Diana S. Bryant, Owner, Wapiti Meadow Ranch

Comments on Plan of Operation Midas Gold/Stibnite

In an area of Idaho where the economic basis is essentially recreation, situated as it is in a proximity to the ever-expanding city and suburbs of Boise, Valley County has much to lose by depending upon an overly ambitious mining project in the heart of its most pristine recreation area. Some insist that the immediate Stibnite area is a historic mining site and can/should remain so. But the infrastructure necessary to support the Midas Gold/Stibnite Mine grandiose plan will impact not only the greater Stibnite area, but all the near wilderness and Wilderness area around it, as well as the access to those traditional hunting, fishing, hiking, riding, biking opportunities so dear to Valley County residents and visitors to the vacation/recreation communities of Cascade, Donnelly, McCall and environs. Of most concern to me, it will impact the quality of life and the economic fortunes of the local backcountry residents.

Valley County has suffered numerous times in the past with a Boom and Bust Economy, several times with overblown and doubtfully financed recreation schemes but with mining ventures as well. Previous mining at Stibnite created toxic pollution that can continue to contaminate the river today. The Midas Gold scheme threatens to be another such venture. Fisheries, game stability and road and trail access is threatened in the backcountry. Infrastructure in the towns and road maintenance throughout the central Valley County will be taxed and threatened.

Midas Gold/Stibnite Mine propose a massive mining operation at the headwaters of the East Fork of the South Fork of the Salmon River, one of the most important tributaries to the South Fork of the Salmon River. The South Fork supports a fishery so pristine that even guided trips for catch-and-release fly fishing have been denied or closely monitored by Idaho Fish and Game and the Forest Service. The East Fork is an important home and spawning habitat for endangered Chinook, steelhead and bull trout, all of which are located at the impact site and downstream from the proposed mining operation. Previous projects devastated these fisheries which are now recovering, due to years of conservation efforts by Idaho Fish and Game and the Nez Perce Tribe. It has culminated in stream and fisheries restoration which were decimated by those last mining operation(s) at the Stibnite site. The proposal to divert the entire stream flow through a temporary tunnel in the side hill so that Midas Gold can mine the streambed is problematic at best. No one has any idea whether it will actually work to reroute an entire important headwater river while preserving water quality and the endangered fishery. Damage to the water quality and migratory patterns of the species present there could have a severe impact even as far downstream as to the South Fork of the Salmon River. If this wide-ranging project should be allowed to proceed, the Forest Service and other affected agencies (DEQ, etc) should have an independent fund to restore the damage independent of promised mining reclamation activities via a bond so big, it could cover all contingencies. Over \$13 million taxpayer dollars have already been spent on restoration at Stibnite. That should not be wasted by more public funds cleaning up after another 'bust' in the future.

Already impacted by the mine traffic, the Johnson Creek Road, which parallels Johnson Creek, a tributary to the East Fork of the South Fork, will continue until the proposed Burnt Log Road route is completed into the mining area. Dust, potential fuel spills and sediment endanger this pristine fishery and one of the last best Salmon spawning beds in the Northwest.

The proposed Burnt Log haul road will cut through some of the best elk, deer, bear, moose and cougar habitat in all of Idaho, and certainly the finest in Valley County. (to say nothing about the endangered species such as Linx and that

have habitat there. There is nothing, no trade-off, that could mitigate the disruption of such a long and busy 'highway' cut through already established roadless areas and parallel to the Frank Church River of No Return Wilderness western border.

The proposed 600 workers living at the mining site will alter all the surrounding backcountry, quasi-wilderness and Wilderness conditions that make the recreational opportunities of Valley County so precious to so many, residents and visitors, alike. The impacts of noise, air pollution and debris/garbage/trash will change the character of the site, surrounding backcountry, approach corridors, and the remote character of the area and Valley County values.

There are several particulars that most concern me, other than the immense scope of the Midas Gold project:

The proposed 'jeep' route beginning at the Johnson Creek Road, up through Hennessey Meadow, over Horse Heaven with a new road built between Horse Heaven and the Meadow Creek Lookout road to access Monumental Summit, Roosevelt Lake and Monumental Creek Trails, Thunder Mountain and the Wilderness entry point there. This route is poorly researched and poorly planned.

