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October 28, 2020

U.S. Forest Service, Payette National Forest
Attn: Linda Jackson, Payette Forest Supervisor
500 North Mission Street
McCall, ID 83638

Subject: Stibnite Gold Project Draft Environmental Impact Statement

Dear Ms. Jackson,

Midas Gold Idaho, Inc. (Midas Gold) appreciates the opportunity to provide comments on the Draft Environmental Impact Statement (DEIS). Clearly, the document represents a substantial effort by many individuals to compile and convey a very large volume of information and analysis regarding the Midas Gold proposed Stibnite Gold Project (SGP). The synthesis of hundreds of documents developed from a much greater multitude of data values, statistical analyses, and modeling projections into a single draft product is a noteworthy accomplishment, and Midas Gold is pleased to have been a stakeholder in its development.

In the attached comments, Midas Gold wishes to respectfully offer its perspective and insights to assist in clarifying and improving content for the Final Environmental Impact Statement (FEIS). Whereas previous Midas Gold comment submittals have addressed specific environmental resources, the attachments provided with this cover letter address comments associated with (1) remaining resource areas and, (2) the Executive Summary of the DEIS. For your convenience, Attachment A includes comments that are provided in a tabulated format that is organized by resource area and includes references to each appropriate subsection heading, page number, and paragraph. Attachment B is in tabular format as well and includes the DEIS Executive Summary Table ES4-1 original text (in grey) with additional clarifications (in white) that reference or summarize applicable information that is included in the DEIS documents.

Thank you for considering Midas Gold's comments. Please contact me if you any questions.

Sincerely,
MIDAS GOLD IDAHO, INC.

Alan Haslam
Vice President – Permitting

Enclosures:
Attachment A: Stibnite Gold Project Other Resources DEIS Comments Compilation Table
Attachment B: Stibnite Gold Project DEIS Comments Executive Summary Table ES4-1 Comments

Attachment A

Attachment A: Stibnite Gold Project Other Resources DEIS Comments Compilation Table

A-1: Executive Summary, Chapter 1, Chapter 2, Chapters 5 - 9, Appendices

Comment Number	Page # or Global	Section	Paragraph (count from top of page)	Commenter Initials	Relevant DEIS Text Excerpt (if applicable)	Comment
1	ES-23		Table ES4-1	MG		Please see Attachment B: Midas Gold Comments on Table ES4-1.
2	ES-2	ES 2.0	1	MG	Environmental monitoring and maintenance would continue for as long as needed to demonstrate that the site has been fully reclaimed.	The text should be revised as follows: Environmental monitoring and maintenance would continue for as long as needed to demonstrate all applicable compliance and performance standards are met.
3	ES-13	ES 7.1	Table ES2-1	MG	Mine Site Subtotal, Total Acres = 1,970 (includes 65 acres of exploration disturbance)	The acreage reported does not match Reclamation and Closure Plan Stibnite Gold Project (Tetra Tech 2019) (RCP) Table 3-1, where total acres of disturbance is report as 1896.3 (excludes 65 acres of exploration disturbance), therefore the DEIS acreage is 8.7 acres greater than the RCP. Please review the impact acreage.
4	ES-29		Table ES4-1, Row 1	MG	Streams 1 to 5	The text in the ES does not explain what these streams are, or reference a relevant section in the EIS for the reader to find the information. Please clarify.
5	ES-21	ES 7.5	1	MG		As indicated on pages ES-5 and ES-6, under the Mining Law, Organic Administration Act, and 36 CFR 228A, the Forest Service may require changes to the Plan of Operations that has been submitted or any subsequent submitted plan of operations to reasonably minimize effects on national forest surface resources or meet the requirements of other applicable federal and state laws, but may not deny mining operations completely. Thus, while the No Action Alternative provides an environmental baseline useful for evaluating and comparing the action alternatives, it is outside the Forest Service's decision space, and does not meet the purpose and need for the SGP.
6	1-6	1.4.1		MG	"...which confer a statutory right to enter upon public lands to search for minerals..."	Please revise to mention General Mining Act of 1872 and the right to develop and extract minerals as opposed to "search". GMA1872 is foundational to regulatory system for mines
7	1-6	1.4.1	1	MG	The Forest Service's purpose is to...to mine and process gold, silver, and antimony from deposits at the SGP mine site in central Idaho for commercial sale.	Please include "restoration" as a part of our purpose and need. Reason: "Restoration" is a core part of the purpose and need for the project as it encompasses items like Blowout that are not needed for mining
8	1-7	1.4.2	2	MG	From the USACE's perspective, the basic purpose for the SGP is to extract gold, silver, and antimony from ore.	Please include "restoration" as a part of our purpose and need. Reason: "Restoration" is a core part of the purpose and need for the project as it encompasses items like Blowout that are not needed for mining
9	1-8	1.5.1	1	MG	and the Boise Forest Supervisor	Please clarify if Boise delegated its decision to Payette; not clear in Paragraph 2 in respect of PRO approval.
10	ES-18		Table ES2-4, Row 3	MG	Existing Access Roads Subtotal	Table ES2-4: existing access road disturbance is presumably for Yellow Pine route and should be similar for all alternatives (currently less for Alternative 4). Also, review of the GIS geodatabase suggests estimated borrow source disturbances on the Yellow Pine Route are not included in New Access Roads subtotal; this should be noted.
11	ES-34		Table ES4-1	MG	Change in Emergency Access (Alt 4)	Alternative 4 would not have similar emergency access as Alternative 1 as presented. The Burntlog Route presents an additional route of ingress/egress to the SGP site and thus is an additional emergency access route.
12	2-147		Table 2.9-1	MG		Please see Attachment B: Midas Gold Comments on Table ES4-1, which has the same text.
13	2-6	2.2.4	Table 2.2-1, Operations - GMS	MG	9 GMSs located in close proximity to project facilities	DEIS reports 9 Growth Media Stockpiles (GMS), which does not match the Reclamation and Closure Plan Stibnite Gold Project (Tetra Tech 2019) (RCP) as 5 GMSs are planned plus one temporary GMS locate on Fiddle GMS. Please revise.
14	2-9	2.2.4	Table 2.2-1, Closure and Reclamation - Pits Mine	MG	Yellow Pine pit backfilled with development rock	Should be revised to state the Yellow Pine pit would be **partial** backfilled with development rock
15	2-16	2.3.3 & 2.3.4.2	Figure 2.3-2 & 1	MG	GMSs	Figure is missing GMSs, which should depicted on this figure. The missing GMSs are as follows: Hangar Flat Pit GMS; Truck Shop GMS; Fiddle Development Rock Storage Area (DRSF) GMS; Midnight GMS; Yellow Pine Pit GMS; and North Homestack GMS. Please examine DEIS text, DEIS Figure 2.3-2 and the RCP (Tetra Tech 2019) for consistency.
16	2-70	2.3.7.2	1	MG	Soil/rock beneath fuel storage areas and chemical storage buildings would be tested for contamination.	Should be revised by adding to the end of this sentence the following" ...and treated or disposed of as appropriate."
17	2-73	2.3.7.9	1	MG	The transmission line ROW from Johnson Creek to the mine site, and spur roads used to access power pole structure sites, would be recontoured to match surrounding topography and revegetated. As part of revegetation, the transmission line ROW and access roads would be scarified, and at least 6 inches of growth media and/or mulching would be applied.	Text should be revised to reflect the following: Where the transmission line right-of-way has been cleared of tall vegetation during operations, reclamation will entail letting the vegetation grow back and managing weeds and invasive plant species. Access road, infrastructure (e.g. substations, switchgear, laydown yards) and construction work areas will be bladed to match surrounding topography, scarified to reduce subgrade compaction and soil salvaged from and windrowed adjacent to these are will be placed (to a nominal depth of 6 inches) back on these areas, followed by seeding and mulching.
18	2-75	2.3.7.14	1	MG	Except for the Hangar Flats and West End pits, and a portion of the Yellow Pine pit highwall, the operator would contour and grade disturbed areas to blend into the surrounding topography and terrain.	Text should be revised to reflect that the Midnight Pit and West End Ancillary Disturbance (East Parcel) should be included in the list of exceptions.
19	2-3	2.2.3	4	MG	Alternative 3 – Alternative 3 was developed to address issues related to waters of the United States and federally protected fish species by relocating the TSF and one of the DRSFs.	Suggest replacing "to address issues" with "...was developed to determine if it was beneficial to waters of the US...."
20	2-3	2.2.3	6	MG	and related activities under the action alternatives	Should state that the removal actions for historic tailings, waste rock, Blowout fix, reconnecting fish passage, etc. will not occur under the No Action Alternative
21	2-4	2.2.4	List	MG		Please include restoration activities that are common to all: Removal of waste rock, fish tunnel, pit back fill, reconnecting fish passage, Blowout Creek repair
22	5-Feb	2.2-1	Row 1	MG	Alt#1 Operations: Approximately 12 years	Should be "12-15 years". Please be consistent through document. Global.
23	2-17	2.3-2		MG	"Remove spent ore in Meadow Creek valley..."	Should read "Remove spent ore and legacy tailings located in Meadow Creek Valley (SODA, Bradley tailings, Hecla heap)...."
24	2-31	2.3.5.6	1	MG	The gold-bearing mineral particles which do not adhere...	Include the non gold-bearing particles in this sentence as non-gold bearing particles go the same way

Attachment A: Stibnite Gold Project Other Resources DEIS Comments Compilation Table

A-1: Executive Summary, Chapter 1, Chapter 2, Chapters 5 - 9, Appendices

Comment Number	Page # or Global	Section	Paragraph (count from top of page)	Commenter Initials	Relevant DEIS Text Excerpt (if applicable)	Comment
25	2-31	2.3.5.6	2	MG	The surface air bubbles are allowed to overflow	Change to "overflow **into troughs"**
26	2-35	2.3-5		MG		Need note clearly pointing out 2:1 vertical scale exaggeration.
27	2-53	2.3.5.9	Water at the TSF	MG	Water infiltrating to the base of the TSF would be captured by the liner, enter a sump, and be pumped back to the supernatant pond	Is this an accurate description? Is there a sump at the bottom? This sounds more like a heap leach facility than a TSF. Tailings will fill and water will be on top?
28	2-120		Table 2.5-1, 1st row	MG	Locating the TSF in the EFSFSR valley could reduced impacts to federally-listed fish species, and surface water quality and temperature.	"could" should be revised to "was evaluated to determine if it could"
29	2-125	2.5.5.3	1	MG	there would be no need to remove the SODA and legacy tailings materials in the Meadow Creek Valley	Discussion should be expanded to indicate that those features would therefore continue to negatively impact water quality.
30	2-126	2.5.5.4	Meadow Creek Diversion	MG	Under this alternative, no diversion or alteration of Meadow Creek would be necessary upstream of Hangar Flats pit.	Should be clarified that therefore about 1 mile of Meadow Creek would remain in its current ditch around the tailings and SODA.
31	2-5		Table 2.2-1, row 2	MG	Associated borrow sources developed along the Yellow Pine Route for materialsneeded for road improvements and maintenance	(Estimated) disturbance areas for these borrow sources are not accounted for in Executive Summary disturbance tables. Please clarify.
32	2-5		Table 2.2-1, row 3	MG		The Construction Phase of Alternative 4 should note that the Yellow Pine Route would require 4 years to construct (2 more than Burntlog Route) and would be subject to periodic access restrictions during that time.
33	2-84		Table 2.4-1, row 9	MG	Public access roads through the mine site would provide motorized access to Thunder Mountain Road (FR 50375) when other public access roads are blocked by mine operations.	Travel on the public access route is not meant to be conditioned on the unavailability of other public access routes, delete "when other public access roads are blocked by mine operations."
34	2-92	2.4.4.2	4	MG	The public access road would be constructed prior to the removal of development rock from Yellow Pine pit.	This is not a possible scenario if the public access road is established on a widened bench of the YPP. Delete.
35	2-124	2.5.4.3	4	MG	The Burntlog Route would be available for public access when other routes are not available	There are no other public access routes (plural). The existing public access would be restricted for the life of the mine and the OHV will not be constructed. Should be clarified to identify the Burntlog Route as the primary public access route.
36	2-133		Table 2.6-2, row 3	MG	Existing Access Road acreage on BNF	It should be clarified why there are 73 less acres of existing disturbance indicated on the BNF between Alt 4 and other alternatives.
37	5-2	5.1.1.3	2	MG		This section should tell the reader that consultation required for EFH will occur during the completion of ESA consultation and will be part of the biological assessment yet to be prepared.
38		I1, References		MG	HDR. 2016. Wetland Resources Baseline Study for Logistics Center Site, Stibnite Gold Project. December.	Only one of seven Wetland Resources Baseline Study Reports are included in the References Cited for this appendix. See Table 3.11-1 Wetland Delineation Reports Prepared for the Proposed SGP. Please include references to the other reports in this appendix.
39	Global	Appendix A		MG	discussion of Forest Plan consistency and amendment legal framework	MGII notes under the National Forest Management Act and other law, requirements for Forest Plan consistency are subject to Mining Law and other valid existing rights. See, e.g., 16 U.S.C. 1604(i); 36 CFR 219.15. Both the PNF and BNF Forest Plans recognize that under the Mining Laws, Organic Administration Act, 36 CFR 228A regulations and other legal authority, the Forest Service is limited in applying standards, guidelines and other Forest Plan management direction to reasonable terms, conditions and measures to minimize or mitigate effects, to the extent feasible, on national forest surface resources from locatable mining activities. PNF Plan, Chapter III, page III-4; BNF Plan, Chapter III, p. III-4. Project-specific Forest Plan amendments assist in achieving and maintaining consistency in this context.

