**Comments on the Stibnite Gold Plan of Operations EIS #50516 by Steven Harshfield. 7/20/2017**

**The Plan's Public Access Problem.**

NOAA via NMFS via Johnna Sandow have educated the Yellow Pine-Big Creek Road Collaborative. In large part, the education comes down to one mantra: ***if you add a road, you must perform equitable mitigation***. This mantra is a good tool. I believe the public has its own mantra: ***if you take away a road, you must perform equitable mitigation.*** This mantra most assuredly applies to the road through Stibnite.

Due to factors real and artificial, towns like Yellow Pine must subsist on recreation. For Yellow Pine, recreation requires access to destinations. If the road through Stibnite is lost, Yellow Pine would lose access to historic Stibnite, Cinnabar and Thunder Mountain. In other words, Yellow Pine would lose most of its travel destinations, most of its recreation traffic and most of the associated revenue. In the past, recreation and mining shared the roads and Yellow Pine served both groups. However, the Midas Gold Plan stops Yellow Pine from serving either group. This would be a grievous mistake and it should not stand. At the very least, losing the Stibnite road requires equitable mitigation.

Recently, I reintroducing myself to the Yellow Pine-Big Creek Road Collaborative. I saw the mining group suggest a substitute for the Stibnite road by promoting a Connector between Horse Heaven and the Meadow Creek Lookout. However, I felt resistance to the Connector by the environmental community. My concern was whether or not the Connector would be an equitable mitigation. Since the Connector must use the unimproved Powerline road, this travel route is far from equivalent to the improved Stibnite road. Hence, it is not an equitable substitute. Moreover, the Connector would have a high cost and would still have environmental issues. I was left wondering if we could find better options with the same time, money and effort and keep the options within the Payette Forest.

Midas Gold has enough brains and money to make about any road alternative work. However, Midas Gold must do more discovery into the public needs and preferences in order to find the most equitable road solution. For my part, I will list options that seem fair for the public and Midas Gold. First, Stibnite road would remain in approximately the same place. Second, Stibnite road would be routed high on the mountain to the east or to the west of the mine as needed. Third, Stibnite road would be temporarily abandoned and replaced by an upgraded Sugar Creek/Cinnabar road to Thunder Mountain.

I prefer, and the public seems to prefer, keeping the Stibnite road as it is. Small adjustments around the mining area are acceptable. Also, avoiding interactions between the public and mining traffic is desirable. The solution could be temporary bridges for the public. Reusing old steel bridges, found all around Idaho, would work as long as County road standards could be used. I feel timid in suggesting this out-of-the-box solution. However, I feel justified in making the first move to find a public preferred solution.

My second alternative gives more flexibility to Midas Gold to make changes to the Stibnite road as long as the road stays within the East Fork drainage. Why stay near Stibnite? Because a surprising number of people have ties to Stibnite. They return often with family and friends. They revisit Idaho history and their family history. They marvel at the big hole in the ground. They are not ashamed of the old mine, because it saved thousands of lives and helped end World War II. They return to hunt where Grandpa got the big buck. They have lunch where Bradley Corporation hosted the company picnic. I assure you, a trip to Stibnite is a pilgrimage for many people.

The Sugar Creek/Cinnabar road is not my first choice, but I see it as a workable solution. Amazingly, it would require fewer miles of road building than the Collaborative's Connector. The Forest Service would have to include this travel route on their system and Midas Gold would have to rebuild the road along Sugar Creek and above the Cinnabar Mine. Even now, the road is a decent travel route. With a little work, it could be great.

