

To: Payette National Forest  
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ATTN: Supervisor Keith Lannom - Stibnite Gold EIS

July 18, 2017

also to: [comments-intermtn-payette@fs.fed.us](mailto:comments-intermtn-payette@fs.fed.us) and <http://www.fs.usda.gov/goto/payette/StibniteGold>

### **Important Issues and Potential Impacts That Must Be Disclosed and Analyzed in the EIS on Midas Gold's Proposed Stibnite Gold Project**

I concur with the preliminary list of issues included in the Federal Register notice of this proposed action. Please disclose and analyze the short-term and long-term direct, indirect, and cumulative impacts of the proposed action on: access and transportation; aesthetics and visual resources; botanical resources including wetlands; threatened, endangered, proposed, and sensitive species; climate and air quality; cultural and heritage resources; environmental justice; federal land management and environmental protection; fire and fuels management; fisheries and wildlife including threatened, endangered, proposed, and sensitive species; geochemistry; geology; hazardous materials; land use; long-term, post closure site management; noise; public health and safety; recreation; roadless and wilderness resources; socioeconomics; soils and reclamation cover materials; timber resources; water resources (groundwater and surface water); and water rights.

I have read the Plan of Operations and the Prefeasibility Study. In addition to, or expanding upon, the above listed issues, I believe following issues are important and must be included in the EIS. In no particular order.

**Development of alternatives** - The EIS should include clear and distinct alternatives to the proposed action and not a mere reshuffling of components of the proposed action.

**Avoiding segmentation** - The EIS should include all potential short-term, long-term, direct, indirect, and cumulative effects and impacts that will result from the proposed action and each alternative. The EIS should be all inclusive temporally and spatially and not just an examination of selected components or individual segments of the proposed action.

**Mitigation and analysis of mitigation effectiveness** - Where adverse impacts are unavoidable, the EIS should include mitigation measures for each unavoidable impact and a discussion and analysis of the effectiveness of each proposed mitigation measure.

**Carbon production** - The EIS should include disclosure and discussion of total atmospheric carbon emitted by each alternative over the life of the project.

**Energy consumption** - The EIS should disclose total energy consumption from all sources for each alternative over the life of the project.

**Transportation of hazardous materials and fuel** - The proposed action would cause the transportation of hazardous materials, fuels, and other materials over many miles of backcountry roads, under often dangerous weather and traffic conditions, in drainages that are

home to ESA-listed fish. The EIS must include and analyze the expected and potential short-term and long-term direct, indirect, and cumulative impacts of the transportation of all hazardous materials, including but not limited to fuels, lubricants, blasting agents, chemicals and reagents, and cyanide. The EIS must include a risk analysis of the likelihood of spills and analysis of the impacts of spills.

**Spill Response and Incident Command** - The EIS (perhaps as an appendix) must include: 1) a spill response plan; 2) a description of spill mitigation measures to be employed including an analysis of mitigation effectiveness; 3) a description of the nature of and location(s) of spill containment materials and equipment; 4) a listing of spill response personnel and a description of the training and experience required of spill response personnel; and 5) an Incident Command plan.

**Socioeconomics** - Valley County and Idaho taxpayers have suffered the results of boom-and-bust projects, i.e. the failed Tamarack Resort and the Thompson Creek mine. The proposed action would bring hundreds of workers plus many hundreds more dependents to the project area. The EIS should include, describe, and analyze the short-term and long-term direct, indirect, and cumulative impacts of the proposed action on: schools, emergency and medical services, social services, law enforcement, fish and game regulation enforcement, housing, sanitation, and sewage treatment.

**Roads** - The EIS should analyze the effects of the proposed action on county, state, and USFS roads. The analysis should include costs for road construction, upgrade, and maintenance for the life of the proposed action and who would bear those costs.

**Heap Leaching** - If the proposed project is constructed, I expect, at some time in the future, for the mine operators to propose converting from vat leaching to heap leaching. The EIS should consider and discuss this.

**Hydrology** - The EIS should analyze the short-term and long-term direct, indirect, and cumulative impacts of the proposed action on the hydrology of all surface waters in all drainages affected by the proposed action. Both quantity and timing of streamflows should be discussed.