Attachment A: Stibnite Gold Project Other Resources DEIS Comments Compilation Table

A-2: Sections 3.1 and 4.1 - Introduction

Comment Number	Page # or Global	Section	Paragraph (count from top of page)	Commenter Initials	Relevant DEIS Text Excerpt (if applicable)	Comment
1	4.1-3	4.1.2	Table 4.1-1	MG	Incorporation of special status plant habitat information (Wetlands/Riparian Areas).	Midas used the element occurrences for special status plant and animals for the State of Idaho and incorporated them into the MWAM functions and values, amended the 2016 HDR functions and values report, and submitted that technical memorandum to the Forest Service is 2018. The Forest Service is aware of this technical memorandum as it is cited in Chapter 4 Wetland Section (Section 4.11). The approach of using element occurrences based on Idaho data seems to be more applicable than modeled habitat, which does not indicate presence. Midas believes that the MWAM analysis is appropriately based on element occurrences, and do not believe that updating the analysis with modeled habitat will have any material effect on the results. Tetra Tech 2018. Additional Information to Amend the 2016 HDR Wetlands Functions and Values Assessment. Tetra Tech, Boise ID. March 27, 2018.
2	4.1-4	4.1-2	Table 4.1-1, Row 10	MG	Complete information has not been developed regarding some features of action alternatives, such as vehicle travel distances and material handling rates. Emissions will vary among alternatives based on facility and operations/reclamation changes, such as moving the TSF to the EFSFSR.	Proposed Change: Please insert at the end "However, the Alternative 1 and 2 EIS inventories and the Alternative 2 NSR inventory are sufficiently conservative to cover all alternatives." Reason for Proposed Change: Correction. All necessary emissions information has been developed. The emission inventories provided included emissions for the highest-emission alternatives and 15 LOM years, including the construction years. The DEIS Section 4.3 also acknowledges that emission inventories provided by Midas cover the highest emission scenarios and that the emissions of other alternatives will be the same or less.
3	4.1-4 to 5	4.1.4		MG	Text indicating that mitigation measures have been reflected in Chapter 4 analysis of SGP effects	The effects analysis needs to further consider and reflect mitigation measures that will reduce impacts to various resources; the potential or likely effects described in Chapter 4 are greater for various resources than MGII's review and analysis indicates will be the case, particularly with mitigation measures fully considered. MGII will work with the agencies to incorporate further feasible design adjustments and other mitigation measures to further reduce SGP impacts.
4	4.1-7	4.1.5.1	6	MG	Past and present mineral exploration and mining have occurred in the vicinity of the mine site, including	The term vicinity or vicinity of the mine is used a number of times in this section. The geographic location of RFFAs are important for assessing potential cumulative impacts. This section should explain the geographic location and extent of the RFFAs.
5	4.1-10	4.1.5.1	3	MG	– Midas Gold collected geophysical data at proposed rock quarries, bridge abutments,	Should be "geotechnical" not "geophysical" Reason: Incorrect terminology

Attachment A: Stibnite Gold Project Other Resources DEIS Comments Compilation Table

A-3: Sections 3.2 and 4.2 - Geologic Resources and Geotechnical Hazards

Comment Number	Page # or Global	Section	Paragraph (count from top of page)	Commenter Initials	Relevant DEIS Text Excerpt (if applicable)	Comment
1	3.2-15	3.2.3.2.2	4	MG	"...3,758 ounces of antimony..."	Should read "...3,758 TONS of antimony..."
2	3.2-23	3.2.3.7.1	7	MG	"...(STRATA 2013)."	Incorrect reference, should be (STRATA, 2014a)
3	3.2-24	3.2.3.7.1	3	MG	"...(STRATA 2013)..."	Incorrect reference, should be (STRATA, 2014a)
4	3.2-32	3.2.3.8.1.1	5	MG	"...ranges from 47 to 61 feet..."	Incorrect values, should read "ranges from 53 to 61 feet"
5	3.2-33	3.2.3.8.1.1	1	MG	"...silts and clays."	Delete "and clays". Results indicate primarily silts
6	3.2-33	3.2.3.8.1.1	2	MG	"Two borings were drilled into the overburden at the West End pit."	Delete. There have NOT been any overburden boreholes at West End.
7	3.2-33	3.2.3.8.1.1	2	MG	"clayey silty sand with gravel"	Delete "silty" so classification matches source report and lab data
8	3.2-33	3.2.3.8.1.2	4	MG	Incorrect Reference	Replace with (STRATA and Tierra Group, 2017)
9	3.2-34	3.2.3.8.1.3	4	MG	"...rock mass in seven of the 13 boreholes (four boreholes in the Yellow Pine pit area..."	Two values are incorrect. Replace "seven" with "eight" and "four" with "five"
10	3.2-35	3.2.3.8.1.3	1	MG	Incorrect Reference	Replace with (STRATA and Tierra Group, 2017)
11	3.2-35	3.2.3.8.1.4	3	MG	"...These rock types are typically very competent...."	Delete sentence
12	3.2-35	3.2.3.8.1.4	3	MG	"...core breaks by gently hitting with a hammer."	Delete "gently"
13	3.2-35	3.2.3.8.1.4	4	MG	"...Concrete has an unconfined compressive strength of approximately 14 to 42 megapascals"	Delete sentence
14	3.2-35	3.2.3.8.1.4	4	MG	"...11.2 to 123.1 megapascals (1,624 pounds per square inch...."	2 values incorrect. Replace 11.2 with 10.0 and 1,624 with 1,450
15	3.2-35	3.2.3.8.2	5	MG	"The spent ore and tailings were up to 100 feet thick at the SODA"	Delete. No Spent ore/Tailings at the TSF, this is within the Hangar DRSF footprint.
16	3.2-35	3.2.3.8.2	5	MG	Entire Paragraph	Add the following text to end of paragraph "Less than 30 feet of silt and clay was encountered in over 2,100 feet of drilling" (Tierra Group, 2018)
17	3.2-35	3.2.3.8.2	6	MG	"Depths to groundwater ranged from 0 up to 34 feet below ground surface at the TSF."	Statement is untrue. Replace with "Artesian conditions were encountered in 2 boreholes and 2 boreholes were dry. In holes where groundwater was encountered (not artesian), groundwater was encountered at depths ranging from 2.6 to 34 feet below the ground surface."
18	3.2-35	3.2.3.8.2	6	MG	(SRK, 2012)	Incorrect reference, should be (Tierra Group, 2018)
19	3.2-36	3.2.3.8.3.1	2	MG	"...42 of these boreholes specific to the SODA"	Replace with "...42 boreholes intended to characterize the spent ore and Bradley Tailings."
20	3.2-36	3.2.3.8.3.1	2	MG	Entire Paragraph	Add the following text to end of paragraph "Approximately 250 feet of silt and clay was encountered in native soil in over 6,100 feet of drilling (1,200 feet in native soil and 4,900 feet in spent ore and tailings)" (Tierra Group, 2018)
21	3.2-36	3.2.3.8.3.1	3	MG	"...ranging from 5 to 88 feet..."	Replace 88 with 90
22	3.2-36	3.2.3.8.3.1	3	MG	Incorrect Reference	Reference to be (Tierra Group, 2018)
23	3.2-36	3.2.3.8.3.1	4	MG	"...standard Proctor compaction text..."	Replace with "standard and modified Proctors"
24	3.2-36	3.2.3.8.4	5	MG	Entire Paragraph	Add "No silt or clay was encountered in nearly 250 feet of drilling"
25	3.2-36	3.2.3.8.4	6	MG	"This may be because the materials were too coarse grained to result in meaningful laboratory tests (although this is not stated in the referenced report)."	Delete sentence
26	3.2-36	3.2.3.8.4.1	7	MG	"The West End pit geotechnical information is applicable to this area."	Replace with "No geotechnical data is available for the overburden in this area."
27	3.2-37	3.2.3.8.4.2	1	MG	"...Bedrock was encountered at depths ranging from 47 to over..."	Replace 47 with 13
28	3.2-37	3.2.3.8.4.2	1	MG	Entire Paragraph	Add "Less than 30 feet of silt and clay was encountered in over 6,300 feet of total drilling"
29	3.2-37	3.2.3.8.5	5	MG	Depth to groundwater is incorrect	Replace with 24 to 92 feet
30	3.2-37	3.2.3.8.5	5	MG	Depth to bedrock is incorrect	Replace with 53 to 155 feet

Attachment A: Stibnite Gold Project Other Resources DEIS Comments Compilation Table

A-3: Sections 3.2 and 4.2 - Geologic Resources and Geotechnical Hazards

Comment Number	Page # or Global	Section	Paragraph (count from top of page)	Commenter Initials	Relevant DEIS Text Excerpt (if applicable)	Comment
31	3.2-37	3.2.3.8.5	5	MG	"Bedrock along the tunnel alignment is generally unaltered to weakly altered and weakly mineralized"	Delete sentence. This is not in the source document
32	3.2-37	3.2.3.8.5	6	MG	"Geotechnical investigations summary report (Tierra Group 2018)"	Incorrect reference. Should Be "Geotechnical Baseline Summary (STRATA and Tierra Group 2017)"
33	3.2-37	3.2.3.8.6	7	MG	"...and several monitoring wells were completed, although several were dry."	Delete statement
34	3.2-38	3.2.3.8.6	1	MG	Entire Paragraph	Add "Less than 10 feet of silt and clay was encountered in over 1,200 total feet of drilling" (Tierra Group, 2018)
35	3.2-38	3.2.3.8.7	4	MG	Entire Paragraph	Add "No silt or clay was encountered in over 250 feet of drilling." (Tierra Group, 2018)
36	4.2-1	4.2.1	2	MG	national goal of being economically independent in strategic metals, such as antimony	Should be "critical" not "strategic". Reason: See Federal Register /Vol. 83, No. 33 / Friday, February 16, 2018 /Notices
37	4.2-2	4.2.2.1.1	2	MG	The legacy tailings are in the Meadow Creek valley.	Addition/clarification: "...and are located in portions of the EFSFSR below the confluence with Meadow Creek..."
38	4.2-2	4.2.2.1.1	2	MG	The legacy tailings, which were deposited in the Meadow Creek valley bottom without a liner system, are currently under the spent heap leach ore disposal area but within the planned footprint of the proposed Hangar Flats development rock storage facility (DRSF).	Addition/clarification: "...and also are present in other areas downgradient...."
39	4.2-2	4.2.2	7	MG	The ore of interest (i.e., gold-, silver-, and antimony-bearing material) is economically valuable and/or of strategic importance.	Should be "critical" not "strategic". Reason: See Federal Register /Vol. 83, No. 33 / Friday, February 16, 2018 /Notices
40	4.2-3	4.2.2.1.1.3	1	MG	Impacts from earthquakes could be minimized with mitigative measures such as incorporation of existing geotechnical design standards and building code stan	Should say "would" not "could" Reason: Mitigative measures will be integral to designs. Currently implies they are optional
41	4.2-4	4.2.2.1.1.4	2	MG	Such high-intensity effects from mass wasting would be reduced to moderate-intensity effects through incorporation of existing geotechnical design standards and building code standards, as well as construction quality control, operations and maintenance, and surveillance.	Should note "avoidance" of high risk areas as a key mitigation. Reason: Midas Gold Consultants conducted and provided USFS a detailed geohazard assessment and placed facilities to avoid such geohazards.
42	4.2-4	4.2.2.1.1.4	3	MG	Presence of personnel at the mine site and increased value of facilities and structures as a result of Alternative 1 could increase the magnitude of impact through property damage and personal injury or loss of life from avalanches.	Should note "avoidance" of high risk areas as a key mitigation. Reason: Midas Gold Consultants conducted and provided USFS a detailed avalanche assessment and placed facilities to avoid such avalanche hazards.
43	4.2-4	4.2.2.1.1.4	4	MG	Blasting associated with mining operations could trigger avalanches; however, this would likely cause more frequent but less severe avalanches than would naturally occur without blasting. Presence of personnel at the mine site and increased value of facilities and structures as a result of Alternative 1 could increase the magnitude of impact through property damage and personal injury or loss of life from avalanches.	CLARIFICATION: Mine safety personnel would routinely address potential avalanche issues via commonly used measures in coordination with state and federal regulators as is done at ski areas and other facilities in avalanche areas within the National Forest landscape.

