

From: Jann Higdem
To: [FS-comments-intermtn-payette](#)
Subject: Stibnite Gold POO Scoping Comments
Date: Thursday, July 20, 2017 5:00:51 PM
Attachments: [HigdemScopingLtr StibniteGoldProject-7-20-2017.docx](#)

Mr. Lannom,
Please find my Scoping comment letter attached and that its submission is timely.
Thank you,
Jann Higdem

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

RE: Stibnite Gold EIS Plan of Operations Scoping

Supervisor Lannom,

Thank you for the opportunity to comment, in support of the Stibnite Gold Project.

I have been following this project for years. The Midas Gold Team, as seen on their website is stellar. It may be a Canadian-owned company, but it is loaded with experienced Idahoan professionals, including conservationists and environmental geologists and engineers. Their massive EIS is very well written and I have never seen the word “restoration” so many times in any document that was not a federal Land Management Plan.

It is clear that \$1 billion devoted to the mine site and local area can only be considered a winning situation. A win for the aquatic and terrestrial environment, both in the immediate and in final reclamation and especially considering the pre-Midas condition was left as okay by the EPA . A win for the U.S. regarding local production of strategic and critical minerals: gold & silver are not only “honest money”, but they are also heavily used in the manufacturing industry; antimony is necessary for our national defense in a time when it may soon become necessary. A win for Idaho through increased income, which at one time was a very wealthy state, but is now barely maintaining its financial mandates. A win for the local economies which struggle to keep the doors open and the people who must rely on government subsidies when their seasonal minimum wage recreation/tourism jobs can’t pay the bills. A win for a very environmentally conscious company who will have collectively put their “all” into this project.

The rest of this letter briefly addresses what I consider to be important considerations for you and your staff as you prepare the USFS Draft Environmental Impact Statement.

NEPA. 42 USC 4331 Sec 101. (a) The Congress, recognizes the profound impact of man's activity on the interrelations of all components of the natural environment, particularly the profound influences of population. growth, high-density urbanization, industrial expansion, resource exploitation, and new and expanding technological advances and recognizes further the critical importance of restoring and maintaining environmental quality to the overall welfare and development of man, declares that it is the continuing policy of the Federal Government, in *cooperation with* State and local governments, and other concerned public and private organizations, to use all practicable means and measures, including financial and technical assistance, in a manner calculated to *foster and promote the general welfare, to create and maintain conditions under which man and nature can exist in productive harmony, and fulfill the social economic, and other requirements of present and future generations of Americans.* (emphasis added)

PURPOSE AND NEED. In your Scoping Letter, you stated that “the Payette National Forest is preparing an Environmental Impact Statement (EIS) to evaluate and disclose the potential *environmental effects* from: (1) Approval of the "Stibnite Gold Project Plan of Restoration and Operations" (Plan) submitted by Midas Gold Idaho, Inc. in September 2016, to occupy and use National Forest System (NFS) lands for operations associated with open-pit mining and ore processing; and (2) related amendments to the Payette National Forest Land and Resource Management Plan and/or the Boise National Forest Land and Resource Management Plan.” (emphasis added) Please recall man and nature can live in productive harmony.

NFS lands administered by the Payette National Forest in the historic Stibnite Mining District, and two supporting infrastructure corridors located primarily in the Boise National Forest. It would seem that only the applicable portions of each forest plan would be reviewed. That is, the Payette plan and the Mining District area and the Boise plan for the roads.

ALTERNATIVES. Mr. Lannom, there must be a meaningful range of Alternatives in the Draft EIS. These alternatives should be developed to avoid some or all of the adverse environmental effects, including the costs and benefits of each. Each should assess the cumulative long-term effects, including its relationship to short-term use of the environment versus the environment's long-term productivity.

A No Action Alternative will leave the area as it is with no environmental restoration at all. It is unclear why most environmentalists and conservationists are "opposed" to the project. These sue & settle happy groups seem to always complain, object to and obstruct almost anything that is counter to Rewilding (leave it alone), yet never do they offer a better solution.

MINING ACT OF 1872. As you know, the Mining Act of 1872 allows Midas Gold the right to locate and extract minerals on federal lands, and 36 CFR §228 Subpart A depicts how operations, where feasible, are to *minimize* adverse environmental impacts on them and provide for final reclamation to its pre-mining state on those lands. I am confident that the USFS, USACE, EPA, FWS & IDWR to name some of the cooperating agencies, will all ensure, through their consultations and oversight, that Midas Gold will be allowed to responsibly mine the strategic & critical minerals the nation is in short supply of.

