

**From:** chris schwarzhoff  
**To:** [FS-comments-intermtn-payette](#)  
**Subject:** Stibnite Mining Proposal  
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**Attachments:** [SchwarzhoffScopingComments.doc](#)

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Attached are our comments on the scoping proposal for the Midas Gold Mining Proposal

Chris & Lois Schwarzhoff  
4753 N. Fieldcrest Way  
Boise, Id 83704  
July 15, 2007  
chrisschwarzhoff@gmail.com

Payette National Forest  
ATTN: Forest Supervisor Keith Lannon  
Subject Matter Stibnite Gold EIS Scoping  
500 N. Mission St. Bldg 2  
McCall, ID83638

We are responding to Scoping Notices and the public meeting on the Midas Gold Proposal for new mining in the Stibnite Area. Over all we believe there are merits to this project, but it does have one very serious shortcomings that has not been adequately addressed, and must be addressed prior to allowing this project to move forward.

We have concluded the major strength of this mining proposal is the attention given to protecting & improving the natural resources in and around the project area with a detailed and heavy focus on water quality and fisheries. It does seem to us that if the proposal precedes with adequate oversight this could be a winner in regards to natural resources in and around the project. Perhaps the one exception to this conclusion is that of big game & big game hunting. The proposal certainly will have at least temporary impacts on both, and this is not adequately addressed in the proposal.

The serious shortcomings that we see in the proposal are the lack of attention to social and economic impacts to the closest communities to the project and the impact of restricted access to the general public, especially Recreationists accessing the surrounding public lands. We were very surprised to see these shortcomings in the proposal, because up to the time of this proposal we had believed Midas Gold would be a good neighbor & recognized the need to be responsible to other existing uses of the public lands which surrounds the proposed project. There are numerous examples in the Midas Gold proposal that discuss the need for the proposal to take in to account the obligation to do no harm & indeed be supportive of the closest communities and recreation activities on surrounding public lands. The specific action that creates the shortcomings cited above is the decision to request closure of the existing Valley County Road (FRTA easement from the Forest Service) that traverses through the project area with no reasonable alternatives proposed. There is nothing in the proposal that indicates any alternatives or mitigation were seriously considered. This road closure is not even mentioned in the Executive Summary for the PRO. This is a serious issue that if implemented would have devastating impacts on the overall well being of the village of Yellow Pine, and would significantly reduce recreation opportunities on the lands surrounding the project. Residents of the Big Creek area often utilize services in Yellow Pine; therefore any significant decrease in Yellow Pine services affects property owners and residents of Big Creek as well.

This request to close the existing Stibnite Road is not well covered in the Midas Documents. The clearest wording comes from page 8-6 section 8.5 of the PRO report. This section is titled ONSITE ROADS & TRAIL SYSTEM - to avoid readers of this letter having to chase down this information it is provided in the following quote: "Public access to the existing Thunder Mountain Road (Forest Service Road 375) will be provided via the Burntlog and Trapper Flats routes. Midas Gold proposes that the Stibnite Road (Forest Service Road 412) will be closed from near the confluence of Sugar Creek and EFSFSR to the area southeast of the employee housing facility, once the upgrades to the Burntlog and Trapper Flats roads are completed. To provide off-highway vehicle (OHV) access around the Project site, Midas Gold will coordinate with the Forest Service and Valley County to link the Horse Heaven/power-line road with the Meadow Creek Lookout Road in order to enhance road connectivity for recreational users." It does need to be clarified the Stibnite Road is currently managed and maintained by Valley County under a Forest Road and Trail Act authorized easement. This road closure is also covered in Appendix G page 89 footnote #22. In this footnote Midas Gold seems to be proposing the Forest Service find a solution to the impacts of this proposal.

It is important to acknowledge the past efforts Midas Gold has made to support the village of Yellow Pine. However, the efforts to date will be for naught if the Stibnite Road is closed during operations without mitigation or alternatives

In projects of the type proposed, it is generally accepted that the closest local communities would benefit financially from the project, and up until the proposed closure of the Stibnite road that seemed to be the case for this project & the village of Yellow Pine. However, closure of the Stibnite Road would be a complete "game changer" for Yellow Pine & recreation activities out of Yellow Pine. This closure effectively "walls off" Yellow Pine from Stibnite in two important ways. First, it for practicality eliminates conventional ground transportation between the two locals, and eliminates needed financial support such as family members seeking employment with normal type commutes to work. Secondly, it routes existing recreation away from Yellow Pine that further harms the economics of Yellow Pine. Recreation activities in the offsite surrounding areas are certainly going to be reduced. The services previously provided by Yellow Pine to recreationists such as lodging, eating and drink establishments, fuel, groceries, RV parks and general camping supplies would be practically unavailable to recreationists in Stibnite & Thunder Mountain areas. It seems highly likely recreation is going to decline in the whole area if the Stibnite Road is closed. The effects described above are in stark contrast to the document Sustainable Development for Minerals Application signed by the Chief of the Forest Service on 10/22/03 where Paragraph 46 states: (Forests will) "Support efforts to address the environmental, economic, health, and social impacts and benefits of mining, minerals and metals throughout their life cycle" Evaluating the social & economic impact of this project to the closest local communities is also a requirement of FSM 1950.2.2 which states "Use a systematic, interdisciplinary approach to fully consider the impacts of Forest Service proposed actions on the physical, biological, social, and economic aspects of the human environment (40 CFR 1507.2(a), 40 CFR 1508.14);" The proposal is totally lacking in analyzing social & economic effects relative to the human environment in Yellow Pine.

The perplexing part of the Midas proposal to close the Stibnite Road with the accompanying obvious negative impacts to Recreation and the Village of Yellow Pine is the apparent lack of documented analysis. The OHV proposal (described in the Midas quote above) does nothing significant to mitigate the impacts of the Stibnite Road closure. Very obvious and meaningful alternatives such as opening up the Sugar Creek Road for light vehicular traffic to Stibnite and beyond do exist, but are not mentioned in the Proposal.

We strongly believe the Stibnite access issue must be addressed & some reasonable solution to this problem must be found.

Thanks for considering our concerns. If we could assist in this effort please let us know.

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Chris Schwarzhoff

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Lois Schwarzhoff