Attachment A: Stibnite Gold Project Other Resources DEIS Comments Compilation Table

A-3: Sections 3.2 and 4.2 - Geologic Resources and Geotechnical Hazards

Comment Number	Page # or Global	Section	Paragraph (count from top of page)	Commenter Initials	Relevant DEIS Text Excerpt (if applicable)	Comment
44	4.2-5	4.2.2.1.2.1	3	MG	"The term "factor of safety" is used to express how much stronger a feature is (e.g. tailings dam) to wothstand the calculated load imposed on the structure."	Definition provided is poor. Suggest revising with the following: "The slope stability factor of safety is the calculated ratio of the resisting forces (embankment and foundation materials shear strength) to the driving forces (weight of slope materials and external accelerations) present along a potential failure surface in the slope. A factor of safety greater than 1.0 indicates a stable slope, while a factor of safety less than 1.0 indicates the potential for slope movement.
45	4.2-6	4.2.2.1.2.1	3	MG	within the	CLARIFICATION: and exceed the required FOS
46	4.2-6	4.2.2.1.2.2	4	MG	"In general, a 3:1 slope design is considered to be protective against a slope failure under most conditions"	Delete sentence. General statement with no basis, slope stability is based on slope angle and material strengths.
47	4.2-7	4.2.2.1.2.3	3	MG	failure of the pit walls during the scope of the SGP and beyond is considered to be unlikely.	CLARIFICATION: In addition, modern mining operations employ a variety of GPS and laser-based active geotechnical slope monitoring techniques that can provide early warning of potential pit wall instability and failures allowing for implementation of mitigation measures such as widening benches or focused excavations to remove stresses.
48	4.2-8	4.2.2.1.4.1	5	MG	failure of the TSF dam from a seismic event is considered to have extremely low probability.	CLARIFICATION: The reader may desire to know WHY the TSF dam failure has a low probability of failure. To assist the reader it would be useful to add some key elements as to why this is the case including: (1) the dam will be keyed into bedrock with bedrock walls eliminating or reducing the risk of side cutting if channelization where to occur because of the massive character of the bedrock walls; (2) TSF will include a very large embankment made up of crushed rock, not soils; (3) The dam will be constructed using the downstream method, comprised of development rock and legacy spent ore and (4) will contain ancillary water management features and (5) will be actively monitored. See sections 11-2 through 11-8 in the PRO for details of construction, monitoring and Appendix G for why the selected embankment method was chosen.
49	4.2-9	4.2.2.1.4.3	4	MG	Overall it is unlikely that failure of the pit slope, before or after mining, would result in significant environmental impacts to the SGP. This conclusion is based on the rock types (granite, marble, etc.), but also the edges and benches of the existing Yellow Pine, Midnight, and West End pits, which are still well defined since historic mining ceased. However, such a failure could result in socioeconomic impacts to the area, shutting down the mine for some period of time. A pit slope failure could impact health and safety of mine workers. Slumps or collapse post-mining into the resulting pit lakes at Hangar Flats and West End pits could result in water overtopping the rim of the pit lake, sending water downstream. West End pit water levels, water management, and water quality are described Section 4.9, Surface Water and Groundwater Quality.	CLARIFICATION: Modern mining operations are required to actively monitor pit slopes to ensure safety of workers and the public and for environmental reasons. Active monitoring of pit slopes and geotechnical stability during operations would include use of GPS and laser based systems that would provide data to allow for adaptive management and implementation of mitigation measures should conditions indicate pit wall failures are likely.
50	4.2-9	4.2.2.1.5	6	MG	Impacts would be minor provided mine support facilities and infrastructure would be designed in accordance with applicable building codes and in accordance with recommendations of site-specificgeotechnical design reports.	CLARIFICATION: Federal, State and local regulatory agencies will require all buildings and support facilities be constructed to code and must approve them for occupancy and use prior to there being utilized for project activities.

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A-3: Sections 3.2 and 4.2 - Geologic Resources and Geotechnical Hazards

Comment Number	Page # or Global	Section	Paragraph (count from top of page)	Commenter Initials	Relevant DEIS Text Excerpt (if applicable)	Comment
51	4.2-10	4.2.2.1.5.2	1	MG	Impacts would be reduced to moderate intensity effects through incorporation of existing geotechnical design standards and building code standards, as well as construction quality control, operations and maintenance, and surveillance.	Should note "avoidance" of high risk areas as a key mitigation. Reason: Midas Gold Consultants conducted and provided USFS a detailed geotechnical assessment and placed facilities to avoid such geohazards.
52	4.2-11	4.2.2.1.5.3	1	MG	would increase the risk of damage, injury, and loss of life from the existing hazards.	CLARIFICATION: These risks would be substantially mitigated by use of qualified avalanche forecasters, active monitoring and if required active mitigation measures.
53	4.2-11	4.2.2.1.6	2	MG	In addition, spent heap leach ore from historical mining operations may be reused for road construction purposes.	CLARIFICATION: Provided the material potentially for reuse does not contain or leach deleterious materials at levels that would pose a risk of significant impacts to people or the environment.
54	4.2-11	4.2.2.1.6	3	MG	for the access roads	CLARIFICATION: There is detailed information for many portions of the proposed access road network. See baseline studies and RFAI responses. In addition, a detailed engineering and geophysical study has been proposed for sections of the proposed access road that do not have detailed engineering and is awaiting approval form the USFS to implement. Once this work is completed additional mitigation measures, if required, would be implemented as per requirements of the operating plan and only with USFS approval.
55	4.2-11	4.2.2.1.5.3	1	MG	The increased number of personnel present at mine facilities, and increased value of facilities and structures at the mine as a result of Alternative 1 would increase the risk of damage, injury, and loss of life from the existing hazards.	Should note "avoidance" of high risk areas as a key mitigation. Reason: Midas Gold Consultants conducted and provided USFS a detailed avalanche assessment and placed facilities to avoid such avalanche hazards.
56	4.2-12	4.2.2.1.16.3	2	MG	structure, or personal injury or loss of life	CLARIFICATION: This entire section describes risks, but essentially ignores the fact that the majority of these risks would be mitigated by active monitoring, and implementation of appropriate safety protocols including routine inspections by qualified avalanche forecasters and use of active mitigation measures as required and in coordination with local, state and federal regulators to reduce these risks.
57	4.2-14	4.2.2.1.1.8.3	2	MG	Detailed geotechnical data or assessment of existing mass wasting hazards has not been generated for off-site facility components of the SGP.	CLARIFICATION: Any offsite construction of facilities will be required to meet local, state and federal regulatory code requirements that would address risks and mitigate any existing or potential mass wasting hazards.
58	4.2-15	4.2.2.2.3	2, Bullet 1	MG	On the other hand, inclusion of a public access road through the mine site (Option 1 or Option 2) would increase vehicular traffic in the area and therefore subject additional drivers to avalanche risk within the mine site.	CLARIFICATION: This assumes that there would be more public drivers than currently utilize the existing road through the site. There is no justification for this assumption so the increased risk is not associated with public users.
59	4.2-16	4.2.2.3.1	1	MG	existing landslide	CLARIFICATION: this slide is not only existing but is active.
60	4.2-16	4.2.2.3.1	3	MG	However, given that the design of the structures is proposed in a similar manner to Alternative 1, it is assumed that Factors of Safety	CLARIFICATION: This is an incorrect assumption since the EFSF site does not contain a narrow bedrock walled valley nor other geomorphological characteristics as the TSF site outlined and proposed int he PRO in Meadow Creek and thus would require substantially more earthwork versus natural structures to obtain the same level of geotechnical stability which may not be possible in the EFSF site due to topography.

Attachment A: Stibnite Gold Project Other Resources DEIS Comments Compilation Table

A-3: Sections 3.2 and 4.2 - Geologic Resources and Geotechnical Hazards

Comment Number	Page # or Global	Section	Paragraph (count from top of page)	Commenter Initials	Relevant DEIS Text Excerpt (if applicable)	Comment
61	4.2-17	4.2.2.4.1	5	MG	Bedrock and Surficial Geology – same as for Alternative 1.	CLARIFICATION: The assumption that the use of the existing Yellow Pine-Stibnite Road for life of mine traffic including concentrate trucks assumes that there would be minimal requirements for the road's upgrade for this extended use and is likely incorrect. During construction some upgrades would be required for this route, but they would be considerably less that those required for routine use. These additional upgrades would require significantly more earthwork and excavations in bedrock adjacent to the EFSFSR.
62	4.2-17	4.2.2.4.1	6	MG	Seismic and Mass Wasting Hazards – same as for Alternative 1. Geotechnical Stability –	CLARIFICATION: There is clearly more risk of mass wasting and geotechnical stability for long term and expanded use of the Yellow Pine Road route versus the Burntlog Route. See Appendix G in the PRO for details on route selection design criteria. These "same as Alternative 1" statements are in direct conflict with information provided in Section 4.2.2.4.3 and Appendix E-2 of the DEIS.
63	4.2-17	4.2.2.4.3	12	MG	Seismic and Mass Wasting Hazards and Geotechnical Stability	CLARIFICATION: In addition to the direct mass wasting risks from avalanches and landslides, there is a significant risk of damage to a widened road bed here to erosion and damage from the EFSFSR which in the historic and more recent past has eroded the road. There is particularly more risk to this risk over the long term compared to the Burntlog route because the Burntlog route typically dies not parallel active river channels as does the Yellow Pine -Stibnite Road.
64	4.2-18	4.2.2.5	4	MG	This has resulted in ongoing upstream erosion of the valley and deposition of the resulting sediments downstream.	Need to add "and the progressive lowering of the water table in the Blowout Creek valley, reducing the functionality of the wetlands located there on an ongoing basis." Reason: Incomplete description of impacts of doing nothing
65	4.2-19	4.2.2.5	2	MG	The design, construction, and reclamation of the subject waste rock dumps complied with federal and state standards at the time (1980s and 1990s) and these standards have not substantively changed since 1998.	Reword to: "The design, construction, and reclamation of the 1920s-1950s have unknown construction methods and there were no regulatory standards at the time, and therefore may present a higher risk than waste rock dumps placed in the 1980s and 1990s which complied with federal and state standards at the time and these standards have not substantively changed since 1998." Reason: Many of the dumps were placed in the 1920s-1950s and therefore were placed before the 1980s and 1990s standards and therefore have higher risk of failure given unknown subbase/foundations below dumps and therefore may have a higher risk of failure than 1980s and 1990s dumps. See 4.2.4.1.3 for wording to that effect.
66	4.2-19	4.2.3	1	MG	Mitigation Measures	CLARIFICATION: The USACE is a cooperating agency and also will require considerable compensatory mitigation which is not discussed in this section. This mitigation not only offsets, but provides additional environmental improvements to comply with the applicable sections of the CWA in regards to wetlands.
67	4.2-21	4.2.5.1	4	MG	Although this risk of failure likely would be very low, it would be unlikely to ever be eliminated completely.	Add to end "However, the risk of a TSF failure is estimated at 1 in 10 million (see 4.2.2.1.2.1) and any failure of a DRSF (see 4.2.2.1.2.2) or pit wall (see 4.2.2.1.2.3) would be no expected impacts on surface water bodies" Reason: Statement could be taken out of context.
68	4.2-23	4.2.7	Table 4.2-2	MG	A total of approximately 3,532 acres of land would be disturbed by proposed mining and related activities	CLARIFICATION: This table for Alts 2-3-4 should note that much of this total acreage of disturbance is already impacted

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A-4: Sections 3.4 and 4.4 - Climate Change

