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Comments: I am a retired USDA Forest Service environmental engineer. I have 20 plus years' experience of mitigating the treats to human health and the environment. I have 15 yeas working at Stibnite alone. Of course, I feel any work in Stibnite will undo all the fine work completed by the USDAFS, USEPA, USFWS, Nez Piece Tribes, Idaho Fish and Wildlife Service, and Idaho Department of Environmental Quality. Millions of dollars were spent in mitigating the actions of Bradley Mining Company. The purposed site is in critical habitat for several list ESA species such as: chinook salmon, steelhead, and bull trout. So, extra care must be made to protect from any releases of toxic substance. This area needs a rest from further disturbance. There are over 2000 abandoned mine sites in Idaho alone. So, the odds of this site not causing a problem are very small. I realize this doesn't have any bearing on this decision. But, it keeps it in perspective.

After reviewing the purposed Stibnite project, I have a few issues that lack proper evaluation:

The purposed use of a tunnel as a method for protecting the fish habitat is based on a few small-scale bench tests. The use of a fish tunnel at Stibnite need more evaluation before any agreement can be given. The fish latter in the EFSR box culvert is a good example of a proposal that was infective. Wetlands and riparian zones will likely will increase and need to be further protection and defined.

This project will be disturbing the historic Meadow Creek site and likely causing the release of sulfides. The DEIS does not adequally provide the long-term treatment of sulfides if or when that happens. The water quality portion does not address this and the high levels of arsenic already in the ground water. (The USGS once told me that the arsenic levels in the ground water is one of the highest they sampled.)

The effects of excavating through the historic toxic substance into a new substrate needs more evaluation on the effects of combining the old oxidization soils with the new unoxidized soils. What are the water quality effects both short term and long term of meteoric water flowing through these new soils.

The increase in traffic for roads such as (South Fork Salmon Rd, Lick Creek Rd. Warm Lake road, and Johnson Creek Road such could be an endangerment for vehicles. I agree that another route away Johnson Creek, Sugar Creek, East Fork of Salmon River should utilized.

Lastly but equally important, the long-term effects thought the mine life (including reclamation) needs to evaluated for the effects of Climate change. It will be exacerbated with increased temperatures and it's causing to increase meteoric water effecting snow depth, avalanche potentials, and soil stability and increased water flows.

In summary, the Forest Service should not allow this project to move forward. The negative impacts could not be easily reversed and the risk does not justify the damage. I also think Perpetua Resources should be mitigating Cinnabar Mine and the Springfield Mine.