Keith Lannom, Supervisor
Payette National Forest,
500 N. Mission St. Bldg 2
McCall, ID 83638

July 20, 2017

RE: Stibnite Gold Project Scoping Comments

Dear Mr. Lannom:

Please accept our scoping comments on the Stibnite Gold Project as Idaho residents who have lived in Cascade for more than a decade. We are both practicing veterinarians and concerned about the health of both domestic and wild animals, including birds, fishes, and supporting aquatic and terrestrial habitats, as well as people living and recreating in Valley County.

While Midas Gold owns significant deeded land in the historic Stibnite mining area, the current project will profoundly impact surrounding national forest lands and waters for likely decades if not much longer. While it is ostensibly well intentioned that Midas Gold includes major reclamation efforts in its proposed mining, it is important that the Forest Service recognize that previous mining efforts involving ironically another Canadian company. Canadian Superior Mining, from 1979 through 1991, left such massive land and water pollution that the EPA proposed that the Stibnite Yellow Pine Mining area be declared as a Superfund site on September 13, 2001.

As such, it is necessary that the Forest Service keep foremost – that, however, Midas Gold may package their Idaho efforts – their ultimate goal is to make money mining and processing precious minerals, primarily gold. Gold mining continues to be inherently destructive and polluting to the environment just as it has been in the past, with long-term consequences. The most recent scientific investigation titled “Occurrence and transport of selected constituents in streams near the Stibnite mining area, Central Idaho, 2012-14” documents the long-term effects of mining in the Stibnite area that has poisoned nearby streams with arsenic and antimony (<https://pubs.er.usgs.gov/publication/sir20155166>). The first paragraph of the abstract states:

*“Mining of stibnite (antimony sulfide), tungsten, gold, silver, and mercury near the town of Stibnite in central Idaho has left a legacy of trace element contamination in local streams. Water-quality and streamflow monitoring data from a network of five streamflow-gaging stations were used to estimate trace-element and suspended-sediment loads and flow-weighted concentrations in the Stibnite mining area between 2012 and 2014. Measured concentrations of arsenic exceeded human health-based water-quality criteria at each streamflow-gaging station, except for Meadow Creek (site 2), which was selected to represent background conditions in the study area. Measured concentrations of antimony exceeded human health-based water-quality criteria at sites 3, 4, and 5.”*

The Forest Service has profound ethical and legal overarching obligations to:

1) Guarantee that any additional earth disturbance, ore processing, or ore transport during mining in the Stibnite area does not magnify the enormous pre-existing heavy metal pollution.

 2) Ensure that the “promised” reclamation be financially protected through rigorous and adequate bonding in the event that Midas Gold declares bankruptcy at any point in that project. There must be sufficient available funds to complete all reclamation, repair any additional environmental damage, and restore the natural habitat.

We find that the Plan of Restoration and Operations that Midas Gold has provided to the Forest Service has inadequate detail for thorough evaluation of the planned day-to-day operation from beginning to the end of project and final reclamation. This lack of specificity is particularly concerning. The project is a stunningly huge open pit mine with massive onsite ore processing and is adjacent to arguably the most pristine, largest nationally designated wilderness in the lower 48 states. Additionally, this mining project proposes to destroy pre-existing river systems in the East Fork of the South Fork Salmon River by diverting legally-designated threatened spring and fall Chinook, steelhead, and bull trout through cement tunnels.

Additionally, the development of the Burntlog road (capable of handling very large truck and trailer units hauling ore year round) from Stibnite to the Landmark Maintenance Facility west of Warm Lake will skirt or enter the western edge of the Frank Church -River of No Return Wilderness. This will potentially destroy designated “roadless areas,” and exponentially increase traffic crossing local tributaries feeding Johnson Creek. Pollution during the building or upgrading of the Burntlog road as well as associated with vehicle passage will likely endanger the viability of the last non-polluted stream (Johnson Creek) feeding into the East Fork of the South Fork Salmon River. (Last August, we spent an enchanting day and night at Ice Hole campground on Johnson Creek watching and listening to huge Chinook salmon battling their way through crystal clear waters in their final effort to spawn before dying.)

Respectfully, we request that Midas Gold and the Forest Service use the Idaho Department of Fish and Game’s detailed list of determined rare and sensitive species (fish are not yet included) for Valley County to determine what species will be disturbed, the extent of that disturbance, and the disturbance’s impact on the viability of the Idaho population (<https://idfg.idaho.gov/species/taxa/list/county/valley>). For simplicity, we have included IDFG’s list of 140 species (including iconic wilderness-associated large mammals such as Lynx, Fisher, and Wolverine) below our signatures.