Comment Number	Page # or Global	Section	Paragraph (count from top of page)	Commenter Initials	Relevant DEIS Text Excerpt (if applicable)	Comment
1	3.4-17	3.4.3.3.18	1	MG	text regarding location of tribe communities with respect to SGP analysis area and equitable access to resources	It should be clarified that the tribe communities identified are located more than 100 miles from the SGP analysis area (see DEIS section 3.22.1, page3.22-1). While members of these tribe communities may visit portions of the analysis are for traditional uses, they have equal or greater access to such lands as other users, and are not disadvantaged with respect to potential climate change trends or the negligible potential climate change impacts of the SGP.
2	global			MG	Discussion of SGP and climate change trends potential effects in the analysis area	Further qualitative description of the likely significance of effects in relation to SGP would be helpful. MGII review and analysis indicates that the incremental GHG or other effects of SGP respecting climate change will be negligible or minor, and that the design and other mitigation measures for SGP will adequately account for climate change trends and effects in the Project area.
3	4.4-1	4.4.1	1	MG		Please state which USFS regulations and guidance were used in developing these Issues and Indicators.
4	4.4-4	4.4.1.6	2	MG	Assessment of current baseline climate conditions that, in theory, could be compared to future trends in regional climate is subject to uncertainty that these baseline conditions accurately represent the SGP area. Therefore, discussion of climate conditions in Idaho and surrounding states was generally qualitative in this analysis.	Please explain why a qualitative analysis is not subject to equal uncertainty as a quantitative analysis. The qualitative analysis (may, could, might) presented in this section is highly uncertain, and that should be explicitly described. If the case cannot be made that qualitative analysis presented below is less subject to uncertainly, then delete or modify this statement.
5	4.4-5	4.4.2	2	MG	Guidance provided by the U.S. Forest Service (Forest Service) has indicated that, "it is not currently feasible to quantify the indirect effects of individual or multiple projects on global climate change and therefore determining significant effects of those projects or project alternatives on global climate change cannot be made at any scale" (Forest Service 2009).	This statement should be made at the beginning of 4.4 as it is essential to the reader's understanding up front.
6	4.4-10	4.4.2.1.4.3	4	MG		Section 4.4 has a few supporting literature citations, particularly Halofsky et al. (2018). Please add others to strengthen the points made.
7	4.4-13	4.4.2.1.4.7	2	MG	Final closure and reclamation of the mine site, conducted under an agency-approved Reclamation and Closure Plan, would reestablish wetlands impacted by Alternative 1 during construction and operation where feasible and practical	Please include Midas Gold's Stream and Wetland Compensatory Mitigation Plan (CMP).
8	4.4-13	4.4.2.1.4.8	3	MG	other migratory species would be the most vulnerable to climate change impacts and loss of habitat connectivity.	The SGP will demonstrably increase habitat connectivity within the upper EFSFSR, so please comment here on that benefit.
9	4.4-13	4.4.2.1.4.9	4	MG	Climate change impacts to wildlife and wildlife habitat in the SGP area would include habitat loss and fragmentation, physiological sensitivities, and alterations in the timing of seasonal life cycles	Please add the supporting basis for this statement or delete.
10	4.4-14	4.4.2.1.4.9	1	MG	habitat, which would help to reclaim habitat connectivity. However, the post-closure reclamation activities were developed to help offset Alternative 1 wildlife impacts, and were not designed to offset wildlife impacts due to climate change impacts.	If the proposed post-mining reclamation and mitigation measures improve structure and function AND reduce climate change impacts, then the benefits should be stated whether the primary goal or not.
11	4.4-14	4.4.2.1.4.10	3	MG	Therefore, these reclamation efforts cannot be relied upon to offset the GHG emissions from Alternative 1.	This statement implies that no credit is given to reforestation effort. Please support this position or modify it.
12	4.4-14	4.4.2.1.4.12	5	MG	Access to and through the SGP area would be maintained under Alternative 1 during construction, operation, and closure and reclamation, except there would be no public access through the mine site during construction and operations. Climatic changes causing an increase in catastrophic events, such as floods, landslides, and avalanches, can add stress to roadways and other infrastructure, which may result in more frequent maintenance and repairs.	Please add the supporting basis for this statement.
13	4.4-15	4.4.2.1.4.13	2	MG	There are mitigation measures to avoid and minimize impacts to cultural resources and tribal rights and interests under Alternative 1 in the SGP area, which also may help to minimize potential effects from climate change.	Please specify for the reader what the mitigation measures are or where they are described.
14	4.4-15	4.4.2.1.4.14	3	MG	Alternative 1 has the potential to impact public health and safety through the release of chemicals to the environment, natural environmental hazards, economic impacts, changes to public services and infrastructure, and impacts to the local population.	Makes it sound like impacts are all negative, whereas some are positive. This could be said for the No Action alternative as well. Please clarify.

Comment Number	Page # or Global	Section	Paragraph (count from top of page)	Commenter Initials	Relevant DEIS Text Excerpt (if applicable)	Comment
15	4.4-15	4.4.2.1.4.14	4	MG	Climate change could exacerbate some Alternative 1 impacts to public health and safety by affecting the way spills are handled or enter the environment. It also could increase the frequency and amplify the impacts of natural hazards such as avalanches and landslides, flash floods, and wildfires (Halofsky et al. 2018).	State also that however, these are low-probability events and there are considerable measures in place to avoid and minimize spills.
16	4.4-15	4.4.2.1.4.15	5	MG	Much of the SGP area is used for recreation year-round, which would be both directly and indirectly impacted by climate change.	Correction: The main SGP operations site is not used for recreation, other than people in transit.
17	4.4-16	4.4.2.1.4.16	2	MG	Alternative 1 would impact scenic resources in the SGP area through construction and operation of new facilities and roads. Because much of the SGP area vegetation has been characteristically burned by past wildfires, the visual impacts of these new facilities would be amplified as there are less trees to block views.	Please include existing impacts from legacy activities that could currently impair scenic resources.
18	4.4-17	4.4.2.2	3	MG	However, the reduced GHG emissions for the net reduction in delivery truck activity would largely be offset by off-highway mining haul truck traffic bringing limestone to the lime generation process, at approximately two trucks per day.	Incorrect; this haul truck traffic would already occur to transport this rock to a DRSF and so be accounted for in the EI. Moreover, the distance from the West End pit is much less than the length of the access road, and much less than transport from the off-site lime source.
19	4.4-22	4.4.2.3.2.1	2	MG	Relocating the TSF would serve to reduce adverse impacts to water quality and temperature in Meadow Creek.	Clarification required, reword to "Relocating the TSF would serve to reduce adverse impacts to water quality and temperature in Meadow Creek from new activities but would leave existing legacy tailings, spent ore, heap leach piles and other legacy fractures in place, which are currently impacting water quality" Reason: Does not mention existing impacts remain and new TSF location is pristine
20	4.4-23	4.4.2.4	1	MG	however, several other design features under Alternative 4 also would provide opportunities to minimize the severity of GHG and climate change impacts than the other action alternatives.	Please specify what design features are being referenced. Alternative 4 includes 2 additional years of construction which will increase GHG emissions.
21	4.4-23	4.4.2.4.1	2	MG	Based on relative roadway length affected,	Severity of terrain means YP Route would take much more work per km than Burntlog Route, so more GHG per km; quantified in an RFAI, please revise.
22	4.4-30	4.4.7	1	MG	Changes in hydrologic patterns and overall increasing temperatures are expected to result in decreased or degraded soil moisture and quality, air quality, annual streamflows, groundwater recharge, and water quality. Increased surface water temperatures; increased spread of insects and diseases; changes in the timing, duration, and severity of fire seasons; as well as habitat loss and fragmentation also are expected to occur.	After: Changes in hydrologic patterns and overall increasing temperatures ADD … "due to climate change…"

Attachment A: Stibnite Gold Project Other Resources DEIS Comments Compilation Table

A-5: Sections 3.5 and 4.5 - Soils and Reclamation Cover Materials

Comment Number	Page # or Global	Section	Paragraph (count from top of page)	Commenter Initials	Relevant DEIS Text Excerpt (if applicable)	Comment
1	3.5-10	3.5.3.2.1	Table 3.5-1	MG	Values locate in the Depth to Extremely Cobbly or Gravelly Material (inches) column	The text should be revised to include a brief description of the method used to generate these values.
2	3.5-9 & 15	3.5.3.2.1	Pg. 3.5-9 Paragraph 1; Pg. 3.5-9 Paragraphs 2 & 3	MG	Descriptions of Soil Map Units (SMU) fOD, fTH & mTC	This and other descriptions presented should also be revised to state that soils within SMU fOD, fTH and mTC are within the SGP are non-saline and non-sodic, with K-factors (water erodibility indices) of 0.1 ,which is considered low (Soil Resources Baseline Study, Stibnite Gold Project, Tetra Tech 2017).
3	Global	4.5		MG		During USFS review of the RCP there were numerous requests for more detailed information on soils, reclamation plans, etc., however, Section 4 of the DEIS uses little of that detail and presents a very general discussion of effects and the activities Midas Gold proposes to mitigate impacts to soil resources. The public would have a better understanding of the SGP if a more detailed analysis were included.
4	4.5-1	4.5.1	last on page	MG	this is the conversion of a productive site to an essentially non-productive site for a period of more than 50 years.	The project life is 25 years, including closure and reclamation, and soils will be productive when placed. Please revise.
5	4.5-1	4.5.1	last on page	MG	Productivity on these areas range from 0 to 40 percent of natural background.	Reword to "Current productivity of these areas is highly impaired by legacy mining activities and ranges from 0 to 40 percent of natural background." Reason: Not clear way of stating currently unproductive
6	4.5-2	4.5.1	1	MG	a) In an activity area where existing conditions of TSRC are below 5 percent of the area, management activities shall leave the area in a condition of 5 percent or less TSRC following completion of the activities. b) In an activity area where existing conditions of TSRC exceed 5 percent of the area, management activities shall include mitigation and restoration so that TSRC levels are moved back toward 5 percent or less following completion of the activities.	"*...completion of the activities*." In the context of the TSRC, analysis should be described as being synonymous with the time when the results of quantitative reclamation monitoring identified in the Reclamation and Closure Plan (Tetra Tech 2019) (RCP), Section 3.3.6.2.2 demonstrates compliance with reclamation performance standards identified in RCP Section 3.3.6.3.
7	4.5-6	4.5.2	1	MG	Being situated in a highly mineralized zone, where background concentrations of some metals (e.g., arsenic, antimony, and mercury) are known to be relatively high in some soils and underlying layers (i.e., the mean concentration of arsenic in soil samples adjacent to the site was found to be five times higher than U.S. Environmental Protection Agency's ecological soil screening level for arsenic; refer to Section 4.5.2.1.3, Reclamation Cover Materials, for further discussion);	Immediately following "*...and underlying layers...* " insert text as follows: "...that support natural plant communities typical of the region, aspect, and elevation..." . In addition, while the elemental data presented in RCP Appendix A are representative of background soil conditions within and adjacent to the Stibnite Mining District's primary zone of mineralization, most soil sample sites were located outside the area of proposed SGP disturbance. Elemental data from salvaged soils within the area of SGP disturbance should therefore be presented or referenced when describing site conditions and assessing the effects of the soils and RCM on reclamation performance and post-closure conditions.
8	4.5-7	4.5.2.1.1.1	1	MG	The majority of construction, mining production, and closure activities would involve excavation, grading, and/or filling of the existing soils that would severely reduce or eliminate soil productivity.	Replace sentence with the following: "Prior to construction and mining activities, practicably salvageable soil that is suitable for reclamation would be separately excavated, 'live-handled' or placed in stockpiles, protected from wind and water erosion, then spread on areas prepared for reclamation. All of these activities have the potential to severely reduce soil productivity." (remove the words "or eliminate")
9	4.5-7	4.5.2.1.1.1	1	MG	The majority of construction, mining production, and closure activities would involved excavation, grading and/or filling of the existing soils that would severely reduce or eliminate soil productivity.	Please provide reference that supports this statement that salvaging soil will severely reduce or eliminate soil productivity. We have looked at other PNF EISs (e.g., Huckleberry Landscape Restoration Project EIS), which repeatedly states that logging roads that are obliterated, scarified and have soil replaced and mitigation measures applied will have restored soil productivity and are not classified as a long-term TSRC.
10	4.5-8	4.5.2.1.1.1	2	MG	According to the RCP, Midas Gold intends to reclaim all of the SGP-related disturbance except for approximately 357 acres associated with the Hangar Flats pit lake and high walls, the West End pit lake and high walls, the Midnight pit lake, and Yellow Pine pit high walls. These areas would remain a permanent commitment of soil resources (a large portion of which would occur on private patented mining claims	CLARIFICATION: It should be noted that these areas already have considerable soil loss and impacts.
11	4.5-8	4.5.2.1.1.1	3	MG	"Productive conditions" are not further defined in the RCP, and there is no direct correlation with TSRC (i.e., a reclaimed site may or may not continue to meet the Forest Plan definition of TSRC, which requires a greater than 40 percent recovery of natural background soil productivity within 50 years of disturbance).	CLARIFICATION: IDL has regulatory authority over all mining whether on state or federal lands within the state of Idaho. IDAPA regulations at 20.03.03 provide specific criteria for soils and revegetation that are at least, if not more stringent, than the cited Forest Plan standards and guidelines. The operations must meet IDAPA criteria.

