

10/28/2020

Supervisor Linda Jackson
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Forest Supervisor Jackson:

My name is Greta Kleberg. I am a resident of Cascade Idaho who moved to Valley County for the outstanding recreational value. I am an avid trail runner, enthusiastic outdoor recreationalist, and concerned citizen. I began recreating in the outdoors in my childhood, and mountains and rivers continue to be a staple in my everyday life. After a few years of traveling the United States to find my home, I finally settled around the Payette and Salmon River Watersheds. I have a dramatic respect for the mountainous resources of Idaho, and the wild rivers in the heart of this state are second to none. While many river ecosystems in the United States are heavily utilized by recreationalists, Idaho's waters remain wild, and well managed to preserve the wilderness mystique. The high country mountains and rugged terrain lead to ample explorations.

As a concerned citizen of Cascade, and wife to a local kayaker of the South Salmon, licensed guide on the Main Salmon, and hunter/fisher of the Salmon River Mountains, I am writing to 1) ask the Forest Service to **create a Supplemental Draft Environmental Impact Statement** for the relative agencies and public to review and have the opportunity to comment to address all of the missing and incomplete information of the current DEIS, 2) to request an extension for a full 120 day comment period, and 3) to **support Alternative 5, the No Action Alternative** outlined in the existing Stibnite Gold Project's Draft Environmental Impact Statement.

First of all, in its current state, the DEIS is incomplete and the lack of important information impedes the public's ability, and the USFS's ability, to properly evaluate the significant adverse impacts of the Stibnite Gold Project. This document is still in draft format, and extremely important information that MUST be included in the DEIS includes:

- Adequate information on the adequacy of the leak detection layer (for Alt. 2) / the functionality of the MicroDrain liner/leak configuration. The leak liners are known to tear.
- A mitigation plan for transporting cyanide into and along the SF Salmon River, and Burntlog and Johnson Creeks.
- Information on whether or not the public have access to this area and region for recreation / hunting / fishing access during mining operations.
- Information on accountability for Midas's mining practices
- Information on accountability and future funding for restoration / mitigation projects when the mine becomes inactive

Secondly, I advocate for a full extension to 120 days for the comment period. I appreciate the extension of the October 13 deadline to today, October 28, and still need more time to review. The depth and breadth of this document, which took multiple years to draft, can not be reviewed with such a brief amount of time. Similar mining proposals, such as the Pebble Mine DEIS 2019 (120 days), Rosemont Copper Mine DEIS 2011 (90 days), Idaho Cobalt Project 2007 (originally 60 days but was extended to 90 days in response to requests for additional review time), Thompson Creek Mine MMPO DEIS

2014 (modified mine plan of operations 90 days), have had comment periods at least twice as long.

Finally, after reviewing what I could of the DEIS **I fully support Alternative No. 5—the No Action Alternative**—because I strongly believe that the negative environmental and social impacts (largely omitted in the DEIS) strongly outweigh any positive economic or job-bolstering effects of Midas’s proposed Stibnite Mine Project. The following is a brief list highlighting some of the most important reasons that I support the No Action Alternative:

- Cyanide leach mining is a practice banned completely in the state of Montana (1998), Wisconsin (2001), 5 Colorado Counties (2004), and many other countries around the world related to a high affinity for failure and environmental destruction
- There is a long and evident history of mining companies going bankrupt and/or leaving sites in environmental distress / destruction requiring the use of federal funds (ie: Superfund Sites). This proposal must include binding legal documents that hold Midas—and any future entity charged with mining operations—accountable for future environmental cleanup.
- Midas’s claims that this is a “reclamation project”; however, the re-mining is a very small portion of the project. In reality, this is a proposal for a cyanide leach dam that will double the current size or more
- All 4 of the alternatives contain 3 open pits and a giant tailings storage facility. Open Pit Mines are inherently destructive.
 - There is no proposal for different configurations, smaller scale, or underground mining.
 - Mining as an open pit eventually turns into a pit lake which will 100% have a negative impact on water quality.
 - Mining underground contains less rock removal and thus generates less rock waste.
 - Dry mining could / should be considered when dealing with an environment sensitive to water quality and quantity.
- There is no reclamation or mitigation plan and this needs clarification in a supplemental DEIS. The statement that “the environmental monitoring and maintenance phase will continue for as long as needed” is an unacceptable plan.
- Midas claims safe environmental practices but I fail to find an example or proof. Therefore the DEIS must include requirements for accountability for Midas in the form of binding legal documents
- The DEIS predicts that Chinook, Steelhead, Bull Trout, West Slope CutThroat will be adversely affected by both water quality and/or quantity
- Even in the DEIS, there is not compelling evidence to refute concern that this mine will have a negative and permanent impact on the health of the downstream ecosystems (fishing, hunting etc.) and recreational landscape of the river corridors.

In Conclusion, I am asking for continued due diligence in reviewing the Midas Gold Proposal for the Stibnite Mine. My concerns are for my family, my lifestyle, and my community, and the decision to permit an open pit mine under the guise of reclamation and restoration is preposterous. The mission of the United States Forest Service is “To sustain the health, diversity, and productivity of the Nation’s forests and grasslands to meet the needs of present and future generations.” Please do not make hasty decisions now that harm the future. Please allow the full 120 day comment period. Please look deeply at Midas Golds plan and intention, and consider the long term and lasting implications to the health, diversity, and productivity of this region in Idaho.

Respectfully,

Greta Kleberg