I am writing to express concern about the Stibnite Mine proposal. I am however, not an expert in this subject. Copied below are a list of concerns from the group Save the South Fork Salmon. I have read through them and feel that each raises a valid and serious concern. In lieu of my personal (and incredibly amateur) assessment of the draft EIS, I would like my substantive and specific comments to echo the concerns raised by this group, as I share them as well. Each of these should be better addressed in order to meet the responsibilities of the Forest Service stewardship of public land and Midas Gold’s stated claims of restoration and exceeding industry best practices.

Overall, this proposal does not seem to guarantee that Midas Gold would “restore the site” as they have claimed in their marketing materials. There should be a guarantee beyond any doubt that there are sufficient funds to return the quality of this land to its pre-mining status. All alternatives would of course do worse than that, but there should be as best an effort as possible to accomplish that essential goal.

Thank you,

Max Silverson

McCall, Idaho

**The ALTERNATIVES are narrow in scope and rely on incomplete analysis**

T​here are no modeled predictions or results for alt. 3&4. The DEIS has not fully disclosed the effects of 3 a​ nd 4 for comparisons. This is disparate treatment of the alternatives giving us a fragmented basis on which to make judgements for comparisons. The DEIS does not take a HARD LOOK at 3 & 4. There is the hard look doctrine that should have guided this.

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Insection**1**​ **502.14ofNEPA​**Regulationsitrequiresthattheagencymust“rigorously explore and objectively evaluate all reasonable alternatives” and “devote substantial treatment to each alternative.” In addition regulations require “appropriate mitigation measures” be included. The treatment of alternatives 3 & 4 was cursory at best and in many sections of the DEIS there are “adverse impacts” mentioned and NO mitigations at all offered.

**GEOCHEMISTRY & WATER QUALITY**

BACKGROUND: Chemical reactions between rock and water have the potential to release acid and toxic metal ions into groundwater and surface water. Groundwater quality and quantity will be adversely impacted by the project. These impacts will then affect surface water which in turn affects aquatic organisms. Groundwater and surface water have many interactions and should be thought of as two parts of a single integrated system, the primary distinction between the two being the time scales of their respective processes. Modeling in the DEIS shows that arsenic, antimony, mercury, and other metals will contaminate water for many years after mine closure. Keep in mind this detrimental prediction likely represents a best case scenario.

COMMENT: The effects analysis in the DEIS focuses on predictive numerical modeling. In attempting to quantify changes to water quality and quantity at different times during the mining operation and upto one hundred years in the future, the DEIS relies on certain assumptions that contain significant error. This error is primarily based on the methodology employed to analyze uncertainty in the model outputs.

For example, the faults and fracture zones present in the area are acknowledged as having potentially significant influence on groundwater movement and quality. However, they are not taken into account in the modeling. This omission is identified at **C**​ **hapter 4.8.8.2.1.3​**.

Further, the plan to treat surface water *i*​ *n perpetuity* t*​* o meet state water quality standards relies on an assumption that whatever company mines the site will put money into a trust fund to support the operational costs to treat the water forever. The infrastructure to do so (powerline, roads, treatment facilities) will remain forever. However, the contamination is modeled to still require treatment 100 years in the future. The DEIS assumes, without support that chemical reactions causing contamination will slowly decrease to a point where contaminants will be below state standards. When this time comes is unknowable. Moreover, state water quality standards have equal chances of becoming more strict in the future as remaining the same.

S e e ​**C h a p t e r 4 . 8 . 7 ​**, ​**4 . 8 . 8 ​**, ​**4 . 9 . 7** , **​**a n d ​**C h 4 . 9 . 8 ​**f o r m o r e d e t a i l . I n p a r t i c u l a r ​**4 . 8 . 8 . 2 . 3** expresses an unsupported opinion that it is “unrealistic” to bring water quality up to a standard that is better than what exists currently at the mine site.

**FISH**Fish Facts from the DEIS which may be ​**inconsistent** w**​** ith a “restoration” theme.

REMIND THE USFS that to ensure viable and resilient fish habitat in the East Fork of the South Fork the most assured method is to “protect the best and restore the rest.” Over half of the mine footprint is in undisturbed habitat. The USFS must analyze an alternative to minimize the mine footprint that is contained only to previously disturbed areas.

OTHER SUGGESTIONS:
1. Don'tputminingwaste-neworold-orbuildnewroads-inundisturbedhabitat.

1. Don'tconductactivitiesthatarelikelytomobilizeadditionalarsenicsuchasblasting

waste rock and grinding rock into tailings.

1. Don'tbringmillionsofgallonsofdieselfuel,cyanideandotherchemicalstothesite.
2. Doreconnecthabitat,isolatehistoricminewastefromstreams,andrestoredegraded

riparian areas.

**DEEP DIVE INTO FISH**

*Commentsareinitalics,*n*​* on-italicsareverbatimfromtheDEIS.