Comment Number	Page # or Global	Section	Paragraph (count from top of page)	Commenter Initials	Relevant DEIS Text Excerpt (if applicable)	Comment
12	4.5-8	4.5.2.1.1.1	3	MG	As a general rule, the processes responsible for restoration of soil productivity occur over a very long timeframe (centuries) and do not directly correlate to successful reclamation, which is mainly oriented to short-term objectives. The short target timeframe for achievable reclamation measures (e.g., 5 to 10 years) would not be sufficient to establish trends in soil resources and productivity that would take many centuries and up to millennia to develop within the conditions that pertain to the activity area, especially with respect to the short growing season and harsh winters. Important measures of long-term soil productivity would include: development of a litter layer, biotic crust and/or A horizon (organic matter-enriched surface layer); development of soil structure to support water and air movement; physical and chemical weathering of coarse fragments to add soil fines and nutrients; and development of the soil food web, nutrient cycles, and microbial community, especially the mycorrhizal network. Thus, the following considerations make the recovery of greater than 40 percent soil productivity within a 50-year timeframe to be unlikely: PLEASE NOTE: The items below are summaries and excerpts of the 8 bulleted items that follow the text excerpt presented immediately above. Bullet 2 - Organic matter and woody debris are limited Bullet 4 - High metal concentrations in soil and rock may potentially complicate revegetation plans "*...by requiring use of local adapted genotypes and frequent testing of growth media*..." Bullet 5 - "*...there would be a long delay (18 to 20 years)*..." between disturbance and final reclamation Bullet 6 - reclamation performance standards "*...are not directly tied to soil amelioration/productivity.* " Bullet 7 - reclamation performed with GM from stockpiles "*...would undergo changes in bulk density, organic matter content, nutrient, and microbial activity*..." persisting "*...until soil structure and organic matter build up occurred.* " Bullet 8 -"*...Soil organic carbon is a prime indicator of soil quality recovery in post-mining soils* ..." and "*Native soil organic carbon forms and levels generally take decades to recover in post-mining GM.* "	These bullets and other relevant text in the section should be revised to reflect our comments as follows: Bullet 2 - An estimated 200,000 CY of logs and slash would be available within the SGP disturbance. Midas Gold intends used these materials to enhance reclamation performance. Also, see the last two sentences of the comment pertaining to Bullet 8 below. Bullet 4 - The need to exclusively use seed and other propagules from local plant genotypes adapted to the elevated metals concentrations in soil located within the mineralized zone at the SGP has not been established, but would be investigated further along with frequent testing of GM and other materials as they are being placed, which is a standard reclamation practice employed by the mining industry. In addition, of the approximately 1,884,000 BCY of GM/Seed Bank Materials (SBM) anticipated to be salvaged for reclamation purposes at the SGP, approximately 666,000 BCY or 35% would be salvaged from the mineralized zone at the SGP, therefore the concentration of metals in 65% of the GM/SBM salvaged would be significantly lower than observed within the mineralized zone. Bullet 5 - Approximately 150,000 BCY of GM/SBM would be 'live handled' and therefore not stockpiled. The remaining 1,730,400 BCY would be stored in stockpiles between 6 and 20 years. The average period between the initiation of disturbance and initiation of reclamation is anticipated to be 13 years for the 28 named facilities at the SGP, therefore the characterization of the time period between reclamation and disturbance should be revised to reflect the information presented here. In addition, this is a very general statement that lumps the entire site into one category, i.e., long periods between soil salvage and replacement. RCP Table 3-1 outlines the disturbance and reclamation schedule in detail by listing the year that each named facility at the SGP would be disturbed and reclaimed (including the number of acres affected and reclaimed) . The generalization present by this bullet (and other similar text) does not account for areas that would be reclaimed using live-handled GM as outlined above, nor does it account for areas that would be concurrently reclaimed, long before the end of SGP operations. There are up to 300 additional acres reclaimed between years 7 and 11 that can use GM that has only been in stockpiles from 2 to 4 years. Bullet 6 - As discussed at the outset of this comment, reclamation monitoring protocol and performance standards present in the RCP are directly tied to soil productivity. Bullet 7 - Many of the reclamation practices identified in the RCP Section 3.0 are specifically designed to address the anticipated changes stated in this bullet during stockpiling of salvaged GM/SBM. The practices should hasten recovery of soil productivity. Bullet 8 - See discussion at the outset of this comment as it pertains to soil erosion being one prime, if not the prime "...indicator of soil quality recovery in post-mining soils...". In addition, as shown in RCP Table 3-8, a surplus of approximately 156,000 BCY of SBM with relatively high organic matter content is anticipated to exist and this material would be used as a surrogate to GM, as a GM deficit of approximately 190,000 BCY is anticipated to exist. This excess SBM would therefore increase the overall organic matter content of GM applied to uplands portions of the SGP disturbance that would be reclaimed. Furthermore, approximate 103,000 BCY of SBM will be used as a "top dressing" over GM to restore approximately 153 acres of wetlands and stream reaches at the SGP. This and other descriptions presented should also be revised to state that the soil salvaged for reclamation at the SGP are non-saline and non-sodic, with K-factors ("...relative index of susceptibility of bare, cultivate soil to particle detachment and transport by rainfall." National Soil Survey Handbook, Natural Resources Conservation Service, US Department of Agriculture, March 2017.) of 0.1 ,which is considered low (Soil Resources Baseline Study, Stibnite Gold Project, Tetra Tech 2017). Finally, the methods and approaches used by the in the Huckleberry Land Restoration EIS by the USFS to evaluate the effects of an activity on soil productivity should be employed to evaluate the effects of the SGP on soils productivity.
13	4.5-9	4.5.2.1.1.1	1, Bullet 3	MG	Proposed soil amendments, including small amounts of organic composts and fertilizers, may not be retained by this GM.	CLARIFICATION/SOLUTION: See previous comment RE: IDAPA regulations at 20.03.02 that require restoration of soil productivity and revegetation standards after mining operations. Additional GM can be generated during operations by cycling of materials off existing proposed GM compost facilities as required to develop sufficient materials to satisfy the requirements.
14	4.5-10	4.5.2.1.1.1	3rd	MG	The additional reclamation challenges associated with these types of facilities is consistent with observations of nearby, previously reclaimed mining areas having mixed vegetative cover success.....	These are very general statements with no detail to back up the equivalency of past reclamation efforts by others to those proposed by Midas Gold, nor does this statement provide any detail or data as to why the USFS believes past reclamation has not resulted in a self sustaining vegetation cover. If the status of previously reclaimed historical mine-related disturbance at the Stibnite Mining District is a basis for concluding the proposed reclamation plan for the SGP-disturbance will not work, then data should be presented to demonstrate how it was equivalent to Midas' proposed reclamation methods.
15	4.5-10	4.5.2.1.1.1	2	MG	These include physical characteristics of very coarse substrate in waste rock, and chemistry that is highly variable but generally deficient in essential nutrients, and potentially high in other elements (metals) that may affect plant growth.	CLARIFICATION: This is essentially no different than existing conditions over most of the site - it is a high relief environment where physical weathering processes are dominant and chemical weathering processes are nearly non-existent. Thus the DSRFs and other areas of disturbance generally would have no real change compared to existing conditions.
16	4.5-10	4.5.2.1.1.1	2	MG	As such, in addition to the considerations listed above, the root zone material from waste rock (with potentially higher concentrations of arsenic and other heavy metals) would be up to 70 percent coarse fragments that may facilitate fines in the overlying GM to migrate into the underlying coarse rock below, and the DRSF outer slopes would be at steep gradients (3:1 or steeper), which further restricts soil development and amelioration in these areas.	CLARIFICATION/SOLUTION: This assumes that there are no growth mats or other bioengineering practices implemented to prevent this. This is actually an existing problem on site in numerous area because such measures were not required nor implemented in past mining reclamation operations. Use of appropriate GM mats and bioengineering practices can be a requirement for reclamation and mitigate this issue.

