

Data Submitted (UTC 11): 1/6/2023 3:43:38 PM

First name: Steve

Last name: Williams

Organization:

Title:

Comments: I am writing to oppose the Stibnite mine project. I am a retired Forest Service line officer and I have wrestled with many mining projects over my career. The bottom line is that the things that mining companies tell you will occur over the life of a mine, never seem to occur as market conditions and operating expenses change over time. These things delay promised work and result in shutdowns of mining operations or sale of the operation. I know mining companies promise shutdown actions, but they rarely deliver on their promises. In addition, actual bonding is never sufficient to do the work for them, and in the case of a cyanide heap leach operation, the Forest Service does not have the expertise to seize the bond and perform the operations needed to protect the site, or the rivers running through it. In this case the river is home to ESA listed fish species. The mine operations (blasting and heavy machinery) will also have an intrusive impact on the nearby wilderness and the values these areas were set up to protect. For a multitude of reasons this project should not proceed, but if it does, the cost of developing this mine need to include costs that provide the Forest Service the expertise manage a heap leach operation on a near daily basis (not the more normal monthly forest tech visit to the mine site), mitigation measures to protect the river and wilderness resources, and a substantial reclamation bond that the Forest Service can access quickly in the cases of shutdowns especially if the shutdown occurs in the late summer season. This would be required to stabilize any necessary facilities over winter.

I know that such proposals are rarely stopped, but heap leach operations are used when ore grade is very low, so the mine is already of questionable economic viability. I also know that the Forest Service rarely requires sufficient bonding for the operations. Mining operation costs and reclamation bonds for operations in this area need to be much higher normal mining operations costs might be in the middle of Nevada. When this occurs mining companies scream and go political on the agency, but in this case the special resources that need to be protected require the Forest Service to adopt strict timing mitigation measures to protect wilderness values, implement seasonal mitigation measures in the event even slowed mining operations, and reclamation bonding to restore the site in rapid order if the mining company walks away as so often occurs. Be prepared justify your added mitigation, and your bonding requirements, and do not negotiate these measures just to avoid the politics. One other suggestion is for the Forest Supervisor to insure the Payette Forest has someone with field experience in the monitoring of a large heap leach mining project(s), to finalize the operating plan. Also please require the bonding requirements are reviewed annually so that changes in conditions can be accommodated in the bond. This is not a simple normal mining proposal. This area has special resources that absolutely need to be mitigated or completely protected.