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To: [FS-comments-intermtn-payette](#)
Subject: Stibnite Gold EIS
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Attachments: [Forest Supervisor Keith Lannom July 19.docx](#)

Please see attached file for comments.

Forest Supervisor Keith Lannom
Stibnite Gold EIS
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McCall, Idaho 83638

July 19, 2017

Supervisor Lannom:

I greatly appreciate the opportunity to comment on Midas Gold's Operating Plan proposal as part of the Stibnite Gold EIS process. The contents herein are my personal comments and have no connection to any other group or organization. I do hope you get many substantive comments to help guide your analysis of this project.

My comments are centered around my belief that this project has numerous benefits. The source of a scarce mineral, substantial gold reserves, rehabilitation of some past mining activity, job creation and stimulation of a local and statewide economy are the big ones. The accomplishment by Midas pioneers to consolidate the ownership of claims and royalty interests was the key action that changed everything at Stibnite and presents our society with an opportunity here-to-fore unthinkable. It has made it possible to evaluate the combined potential of all the properties and develop a comprehensive plan to extract the resources and accomplish rehabilitation on historic workings. I support this project moving forward with some conditions that may enhance the likelihood of obtaining permits.

I was fortunate to have been the District Ranger at Cascade from 1987-2005. To say I learned a lot about all activities associated with land and resource management in the South Fork of the Salmon River would be an understatement. It is not an easy drainage to manage and get projects through the regulatory process. Easily my proudest and greatest disappointment from a management perspective occurred in the South Fork. The Thunderbolt wildfire in 1994 scorched 27,000 acres of the Cascade and Krassel Ranger Districts. Myself and my staff were given the assignment to develop a post-fire recovery project. That we did and it included salvage logging on a portion of the fire area. We spent countless hours attempting to convince those that opposed the project. We were litigated-won and survived an appeal in the Ninth Circuit Court of Appeals. Other federal agencies did not concur. It finally came to a conclusion 2 years later when the Heads of the Federal Agencies in Washington DC were to make the final determination. To his credit, USFS Chief Jack Ward Thomas, who had taken the time to come to Idaho and review the project on-the-ground, convinced his counterparts this project needed to move forward. That was my proudest day. The most disappointing day came a little over a year later when the Chief lost his job for supporting his managers.

The group of managers at Midas is a solid crew. They do care about trying to do the right things to get this project permitted. If they have a shortcoming, it might be inexperience with the South Fork and some elements of the regulatory process. That said, I have some reservations about some of the items in the Operating Plan. I expect the analysis of the proposed action to show undesirable effects or unacceptable risk for those elements. The biological consultation process is going to be a very difficult avenue to navigate and likely will result in a jeopardy opinion. That will make it difficult for the Operating Plan to move forward and could subject the decision to litigation. In addition, there is some popular belief that in this current political climate, problem maker government employees will be fired or transferred. This project cannot succeed if either a jeopardy opinion or purging employees occurs.

The use of a third-party contractor to do the EIS analysis has distinct advantages and disadvantages. It will save your staff a lot of time and allow the project to stay on the timeline. However, I don't feel the

contractor has a high level of knowledge of the ground. It is going to take a lot of time on your part to proof their work. And it comes at a time when fire season is just beginning.

So, what to do? It will take a lot of effort to develop a range of workable alternatives that are responsive to the issues. The alternatives cannot be superficial. They must be very viable and be ground-truthed and tested. The Company and the stakeholders need to be engaged. I suggest this is where you should spend the bulk of your time early on. Such will then make it possible to have a solid range of alternatives to weigh against each other. The analysis must be robust. This project will result in two unclaimed mining pits, the loss of a historic access road, a waste rock dump, and a tailings pond that will remain after mining. Restoring fish passage, processing tailings, retarding sediment from Blowout Creek and environmental cleanup may not be sufficient gains to get it permitted. The reconstruction of the Burnt Log and Thunder Mountain roads, a bigger powerline corridor off-site and the short-term loss of a snowmobile trail add a whole dimension to what needs to be approved.