Comment Number	Page # or Global	Section	Paragraph (count from top of page)	Commenter Initials	Relevant DEIS Text Excerpt (if applicable)	Comment
17	Global			MG	p. 4.5-8: "Productive conditions" are not further defined in the RCP, and there is no direct correlation with TSRC (i.e., a reclaimed site may or may not continue to meet the Forest Plan definition of TSRC, which requires a greater than 40 percent recovery of natural background soil productivity within 50 years of disturbance). p. 4.5-10:For all of these reasons, this analysis of TSRC assumes that all SGP-related disturbances in the PNF activity area would be considered TSRC due to the site-specific challenges and the duration and nature of soil disturbance to support the proposed mining activities. p. 4.5-15: Nevertheless, this analysis assumes recovery of greater than 40 percent soil productivity of natural background within a 50-year timeframe to be unlikely (due to the nature of disturbance and the conditions at the site) and, therefore, the duration of impacts would be longer-term, well beyond the 50-year threshold. p. 4.5-18: This analysis of TSRC assumes that all SGP-related disturbances in the BNF activity area would be considered TSRC due to the site-specific challenges and the duration and nature of soil disturbance. p. 4.5-18: The same considerations made for the analysis of TSRC on the PNF apply to the access and transmission infrastructure corridors and the off-site facility on the BNF.	The primary basis for these conclusions (assumptions) is the soil productivity of SGP disturbance will be 0 to 40% of natural background soil productivity for a period of more than 50 years, regardless of whether the reclamation activities proposed in the Stibnite Gold Project Reclamation and Closure Plan (Tetra Tech 2019) (CRP) are implemented or not. Natural background soil productivity is however not defined in the DEIS in quantitative terms that can be measured objectively. The PNF - LRMP defines soil productivity as follows: " *Soil productivity includes the inherent capacity of a soil under management to support the growth of specified plants, plant communities, or a sequence of plant communities. Soil productivity may be expressed in terms of volume or weight/unit area/year, percent plant cover, or other measures of biomass accumulation.* " We therefore request the analysis of TSRC presented be revised to include comparisons of the soil productivity of natural background and reclaimed/unreclaimed SGP disturbance. These comparisons should be based on expressions of "*...volume or weight/unit area/year, percent plant cover, or other measures of biomass accumulation.* " Quantitative expressions of soil productivity, that can be objectively measured using standard monitoring and statistical methods, presented in RCP Section 3.3.6.3, page 3-52 are as follows: " *Vegetation Performance Standards* *The revegetation performance standards for the Project will be to achieve:* *• 70 percent of the perennial plant canopy cover of the recommended reference area(s) for two consecutive growing seasons in areas planted to herbaceous species only; and* *• 50 percent the perennial plant canopy cover of the recommended reference area(s) for two consecutive growing seasons and an average of six hundred (600) woody plants per acre in areas planted to a mixture of herbaceous and woody species.* " These performance standards, which would be based on the productivity of one or more reference areas that represent undisturbed vegetation communities adjacent to the SGP (i.e. natural background productivity) and exceed the TSRC standard of 0 to 40 percent of natural background productivity. Midas Gold's responsibilities for the reclamation of SGP-disturbance would not be absolved until these (and other) standards are met, therefore SGP-disturbance, that is reclaimed as described in the RCP, should be included as Detrimental Soil Disturbance or DD (rather than TSRC) in the activity area. As discussed in earlier comments, broad application of TSRC to all SGP-disturbance, reclaimed or not,-lumps the entire site into a worst case scenario. Furthermore, this approach does not account for areas that are reclaimed using live-handled GM or are concurrently reclaimed using GM that has only been stockpiled for a few years . It also does not account for SGP roads, plant site and other areas that would not have development rock or tailings underlying GM, and that would be reclaimed using obliteration and restoration techniques the USFS typically uses for roads and heavily disturbed sites for their own timber sale EISs where they are classified as DD rather than TSRC (see references to text from the Huckleberry Land Restoration EIS in Comment 22). TSRC and DD classifications should be evaluated therefore on a facility-by-facility basis according to the type of reclamation applied to each facility.
18	4.5-15	4.5.2.1.1.1	2	MG	Nevertheless, this analysis assumes recovery of greater than 40 percent soil productivity of natural background within a 50-year timeframe to be unlikely (due to the nature of disturbance and the conditions at the site) and, therefore, the duration of impacts would be longer-term, well beyond the 50-year threshold.	Please provide support for assumption given the IDAPA legal requirements that require this. There are numerous examples on site where MGII has reclaimed and revegetated things successfully that are contrary to this assumption.
19	4.5-18	4.5.1.1.2	6	MG	The magnitude of impacts to soil resources within the BNF includes excavation, grading, or filling of 481 acres (approximately 66 acres of which are already disturbed due to overlap with and use of existing dedicated roadways, etc.), and a net increase of TSRC in the BNF activity area of approximately 414 acres (from 904 acres to 1,318 acres).	The increase in TSRC from 904 to 1,318 needs to be put into context. Table 4.5-3 provides a 1% (0.43% actual) to compare this increase too. By increasing the TSRC from 904 to 1,318 the actual percent increases to 0.64%. Please add this actual percent increase to this statement so the readers can realize there is less than one percent increase.
20	4.5-20	4.5.2.1.2	3	MG	However, based on the estimate of forest land within the ROW, proportion of highly erodible soils, the limited extent of forested wetlands, and the infrequency and short duration of ground disturbing impacts, DD would more likely be somewhere between 8 percent and 15 percent.	Please provide a reference or logic to support the 8% to 15% assumption.
21	4.5-20	4.5.2.1.2	5	MG	The duration of impacts from vegetation clearing (along the Transmission Line from Johnson Creek Substation to the mine site) would be considered long term (>15 years), because disturbance would begin the first year of the construction phase and would continue at least through SGP year 18.	Vegetation clearing would not continue though SGP Year 18 since the tree regrowth and height during this time would not likely be enough to threaten power line and infrastructure. Please remove this sentence or revise it to reflect actual vegetation management typical for transmission lines of this height.
22	4.5-21	4.5.2.1.3.1	2	MG	Reclamation of uplands on the TSF and DRSFs would involve placement of 3 feet of suitable waste rock at the surface, on top of which 12 inches of suitable GM would be placed.	The text should be revised to reflect the following: Outside the restored and lined Meadow Creek corridor, a minimum 2 (not 3) feet of non-potentially acid generating and metals leaching development rock would be placed on the tailings surface prior to application of 1 foot of suitable GM.
23	4.5-21	4.5.2.1.2	1	MG	Clearing impacts would continue indefinitely on the upgraded transmission line corridors that would continue to be maintained by IPCo after mining ceases.	Reword to: "Clearing impacts would continue indefinitely on the upgraded transmission line corridors that would continue to be maintained by IPCo after mining ceases, just as the existing transmission line is currently maintained by IPCo." Reason: Wording does not make it clear that current line is cleared by IPCo already and this is just a continuation of current practices, not new clearing
24	4.5-22	4.5.2.1.3.1	2	MG	However, storing material in windrows for approximately 20 years along a roadway in mountainous terrain is not a typical practice. The potential for losses of this material over time from erosion (i.e., washed away down steep slopes) is expected to be high, and much higher than for traditionally stockpiled material.	The text should be revised to reflect the following: GM/SBM salvage from the BLR would be stored on windrows along the toe of fill slopes (not along the roadway) and other locations suitable for storage such as Burntlog Borrow Source Areas.

Comment Number	Page # or Global	Section	Paragraph (count from top of page)	Commenter Initials	Relevant DEIS Text Excerpt (if applicable)	Comment
25	4.5-22	4.5.2.1.3.1	1	MG	The GM deficit is thus estimated at approximately 34,000 BCY.	Add to end: "...or less than 2% of the GM required." Reason: Puts deficit in perspective
26	4.5-24	4.5.2.1.3.2	1	MG	The Forest Service would require mitigation measures (see Table D-1 of Appendix D) to incorporate coarse woody debris (>3 inches diameter) onto reclaimed lands as evenly distributed as possible in the tonnages and diameters described in the Forest Plan. The objective would be to meet the upper range of tons per acre by "potential vegetation group" or greater with larger-diameter material.	The text should be revised to as follows: coarse woody debris will be unevenly distributed to improve diversity in habitat, microsites, soil organic matter content, and soil temperature and moisture regimes.
27	4.5-24	4.5.2.1.3.2	3rd	MG	The RCP prioritizes live-handling of GM where possible. However, due to the extended period of operations, and logistical issues, only about 150,000 BCY or GM would be live-handled.	Live handled GM will be applied to almost 8% of the total SGP disturbance that would be reclaimed, which would be significant portion of the disturbance to be reclaimed at the SGP. We request therefore, that these areas be classified DD at maximum rather than TSRC, or classified as neither .
28	4.5-25	4.5.2.1.3.2	2	MG	Despite these measures the storage of GM within deep stockpiles for years would still result in the loss of soil productivity, which would affect the overall quality of this material at the time of placement.	The text should be revised to reflect comments above . In addition, this statement focuses solely on the longest soil storage periods and does not acknowledge the significant quantity of soil that would be stockpiled for only a few years. Concurrent reclamation of approximately 300 acres would occur during years 7 through 11 and use GM removed in years 5 through 10,thereby dramatically reducing the stockpiling period and associated effects on soil productivity. We recommend detailed description and assessment of the conditions predicted to exist at specific SGP facilities following application of the reclamation practices identified in the RCP, including reclassifying-SGP disturbance that would be reclaimed from TSRC to DD or lesser effects categories.
29	4.5-26	4.5.2.1.3.2	1	MG	Some known locations of contamination were cleaned up in the past, but it is possible that additional areas of contamination would be exposed and observed during SGP-related construction and operations.	The text should be revised to state the following: Midas Gold anticipates and plans to excavate historical mine waste and impacted soil where it is necessary for the execution of the SGP and these materials will be used for construction of facilities, or, processed for metals recovery and disposed of in the TSF or DRSFs.
30	4.5-28	4.5.2.1.3.2	1st	MG	Additionally, Section 4.18 provides recreational risk-based (human health) soil screening level calculations for the GM.	We request this be removed unless the data cited or presented were collected from locations within the SGP disturbance where soil would be salvaged for use in reclamation of the SGP.
31	4.5-33	4.5.2.3	Entire Section	MG	Global comment on Alternative 3.	The comments herein regarding Section 4.5.2.1 Alternative 1, and all of its subsections, also apply to the analysis of Alternative 3. It should be noted that moving the TSF from the Meadow Creek drainage, which is west of the primary area of mineralization and placing it in the EFSFSR drainage may increase the metals concentrations in soil salvaged from the footprint of the TSF. The TSF location under Alternative 3 is closer to mineralized areas observed in the exploration soil samples collected by MGII, as outlined in Appendix A (Figure A-1) of the RCP.
32	4.5-43	4.5.3	Entire Section	MG	Global comment on Mitigation Measures	The mitigation measures presented in this section are given very little attention in Section 4.5.2 of the DEIS. Many of the measures which are listed here would mitigate the impacts identified in Section 4.5.2. Please identify mitigation measures in Section 4.5.2 that address the identified issues and identify that they will be implemented.
33	4.5-45	4.5.5	2nd	MG	These disturbances would be considered an irreversible effect with regards to the commitment of soil resources. However, certain facilities would recover soil productivity faster than others. This would be most likely in areas of wetland and stream construction that would receive the highest quality GM and seedbed material from organic and alluvial soil, or for those surficial facilities or shallower ground disturbances, (especially where occurring in areas of flatter topography). These areas would regain productive capacity relatively faster when compared to reclamation over the TSF and DRSF....	Why are these areas not classified as DD, rather than TSRC? The same question applies to the following sentence regarding haul roads, the Plant Site, worker housing area, and other surficial facilities regaining productivity sooner. These should be classified as DD at a minimum. The overly general approach to evaluation of the productivity of reclaimed areas overlooks the significant variability that will exist across the SGP. Please conduct a more detailed breakdown of soil productivity based on the conditions of each facility area and the nature of the reclamation that is proposed for each facility.
34	4.5-45	4.5.7.1	3rd	MG	For the BNF activity area, the magnitude of impacts to soil resources varies by alternative,....., increasing from 1 to 2 percent TSRC of the BNF activity area under all action alternatives.	This is based on reclamation of roads being classified as TSRC. The BLR roads, which are the primary disturbance in the BNF, will be removed and restored using very similar methods as the USFS does for their timber sale road, where they are not classified as TSRC (see page references to Huckleberry EIS under Comment 22). The BLR roads should be classified as DD at a minimum and perhaps not classified as either DD or TSRC.
35	4.5-45	4.5.6	Entire section	MG	Some residual impacts from legacy mining operations would be reclaimed prior to construction and operation of the mine site.	There is no discussion of the improved productivity of currently unreclaimed areas that will be covered with GM and revegetated as part of the SGP. These will certainly be an improvement in productivity over current conditions. Please identify the acres of previously disturbed soils that would be reclaimed as a result of the SGP and provide credit for these improved conditions. By using only the DD and TSRC basis for evaluating reclaimed areas the DEIS overlooks the hundreds of acres of private lands that are currently disturbed by historical mining activities, but will be reclaimed and left in a much improved condition.
36	4.5-45	4.5.6	2	MG	Some residual impacts from legacy mining operations would be reclaimed prior to construction and operation of the mine site. Most of the proposed disturbance area is anticipated to be reclaimed upon completion of all mining operations.	Reword as "A number of residual impacts from legacy mining operations would be reclaimed during construction and operations of the mine site, while other reclamation and restoration related to new activity would be carried out concurrently with operations or during closure." Reason: Incorrect characterization of sequence of events. Nothing occurs before construction, most legacy impacts are addressed during construction (Blowout, river diversion and fish passage, spent ore removal, YP dumps) while other occur during operations (backfilling YP pit, removal of Hecla heap and old mill site, etc.)
37	4.5-48	4.5.7.3	3rd	MG	Additionally, the naturally high background levels of trace metals at the mine site represents a challenge with regards to the suitability of RCM and reclamation - related revegetation efforts.	The DEIS has used soils data from outside the disturbance area to make this statement. Please remove statement or modify it using data that is representative of soils that will be salvaged and placed as GM, not soils from the highly mineralized areas to the east of the TSF, Fiddle and other major soil salvage areas. The DEIS acknowledges that natural vegetation is growing on areas with elevated metals concentrations in soils (page 4.5-26 3rd paragraph). This information should be repeated here since it is very relevant to this summary of RCM quality.

