak has been detected. Most liners fail due to poor installation.

Both cumulative and immediate impacts have opportunity to impact the main artery of the body of Idaho that is the Salmon River. Though some in the Service will move on to other assignments, we here in Idaho will be left with the legacy of your investigations and your integrity. Please consider these comments and keep future Idahoans and Americans in your mind as you make your recommendations.

Mike Settell