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Comments: Stibnite mine proposal objection
The decision needs to be changed to address the following.
The analysis is lacking in displaying the potential impacts to ground water. Without multiple modeling processes, such as those used in mining proposals in Arizona, the US forest Service and the public will not know the potential impacts to ground water.
The EIS and draft decision is also lacking in fully displaying the potential impacts from the connected actions from traffic and hazardous waste hauling on Highway 55. (Especially the potential for impacts to water quality in Big Payette Lake, the source of drinking water for the City of McCall.) Currently there is no catchment or filtering of runoff of pollutants from Highway 55 before contaminated water flows into Big Payette Lake. Any accidents with mine material on Highway 55, within the City's impact zone will have the potential to flow into Big Payette Lake. I am fully aware that the US Forest Service has no control over actions on State jurisdiction, but the US Forest Service is required to display the potential impacts from connected actions.
In addition the final decision needs to clearly state that there is an inherent risk of mining and the high potential for release of mine pollution that will result in permanent degradation of water quality impacting fisheries. A 2012 review of water quality impacts from 14 operating U.S. mines found that 100% of the mines experienced pipeline spills or accidental release and 13 out of 14 mines experienced failures to control contaminated mine seepage, leading to harmful water quality impacts. In a 2019 update to the 2012 report, available records reflecting the performance of 15 U.S. mines were examined and found that 14 out of 15 failed to capture and control wastewater, resulting in significant water quality impacts. (1) In April 2022, a report of five hardrock mines in Alaska documented 8,157 spills from 1995 to 2020. (2)
No matter how well mine plans are designed and implemented, spills, leakage, or failures will occur. Mining occurs in the natural environment and not in a controlled facility. It will be just a matter of time before an unforeseen event (earthquake, mass failure, and historic weather) will occur that will exceed the safe guards of the best mining plan. The final decision needs to clearly state that with our changed climate the frequency and scale of disturbance events will continue to increase. Thus spills, leakage and failures that release toxic and heavy metals, mine pollution into the environment will occur at a higher frequency from what we have seen in the past. The analysis is lacking in fully displaying the potential impacts to endangered and vulnerable fisheries. With the high potential for a mine failure, and the cumulative impacts starting with the 4 lower Snake river dams the determination for steelhead and chinook salmon must be likely to jeopardize the continued existence to both species
The public also needs to know that the US Forest Service has no authority to require the mining proponent to have the financial capability to remediate leaks, spills or failures that that would require expensive remediation. Where the U.S. Agencies and States have successfully filed lawsuits to force mining companies to pay $ millions for resource damages, there is no requirement for the mining proponent to have the financial capability. (EPA decision released on 02/21/2018, to not issue final regulations for financial requirements applicable to hardrock mining facilities that were published on January 11, 2017.) The mining entity could just walk away.

Reclamation bond requirements and full disclosure of "reasonable and practicable" limitations
The Forest Service is required to obtain the necessary reclamation bond, sureties or other financial requirements where the dollar amounts are sufficient enough to cover the full cost of reclamation, including the cost for long-term maintenance requirements. It is essential that the surety bond remains available for at least 100 years. The history of mining and the Forest Service's past performance indicates that there is a tendency to require a bond amount that is sufficiently less than the true costs of reclamation and to use adequate inflationary factors to ensure that the public will not have to pay for reclamation or in the worst case, it will not be done. Unless there is an adequate long-term reclamation bond, the history of mining in the United States supports that there is high potential for the Stibnite mine to just become a larger super fund site in the future. Since reclamation bonds need

to consider what is reasonable and practicable it is essential that the final decision clearly states what reclamation will be required and the long-term impacts to the environment and especially fisheries that will exist. The Forest Service must fully disclose to the public and the proponent the full cost and duration of reclamation and remediation bonds. Even though bonding is determined based on level and amount of disturbance and environmental and social impacts, the bond or surety trust must be for a minimum of 100 years. The amount and duration of necessary bonding questions the economic viability of the proposal.

Also, it is essential that the Forest Service display the long-term impacts from any disturbance on State responsibility lands and the likelihood that little to no reclamation will occur on these lands. Since the State of Idaho does not require a bond there is no guarantee that the mining proponent will implement any reclamation on these areas. A financial capability statement has no value when you factor in market changes, economic recessions, and when mining companies are foreign owned.

Thank you for the work you have done.

(1) Operating Copper Sulfide Mining, By Bonnie Gestring, May 2019.
(2) April 2022, Alaska Ming Spills, Earthworks