

To: Payette National Forest  
ATTN: Forest Supervisor - Keith Lannom

Subject: Stibnite Gold EIS - Project #50516 - Comments / Objection

Dear Mr. Lannom

Thank you for the opportunity to provide important information for reference and use by yourself, the United States Army Corps of Engineers (USACE), and the Environmental Protection Agency (EPA) during preparation and assessment of the Stibnite Gold EIS. My comments and objection to the Midas proposed Plan of Restoration and Operations (the Plan) center on a single, highly threatening risk the proposed project imposes on a specific fragile area outside the immediate footprint of the open-pit mine itself. The Operations section of the proposed Plan (section 6.2.9 Roads & Transportation) does not describe or identify this risk, demonstrate that the risk has been considered and assessed, nor that the likely environmental impact will, or even can be, mitigated.

As the Responsible Official delegated singular authority for approving the Plan's impact on National Forest System (NFS) Lands, including the proposed heavy use of the infrastructure corridor (roads and bridges) not within your forest but within the Boise National Forest (BNF), I understand the importance of bringing to your attention impacts the Plan will have outside your forest. I also believe this specific issue warrants focused investigation and consideration by the USACE and EPA, who will weigh grave risk to the environment imposed by the proposed Plan against the propriety of issuing Sec 402 and 404 permits under the Clean Water Act (CWA).

**Risk Imposed on Water Quality:**

Warm Lake Creek to Warm Lake - Warm Lake - Warm Lake outlet to its confluence with the S. Fork of the Salmon River

The remote location of the proposed mining site relies on extremely heavy, unprecedented use of transportation infrastructure corridor (roads and bridges) in the National Forest System (NFS). In many sections of the corridor, its location and configuration are not designed or constructed to accommodate the proposed level of use or prevent hazardous material spills from immediately flowing to fragile, pristine waterways which flow into the S. Fork of the Salmon River.

Under the Plan, **ALL** materials and supplies transported to the site and **ALL** minerals and antimony concentrate extracted from the site would be transported through a single treacherous and regionally notorious 5-mile segment of Warm Lake Road - from Warm Lake to the Landmark summit (Valley County road #10-579). The level of risk for accidents and rollovers and the direct impact hazardous spills would have within this road segment are self-evident when considering the natural terrain and configuration of the road. This road segment traverses and crosses over the primary headwaters of Warm Lake, at numerous points. The road has extreme grade (8+%) through many tight, low-speed switchbacks through a steep, narrow canyon where all waters collected by Warm Lake Creek flow directly to Warm Lake. Warm Lake Creek is the primary tributary to Warm Lake, providing over 90% of all inflow to the lake. The hazardous features and location of this road segment are clearly insufficient to ensure reliable, safe, contained *daily* transport of the tons of environmentally destructive toxic mining chemicals. Fuels / oils / lubricants / solvents, and mining ore proposed for shipment to and from the mining site year-round through extremely severe weather conditions, over the extended twenty-year period called for under the Plan. Risk introduced by the Plan on this fragile, unprotected water resource is not tolerable. Due to the physical attributes of canyon and the road, it is hard to comprehend how risks to water quality imposed by the Plan on this fragile, unprotected watershed can be sufficiently managed or mitigated - given any reasonable level of investment in the reconstruction / reconfiguration of the current road.

Valley County road #10-579 - Warm Lake to Landmark summit

5.1 miles

2,055 ft. elevation gain (from 5,336 ft. to 7,246 ft.)

8.1% grade (average slope)

4 crossings directly over Warm Lake Cr. - road runs parallel to the creek for several miles

Hazardous spills within the narrow canyon would rapidly find their way directly to the creek, the lake, and the river



calculated volume: hazardous liquid deliveries during period of proposed Operations  
using: values and information published in the Plan

Estimated Deliveries during Operations source: Table 12-4			Estimated Deliveries during period of Operations	
Hazardous Liquid	Gallons per Delivery	Deliveries per Year	Years of Operation*	Total Deliveries during Operations
Diesel Fuel	10,000	580	13.5	7,830
Gasoline	5,000	100	13.5	1,350
Lubricants (oils)	3,000	99	13.5	1,337
Antifreeze	3,000	13	13.5	176
Delivery of Hazardous Liquids		792	13.5	10,692

\* average of the Plan's stated range of Operations (12 to 15 years)

During the Plan's proposed period of operations, approximately 11,000 truckloads carrying environmentally hazardous liquids would navigate through the precarious 5.1 mile section of transportation corridor described in pages 1 and 2.

Within the Plan (section 12.3), Midas discloses that fact that they experienced a reportable spill in 2012. They do not specify what substance was spilled. Given the much lower volume of transports conducted prior to and since that date, the incident reported in 2012 represents a spill rate per delivery much greater than 1/11,000. Given the high volume of proposed delivery instances which would occur during all weather and road conditions over the course of each year, one or more catastrophic spills of liquids damaging to water quality are inevitable. As noted earlier, spills within the constricted canyon would rapidly flow to Warm Lake and then to the S. Fork of the Salmon River.

Acting within their authority and responsibilities called for under the CWA, the USACE / EPA / USFS are compelled to weigh this information and assess the great risk imposed on water quality in this pristine area by the Plan. The probability of and damaging impacts from spills are supported by information disclosed in the Plan itself. The Plan clearly cannot be accepted as drafted, and calls for action to impose restrictions which sufficiently mitigate this risk or a decision to deny the Sec 402 and 404 permits sought by the Plan.

Sincerely,



Joel Drake

USFS recreational lease permit holder, Boise National Forest

July 19, 2017