**DEIS p. 3.12.1 describes the 4 special status fish: ​***South Fork Salmon River is not pristine, but it is wild, free-flowing, largely within public lands, undeveloped, and supports native fish. While all fish are of management interest, ​****four special status native salmonids​****(i.e., fish in the family which includes salmon and trout) are of particular interest because of their status as federally-listed fish or fish of management concern. These all require cold, clear, clean, running water and varying unobstructed migration pathways to complete their life cycles.*

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The DEIS indicates that the Forest Service has preliminarily determined that ​**project will adversely affect ​**bull trout (pg. 4.12-87), Chinook salmon (pg. 4.12-69), steelhead (pg. 4.12-75), and their critical habitats; and may indirectly impact Westslope cutthroat trout (pg. 4.12-93).

**DEIS p. 4.12-201, Table 4.12-66 “Comparison of Fish and Aquatic Resource Impacts by Alternative.”​***This table documents adverse effects to fish and is worth scrutinizing.. It does not take into account additional, synergistic impacts that will occur downstream of the mine site. It should, because Chapter 3 describes the “Fish Analysis Area” to include waters downstream of the mine. Downstream impacts are highly likely and predictable due to the effects of mine site increased temperatures and exceedences of sediment and chemicals such as mercury and arsenic.*

**Key indicators from Table 4.12-66**

* **-**Length of stream directly impacted by removal (ie, length of stream removed): 10.8-31.8kmoverallalternatives.*T*​ *hisdoesnotaccountforimpactstoindividualfishas a result of this removal, and “Mitigation” is not specifically tied to this removal in the DEIS, only generally mentioned in Appendix D.*
* *-*Direct loss of Chinook salmon habitat over all alternatives: 3.3-4.2 miles lost, or 20.8-26%.T*h*​ *isisasignificantlossofhabitatforathreatenedspecieslistedunderthe Endangered Species Act. This loss is not specifically mitigated in the DEIS, only generally mentioned in Mitigation Appendix D.*
* *-*Direct loss of bull trout critical habitat over all alternatives: 2.8-7.14 miles lost, or 27.5-69.5%.*T*​ *hisisasignificantlossofhabitatforathreatenedspecieslistedunderthe Endangered Species Act. This loss is not specifically mitigated in the DEIS. only generally mentioned in Mitigation Appendix D.*
* *-*Changes in water temperature: ​*Very important to read!!! But difficult to understand as displayed. See “Stream Temperature” below.*
* *-*Changes in water chemistry: V​*ery important to read!!! But difficult to understand as displayed. See “Water Quality” below.*
* *-*Changes in migratory patterns of fish: Fish passage at Yellow Pine pit lake would initially be provided in the EFSFSR tunnel, then ultimately by backfilling the Yellow

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Pine pit and building a new stream channel over the top of the backfill, thereby providing permanent fish passage through the area. The success of “fish passage” depends on the success of the tunnel, which is tentative, unproven, and lacking rationale. See “Fish Tunnel”, and Barriers ​*Removal below.*

The Meadow Creek diversions and then construction and operation of TSF/DRSF ​*(Tailings Storage Facility, or “tailings dump”, and Development Rock Storage Facility, or “waste rock dump”)​* and the construction/operation of the DRSF in Fiddle Creek, would create new barriers to natural fish movement that would be permanent. ​*Meadow and Fiddle Creek support native fishes listed as threatened under the Endangered Species Act, which need all of the habitat they can possibly access. These streams also provide headwater characteristics essential to stream ecology function downstream. The effects of destroying these streams by filling their valleys with waste rock and potentially toxic tailings goes far beyond creating new barriers to ESA-listed migratory fish, and have not been analyzed in the DEIS. See Barriers-Creation below.*

**Bull Trout** *(***​***migrate in late summer from lakes, and larger rivers such as Main Salmon, to smaller streams to spawn, then return to the larger habitats, repeat spawners)*

**DEIS p. 4.12-83 and 4.12-87. “**T**​** otal habitat availability for bull trout decreases along the timeline of the SGP. Post-closure, and a net decrease in quality and quantity of bull trout habitatwouldoccur,*d*​ *espiteremovalofpassagebarriers,dueto:​*-decreaseinstreamflow- increase in modelled stream temperatures by up to 4 degrees C (without climate change)- access to bull trout critical habitat in upper Meadow Creek would be blocked

i*n*​ *-perpetuity-​*CriticalHabitatwilldecreaseby28-70%.
**Chinook Salmon​***(****​****anadromous, migrate from the ocean to our mountain streams in summer to*

*spawn, then die)***DEIS p. 4.12-69​**. ​*Despite removal of passage barriers,* “*​* Following closure and reclamation, the

overall net effect would be a loss of both quantity and quality of habitat for Chinook salmon.”

* -  there would be a decrease in Chinook salmon productivity as a function of water flow,
* -  The increase in modelled stream temperatures by up to 5 degrees C (w/o climate change) in the East Fork South Fork Salmon River at the mine site

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- *Despite removal of passage barriers* w*​* hich could potentially open up to 19.7 km of critical habitat, overall, Critical Habitat will decrease by up to 26%.