- a. There is no way to 'improve' the existing track/trail to accommodate even jeep traffic. It is too narrow and has too precipitous a drop to allow two vehicles to pass and would not allow for widening due to that steep edge on one side and a steep, often sheer rocky, uphill immediately on the other.
 Occasionally a foolhardy flatlander will try it with a four wheel drive (and no sign or designation will deter these types) and will highcenter, fall off or stall on the extremely steep grade.
- b. This is a major recreational resource trail for the hundreds of fly-in guests at the Johnson Creek Airport, allowing them to hike to Riordan Lake for

- fishing and the exercise. There are few other opportunities for these visitors to our area to explore and enjoy the marvels of wilderness.
- c. For 30 to 50 years this trail has been used, during summer as well as during the fall hunting season, by horseback riders and pack strings. Riordan Lake is a fine destination for an extended camping experience or a circuit ride around the lake, up to Duncan's Cabin summit and then down the Thunder Mountain Road. You simply can't mix a general use motorized road with horseback riders, pack strings and even hikers.
 - d. The expense of connecting that track from Horse Heaven to the Meadow Creek Lookout road and the ongoing maintenance of the existing legs, as well as the 'new' road, would be prohibitive. Midas Gold saying they'd be responsible for the construction and maintenance isn't enough to convince me that the County or the Forest Service wouldn't eventually be saddled with decommissioning it or maintaining it.

There are **several alternatives** to this proposal which would be far less costly to establish and maintain.

- a. **Steven Harshfield** (I refer you to his comments on this) has several suggestions that would be better considered than the Riordan Track.
- b. Two proposals were discussed by Yellow Pine residents at the July 17, meeting:

One circumventing the Yellow Pine pit, crossing the new 'haul road at a stop light/sign and reconnecting with the Monumental

the East Fork Road closure, both the airport and Bryant Ranch would suffer the increased road traffic, the inability to hike and ride to Riordan Lake and Horse Heaven. Traffic on the Johnson Creek Road would increase dramatically during the construction of the 'haul' highway, increasing dust, wear and tear on a seldom maintained county road, and even later, with access onto the Riordan 'jeep road'.

Wapiti Meadow Ranch, which is in a conservation easement administered by the RMEF and funded by the Pacific Salmon Recovery Fund, with the conservation work on the ranch and all along Johnson Creek, being done by the Nez Perce Tribe, would suffer the increased traffic, possibility of spills, and degradation of its pristine environment for recreation visitors and the conservation efforts, alike.

The increased heavy haul traffic on the Warm Lake Road endangers all users, including residents of the backcountry area, the myriad of recreation visitors, and the mine workers, as well. All well and good for Midas Gold to promise to maintain the Warm Lake Road. If they do, I'd be pleased for all. However, that cannot mitigate the danger of overuse on a mountain byway by heavy truck traffic, mixed with horse trailers, camper trailers, boat trailers, and local resident traffic. Even summer use would be dangerous. Winter use, encouraged by the plowed access, could be suicidal. Keeping the Warm Lake Road plowed during the winter will ruin the snowmobile access to Yellow Pine, the Deadwood route to Stanley, and most of the winter recreational opportunities around Warm Lake.

I strongly object to any publicly owned property (Landmark Guard Station) being used by a foreign, privately owned mining company that plans to substantially alter the infrastructure and character of this area. If I could, I'd also object to a large facility being erected in Scott Valley, but it was said at the meeting that Midas Gold had purchased private land there for a staging/storage/processing plant. The tentacles of this project will, indeed, destroy the character of all of Valley County, not just the Stibnite mining area. No amount of donations of parks, sponsorship of events, or free lunches can mitigate the damage this grandiose, overblown, overreaching plan will do to our lives and surroundings.

If this mining can't be eliminated, at least the scope of this project could be scaled to meet with the needs of the other interests in the County and the safety and life style of its residents.

The Stibnite project will substantively change the character, recreational opportunities, ecosystem and resident's lives in the backcountry of Valley County. Promises of economic Boom for the Cascade/McCall area can only lead to Bust, as have so many other overblown proposals for massive business development. In the end, the only profit is to unseen, foreign entities and anonymous shareholders, feeding on the natural resources of our unique wilderness environment. I implore the decision makers to take into account how this project would profoundly change the lives, fortunes and futures of the residents of the Valley County backcountry and of the many businesses that would suffer, rather than prosper, if this project were to go forward as proposed.

Sincerely submitted,

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