

## *Comment on Midas Gold Stibnite Mining Project*

June 19, 2017

Dear Stibnite EIS team:

**Background and Interest:** My name is Roby Surabian. I worked as a fly fishing guide at Wapiti Meadow Ranch for several seasons in the late 00s and have continued to visit the area. Professionally I am accountable for Supply Chain Strategy at JR Simplot Company. I received a Masters in Business Administration from the University of Chicago Booth School of Business in 2014. I share this information because it is from the perspective of a guide, a recreational user, and a business strategist that I submit my comments. I support the argument that the Stibnite mine area would benefit from additional restoration activities. I *want* to support this proposal. However after careful review of all proposal materials, participation in the information session in Boise, and discussion with other stakeholders I do not believe that the scope, methods and strategy proposed by Midas will leave the area better off than it is today. Many of the glaring oversights in the proposal dismay me. They do not demonstrate that Midas Gold as an organization has the experience, discipline, knowledge and substantive engagement with the community and surroundings to be successful in such an unprecedented and high risk endeavor.

**Current state:** Although the site is disturbed, it is far from the total loss described by Midas. The Yellow Pine pit (Glory Hole to me) has become very productive habitat for fish and wildlife. I spent some of my most successful guiding days targeting fluvial cutthroat trout up there. I have also seen numerous large, healthy bull trout caught and released near the inlet. I have seen Salmon swimming through the Glory hole and spawning in the gravel at the inlet. Meadow Creek was also a favorite destination for clients interested in a unique fishing experience. In short, because the area had 15 years to recover previous restoration efforts had taken hold.

**Recent degradation:** When I last visited the Stibnite area with a friend in summer 2016 I experienced something very scary. I wanted to take my friend up to Meadow Creek because I was so fond of the restored section (this was the same for all the guides who worked at Wapiti). When we got back there the stream was nothing like I remembered. It was clogged with sediment, nearly stagnant, and had been intentionally re-routed through a field and was flowing over grass. It appeared to me that the stream was dead. Any accusation I make would be circumstantial, but at a minimum, the loss of upper Meadow Creek prior to any large scale mining operation inspires skepticism that Midas would be stewards of the area.

**Restoring salmon passage:** The proposal touts restoration of “historic salmon habitat” to the upper East Fork as justification. Above the Glory Hole I have never seen a flow of water that could realistically hold an adult Chinook Salmon. The East Fork anecdotally appears to have a strong salmon population today. To me our emphasis should be to protect the productive Salmon habitat we have. Over the course of the EIS I would encourage the team to evaluate the claims and net benefits of the restoration effort on Salmon populations, including any impact of the temporary diversion through a tunnel.

**Midas Gold:** Midas is a new organization. Although the company includes industry veterans, as a team they have limited experience with large projects. This proposal is massive in scope. I think of it no differently than building and operating a factory...and there are few factories this large. In our factories sh\*t happens to individuals working on the floor, whether they make a mistake, experience an injury, or notice a food safety hazard. Extensive, processes around project management, safety, environmental management, escalation, and contingency must be in place and practiced by the entire organization. With no track record of similar projects, I have no way to verify Midas has the management processes to execute the project, and to respond quickly, effectively, and honestly whenever something goes wrong.

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Midas Gold started as a development company with expertise in identifying promising projects, not operating them. My understanding is that Midas shopped this project to the market and was not able to sell it. To recover the sunk investments in the site Midas has no choice but to pivot to an operating and extraction company. I would encourage the EIS team to understand the project history from the early stages, and to interview any prospective buyers who turned down the project to understand their reasons for passing.

**Quasi wilderness:** The proposed Burntlog route runs through pristine forest abutting the Frank Church, and the “Jeep Route” would negatively affect hiking resources that directly serve recreation from the Johnson Creek Airport. It is bizarre to propose disturbing Hennessey Meadow. With any consideration for the area, Midas Gold would have revised the infrastructure strategy in the proposal.

**Economics:** Yes, the project will create tax revenue and jobs in Valley County. However, many of those jobs will not go to Valley county residents. These jobs are temporary. The EIS team should assess the economic impact of previous mining activity at the site, including the bust following closures as a counterweight to the tax revenue.

Yellowpine is an example of this today. The town enjoyed a bump while Midas was conducting the exploratory assessment. Now that activity is gone, many of the core businesses supporting the town are struggling or for sale.

**Conclusion:** The project in its current form is excessively ambitious and reckless in its use of unproven methods. Either the proposal purposefully obfuscates the realistic impact of the project and infrastructure on the region, or the preparers were negligent in omitting these impacts. Moreover, the proposal is transparent in its strategy to hide a large scale, intrusive gold mine in the guise of restoration. There is no clear precedent for a project to take a mountain valley apart and put it back together again, and Midas Gold has not demonstrated it is capable of operating a vanilla gold mine, let alone an environmentally complex parallel mining and restoration program.

The EIS team should evaluate the proposal and its entire scope of work, including the team performing that work with religious objectivity, verifying every statement. Do not let the prospect of restoration lead you to overlook the massive risks of this project.

**What is at stake:** The East Fork of the South Fork of the Salmon River is itself a member of an endangered species—the native watershed. Rivers where only the fish, invertebrates, plants, and animals that evolved there persist today. The East Fork allows a few anglers to reach into the river and through time in the act of catching and releasing a native trout. A trout that showed up at that moment, in that spot and ate that fly as the result of the entirety of evolution. In the East Fork we see what protected rivers look like, something to hold in contrast to the dam controlled, hatchery supported rivers where an angler is more likely to catch a fish that evolved in California or Europe than something wild.

*Best Regards,*

*Roby Surabian, Boise*