Sincerely,

Karen Bruhn Balch, DVM

Olin Balch, DVM, MS, PhD

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|  | **County** | **Scientific Name** | **Common Name** |
| 1 | Valley | Accipiter cooperii | Cooper's Hawk |
| 2 | Valley | Accipiter gentilis | Northern Goshawk |
| 3 | Valley | Accipiter striatus | Sharp-shinned Hawk |
| 4 | Valley | Aechmophorus clarkii | Clark's Grebe |
| 5 | Valley | Aechmophorus occidentalis | Western Grebe |
| 6 | Valley | Aegolius acadicus | Northern Saw-whet Owl |
| 7 | Valley | Aegolius funereus | Boreal Owl |
| 8 | Valley | Allium madidum | Swamp Onion |
| 9 | Valley | Allotropa virgata | Candystick |
| 10 | Valley | Ambystoma macrodactylum | Long-toed Salamander |
| 11 | Valley | Ameletus sparsatus | A Mayfly |
| 12 | Valley | Archilochus alexandri | Black-chinned Hummingbird |
| 13 | Valley | Ascaphus montanus | Inland Tailed Frog |
| 14 | Valley | Asio otus | Long-eared Owl |
| 15 | Valley | Bartramia longicauda | Upland Sandpiper |
| 16 | Valley | Botrychium simplex | Least Moonwort |
| 17 | Valley | Bubo virginianus | Great Horned Owl |
| 18 | Valley | Bufo boreas | Western Toad |
| 19 | Valley | Buteo jamaicensis | Red-tailed Hawk |
| 20 | Valley | Buteo regalis | Ferruginous Hawk |
| 21 | Valley | Buxbaumia viridis | Green Bug-on-a-stick |
| 22 | Valley | Canis Lupus | Gray Wolf |
| 23 | Valley | Carex flava | Yellow Sedge |
| 24 | Valley | Carex livida | Pale Sedge |
| 25 | Valley | Carpodacus cassinii | Cassin's Finch |
| 26 | Valley | Cathartes aura | Turkey Vulture |
| 27 | Valley | Catharus ustulatus | Swainson's Thrush |
| 28 | Valley | Caurinella idahoensis | A Mayfly |
| 29 | Valley | Charina bottae | Rubber Boa |
| 30 | Valley | Chiroptera | Unclassified Bat |
| 31 | Valley | Cicuta bulbifera | Bulb-bearing Waterhemlock |
| 32 | Valley | Colaptes auratus | Northern Flicker |
| 33 | Valley | Coluber constrictor | Racer |
| 34 | Valley | Contopus cooperi | Olive-sided Flycatcher |
| 35 | Valley | Contopus sordidulus | Western Wood-Pewee |
| 36 | Valley | Corvus corax | Common Raven |
| 37 | Valley | Corynorhinus townsendii | Townsend's Big-eared Bat |
| 38 | Valley | Crotalus viridis | Prairie Rattlesnake |
| 39 | Valley | Cyanocitta stelleri | Steller's Jay |
| 40 | Valley | Dendragapus obscurus | Blue Grouse |
| 41 | Valley | Dendroica coronata | Yellow-rumped Warbler |
| 42 | Valley | Dendroica petechia | Yellow Warbler |
| 43 | Valley | Dendroica townsendi | Townsend's Warbler |
| 44 | Valley | Diadophis punctatus | Ringneck Snake |
| 45 | Valley | Dicamptodon aterrimus | Idaho Giant Salamander |
| 46 | Valley | Douglasia idahoensis | Idaho Dwarf-primrose |
| 47 | Valley | Dryocopus pileatus | Pileated Woodpecker |
| 48 | Valley | Empidonax oberholseri | Dusky Flycatcher |
| 49 | Valley | Epilobium palustre | Swamp Willow-weed |
| 50 | Valley | Epipactis gigantea | Giant Helleborine |
| 51 | Valley | Eptesicus fuscus | Big Brown Bat |
| 52 | Valley | Eriophorum viridicarinatum | Green Keeled Cotton-grass |
| 53 | Valley | Euderma maculatum | Spotted Bat |
| 54 | Valley | Euphydryas gillettii | Gillette's Checkerspot |
| 55 | Valley | Falco columbarius | Merlin |
| 56 | Valley | Falco peregrinus anatum | Peregrine Falcon |
| 57 | Valley | Gavia immer | Common Loon |
| 58 | Valley | Glaucidium gnoma | Northern Pygmy-Owl |
| 59 | Valley | Glaucomys sabrinus | Northern Flying Squirrel |
| 60 | Valley | Grus canadensis | Sandhill Crane |
| 61 | Valley | Guiraca caerulea | Blue Grosbeak |
| 62 | Valley | Gulo gulo luscus | North American Wolverine |
| 63 | Valley | Haliaeetus leucocephalus | Bald Eagle |
| 64 | Valley | Histrionicus histrionicus | Harlequin Duck |
| 65 | Valley | Junco hyemalis | Dark-eyed Junco |
| 66 | Valley | Lanius ludovicianus | Loggerhead Shrike |
| 67 | Valley | Lasionycteris noctivagans | Silver-haired Bat |
| 68 | Valley | Lasiurus cinereus | Hoary Bat |
| 69 | Valley | Limosa fedoa | Marbled Godwit |
| 70 | Valley | Lynx canadensis | Lynx |
