

From: Kathleen McCarter
To: [FS-comments-intermtn-payette](#)
Subject: Plans for the Stibnite Gold project need to protect water quality and restore habitat
Date: Tuesday, July 18, 2017 10:45:00 PM

Dear Payette Forest Supervisor Keith Lannom and staff,

July 18, 2017

As a part time resident of Valley County for the last 55 years, I have been following the proposed re- opening of the Stibnite Mine area with interest. My husband and I have enjoyed fishing and rafting the Salmon River and creeks in the Yellow Pine area for years.

I attended the informational meeting in McCall last month and after reviewing the information presented by Midas Gold, I do have some definite concerns. As I understand it from the presentation and their website, this project by the Canadian mining company has plans to dig far beneath previous mining projects. Their latest proposal includes diverting the East Fork into a tunnel, excavating an open-pit mine under the riverbed and damming tributaries with waste rock and tailings, which would take at least 14 years. To its credit, Midas Gold has tried to emphasize restoration in its mine plan. While the site is undoubtedly in need of restoration, we must ensure that additional mining on the scale proposed by this project doesn't make things worse. While Midas Gold has done an impressive job with outreach and community relations, it remains to be seen how well its mining plan takes care of water quality in the short and long term. Historically, mining companies make a lot of promises they don't keep. As I understand it, the proposed project will require undoing over \$13 million of taxpayer-funded restoration work from previous mining disasters.

If this project is allowed to proceed, here are some issues that I think should be addressed first:

1. Protecting spawning habitat for threatened and endangered fish is critically important. While Midas Gold has promised to restore fish passage to headwater streams, the current project proposes burying over a mile of spawning habitat under hundreds of feet of mining waste and tailings. The Forest Service needs to examine alternative ways of storing tailings and waste rock so that spawning habitat is protected. I think MG should be required to store its tailings in the open pits they plan to create and replant over them. The tailings should be kept away from all streams, rivers and lakes to prevent water pollution and destruction of fish habitat. I don't trust their idea of using liners in rivers to prevent pollution!
2. The Forest Service should take extreme care to prevent water contamination from heavy metals and acid mine drainage. Previous mining projects in this area devastated fisheries with polluted water. The project should be designed in such a way that mining will not create permanent sources of pollution needing treatment in perpetuity. If there is a risk of contaminating the South Fork headwaters, the project should not proceed. Also, water testing should be done by an independent agency, and published weekly for the public to see. If water quality is impaired, the mining operation should be closed immediately.
3. The Forest Service must have a contingency plan in case MG fails to keep their commitments, since many mining companies have an unfortunate history of backing out of commitments, suspending operations or abandoning sites. The Forest Service should look at ways to restore the site independent of mining activities if Midas Gold is unable to restore the site in a timely manner, without making taxpayers foot the bill again.
4. In view of the extreme risks that mining operations pose to our headwaters, rivers, fish and environment, I suggest that the Forest Service require a bonding level of enough money to completely restore this entire area with no help from MG, in case it goes bankrupt and extend the bonding period for a minimum of 40 years, since damage to water may take years to show up, long after they have ceased operations.

As an Idahoan, who loves our clean streams and rivers and beautiful land, I would ask you to be very careful in approving this project without the important safeguards I have listed above.

Sincerely,

Kathleen McCarter

Ms. Kathleen McCarter