Attachment A: Stibnite Gold Project Other Resources DEIS Comments Compilation Table
A-6: Sections 3.6 and 4.6 - Noise

Comment Number	Page # or Global	Section	Paragraph (count from top of page)	Commenter Initials	Relevant DEIS Text Excerpt (if applicable)	Comment
1	Global	4.6	1	MG		All noise sources and estimated maximum noise levels are reported at a Total Average Hourly Noise Level at a distance of 50 ft. This is an overly conservative method that inflates predicted noise levels. As an example Table 4.6-1 assumes all construction equipment noise (some 98 pieces of equipment), emanating from the same location and assessing that noise at a distance of 50'.
2	4.6-6	4.6.2.1.1.2	4	MG	Construction activities along the Burntlog Route would be limited to the first year of the construction phase.	Construction of the Burntlog Route is likely to be completed within the first two years of construction.
3	4.6-23	4.6.2.1.2.1	1	MG	Blasting noise would occur intermittently for short periods of time.	Reword - add to the end "but only during daytime hours" Reason: Clarification as blasting will not occur at night
4	4.6-46	4.6.2.4.1.1	1	MG	Road widening and straightening, along with drainage and bridge improvements would be required for the Johnson Creek Road (CR 10-413) portion of the Yellow Pine Route. The Stibnite Road (CR 50-412) portion would be improved by straightening curves, constructing retaining walls, and installing culverts.	Please include detail of construction noise on Johnson Creek and Stibnite Road.
5	4.6-48	4.6.2.4.2.1	1	MG	SGP-related traffic would not substantially contribute to noise levels during the operations phase.	Add wording: Increased traffic along the Johnson Creek and Stibnite Roads during operations would increase daytime noise levels at Site 2, Site 5, Site 10, and Site 11 as high as 75 to 84 dBA, which above the baseline ambient noise levels of 34 to 50 dBA. Reason: Does not discuss impacts at Site 2, 5, 10, and11
6	4.6-52	4.6.5	1	MG	The future non-SGP ambient sound environment is likely to be similar to the reported baseline, adjusted only by changes in non-SGP acoustical contributors such as roadway traffic flows and the potential for **new residential, commercial, and industrial development in the SGP vicinity.**	ADD to end: "However, since the majority of the surrounding area outside the SGP is wilderness, such actions are unlikely or temporary. Reason: Little to no possibility of additional activities in the area

Attachment A: Stibnite Gold Project Other Resources DEIS Comments Compilation Table

A-7: Sections 3.7 and 4.7 - Hazardous Materials

Comment Number	Page # or Global	Section	Paragraph (count from top of page)	Commenter Initials	Relevant DEIS Text Excerpt (if applicable)	Comment
1	4.7-9	4.7.2.4.2.1	2	MG	The furnace gas condensers would be disposed in a landfill or waste repository permitted to accept this type of waste material.	REWORD: The furnace gas condensers would be disposed **offsite** in a landfill or waste repository permitted to accept this type of waste material.
2	4.7-10	4.7.2.4.2.5	1	MG	There is no past incidence of spills (since 2016) while transporting fuel and consumables to the mine site (Midas Gold 2016).	REWORD: There is no past incidence of spills (since **2009**) while transporting fuel and consumables to the mine site (Midas Gold 2016). Reason: Midas Gold has not had a reportable transportation-related spill since it commenced operations, aside from the plane incident in 2012
3	4.7-13	4.7.2.4.5	1	MG	Though the Burntlog Route includes a greater number of stream crossings, the Yellow Pine Route includes significantly greater proximity to water resources.	Text above indicates BLR crosses 37 streams, which is less than the 43 different streams the Yellow Pine route crosses. Revise text to indicate the Burntlog Route has a lesser number of stream crossings.
4	4.7-13	4.7.2.5	2	MG	Under Alternative 2, an on-site limestone crushing plant and associated lime generation equipment is proposed and would require additional hazardous materials present at the mine site (i.e., **diesel for associated trucking and** propane to fuel the lime kiln).	Delete highlighted words Reason: limestone is within pit limits so would have been hauled out as part of mining, so no additional diesel involved
5	4.7-21	Table 4.7-3	row 1, column 3	MG	Petroleum products are currently stored at exploration-related facilities for activities associated with the exploration activities. In total approximately 63,885 gallons of petroleum products are used, stored and transported annually.	Should read 24,000 gallons. MGII had capacity for about 65,000 but over the last 6 years have only consumed or had delivered approximately 24,000 annually.

Comment Number	Page # or Global	Section	Paragraph (count from top of page)	Commenter Initials	Relevant DEIS Text Excerpt (if applicable)	Comment
1	3.10-2	3.10.2.3	3	MG	"Forest Plans are considered enforceable regulations and provide guidance to assist agency staff in administering regulations . . . ."	Delete this last sentence of this paragraph. Reason: It is an inaccurate and confusing legal characterization of forest plans, unnecessary for the summary of forest plan provisions earlier in this paragraph, and inconsistent with other descriptions of forest plan provisions in other sections of the DEIS. Forest plans contain standards and other direction that are enforceable where applicable, subject to valid existing mining and other rights, but which are tiered to and may be superseded by published regulations and applicable law.
2	3.10-9	3.10.3.1	1	MG	Approximately 341 acres (2 percent) of the analysis area occur in the Salmon-Challis National Forest (administered by the PNF); however, PVG data were not available for this area.	We believe these data for the Salmon-Challis National Forest are available and should be incorporated into the analysis. Please revise.
3	3.10-26 - 3.10-38	3.10.3.2.2.1 - 3.10.3.2.2.2	multiple	MG	Least Moonwort and other species. This species was not included in past SGP related surveys performed by contractors for the Midas Gold Idaho, Inc (Midas Gold) in 2012, 2013, or 2014 (HDR 2017).	These species are included in HDR 2017 baseline vegetation report tables (Table 3-4 and 3-5) and text and were included in 2012 and 2013 surveys. The baseline vegetation study plan was approved by the USFS and botanist as sufficient baseline data collection.
4	Global			MG		This section does not identify any listed T&E species in the analysis area, although it identifies whitebark pine as a candidate/otherwise of concern, several sensitive and Forest Watch species with in the analysis area (apparently within limited locations/areas) and includes a much larger list of species of concern potentially occurring in the analysis area. Adequate surveys for species of concern have or will be completed, actual likely effects are quite limited and will be avoided or minimized to minor levels with mitigation measures, monitoring, etc.
5	Global			MG		This section only briefly mentions mitigation measures in Appendix D, but does not provide any specifics of how those measures, the mitigation plans, or the Reclamation and Closure Plan (Tetra Tech 2019) would reduce and minimize impacts or were factored into the analysis. The mitigation measures and plans are designed to effect and reduce impacts and do not appear to be factored into the analysis as currently presented. Recommend summarizing the measures and plans applicable to general vegetation communities, botanical resources, and non-native plants and discussing these within each category of impacts under each issue. Consider including these measures and plans in the indicators. The DEIS includes more discussion on how mitigation measures and reclamation would reduce impacts for Alternative 5, the no action alternative, than the action alternatives.
6	Global			MG		Please clarify how the indicators and impact analyses were used to draw the conclusions presented here.
7	4.10.1	4.10.1	3	MG	**Issue:** The SGP would impact non-forested areas (i.e., those that are identified through PVG mapping as not being successional to forests) within Forest Service-administered land and could impact the ability of these areas to reach desired conditions. **Indicator:** Acres of SGP disturbance to previously undisturbed non-forested areas within Forest Service-administered land.	This indicator does not provide a way to analyze the issue as a whole. This indicator identifies the acres of disturbance. There is no way of measuring the impact and ability of the non-forested PVGs to reach desired conditions based on this indicator. Further explanation is needed to clarify impacts as presented.
8	4.10.1	4.10.1	8	MG	**Issue:** The SGP would remove whitebark pine individuals, and habitat conversion associated with the SGP would impact seed production, dispersal, and establishment of this species. **Indicator:** • Number of acres of whitebark pine occupied habitat impacted by the SGP. • Estimated number of mature whitebark pine trees to be cut during SGP construction.	This indicator does not specify how seed production, dispersal, and establishment would be measured. Further explanation is needed to clarify impacts as presented.
9	4.10-1	4.10.1	1	MG	**Issue:** The Stibnite Gold Project (SGP) would impact forested Potential Vegetation Groups (PVGs) within U.S. Forest Service (Forest Service)-administered land and could impact the ability of these areas to reach desired conditions. **Indicator**: Acres of SGP disturbance to previously undisturbed forest PVGs within Forest Service administered land.	This indicator does not provide a way to analyze the issue as a whole. This indicator identifies the acres of disturbance. There is no way of measuring the impact and ability of the forested PVGs to reach desired conditions based on this indicator. Further explanation is needed to clarify impacts as presented.
10	4.10-2	4.10.1.1.1	2	MG		We believe Salmon Challis National Forest PVG and existing vegetation mapping is available and should be used. Please revise.
11	4.10-2	4.10.1.1.1	3	MG	Idaho Natural Heritage Program tracked plant list (2014)	The Heritage Program tracked plant list used is from 2014. Please use the most recent updated list available which is from 2018: https://idfg.idaho.gov/species/taxa/more-resources
12	4.10-3	4.10.1.1.1	1	MG	Forest Service Rare Plant Geographic Information System Data for the SGP Area (Idaho Fish and Wildlife Information System [IFWIS] 2017)	IFWIS 2017 has been updated. As a data partner with IFWIS, USFS receives updated datasets twice annually (January and July). We suggest using updated datasets.

Comment Number	Page # or Global	Section	Paragraph (count from top of page)	Commenter Initials	Relevant DEIS Text Excerpt (if applicable)	Comment
13	4.10-3	4.10.1.1.1	1	MG	Vegetation Baseline Study, which was prepared by HDR in November 2013 and revised in April 2017 to characterize existing vegetation in the SGP area (HDR 2017); and Addendum #1 to the Vegetation Baseline Study, which was prepared by HDR in December 2014 and revised April 2017 to characterize vegetation along the existing 71-mile-long transmission line corridor that runs from a substation south of the community of Lake Fork to approximately 10 miles west of the mine site (HDR 2017).	Baseline existing vegetation from HDR 2017 is more recent than the available existing vegetation mapped from PNF in 2005 and 2009 LANDFIRE data, but it does not appear that these data were used in describing baseline conditions and impacts. We suggest using these ground truthed project data sources to describe vegetation baseline and impacts.
14	4.10-4	4.10.2.1.1.1	4	MG	Construction and operation also would require clearing of tall trees within a 50-foot-wide corridor centered on the new and upgraded transmission lines.	CLARIFICATION: Much of the existing transmission line corridor and ROW is already cleared at this level.
15	4.10-4	4.10.2.1.1.1	4	MG	Vegetation removal and tree clearing would not maintain or move towards desired conditions for vegetation (i.e., species composition, size class, canopy closure, snags and coarse woody debris) as described in the Payette National Forest Land and Resource Management Plan (Payette Forest Plan) (Forest Service 2003) and the Boise National Forest Land and Resource Management Plan (Boise Forest Plan) (Forest Service 2010a).	Once operations are completed, vegetation will be replanted and will return and trend vegetation back towards its desired characteristics. This is a requirement of IDAPA regulations for mine reclamation and is a mandatory requirement in the reclamation plan. In addition, large areas of the SGP area are already devoid of most vegetation because of past anthropogenic activity, including extensive logging to support the development of the town of Stibnite and mining in the 1920s-1950s when a large commercial sawmill operated on site. Extensive fires over multiple years have further damaged the vegetation and loss of soils has made revegetation difficult. The SGP PRO stipulates that it will revegetate these areas as part of closure. Please clarify for the reader.
16	4.10-5	4.10.2.1.1.1	1	MG	Impacts of tall tree clearing associated with existing transmission lines would continue in perpetuity, as the existing transmission lines are likely to be maintained by Idaho Power Company after SGP closure and reclamation.	Clarify that tall tree clearing would only be associated with existing transmission lines where upgrades are proposed.
17	4.10-5	4.10.2.1.1.2	1	MG	These effects would occur during construction and continue through closure and reclamation. It is likely that any or all these impacts may result in changes to the surrounding ecosystem that persist in perpetuity and would result in these areas not being able to meet desired conditions for the foreseeable future.	Planting and revegetation of disturbance areas would occur as described in Section 2.3.7.1 and further detailed in the Reclamation and Closure Plan (Tetra Tech 2019). Mitigation measures listed in Appendix D, including those on page D-27, includes revegetation and soil amendment measures describing how disturbed areas would be reclaimed and restored to natural habitat, the use of a variety of native herbaceous and woody species, vegetation management, and noxious weed control. Long-term maintenance and monitoring is also included. This should be described in this section and explained in relation to impacts.
18	4.10-5	4.10.2.1.1.1	2	MG	Heavy vehicle use in disturbed areas and in the area where transmission line tree clearing would occur would result in soil compaction that would negatively impact the ability of these areas to support vegetation.	Compaction would not preclude these areas to support vegetation. Planting and revegetation of disturbance areas would occur as described in Section 2.3.7.1 and further detailed in the Reclamation and Closure Plan (Tetra Tech 2019). As described in Section 2.3.7.14, compacted areas would be prepared prior to placement of growth media and revegetation. This should be described in this section and explained in relation to impacts.
19	4.10-5	4.10.2.1.1.1	3	MG	However, since it is not possible to precisely determine when or if disturbed or cleared areas would regain the potential for meeting desired conditions, it is assumed that all direct impacts of SGP disturbance or tree clearing on vegetation communities would continue into the foreseeable future.	Planting and revegetation of disturbance areas would occur as described in Section 2.3.7.1 and further detailed in the Reclamation and Closure Plan (Tetra Tech 2019). This should be described in this section and explained in relation to impacts.
20	4.10-5	4.10.2.1.1.1	3	MG	SGP disturbance to vegetation would begin during construction and continue until decommissioning, where all disturbed areas (with the exception of new, permanent pit lakes, or portions of pit highwalls that are too steep for re-vegetating) would be revegetated during the closure and reclamation phase (Tetra Tech 2019). Revegetation would be done according to Payette or Boise Forest Plan Standards and under the supervision of a Forest Service botanist. However, since it is not possible to precisely determine when or if disturbed or cleared areas would regain the potential for meeting desired conditions, it is assumed that all direct impacts of SGP disturbance or tree clearing on vegetation communities would continue into the foreseeable future.	Planting and revegetation of disturbance areas would occur as described in Section 2.3.7.1 and further detailed in the Reclamation and Closure Plan (Tetra Tech 2019). Mitigation measures listed in Appendix D, including those on page D-27, includes revegetation and soil amendment measures describing how disturbed areas would be reclaimed and restored to natural habitat, the use of a variety of native herbaceous and woody species, vegetation management, and noxious weed control. Long-term maintenance and monitoring is also included. This should be described in this section and explained in relation to impacts.
21	4.10-6	4.10.2.1.1.2	5	MG	Increased Soil Erosion Effects on Plants	Text should be modified to identify that BMPs will be implemented to manage erosion and sedimentation. Interim reclamation will occur on some slopes to establish vegetation to manage erosion then final reclamation will establish vegetation that will, in conjunction with water management BMPs, manage runoff and erosion post closure.
22	4.10-6	4.10.2.1.1.2	5	MG	Alternation of Hydrology in Habitat for Hydrophilic and Wetland Plants	BMPs will be implemented to managed surface water runoff and maintain stream channels and to limit erosion and sedimentation that might affect downstream wetlands.
23	4.10-7	4.10.2.1.2	1	MG	Vegetation removal and soil disturbance in these areas would not maintain or move towards desired conditions as defined by the Forest Plans into the foreseeable future for the same reasons as described in Section 4.10.2.1.1.2, Indirect Impacts.	A noxious weed management plan has been developed and implemented by Midas and it will be modified to address the management of noxious plants during expansion of project disturbances and throughout operations. This should be revised in the FEIS.