It is important to remember that both the Johnson Creek and East Fork drainages have experienced a significant amount of high intensity wildfire in the last decade plus. Streams and lakes have received large contributions of sediment from runoff events where the fires occurred. The most striking example of this condition is the roughly 250 cubic yard sediment plume at the inlet/tail waters of Riordan Lake. In addition, the upstream reaches are plugged with new sediment deposits. The point needs to be made that some of these watersheds are severely stressed and fragile. Management activities such as road building and powerline construction will generate a new source of sediment. We must be mindful of the effects on aquatic species and take all reasonable measures in an attempt to avoid a jeopardy determination.

Elements of the proposal that I encourage you to explore for alternative development are:

1. The design standard for the Burnt Log and Thunder Mountain roads needs to be questioned. It is a major undertaking. Can a single lane road with turnouts along with managed industrial traffic (in-bound/outbound schedule, pilot cars, single company transporter) provide a significant safety dimension to a lower standard road? Construction costs would be less, the number of detrimentally disturbed acres would be less and the small drainages of Trapper and Riordan Creeks would be less effected. In addition, there is a lot of rock in that part of the mountains, but much of it is incompetent in terms of hardness for a road running surface. Borrow sources need to be proven to the desired hardness or basalt based gravel must be imported.
2. Extending the powerline to very near the Town of Yellow Pine appears excessive. There is a lot less ground disturbance and clearing if the switching station/transformer was located just downstream of Ditch Creek and the mine powerline were to exit the Johnson Creek valley floor near the intersection with the Thunder Mountain road. This would also have an added advantage of having the access road and powerline corridor in close proximity to one another. It avoids all the clearing, road building and ground disturbance in the Horse Heaven area. Locating the powerline where it was for the WWII era simply because that is where it was last time is weak rationale.
3. It is also confusing as to why the feed for the powerline comes from Lake Fork. The logic employed by Idaho Power in their Future Facilities Forecast seemed to be that there was great utility in feeding in a second 138kv line to Valley County from the High Valley area. If society is going to invest a lot of money into power for this project, it should be done with the greatest gain in mind. Not choosing the south feeder line because it will take too long is like saying we

don't have time to do this right. I think we owe it to all the rate payers in Valley County to have the most reliable infrastructure set-up, even if it takes longer.

4. Construction of a parallel snowmobile trail from Trout Creek to Landmark to serve recreation traffic while the Johnson Creek road is used for 3-5 years for mine construction isn't a realistic approach. The impacts from that construction could be avoided. There will be some loss of recreation opportunity that cannot be avoided.
5. The investment and associated effects as a result of pioneering a new access to Stibnite along with the powerline/corridor for a mine life of 15 plus years will be improvement that deserves strong consideration to be treated differently than an automatic removal tag post mining. Returning the Thunder Mountain road to its present condition would be a step back and result in a whole new round of sediment. The value of a good standard road to the Thunder Mountain area needs to be given fair consideration. I urge you to look at this alternative. Perhaps the final resolution on the powerline and road would be best if left up to the management scenario and managers present in 2030-35-40. Who is to say this will be the last mining activity in the historic Stibnite Mining District?
6. I believe it would be very desirable to develop a construction schedule and forecast that identifies the sequence of construction that must occur to reach the build out of the mine project. Such a schedule will go a long way to avert conflicting activities and rapid development that so often bring unnecessary resource impacts and social issues. For example: it would seem prudent to avoid road building and powerline construction at the same time within the same drainage in order to minimize sediment contribution and congestion.

If this project can be designed to reduce the effects to the minimum so the Company can do the necessary work in a safe and prudent manner, then the positive benefits are within reach. Once the mine site work is obtainable, there will need to be a lot of work accomplished to collaborate with cities, towns, schools and taxing districts to lighten the impacts that this level of growth will bring.

Thank you.

Ronn Julian