**Westslope Cutthroat Trout​***(migrate between streams to spawn in late spring, repeat spawners)*

**DEIS p. 4.12-93​**. “Stream channel changes, direct effects to individuals, and changes to habitat indicators would negatively affect cutthroat trout in the analysis area through the loss of suitable habitat. *D*​ *espite some improvement to access​*, there remain potential effects which may cause injury or mortality to individuals

**Steelhead** *(***​***anadromous, migrate from ocean in April to our mountain streams to spawn, can be repeat spawners)*

**DEIS p. 4.12-75.** “**​**negative effects ... are expected to be less intense for steelhead trout than those for Chinook salmon. ​*Despite some improvement to access*,*​* 1.91 km of habitat in upper Meadow Creek would be *b*​ *locked in-perpetuity*,*​* and potential effects may cause injury or mortality to individuals. the net effect would be an increase in both the quantity and quality of habitat for steelhead trout.”

-Predicted increase in stream temperatures, as modelled, would result in an increase in the amount of available steelhead habitat. *H*​ *owever, this modelling did not include the potential effects of climate change. Increases in temperature beyond the modelled increase of up to 4 degrees C of up to 3 degrees C more, due to climate change, are predicted, which would change, and probably decrease, any amount of increased steelhead habitat.​* (DEIS Appendix J2).

**Fish Tunnel**

*Social media anticipates “seeing anadromous fish get back to their native spawning grounds for the first time since 1938.” This would depend largely on the success of the “Fish Tunnel.” A plethora of stream and fish restoration claims are based on the success of this tunnel.*

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***Apx J3, p. 6.​****The DEIS, however, clearly states that the tunnel’s ability to pass fish is in question. ​*“Even after close collaboration with NMFS, meeting passage criteria, and executing all adaptive management measures, there exists a reasonable probability that the project will not be able to volitionally pass fish safely, timely, or effectively.” ​*The three references (Wollenbaek et al. 2011, Rogers and Cane 1979, Gowans et al. 2003) cited for the rationale of success of this tunnel are weak, presented in abstract only, and address different species and habitats compared to those at Stibnite.*

**Barriers – removal**

*Social media also states that “removal of some barriers allows for free movement and access to habitat for both upstream and downstream fish, improving genetic diversity, overall productivity, and access...”. There is a large cost of such uncertain endeavors, with unpredictable outcome. For instance, about 100,000 fish could be “potentially affected” by injury or death for 1.6 km of channel changes in the EF South Fork Salmon River (DEIS p. 4.12-17).*

***Assumptions for a total of “about 100,000 fish injured or killed”:***

​*Capturing and relocating fish is stressful and has the potential to cause (injury and) mortality (DEIS p. 4.12-15) Oncecaptured,fishcouldsufferinjuryormortality:duringremovalby:gettingcaughtin screens, traps, dipnets, seines, and electrofishing; during transport; at the relocation site by predation, lack of food, disorientation, and competition; and from increasing temperatures, decreased dissolved oxygen, and predation from being stranded in partially dewatered areas (DEIS p. 4.12-15). Giventhesemanywaysfishcanbeinjuredorkilledduringremovalandrelocation:the number of fish present in an area to be dewatered = the number of fish potentially affected or impacted (injured or killed) by SGP dewatering, salvage, and relocation ThenumberoffishpresentduringsnorkelsurveysinareastobedewateredbySGPis summarized in Table 4.12-2b*

*Adding the numbers of fish that might be present, and potentially affected, over all four species and all sites, results in the total number of fish estimated to be potentially injured or killed by dewatering, in order to modify 1.6 km of stream channels. 84,066Chinooksalmon+1,009steelhead+620bulltrout+10,647cutthroat=96,342 fish*

​*Mortality rates were vaguely estimated for a small sampling study (DEIS pg. 4.12-15). No data were presented for methods, or total fish sampled. Injury rates were not estimated. This is not comparable to the proposed effects of the much, much larger-scale dewatering of 1.6 km of the East Fork South Fork Salmon River. Injuryandmortalitytotalsarefromdewatering,salvage,transportation,andrelocation only for 1.6 km of stream channel alterations. Injury and mortality resulting from other stream channel work, culvert replacements, blasting, effects of hazardous spills, and changes in access. Percentages of populations, and population -level impacts, were not analyzed in the DEIS.*

**Barriers-creation**

*The Payette and Boise NF Forest Plans have Standards (promises to the public about resource protection) to “*n*​* ot authorize new surface diversions unless they provide upstream and downstream fish passage” (DEIS Appendix A)*.*​ *The Stibnite Gold Project has proposed a Forest Plan amendment to this standard, to “​*Suspend the requirement of new surface diversions to provide upstream and downstream fish passage within the footprint of mining operations.” *This would create new barriers to upstream and downstream fish.*

**Stream Temperature**

**DEIS Appx J2**.**​**Stream Temperature Tech Memo. Ecosystem Sciences 2019. In general, the impacts associated with the proposed project on stream temperatures would be an increase in stream temperatures in various reaches in the mine site study area. Fish would be affected by these water temperature changes. In general, bull trout and Chinook salmon would be the most negatively affected species, because they migrate and spawn in the summer and fall, when lower flows and higher air temperatures would amplify the impacts of the project on stream temperatures.