| 71 | Valley | Margaritifera falcata | Western Pearlshell |
| 72 | Valley | Martes pennanti | Fisher |
| 73 | Valley | Melanoplus digitifer | A Spur-throat Grasshopper |
| 74 | Valley | Melanoplus payettei | A Spur-throat Grasshopper |
| 75 | Valley | Melospiza lincolnii | Lincoln's Sparrow |
| 76 | Valley | Mimulus clivicola | Bank Monkeyflower |
| 77 | Valley | Mimus polyglottos | Northern Mockingbird |
| 78 | Valley | Molothrus ater | Brown-headed Cowbird |
| 79 | Valley | Myotis | Myotis sp. |
| 80 | Valley | Myotis californicus | California Myotis |
| 81 | Valley | Myotis evotis | Long-eared Myotis |
| 82 | Valley | Myotis lucifugus | Little Brown Myotis |
| 83 | Valley | Myotis thysanodes | Fringed Myotis |
| 84 | Valley | Myotis volans | Long-legged Myotis |
| 85 | Valley | Myotis yumanensis | Yuma Myotis |
| 86 | Valley | Neotamis amoenus | Yellow-pine Chipmunk |
| 87 | Valley | Ochotona princeps | American Pika |
| 88 | Valley | Oporornis tolmiei | MacGillivray's Warbler |
| 89 | Valley | Oreortyx pictus | Mountain Quail |
| 90 | Valley | Otus flammeolus | Flammulated Owl |
| 91 | Valley | Pandion haliaetus | Osprey |
| 92 | Valley | Passerella iliaca | Fox Sparrow |
| 93 | Valley | Perisoreus canadensis | Gray Jay |
| 94 | Valley | Pheucticus melanocephalus | Black-headed Grosbeak |
| 95 | Valley | Picoides albolarvatus | White-headed Woodpecker |
| 96 | Valley | Picoides arcticus | Black-backed Woodpecker |
| 97 | Valley | Picoides dorsalis | Three-toed Woodpecker |
| 98 | Valley | Picoides pubescens | Downy Woodpecker |
| 99 | Valley | Picoides villosus | Hairy Woodpecker |
| 100 | Valley | Piranga ludoviciana | Western Tanager |
| 101 | Valley | Pituophis catenifer | Gopher Snake |
| 102 | Valley | Podiceps grisegena | Red-necked Grebe |
| 103 | Valley | Podiceps nigricollis | Eared Grebe |
| 104 | Valley | Poecile atricapilla | Black-capped Chickadee |
| 105 | Valley | Poecile gambeli | Mountain Chickadee |
| 106 | Valley | Pristiloma idahoense | Thinlip Tightcoil |
| 107 | Valley | Pristiloma wascoense | Shiny Tightcoil |
| 108 | Valley | Pristinicola hemphilli | Pristine Pyrg |
| 109 | Valley | Pseudacris regilla | Pacific Chorus Frog |
| 110 | Valley | Rana luteiventris | Columbia Spotted Frog |
| 111 | Valley | Recurvirostra americana | American Avocet |
| 112 | Valley | Regulus calendula | Ruby-crowned Kinglet |
| 113 | Valley | Regulus satrapa | Golden-crowned Kinglet |
| 114 | Valley | Rhynchospora alba | White Beakrush |
| 115 | Valley | Saxifraga bryophora var. tobiasiae | Tobias' Saxifrage |
| 116 | Valley | Scheuchzeria palustris | Pod Grass |
| 117 | Valley | Schoenoplectus subterminalis | Water Clubrush |
| 118 | Valley | Selasphorus rufus | Rufous Hummingbird |
| 119 | Valley | Sitta canadensis | Red-breasted Nuthatch |
| 120 | Valley | Sitta pygmaea | Pygmy Nuthatch |
| 121 | Valley | Spermophilus brunneus brunneus | Northern Idaho Ground Squirrel |
| 122 | Valley | Spermophilus lateralis | Golden-mantled Ground Squirrel |
| 123 | Valley | Sphyrapicus nuchalis | Red-naped Sapsucker |
| 124 | Valley | Spizella passerina | Chipping Sparrow |
| 125 | Valley | Stellula calliope | Calliope Hummingbird |
| 126 | Valley | Strix nebulosa | Great Gray Owl |
| 127 | Valley | Strix varia | Barred Owl |
| 128 | Valley | Symphyotrichum boreale | Rush Aster |
| 129 | Valley | Tamiasciurus hudsonicus | Red Squirrel |
| 130 | Valley | Thamnophis elegans | Western Terrestrial Garter Snake |
| 131 | Valley | Thamnophis sirtalis | Common Garter Snake |
| 132 | Valley | Triantha occidentalis ssp. brevistyla | Short-style Tofieldia |
| 133 | Valley | Trifolium douglasii | Douglas' Clover |
| 134 | Valley | Troglodytes aedon | House Wren |
| 135 | Valley | Turdus migratorius | American Robin |
| 136 | Valley | Vermivora celata | Orange-crowned Warbler |
| 137 | Valley | Vermivora ruficapilla | Nashville Warbler |
| 138 | Valley | Vireo cassinii | Cassin's Vireo |
| 139 | Valley | Vireo gilvus | Warbling Vireo |
| 140 | Valley | Wilsonia pusilla | Wilson's Warbler |