**The Plan's Haul Road Problem.**

Initially, I thought a new haul road though Riordan, Trapper and Burnt Log drainages was beneficial, because I was told 25 concentrate trucks would be traveling 24 hours a day for 15 years. Surprisingly, the current plan specifies only 1 or 2 concentrate trucks per day. I doubt this is enough traffic to justify traipsing through roadless areas, ripping new routes over nice mountains and messing up people's happy hunting grounds. Who knows how many unintended consequences are waiting for us? In fact, the Plan already sets up in a ridiculous situation. Yellow Pine must suffer excessive mining traffic during the construction phase, and then, Yellow Pine must suffer reduced recreation traffic during the operation phase. Perhaps, sticking with what we know has advantages. It is time to look at using the East Fork road, as did all previous mining operations. Of course, I am concerned about increased traffic in the Yellow Pine area. On the bright side, Yellow Pine retains its recreation access, it becomes a partner with the mining operation, it gets good year-round access and our roads hopefully become improved.

Oh! I just remembered than the Plan indicates the crushed rock from the 1980's operation will be used around Stibnite. We have all been waiting for that material to become safe enough to use as road base from Stibnite to Landmark. Maybe this can be a win-win effort. Well, my last comment was tongue in cheek, but it is time for the public to see what advantages there are to using the traditional route.

**The Plan's Employment Data Problem.**

For the Operation years, the Plan should specify how many current Valley County residents can expect to have jobs. If it is 30 out of 300, it would be a sobering fact for the current residents.

**The Plan's Environmental Problem.**

I refer you to the Executive Summary: ES.3 Project Highlights, Table ES.1, General Components, Development Rock Storage Facilities (DRSF). This section says a DRSF will be placed in the "already impacted" Fiddle valley. Yes, Fiddle valley has a small area of historic mining, but the creek and the valley are largely untouched. The historic impact is barely visible. The historic rock waste from the Fiddle Creek tunnel is maybe two dozen feet high. ***On the other hand, the Midas Gold DRSF would measure 600 feet high filling the whole valley and it would be as intrusive as a gigantic dam.*** The Plan conveniently avoids this fact. Instead, the Plan's map proudly proclaims a reclaimed Fiddle DRSF. I am dumbfounded! There is nothing about the reclamation that mitigates the total destruction of the natural drainage. In fact, it is the height of hypocrisy to use historic mining as the excuse to create one thousand times the impact. Finally, I am at a loss for why the Plan leaves two gaping pits unfilled but chokes Fiddle valley! How did the Plan get this far out of alignment from common sense reclamation? At this point, I am wondering if everything is on the up-and-up?

**The Plan's Historic Preservation Problem.**

Fiddle valley is about the only historic mining area left in Stibnite besides the Yellow Pine Pit. As such, it should be lauded, not damned. Planning to bury Fiddle Creek mine reminds me of the Thunder Mountain reclamation in the 1990s where the Forest Service succeeded in burying the historic Sunny Side Mine: beautiful historic buildings and all. For 30 years, the people of Yellow Pine have documented the Payette Forest's willful destruction of mining history and settler history. I'm not going to cry over spilled milk, but it is time wake people up to Payette Forest's anti-social behavior, because it provides an explanation for why Midas Gold's Plan looks at the local history and the local people as an afterthought.

**The Plan's Local Problem.**

Nationally, the Forest Service promotes good interactions between mining operations and local communities. See attachment 1. However, the Payette Forest, in its part to oversee the Midas Gold Plan, has fallen far short. Under the Plan, the local population will be burdened with less public access and few economic opportunities. Sure, many people in Idaho will get rich, including the Payette Forest, but the Yellow Pine community will be further depressed. Here is our stark reality... ***Billions of dollars*** will be taken from the ***Yellow Pine Mining District***, but the economy around Yellow Pine will not be strong enough to encourage one new family to move to the area. This is a clear miscarriage of stewardship by the Payette Forest, Midas Gold, Valley County and the State of Idaho.

**My Comment Summary.**

I did not suspect that I would find so many problems. No doubt, if I had more time, I could find more problems. Considering the scope and the impact of this project, the public should be given more time to comment or the Plan should be pulled for further development.

**Attachment 1:**