*The SPLNT temperature models used in the DEIS stream temperature analysis do not account for changes to stream temperatures caused by changing climate conditions, and do not account for increased temperatures in the East Fork South Fork downstream of the mine site, even though the “Fisheries Analysis Area” encompasses downstream habitats and downstream temperature increasesareprobableandpredictable.​T*​ *heNorWeSTmodel,producedbytheU.S.ForestService Rocky Mountain Research Station, represents future stream temperatures, adding 1.1-2.0 degrees C in the years 2030-2059, and 1.0-3.0 2070-2099 to SPLNT modelled values.*

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DEIS 4.12.2.3.3 pg. 4.12-26. Meadow Creek downstream of the East Fork Meadow Creek would have potential water temperatures that are lethal to Chinook salmon during the summer, in perpetuity. Even at EOY 112 (112 years after mine operations begin), the EFSFSR (Mdw Ck ds to Sugar) has the potential to reach lethal levels during the summer. Water temperatures in this reach during the summer have the potential to adversely impact all four salmonid species.

In the EFSFSR ds of Sugar Creek, maximum summer (19.3​**°**C**​** ) and fall (14.4°C) temperatures and average summer temperatures (13.2°C) are still predicted to be as much as 4.8 degrees greater than baseline 100 years into the post-closure period (**T**​ **able 4.12-5​**).

**Water Quality**

**Pg. 4.12-39, Chapter 4.12.2.3.3.1 ​**Despite activities that would improve water quality for fish from the removal and reclamation of legacy mine wastes, exceedances of the NMFS and USFWS and other applicable criteria for antimony, arsenic, copper, and mercury are anticipated to extend indefinitely post-closure​**.**

**WILDLIFE**

**WOLVERINE.​**Hundreds of thousands of acres of directly and indirectly impacted wolverine habitat would result from mine activities (Chapter 4.13.2.1.3.2). Wolverines are specially designated.....

**GRAY WOLF. ​**Direct impacts on gray wolves would include and direct/indirect impact to individuals and habitat loss (Chapter 4.13.2.2.4.1)

**MIGRATORY BIRDS (INC EAGLES)**

The Migratory Bird Treaty Act prohibits actions that kill birds on the list of migratory bird species. Executive Order 13186 directs the US Forest Service to protect migrating birds and promote their conservation. In the DEIS, Opinion M-37050 (3.13.2.4) is noted stating that “incidental” takes of migratory birds are not prohibited. In August 2020 the above opinion

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was rejected by the court. The court stated that it is unlawful to kill birds “by any means whatever or in any manner”, including incidental takes.

With this in mind, project actions that kill migratory birds must be readdressed to comply with the court ruling. These include emissions, removal of nest trees, etc. In addition, I was unable to locate a discussion in the DEIS of the effects of arsenic, mercury, etc on water birds that may land on the pit lakes, potentially causing mortality.

**HAZARDOUS MATERIALS**

THE DEIS SAYS: Hazardous materials and chemicals would be transported to the mine site in U.S. Department of Transportation-certified containers by trained personnel and would be stored in designated areas employing secondary containment measures. A Hazardous Materials Handling and Emergency Response Plan would address procedures for responding to accidental spills or releases of hazardous materials to minimize environmental effects. Used products would be stored on site in approved containers that would be separate from other trash and garbage products. Therefore, there is little chance of wildlife being exposed to hazardous materials.

Alternatives 2, 3, & 4 would have similar effects on general wildlife species as Alternative 1.
In the project area how will community and industrial trash and garbage be managed and who will oversee it's management?

COMMENTS AND QUESTIONS TO ASK:
On site who will be responsible for and insure that hazardous materials will be separate from community trash and garbage?
Where will the community and industrial trash and garbage be hauled?
What will you do with the hazardous waste? Does the county have facilities to deal with it? Have you discussed hazardous waste and garbage disposal with Valley Co.?
In your emissions estimates did you include the emissions from the hauling community and industrial hazardous waste and garbage?
Do you have a plan for recycling your community and industrial recyclables?

**AIR QUALITY IMPACTS**

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The Stibnite Gold Project will produce significant amounts of dust and hazardous air pollutants. The Payette National Forest’s DEIS and Idaho Division of Environmental Quality regulators improperly ignore emissions caused by blasting, loading, and transport of ore and waste rock even though those activities are integral to mine operation. Because those dust emissions aren’t counted, the mine is classified as a non-major air pollution source while much smaller operations in other industries are considered major. The analysis shows visible impacts from dust in the adjacent Frank Church - River of No Return Wilderness during 30% of daytime hours and 73% of evening hours. The DEIS ignores the effect of heavy metals such as antimony, arsenic and selenium in dust from the mine, only analyzing the effects of mercury. Almost all deposition of these metals will be in the Salmon River drainage, adversely affecting water quality and ecological integrity in the most ecologically intact drainage in the lower 48 states.

**CARBON EMISSIONS AND CLIMATE CHANGE**

Gold mines emitted on average 0.8 tonnes of CO2 equivalent for every ounce of gold that was produced in 2019, according to a report from ​S&P Global​.

Strong ​price performance​ has led to a large number of new gold mines opening and, with this, also concerns of mining’s impact on climate change.

Another recent ​report from Wood Mackenzie​ found that emissions from metals production will need to halve over the next 20 years in order to achieve the Paris Agreement decarbonization goals.