PACFISH/INFISH. I would like to draw attention to the USFS's use of PACFISH & INFISH evaluation models used in resource management planning. They came directly from the Interior Columbia Basin Ecosystem Management Project (ICBEMP) from the 1990's through the 2000 FEIS. This multi-agency (USFS, BLM, EPA, NOAA & FWS) "Project" used the NEPA process in the beginning. It cost taxpayers over \$40 million before completion, had 1,000's of negative comments, Congressional Hearings resulting in complete disdain by the nation's lawmakers. It was so contentious that, instead of issuing the mandated Record of Decision and following the Congressional Review Act by sending it Congress/OMB for review and approval, the agencies opted to adopt "The Interior Columbia Basin Strategy". Excerpt:

"As new plans are developed that are not all subject to a single set of direction such as PACFISH and INFISH, the need remains for plans and projects developed under plans to continue promoting and achieving conservation of riparian and aquatic resources."

CONGRESSIONAL REVIEW ACT. The Congressional Review Act (CRA) requires agencies to submit every rule to Congress for its review, and defines "rule" broadly to even include most guidance documents. Congress can then schedule simple-majority votes to disapprove rules it dislikes using fast-track procedures. Without its adherence to the CRA, the ICBEMP Strategy is illegal, but is still illegally in effect today. It is certainly just as wrong to use now as it was nearly 20 years ago. The Midas Project R.O.D. must also go through Congressional Review/Approval. Please use the best, more currently available scientific means to study the effects of the Midas project's on aquatic species and aquatic and riparian habitat.

CLIMATE CHANGE. As you move forward in your planning actions on this project, please recall that on March 28, 2017, the President through Executive Order 13783, rescinded E.O. 13653 "Preparing the United States for the Impacts of Climate Change". Accordingly, on April 5, 2017, the Council on Environmental Quality published "Withdrawal of Final Guidance for Federal Departments and Agencies on Consideration of Greenhouse Gas Emissions and the Effects of Climate Change in National Environmental Policy Act Reviews" in the Federal Register (82 FR 16576)

The USFS' "Strategic Plan for 2015-2020" cites Goal #1 is to "Sustain Our Nation's Forests and Grasslands" with the first objective being to Foster resilient, adaptive ecosystems to mitigate climate change. Goal #2 is to "Deliver Benefits to the Public". The 2010-2015 Strategic Plan had Deliver Benefits to the Public as the #1 Goal. As you develop your EIS, please reconsider this strategy as per the E.O.

WATER QUALITY & TMDLs. Please consider in your assessments regarding water quality and Total Maximum Daily Limits (TMDLs) assessments that the Idaho Department of Environmental Quality likely has outdated data. The South Fork Salmon River last had the TMDL Implementation Plan's State-mandated 5-yr Review in 2011. Further improvements have likely been made. Their Beneficial Use Reconnaissance Program (BURP) is updated regularly. Please carefully evaluate their differences in order to obtain the best, most current perspective on water quality and TMDLs.

LOCAL GOVERNMENT COORDINATION. Oftentimes, the lead agency fails to adequately consult (coordinate, collaborate) with the County government's officials and their Comprehensive Plans, as witnessed by them nearly always stating so as Objectors. Please study their Comprehensive Plan and consider Idaho County to be a partner in the development of your Record of Decision. 40 CFR 1508.5 "...A State or local agency of similar qualifications or, when the effects are on a reservation, an Indian Tribe, may by agreement with the lead agency become a cooperating agency." 40 CFR 1500.1 (b) "NEPA procedures must insure that environmental information is available to public officials and citizens *before* decisions are made and *before* actions are taken." Please, give them no reason to object.

Oftentimes, the lead agency fails to meaningfully consider the comments and suggestions of the municipal governments and local businesses. From reading their comments to date, they are all very supportive of this project. Please be sure the Socio-Economic analysis in your EIS considers what these commenters feel is important and not how the plan affects the USFS.

The Stibnite and the Warm Lake Mining Districts, are legal entities, as are all 183 Mining Districts in Idaho. Please consult with their Board of Directors and members throughout the process.

Thank you for the opportunity to comment.

Respectfully,

Jann Higdem