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Comments: To whom it may concern,

I have many objections to the Stibnite Gold Mine, not because I object mining in general, I just object to mining within this specific area due to it's unique qualities and sensitive areas. As an avid river user, I am specifically concerned about the effects on tourism in the area, as well as the potential effects of groundwater and surface water contamination. As a licensed engineer with 12+ years of environmental remediation experience, I know and understand from first hand experiences the toxic effects of mines and other resource production industries in sensitive area. Despite developers legal obligations to protect sensitive environments, they often do not meet the required regulations. If they did, I wouldn't have a job.

GEOCHEMISTRY AND WATER QUALITY

BACKGROUND: Chemical reactions between rock and water have the potential to release acid and toxic metal ions into groundwater and surface water. Groundwater quality and quantity will be adversely impacted by the project. These impacts will then affect surface water which in turn affects aquatic organisms. Groundwater and surface water have many interactions and should be thought of as two parts of a single integrated system, the primary

distinction between the two being the time scales of their respective processes. Modeling in the DEIS shows that arsenic, antimony, mercury, and other metals will contaminate water for many years after mine closure. Keep in mind this detrimental prediction likely represents a best case scenario.

COMMENT: The effects analysis in the DEIS focuses on predictive numerical modeling. In attempting to quantify changes to water quality and quantity at different times during the mining operation and up to one hundred years in the future, the DEIS relies on certain assumptions that contain significant error. This error is primarily based on the methodology employed to analyze uncertainty in the model outputs. For example, the faults and fracture zones present in the area are acknowledged as having potentially significant influence on groundwater movement and quality. However, they are not taken into account in the modeling. This omission is identified at Chapter 4.8.8.2.1.3.

Further, the plan to treat surface water in perpetuity to meet state water quality standards relies on an assumption that whatever company mines the site will put money into a trust fund to support the operational costs to treat the water forever. The infrastructure to do so (powerline, roads, treatment facilities) will remain forever. However, the contamination is modeled to still require treatment 100 years in the future. The DEIS assumes, without support that chemical reactions causing contamination will slowly decrease to a point where contaminants will be below state standards. When this time comes is Unknowable. Moreover, state water quality standards have equal chances of becoming more strict in the future as remaining the same.

TOURISM AND RECREATION:

It is noted in the DEIS that the local communities rely heavily on tourism to support their economies" and that "[t]he analysis area is a popular area for a variety of recreation activities on both private and public lands," yet there is no report, information, or analysis on how the Stibnite proposal will affect tourism, recreation, or the related economic benefits to local communities. A supplemental report and information are needed accordingly. Sources are out of date (many are 2003 and 2010) in the context of Idaho experiencing a population boom, and its residents holding high value in recreation opportunities. Idaho's Recreation and tourism generates \$7.8 billion in consumer spending and support 78,000 jobs; 79% of Idaho's residents participate in outdoor recreation; and recreation opportunities is a recruitment tool for businesses used to attract and retain workers

Recreation and tourism are a big deal locally, state-wide, and nationally and thus, please provide the missing information on impacts to recreation and recreation and tourism economies as related to the Stibnite Alternatives and a management plan and contingencies for the recreation in the area per each alternative.