“Open pit mines emit on average around twice as much CO2e per ounce of gold produced as underground mines, at 0.85 tCO2e and 0.40 tCO2e, respectively. Open pit mines also process roughly five times the amount of ore at an average grade of around 1.05 g/t Au for the population evaluated, versus 3.25 g/t Au for underground mines,” says S&P

On April 20, 2017, the Congressional Review Service (“CRS”) reviewed Executive Order 13783 and determined that prior to the issuance of the rescinded guidance, “some courts had faulted federal agencies for insufficiently taking into account climate-related impacts of their proposed actions” in NEPA reviews.172 The CRS concluded that “in order to comply with such rulings, federal agencies will still likely need to consider the impacts that their proposed actions would have on greenhouse gas [...] emissions and climate change.”173 As to the social costs of carbon methodology, the CRS states:

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[F]ederal agencies may still be required to take into account the costs of carbon in their rulemakings and NEPA reviews. For example, Executive Order 12866, issued in 1993, requires most agencies to consider the costs and benefits of economically significant rules, including the cost of adverse effects in the “natural environment.” The new Executive Order 13783 does not remove the requirement to consider environment-related costs and benefits associated with regulatory actions, including revisions or withdrawals of rules. In these instances, the executive order

directs agencies to be consistent with the guidance in the Office of Management and Budget (OMB) Circular A-4, dated September 17, 2003, when analyzing the value of changes in GHG emissions resulting from regulations. Although the OMB Circular A-4 provides guidance on how to conduct cost-benefit analysis in rulemakings, it mentions climate change costs and benefits only once. In the circular, OMB recommends that federal agencies should analyze and present uncertainties related to its cost-benefits analysis of regulatory options, including, “for example, the uncertain knowledge of how some economic activities might affect future climate change.” Without additional guidance, in order to comply with Executive Orders 12866 and 13783 and NEPA requirements, federal agencies will likely still need to determine how to assess the climate-related costs and benefits associated with rulemakings.174

In summary, we request that the Forest conduct a full and complete analysis of the impacts associated with GHG emissions from the proposed mine, existing GHG emissions from historic activity and the current condition of the site, as well as the combined, cumulative impacts the would be caused by the proposed Project in combination with other existing and proposed GHG emitting sources in the region. We request that the Forest use the accepted social cost of carbon methodology in conducting this analysis. If the Forest refuses to use this methodology in its analysis, we request that, prior to issuing an EIS for this Project, the Forest (or Forest Service) promulgate a new methodology for assessing the impacts associated with GHG emissions for NEPA reviews. We request that this new methodology be subject to public comment and review prior to its adoption. ​The Forest simply cannot proceed with this NEPA review until a new methodology is adopted for determining impacts associated with GHG emissions.

*Taken from the Nez Perce Tribe Scoping Comments*

The Deis does not treat climate change in any comprehensive way; it falls back again and again on “there’s no way to quantify our emissions and we aren’t required to so we’re not going to and it’s not that much when you compare it to the whole nation, etc. etc.” There is no mention of the unfairness of increasing Valley county’s emissions by 800% or of the obscene idea that for every ounce of gold produced .8 tons of CO2 equivalent is emitted. There is mention of the effects of climate change ..reduced precipitation, fires of greater intensity and more frequent, temperature rises, reduced stream flow But there is NO connection of the dots. No additive analysis for example of the project generated rise in stream temperature (4 degrees) which will be exacerbated by the crises in temperature rise from climate change. And how about the additive effect of tree loss through fire , the reduced shade, the extreme weather events, how do these all add up to magnify the already destructive impacts of the mine. These all have to be looked at in entirety. And what about the morality of even doing this obscenity of resource use and emissions in the midst of the worst ecological disaster mankind has ever experienced.

**RECREATION IMPACTS**

It is noted in the DEIS that the local communities rely heavily on tourism to support their economies” and that “[t]he analysis area is a popular area for a variety of recreation activities on both private and public lands,” yet there is no report, information, or analysis on how the Stibnite proposal will affect tourism, recreation, or the related economic benefits to local communities. A supplemental report and information are needed accordingly.

Sources are out of date (many are 2003 and 2010) in the context of Idaho experiencing a population boom, and its residents holding high value in recreation opportunities.

Idaho’s Recreation and tourism generates $7.8 billion in consumer spending and support 78,000 jobs; 79% of Idaho’s residents participate in outdoor recreation; and recreation opportunities is a recruitment tool for businesses used to attract and retain workers (Source: Bureau of Economic Analysis, 2018; Idaho Business for the Outdoors, 2020). Recreation and tourism are a big deal locally, state-wide, and nationally and thus, please provide the missing information on impacts to recreation and recreation and tourism economies as related to the Stibnite Alternatives and a management plan and contingencies for the recreation in the area per each alternative.

Also,thesestandoutintheguidingP​ rinciplesoftheForest



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* -  We use the best scientific knowledge in making decisions and select the most appropriate technologies in the management of resources. This report does not include the best scientific knowledge and therefore is insufficient for comment.
* -  We follow laws, regulations, executive direction, and congressional intent.

