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Comments: On behalf of the Idaho Office of the Northwest Power and Conservation Council, we offer comments in support of the Stibnite Gold Project Environmental Impact Statement (EIS), which seeks to clean up a large abandoned mine site, utilize mining proceeds to improve habitat and reconnect fish passage, and ultimately, yield an increase in populations of endangered salmon, steelhead and bull trout in the East Fork of the South Fork of the Salmon River.

Under the Northwest Power Act of 1980<sup>1</sup>, Idaho, along with the states of Oregon, Washington and Montana supports a robust program to protect, mitigate and enhance fish and wildlife, including related spawning grounds and habitat affected by hydropower facilities on the Columbia River and its tributaries. The Council partners annually with state, tribal and other entities to fund and implement hundreds of projects as part of Bonneville Power Administration's (BPA) fish and wildlife program. In 2018 alone, \$40 million was invested in Idaho for on-the-ground work, resulting in the protection of over 2,000 acre-feet of water and opening 116 miles of habitat and 18 stream miles.<sup>2</sup>

For many years, the Council has supported stakeholder efforts in the Salmon River sub-basin to improve conditions for Endangered Species Act-listed salmon and steelhead. For example, in May 2004, a comprehensive Salmon River Sub basin Management plan, developed with Council funding<sup>3</sup>, identified a number of activities associated with inactive, orphaned mine sites, including the Stibnite Mine, Meadow and Blowout Creeks along the East Fork of the South Fork Salmon River. The sub basin plan includes several strategies to improve distribution and habitat of fish species in this area, including:

- [bull] Cleaning up and stabilizing (through planting) unconsolidated tailings piles at active, inactive and orphaned mine sites; Implementing alternative mitigation approaches such as slope recontouring, drainage re-routing, or export of waste material;

- [bull] Ensuring adequate riparian areas exist upstream and downstream of the effected site; and

- [bull] Monitoring and evaluating all mitigation activities.

We are encouraged that the proposed Stibnite Project includes actions that are consistent with and would begin to address several issues on lands including the Stibnite Mine, Meadow and Blowout Creeks along the East Fork of the South Fork Salmon River. Successful restoration and mitigation of another area of the Salmon River basin at the Blackbird Mine site<sup>4</sup> has provided critical financial resources to improve water quality and recover fish habitat conditions in Panther Creek, and offers the potential for other tangible actions to restore chinook salmon populations and enhance tribal and non-tribal harvest opportunities.

In addition, the Council has recognized the important priority to improve fish passage to facilitate migration to spawning areas and to explore the feasibility of using innovative technologies. For example, in October 2019, the Council was briefed on the U.S. Bureau of Reclamation and the State of Washington's completion of an extensive juvenile fish passage tunnel project at the Cle Elum Dam. <sup>5</sup> That project aims to provide salmon access to historic habitat, restore biodiversity and natural production of anadromous salmon in the upper Cle Elum sub basin. Consistent with this effort, the Stibnite Project proposes construction of an innovative, temporary fish tunnel to provide a route for juvenile and adult salmon around the Yellow Pine pit. This would reconnect anadromous fish habitat that has been blocked since the 1930's, and jumpstart blocked fish passage until surface waters could be restored and provide restoration on a more permanent basis.

We support fish and wildlife projects that are science-based, cost-effective, which respect Idaho's important multi-use purposes, and where possible, do not add to the state or federal taxpayers' or BPA ratepayers' burden. This project's significant private investments would meet these objectives.

Thank you for the opportunity to comment on the Stibnite Project's Environmental Impact Statement

1 16 U.S.C. [sect]839b

2 See: <https://species.idaho.gov/wp-content/uploads/sites/82/2019/07/SalmonWorkgroupPresentationBONNEVILLE.pptx>

3 p. 52, Salmon River Subbasin Management Plan, May 2004, Ecovista, contracted by Nez Perce Tribe Watershed Division and Shoshone-Bannock Tribes (see: <https://www.nwcouncil.org/sites/default/files/MgmtPlanScreenO.pdf>)

4 See: <https://www.usgs.gov/news/30-year-scientific-record-examines-recovery-mining-damaged-idaho-stream>

5 See: <https://www.usbr.gov/pn/programs/eis/cle-elum/index.html>