**Project water balance** - The EIS should include a detailed water balance accounting for the project area including the pits, the tailings impoundment, the waste rock dumps, and the processing and housing areas, and roads.

**Acid Mine Drainage** - Detailed discussion of acid mine drainage is absent in the Plan of Operations, even though the Prefeasibility Study, incorporated into the Plan of Operation by reference, contains some discussion of the issue. The EIS should contain a thorough and complete disclosure and analysis of the potential for acid mine drainage from the waste rock dumps, tailings impoundment, and abandoned mine pits. The analysis should include both static and dynamic tests for acid production potential for ore, tailings, waste rock, and pit walls. If neutralization of acid by carbonate rock buffering is the current proposal, then the EIS should contain a clear acid/base accounting, a discussion and analysis of the buffering capacity of the carbonate rock, the amount of such rock that will be available, and the method to insure adequate carbonate rock is incorporated and mixed with acid producing rock in waste rock dumps and the tailings impoundment.

**Mobilization of metals** - It is already well known that past mining activities in the project areas have mobilized metals. The EIS should disclose and analyze the short-term and long-term direct, indirect, and cumulative impacts of the proposed action on mobilization of metals into surface and ground waters.

**Long-Term Monitoring of Acid Drainage and/or Metals Mobilization** - The EIS should discuss and analyze a plan for perpetual monitoring of surface and groundwater, including flooded mine pits, for lowered pH and/or metals mobilization. The discussion should include parties or entities responsible for formulating the monitoring plan, performing the monitoring, the cost of the monitoring, and who will bear the cost.

**Long-Term Remediation of Acid Drainage and/or Metals Mobilization** - The EIS should present, discuss, and analyze a plan for perpetual remediation of acid drainage and/or metals mobilization should either occur. The discussion should identify parties or entities responsible for the remediation, the potential costs of the remediation, who will bear the cost, and an analysis of the likely effectiveness of remediation.

**Water Quality** - The EIS should provide a detailed analysis and discussion of the physical and chemical impacts on all water resources (inclusive of issues/considerations above) and address the potential failure of reclamation efforts with regards to protecting water quality/quantity. This includes determining whether the Plan of Operation adequately analyzes the probable hydrologic consequences of the mining for the projected life of the mine and disclosing and evaluating those effects in the EIS.

**Tailings Impoundment Dam** - The EIS should discuss and analyze a plan for perpetual monitoring of the integrity and safety of the tailings impoundment dam. The discussion should identify parties or entities responsible for the monitoring, the cost of the monitoring, and who will bear the cost of monitoring, and the cost of repairs that will be necessary in the future. Gravity always wins - especially with dirt and rock dams.

**Forest Plan Amendments** - The EIS should identify and discuss the rationale for the amendments to the Payette and Boise National Forest plans that the proposed action will necessitate.

**Dark Skies** - The EIS should disclose and analyze the short-term and long-term direct, indirect, and cumulative impacts of the proposed action on dark skies in the project area.

**Power Line** - The EIS should disclose and analyze the short-term and long-term direct, indirect, and cumulative impacts of the upgrade of the existing power line and the construction of the new power line. If any costs associated with the power line will be borne by Idaho Power ratepayers, this should be disclosed and analyzed.

**Riparian areas** - The EIS should disclose and analyze the short-term and long-term direct, indirect, and cumulative impacts of the proposed action and each alternative on riparian areas.

**Wildlife Movement Corridors** - The EIS should disclose and analyze the short-term and long-term direct, indirect, and cumulative impacts of the proposed action and each alternative on wildlife movement corridors.

**Bonding** - The EIS should disclose and discuss bonding requirements, criteria for determining adequacy of bonding amount, calculation of bonding amount, bonding by third-parties, criteria for bond release, timeline for bond release, and the procedure for resolution of disputes over bond release.

**Experience of the Project Proponent** - The EIS should list and briefly discuss any and all mines that Midas Gold has developed and operated. If there are no such mines, the EIS should disclose this.

I appreciate the opportunity to submit these comments. Please contact me if there are questions about my comments. I look forward to reading the draft EIS.

Sincerely,

*Charles Ray*

Charles Ray



Mr. Charles Ray



RECEIVED

JUL 18 2017

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