*Specifics from the DEIS*

1. In**S**​ **ection3.4.3.3.17SOCIALANDECONOMICCONDITIONS​**,theDEIS notes that “Communities near the analysis area are rural and rely heavily on tourism and the trade industry to support their economies” and yet the Recreation section of the DEIS (​**3.19 beginning on page 603​**) does not include any information on the impact the project will have on local recreation.

- Please provide an economic analysis of the local tourism economy and the Stibnite impacts including methods, sources, and data relevant to the most recent 2-3 years.

1. Thecitedrecreationuseon​**pg.603​**“Theanalysisareaisapopularareaforavarietyof recreation activities on both private and public lands.” A summary statement of the importance and abundance of recreation in the analysis area is provided; however, the entirety of the recreation section does not mention or address how recreation will be impacted by the Stibnite project, nor does it provide recent sources in its descriptions of uses (sources are out of dates, esp. In the context of Idaho’s booming population, noting its value of recreation (census.gov, 2020; Foy, 2020; Raphelson, 2017; Men’s Journal, 2019). Please provide information on impacts to economic and social cultural benefits of recreation to local communities and state, national, and international visitors in a supplemental DEIS that can be reviewed.
2. Citedonpg.615“​RecreationisconsideredamajoruseintheBigCreekarea​ofPNF MA 13 (Forest Service 2003a),” is cited using a 2003 reference (17 years out of date). Per the National Forest Management Act and ROS, the FS is required to provide recreation opportunities. As Idaho is currently the fastest growing state in the nation since 2016 and it is noted that current and inbound residents value recreation highly (a motivating factor in their move to this state) (census.gov, 2020; Foy, 2020; Raphelson, 2017; Men’s Journal, 2019), please include and disclose more recent resources for recreation use analysis of this area in a supplemental DEIS in order to inform substantial and informed comments.

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a. FURTHER related to more recent data being taken into account is this:

* -  Recreation is Idaho's outdoor recreation economy generates $7.8 billion

in consumer spending and support 78,000 jobs

* -  79% of Idaho’s residents participate in outdoor recreation
* -  Our outdoors are a recruitment tool for businesses used to attract and

retain workers

* -  Areas in the West with protected wilderness, national parks and

recreational assets have higher growth rate and higher per-capita income

* -  Medical savings and improved physical and mental health are associated

with outdoor lifestyles
(Source: Bureau of Economic Analysis, 2018; Idaho Business for the Outdoors, 2020)

1. Similarlytotheabove,citedonpage**6**​ **15​**usessourcescitedfrom2003-2010,whichare are inadequate and out of date, especially in the context of Idaho’s growing population, recreation interests, and general economic benefits to local Idaho citizens (census.gov, 2020; Foy, 2020; Raphelson, 2017; Men’s Journal, 2019). Please provide more up to date information and analysis. “Recreation users in the analysis area are mostly locals, originating from areas in the analysis area such as Yellow Pine, Warm Lake, Big Creek/Edwardsburg, and areas just west of the analysis area including Cascade and Long Valley (Forest Service 2010).

Users particularly in the western portion of the analysis area also are from populated areas further south including Treasure Valley and Boise (Forest Service 2010). As noted in the Payette Forest Plan for PNF MA 13, though most use is local, “users come through the area from all over the country to use the adjacent Wilderness [FCRNRW], especially during big-game hunting seasons” (Forest Service 2003a).” This section further presents information that needs clarification. Cited local areas such as recreationists being mostly local, but also from the Treasure Valley, Boise, and from all over the country, what effect will the Stibnite project have on these local, Treasure Valley/ Boise/ other Idaho, national and even international visitor’s uses? There is no information on impact to visitors or the local tourism economies that depend upon them

1. ThepurposeoftheValleyCountyComprehensivePlanistopromotethehealth, safety, and general welfare of the people of the state of Idaho, and in part, to ensure the

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protection of “fish, wildlife, and recreation resources” (Valley County 2018). The Valley County Comprehensive Plan also includes a Recreation and Open Space goal “To promote and support a viable recreation and tourism program ...” (Valley County 2018). Objectives include creating improvements for more varied recreation opportunities, promoting development of new recreation facilities when compatible with land use goals, and protecting access to public lands (Valley County 2018).

1. Note of this law denotes local work and law to protect recreation resources in Valley County. Again, the current DEIS does not provide information on how recreation in the area will be impacted and provides out of date sources on current use.
2. Pleaseprovideinformationonimpactincludingeconomicimpactstothese local economies that rely on tourists, per EIS requirements.
3. Please provide an economic analysis of the local tourism economy and the Stibnite impacts including methods, sources, and data relevant to the most recent 2-3 years.

**RECLAMATION /SOILS**

4.5 Soils and Reclamation Materials

* Inconsistent statements regarding soil contaminants and planned usage
* Exposure to contaminants is likely if onsight soil is used for reclamation

● Mention of ‘arsenic unpredictability’

* Biohazard of compost is not addressed
* Winter safety
* 3.5 - Soil analysis is vague, not specific
	+ ●  No clarity if onsight soil is adequate for reclamation purposes
	+ ●  Overall, lack of clear graphics
	+ ●  ? For Hangar Flats, 96 samples were collected, but only 7 were

analyzed - why?

