

# COOPER LAMBLA

Dear U.S. Forest Service,

My name is Cooper Lambla, and as a former Forestry Technician of the U.S. Department of Agriculture and the U.S. Forest Service, I would like to formally submit the following comments and concerns with the Stibnite Gold Project EIS:

- It is of concern to me that there are no modeled predictions or results for alternative 3 and 4. The DEIS has not fully disclosed the effects of alternative 3 and 4 for comparisons, nor does the DEIS take a hard look at alternatives 3 and 4. The hard look doctrine should have guided this process as section 1502.14 of NEPA Regulations states. In many sections of the DEIS there are “adverse impacts” mentioned and no mitigations offered at all.
- It is of concern that in an attempt to quantify changes to water quality and quantity at different times during the mining operation and up to one hundred years in the future, the DEIS relies on certain assumptions that contain significant error. The error is primarily based on the methodology employed to analyze uncertainty in the model outputs.
- It is worth noting that to ensure viable and resilient fish habitat in the East Fork of the South Fork, the best method is to “protect the best and restore the rest.” Over half of the mine footprint is in undisturbed habitat. The USFS needs to analyze an alternative to minimize the mine footprint that is contained only to previously disturbed areas. Putting mining waste or building new roads in undisturbed habitat is not advised. Nor is it advised to conduct activities that are likely to mobilize additional arsenic such as blasting waste rock and grinding rock into tailings. It should be noted that bringing millions of gallons of diesel fuel, cyanide and other chemicals to undisturbed areas within the forest presents great environmental threats.
- It is also of concern that the Payette and Boise National Forest Plans have standards (promises to the public about resource protection) to “not authorize new surface diversions unless they provide upstream and downstream fish passage” (DEIS Appendix A). The Stibnite Gold Project has proposed a Forest Plan amendment to this standard, to “suspend the requirement of new surface diversions to provide upstream and downstream fish passage within the footprint of mining operations.” This would create new barriers to upstream and downstream fish.
- It is of concern that the impacts associated with the proposed project on stream temperatures would be an increase in stream temperatures in various reaches of the mine site study area. Fish would be affected by these water temperature changes. Bull Trout and Chinook salmon would be the most negatively affected species, because they migrate and spawn in the summer and fall, when lower flows and higher air temperatures would amplify the impacts of the project on stream temperatures.
- It is of concern that this project’s mine activities would directly and indirectly impact the habitat of wolverine, grey wolf, and migratory birds. Nor is there any analysis of the effects of arsenic and/or mercury on water birds that may land on the mine pit lakes, potentially causing mortality.
- It is of grave concern that the plan for hazardous materials and chemicals transported to and from the mine site is so vague. Who is responsible for and ensures that hazardous materials will be separate from community trash and garbage? Where will the community and industrial trash and garbage be hauled? What will you do with the hazardous waste? Does the county have facilities to deal with it? Have you discussed hazardous waste and garbage disposal with Valley Co.? In your emissions estimates did you include the emissions from the hauling community and industrial hazardous waste and garbage? Do you have a plan for recycling your community and industrial recyclables?
- As someone familiar working with Forest Plans and U.S.D.A. / U.S.F.S. staff, it is very concerning that both Boise and Payette National Forest Forest Plans are proposed to be amended (meaning to be “de-promised”) for the Stibnite Gold Project and include fish and wildlife degradation (that will have adverse effects), total soil resource commitment (stated more directly - soil disturbance), as well as adverse degradation to the Forest’s visual quality, and water diversions.
- Finally the Payette National Forest did not offer printed copies of the DEIS to the general public. The Forest only made the DEIS available in electronic form. The failure to provide printed copies excludes a significant portion of the public from participation in the DEIS process. If a person doesn’t have a good computer, reliable Internet service, and enough computer skill to negotiate the document – the DEIS is essentially unavailable. Additionally, it is well-documented that Internet access is much more limited for families that are low-income, rural, American Indian/Alaska Native, Black, or Latinx, compared to more affluent white families. The Payette National Forest’s failure to provide printed copies hinders public participation and is an abuse of discretion, discriminatory, and unethical.

Thank you for considering these comments.

Sincerely,

