

From: jonne hower
To: [FS-comments-intermtn-payette](#)
Subject: Stibnite Gold EIS Scoping Comment
Date: Thursday, July 20, 2017 12:49:51 PM

TO: U.S. Forest Service

FROM: Jonne Hower, [REDACTED]

RE: Scoping comments for Purpose and Need: Stibnite Gold Plan of Operations EIS

DATE: July 20, 2017

Although I am not whole-heartedly in support of mining operations on public land, I am support of this project due to the fact that it is located in an already-designated mining district. In addition, I appreciate the community outreach completed by Midas. In my experience as a retired federal employee from Bureau of Reclamation and Bureau of Land Management, Midas has displayed an unprecedented willingness to listen to concerns of local residents and modify their plans – even though they remain focused on their goal of extraction and economic benefit to the company and its investors.

Below are my comments:

- Although Midas does address restoration and cleanup of past mining, at places it is mentioned as a seeming afterthought. Is there a mechanism to require the cleanup of past mining? I think I understand there is a bonding requirement by the USFS which would ensure restoration of the site following the operation of Midas.
- HAS the mine site been declared a brownfield by EPA? If so, would there be financial support from EPA for restoration?
- Although Midas has a robust public relations and community outreach program, it doesn't seem that Midas "does business" in Cascade or Valley County. Is there a process that USFS could use in the Socioeconomic Impacts section to analyze the effects of dollars spent for operational supplies and needs in Valley County vs outside of the County?
- After hiring current, qualified local residents, how would Midas recruit employees?

- Since Valley County already suffers from a worker-housing shortage, at what point would Midas be involved in developing housing? What would be the plan for that housing?
- Many communities in the western US have suffered the “boom and bust” cycle of modern mining activities. During community meetings, I have heard Midas staff indicate they expect to ramp up and ramp down employment in a measured way, so that there would be little effect of the “bust” phenomenon.
- Although I believe the statements from Midas staff regarding the company's commitments to the environment, the safety of their employees, and the local communities, I have also heard staff indicate there would be a possibility for larger firms to acquire Midas and their on-going work at Stibnite. What would be the assurance that the acquiring firm would be accountable to the commitments made by Midas?
- With respect to roads, I request analysis of providing a dedicated-use haul road from Stibnite to where the pavement begins on the Warm Lake road or State Highway 55. Increasing recreational use and heavy truck traffic are not a good mix. Accidents would be inevitable - how many would be acceptable? What is the insuring mechanism for Midas – would they be self-insured or use commercially-available insurance?
- Continuing on with the subject of roads, I am very concerned about the capacity of both State Highway 55 and US Highway 95 to carry the increased traffic resulting from development and operation of the mine. Although I understand that the “big trucks” - both coming and going - from I-84 will use US Highway 95 and not the Scenic Byway section of State Highway 55, I remain alarmed at the increased volume of traffic on each road. Again, increasing recreational use of visitors from the Boise Valley to Valley County and destinations north of the County and heavy truck traffic are not a good mix.
- I support use of a haul road from Stibnite to State Highway 55 that does NOT travel adjacent to a salmon-bearing stream.
- I support the requirement for Midas to close and restore any roads they construct for the purposes of operations at Stibnite.

Thank you for an opportunity to comment on the scoping of the EIS and other NEPA-required analyses.