* + ●  3.5-3.22 - Soil Contamination Chemistry
	+ ●  3.18.1.2 - mentions reclamation work
	+ ●  Soil Quality

○ ! inconsistent statements throughout the document !

* Unclear origin of Reclamation Cover Materials
* Soil Mitigation Proposal is inadequate, does not discuss sampling

soil contaminants at various depths, only various locations

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There really needs to be a fully fleshed out Reclamation Plan in the DEIS because it is an essential part of the proposed action. But instead there is an offering with no detail . A water treatment plan post-operational is crucial yet there is a lack of details How can we know how it fits into the reclamation plan?What about the liners, how effective are they? Was state law changed at MIDAS request so a liner did not have to be provided in some cases? How are the liners that are going to be used going to be monitored?

**CONSISTENCY WITH FOREST PLAN**

Forest Plans are promises between the USFS and the public. Both the Boise and Payette NF Forest Plans that are proposed to be amended (meaning to be “de-promised” ) for the SGP include:

* -  duration of fish and wildlife degradation ( adverse effects),
* -  total soil resource commitment (ie soil disturbance),
* -  visual quality, and
* -  water diversions.

(DEIS Appendix A)

**Forest Service Amendments**

For a waiver of that geographical scope and time scale (as in the duration of fish and wildlife degradation), it should be a plan level amendment NOT a project specific amendment. Project specific amendments are for short term effects like in the case of adding small amounts(0.6 miles) to a road system, nothing like what Midas was requesting. However, the process of a plan level amendment was not followed per 36CFR § 219 in the regulations.

First, remind the USFS that when an amendment is covering more than 15 years it needs to be under a plan level amendment process. Second, remind the USFS that certain standards cannot be amended because they are tied into the endangered species act consultations and the USFS **doesn't have authority​**to waive them. Finally, any waiver of these standards requires disclosure of the effects that the waiver is going to generate. There are no details given in the DEIS of these effects.

**SOCIAL AND ECONOMIC IMPACTS**

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*There is uncertainty regarding the type and extent of local employment and the type and extent of inmigration. 4.21-1
High percentage of non-local employees. 4.21-2
Most workers would reside in the Boise area and would commute. 4.21-9*

*Most employees are expected to spend almost all their earnings at their place of residence. As a result the economic contributions to Valley and Adams counties economies would be limited to income earned by workers that live in the area. 4.21-7*

The prediction is a population increase of 438 new residents. There is already a current housing crisis. (4.21-11) 59% of Valley county households pay more than 30% of their income on housing. With population increase local housing demand will increase. There will be a greater scarcity of affordable housing and higher prices for real estate. The DEIS offers no mitigation for the exacerbation of this local crisis.
Public utilities and the McCall-Donnelly school system have the most potential to be impacted by population increase. (4.21-15) Substantial adverse impacts could be expected to the McCall-Donnelly School system and the water and sewer system capacities depending on where new workers reside. The DEIS offers no mitigation for these adverse impacts.
Valley County public agencies and service sectors could experience adverse impacts from wage inflation and/or understaffing. Government agencies have limited flexibility to adjust wages or increase funding to pay contractors. Labor cost increases affect the capacity of government agencies to continue providing services like school bus drivers, plow operators, garbage haulers and road maintenance. Contraction could also occur for private businesses relying on lower wage workers. This all could result in loss of local businesses and reduced public services. The DEIS offers no mitigation for this potential crisis.

Telecommunications and internet infrastructure may have difficulty in maintaining service because of increased demand. The Deis offers no mitigation.

No property taxes will be paid by Midas until after the SGP facilities are completed and the mining operations begin. As a result construction activities are expected to result in negligible tax revenue benefits for the local area’s economy. (4.21-8) The federal government is expected to receive most of the total tax revenues resulting from operations. The state of Idaho is expected to get ten million dollars in tax revenue per year. Valley County is expected to get $300,000 per year. ​*As a result operations are expected to result in a relatively limited tax revenue increaseforthelocalarea’seconomy.4.21-26*T*​* heDEISoffersnomitigationtothesubstantial costs that will be incurred by Valley County Taxpayers.

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In spite of describing the dire consequences in the BUST cycle of the project (4.21-31...4.21-35) the DEIS offers again no mitigations or ideas for reducing the impact of this projected massive disruption to the area’s economy. ​*In the absence of adequate economic transition mitigation, the mine-closure related decrease in local employment could have an adverse effect on the local area’s residents, businesses and overall economy.*

The Deis offers no analysis of the impact of congestion from commuting workers or trucks hauling mine supplies on highway 55 or highway 95, both of which are crucial corridors for the recreation and tourist traffic that is essential to this area. Even though they say 29% of employment is through the tourist industry their operations could cause a drop in visitors because of increased congestion and danger on the access roads to this area. The DEIS offers no analysis of this crucial issue nor mitigations

**POST CLOSURE AND PERPETUAL CARE**

Some pages in the DEIS containing reference to ​**perpetual water treatment​**are listed below.
At this time Perpetual Treatment would only be used in Alt. 2 - Midas’ preferred alt. If perpetual treatment is

used, power lines, power substations, and roads to the mine would remain in perpetuity.

3-4 employees would be needed to tend the treatment plant, and 40 additional truckloads of chemicals for the plant would be needed annually

Page, section or paragraph
page2-10, InChartunder"ClosureandReclamation”

2-71, 1st full ¶
4.3-43, 3rd line
4.3-45, last ¶
4.4-17, section 4.4.2.2
4.5-33, section 4.5.2.2.3 4.7-14, Table 4-7.2 and below it 4.9-71 1st full ¶

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4.9-75
4.9-13
4.12 - 104
4.20-31, top of page 4.21-38, section 4.21.2.2.3 4.23-65, section 4.23.3.5

**HAZARDOUS MATERIALS**

The Stibnite Gold Project will require year-round shipments of thousands of tons of hazardous or toxic chemicals and explosives and millions of gallons of gasoline and diesel fuel. The transportation routes are along the Payette River, or the Weiser River, or the Salmon and Little Salmon Rivers. All shipments will travel through residential and commercial areas of McCall or Cascade, then along 75 miles of backcountry roads to the mine site. The Draft Environmental Impact Statement does not analyze the accident and spill risk anywhere on Hwy.’s 95 or 55 or in the towns of McCall or Cascade. The DEIS grossly underestimates the accident risk on backcountry roads. The DEIS contains no analysis of the effects of a spill and no plan to clean up a spill.

**ACCESS AND TRANSPORTATION**

***SPILL RISK. ​***Haul of highly toxic reagents and fossil fuels at the mine site and on the haul route could result in spills with significant impact to fish (**C**​ **hapter 4.12.2.3.2.1​**and **4**​ **.7.2​**). Nearly the entire length of streams adjacent to both access routes (Burntlog and Yellow Pine) is within designated critical habitat for Chinook salmon, steelhead, bull trout, and westslope cutthroat trout (**C**​ **hapter 4.12.2​**). The spill risk modelling, spill probabilities, and # of potential spills in the DEIS (​**Chapter 4.12.2.3.2.1**)**​**is 2 orders of magnitude less than that calculated by statistician Lubetkin pers comm 9/2/20. The assumption that 91 meters from access routes contain all important fish habitat potentially impacted by spills is arbitrary and capricious.

**● 4.16.2.1.1**○ Yellowpine Route is planned to be used until Burnt Log Route Completion

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* No geohazard analysis conducted for Yellowpine route
* No planned road modification
* Danger of this route is repeatedly elaborated with its proximity to water

(Alternative 2 transportation section)

* No discussion of seasonal road narrowing due to snow conditions
* Traffic Analysis is not adequate
	+ ●  Volume is analyzed, but not weight
	+ ●  Effective road life/integrity not projected
	+ ●  Over 150% increase on Johnson Crk and Stibnite Rd
* Clarify volume to public:

● 5 trucks per hour, 5AM-7PM, year-round, for at least 12 years

* ! Accident report not modeled for
	+ ●  Increase in recreational traffic (ask for numbers from 2020)
	+ ●  Numbers were averaged, rather than trended
	+ ●  Factor that Midas drivers will have a % of failure
* Seasonal delays are not mentioned
	+ ●  Nor evaluated in economic models
	+ ●  Diminish + effect on economy
* 6% grade during winter; no truck runaway ramps planned **○ 4.16.2.1.5**

■ Air Traffic Details during the winter are not discussed, nor mitigated **○ 4.16.2.1.5**

■ Transportation route to Lewiston Barge Transportation

* ●  Huge public health risk
* ●  Drinking water and recreational water sources line the corridor of transportation
* ●  One of the HIGHEST sections of road accidents in the state
* ●  Planned 2 Trucks/day, year round
* **○  3.7.32 (p.142)**
* ○  Lack or incident plan for recreational interactions **ROAD/AVALANCHE HAZARDS**

There is a lack of analysis of an avalanche program for mine site access and workers' safety, the impacts of using explosives along the Burnt Log route and in areas around the mine site in

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general. There is no analysis about how Midas plans to mitigate avalanche hazard (stated 5 year recurrence interval in Appendix C) along the Stibnite road during the construction phase of the mine before the Burntlog road is even built.

According to **A**​ **ppendix C​**, it basically says that Midas did a desktop study (Google Earth) to analyze avalanche paths and that they didn't find them along the Burntlog Route; they used vegetation patterns as their indicator. Then, they cite a reference (Mears 1992 Snow Avalanche Analysis for Land-Use Planning and Engineering) that says vegetation patterns are not always the best indicator: "Many slopes with potential avalanche terrain lack a long history and show no sign of previous avalanche activity through study of vegetative indicators or aerial photos" (Mears, 23).

Basically the cited study contradicts the findings stated in the DEIS report, appendix E.

**SEISMIC ISSUES**● **4.2.2.1.1.3 ​**Seismic Hazards

* ○  Inadequately address potential consequences
* ○  Mitigation is vague does not fulfill potential risk

■ Background ​**3.2.2.4 - 6**

* ●  Standards for large scale preparation unclear
* ●  **3.2.3.6​**Seismic Study Conducted in 2013; need updated data
* ●  **3.2.3.9​**Mention of previous dam failing (Canada)