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24	4.10-7	4.10.2.1.2	1	MG	Impacts to Non-Forested.....	The use of term "foreseeable future" is not correct. Reclamation of the various facilities will occur during the years outlined on Figure 3-3 of the RCP, hence, the timing of revegetation and the number of years until revegetation efforts result in vegetation cover that meets project standards can be estimated at 5 years or more.
25	4.10-8	4.10.2.1.4	1	MG	Removal of whitebark pine individuals, particularly mature, cone-bearing individuals, would reduce the population size of this species in the Forests and potentially have long-term consequences for this species in the analysis area. Loss of whitebark pine individuals would result in reductions in seed production and dispersal, which would result in reduced establishment of this species in and adjacent to the analysis area.	Due to past disturbance, including widespread wildfire, most whitebark pine trees are sapling and young trees that have not yet reached maturity and are not yet cone-bearing. This should be disclosed.
26	4.10-8	4.10.2.1.4	3	MG	Transport of whitebark pine individuals that are cut down for SGP construction outside the SGP area also has the potential to spread conifer pathogens such as pathogenic bark beetle species (e.g., mountain pine beetle [Dendroctonus ponderosae]), which are a main cause of tree mortality in the coniferous forests of the western U.S. in recent years (Hinke et al. 2016). White pine blister rust disease, which is caused by the introduced pathogen Cronartium ribicola, is another conifer pathogen (Keane et al. 2017) that has the potential to spread if infected trees are transported outside the SGP area. These pathogens are a threat to whitebark pine in the PNF and BNF, and their potential spread as a result of SGP actions could detrimentally impact whitebark pine and other conifers within and outside the analysis area.	Transportation off-site of any conifer species has the potential of speeding such conifer pathogens. Remove this paragraph or clarify.
27	4.10-8	4.10.2.1.6	1	MG	clearing of tall trees within the 50-foot-wide corridor centered on the new and upgraded transmission lines would alter understory vegetation and cause soil compaction to the degree that there may no longer be suitable habitat for any associated special status plant species. Any loss of special status plant potential habitat in areas of vegetation removal or tall tree clearing would occur during SGP construction and would continue into perpetuity, as it is unlikely that potential habitat for these species could be recovered in the same location as soil disturbance would likely preclude conditions necessary for their germination and reestablishment.	This is not an appropriate assumption. Planting and revegetation of disturbance areas would occur as described in Section 2.3.7.1 and further detailed in the Reclamation and Closure Plan (Tetra Tech 2019). As described in Section 2.3.7.14, compacted areas would be prepared prior to placement of growth media and revegetation. Mitigation measures listed in Appendix D, including those on page D-27, includes revegetation and soil amendment measures describing how disturbed areas would be reclaimed and restored to natural habitat, the use of a variety of native herbaceous and woody species, vegetation management, and noxious weed control. Long-term maintenance and monitoring is also included. There are multiple mitigation measures specific to TEPC, sensitive, and forest watch species that would reduce impacts and are not mentioned, including FS-56, FS-63, FS-64, FS-68, FS-69, FS-70.
28	4.10-9	4.10.2.1.6	1	MG		Mitigation measure F-56 on page D-6 of Appendix D-1 states areas where TEPC, sensitive or forest watch species are impacted, they will be restored where degraded. Should not assuming areas of reestablishment are not feasible. Recommend rewording that under the mitigation measure F-56, areas where sensitive species have been degraded or impacted, those areas will be restored to a condition suitable for reestablishment.
29	4.10-9 to 4.10-10	4.10.2.1.7	all	MG		This section references and incorporates the mitigation measures applicable to noxious weeds and describes how impacts would be reduced. The same should be done for vegetation communities and botanical resources.
30	4.10-14	4.10.2.2.4	3	MG	Alternative 1 would impact approximately 257.8 acres of occupied whitebark pine habitat and would remove an estimated 1,027 individual trees, 50 of which would be mature, cone-bearing individuals.	As shown in Appendix H-6 these WBP impact values are based on modeled WBP habitat with modeled estimated occupancy and modeled individuals and cone-bearing individuals. Reword this statement as follows. "Alternative 1 would impact approximately 257.8 acres of modeled occupied whitebark pine habitat and would remove an estimated 1,027 individual trees, 50 of which are estimated to be mature, cone-bearing individuals." This is a global comment and applies to the WBP impacts sections for all the other alternatives.
31	4.10-14	4.10.2.2.4	3	MG	"The Forest Service has preliminarily determined that Alternative 1 would impact whitebark pine, but will not jeopardize the continued existence of this species."	Jeopardy is a ESA-centric term and should not be used in the DEIS nor can USFS call jeopardy on a species. Recommend rewording to reflect not likely to adversely affect WBP. This comment applies to WBP sections for other alternatives.
32	4.10-14 to 4.10-19	4.10.2.2.5	all	MG		This section makes no reference to revegetation as described in Section 2.3.7.1, reclamation and closure plan (Tetra Tech 2019), and applicable mitigation measures in Appendix D that would be implemented and help reduce impacts. Please revise to include.

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33	4.10-42	4.10.3	3	MG		Unclear how the USFS is considering the mitigation measures in Appendix D to minimize impacts by alternative in the preceding sections. Recommend providing a quantitative impact assessment of acres or numbers of individual WBP specimens that would not be impacted due to these mitigation measures. In addition, it could be useful for the reader to see the categories of mitigation at a minimum for vegetation without having to go to an appendix. Describe how much of the acreage of impacts or impacts to individual specimens would be offset by this mitigation or post-closure reclamation efforts or how activities would minimize indirect impacts on vegetation.
34	4.10-42	4.10.4	5	MG		Past and present actions plus reasonably foreseeable future actions (RFFAs) that could cumulatively affect vegetation are provided along with the potential effect of each action could be; however, what those effects mean for the cumulative impacts is not clear. Please clarify.
35	4.10-42	4.10.2.6	2	MG	Midas Gold would be required to continue to comply with reclamation and monitoring commitments included in the applicable Golden Meadows Exploration Project Plan of Operations and EA, which include reclamation of the drill pads and temporary roads by backfilling, re-contouring, and seeding using standard reclamation practices, and monitoring to ensure that sediment and stormwater best management practices are in place and effective so that impacts to vegetation are avoided or minimized.	This section, which is Alternative 5, discusses reclamation and monitoring commitments to reduce impacts more than the 4 action alternatives. It should be clarified that all action alternatives would follow reclamation and monitoring associated with the proposed project, thus reducing impacts.
36	4.10-43	4.10-4	1	MG	Removal of Firewood. Removal of firewood by the public has likely occurred in the vegetation analysis area, resulting in loss of coarse woody debris and snags over time.	Removal of firewood in the past and into the future would have the same potential indirect effect as cutting and removing whitebark pine and transporting individuals outside of the SGP area. The potential for spread of conifer pathogens such as bark beetle and whitepine blister rust described in Section 4.10.2.1.4 would be there with transport off site and should be disclosed.
37	4.10-43	4.10-4	1	MG	Infrastructure and Development projects: Transmission line upgrades in the West Central Mountain Electric Plan 2014, which follows the general location Stibnite Mine transmission line route, have required removal of tall trees in the right-of-way for safe operation of the transmission line. Removal of tall trees has altered understory vegetation community composition and likely removed potential habitat for special status plants.	Removal of tall trees in the past and into the future would have the same potential indirect effect as cutting and removing whitebark pine and transporting individuals outside of the SGP area. The potential for spread of conifer pathogens such as bark beetle and whitepine blister rust described in Section 4.10.2.1.4 would be there with transport off site and should be disclosed.
38	4.10-43	4.10-4	1	MG	Transmission line upgrades in the West Central Mountain Electric Plan 2014, which follows the general location Stibnite Mine transmission line route, have required removal of tall trees in the right-of-way for safe operation of the transmission line. Removal of tall trees has altered understory vegetation community composition and likely removed potential habitat for special status plants.	Table 4.10-19 uses "removal of tall trees in the right-of-way for safe operation of the transmission line", where descriptions of transmission line upgrades under the action alternatives uses "tall tree clearing". The actions should be described more similarly since the actions are similar.
39	4.10-44	4.10-4	1	MG		Table 4.10-20 points out impacts to vegetation communities and special status plants, but does not mention non-native plants. Impacts to non-native plants from these projects should be identified.
40	4.10-44	4.10-4	1	MG		Suggest adding the Granite Meadows project to this table and cumulative effects analysis for vegetation, as included in Table 4.11-23 *Reasonably Foreseeable Future Actions in the Wetland and Riparian Resources Cumulative Effect Analysis Area* .

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1	3.11-11	3.11.2.1	2	MG	Statement that the 404b1 Guidelines prohibit discharge that will cause or contribute to "significant degradation of the aquatic ecosystem."	Correct this statement to state that the prohibition concerns "significant degradation of WOTUS." Reason: 40 CFR 230.10(c) uses the term "waters of the United States" rather than "the aquatic ecosystem" in stating this restriction upon CWA 404 permitting, although under 40 CFR 230.10(c)(3), significantly adverse effects on aquatic ecosystem components are among those considered as contributing to significant degradation of WOTUS.
2	Global			MG		There is no discussion of disturbance from historic/previously mined impacts, except for under Alternative 5. Pointing out the approximate number of acres of previous mine disturbance should be discussed and disclosed up front to set the stage for existing conditions and the analysis area.
3	4.11-1 to 4.11-2	4.11 and 4.11.1	1	MG	A summary of wetland impacts by assessment area is provided in Appendix I Table I-1-1 Wetland Functional Point Summary for all Assessment Areas. AA Number 14.	The wetland category for AA 14 (Fiddle Creek Slope Wetlands) is incorrectly called category II when it should be a category III. Tetra Tech 2018 and HDR 2016 indicates this is a category III wetland. This wetland category should be corrected to be category III and the analysis updated to reflect this. The second impact indicator includes high-value wetlands (categories I and II), thus the incorrect categorization would effect this issue and indicator analysis. AA 35 is incorrectly called IV when it should be a III.
4	4.11-4	4.11.1.1.2	2	MG	Wetlands also have not been delineated to the full extent of the 5th field (10-digit HUC) watersheds that compose the analysis area for SGP components outside the mine site, and therefore quantitative contextualization of wetland impacts (e.g., reporting the percentage loss of wetlands in a given watershed) is not possible in this portion of the analysis area.	Wetlands have not been delineated in reports by HDR or Tetra Tech beyond the wetland study areas described in the delineation reports. The study areas do not extend to the full extent of any 10-digit HUC watersheds. It is misleading to say that they have been delineated to this larger area.
5	4.11-4	4.11.1.1.2	4	MG	However, since species-specific plant surveys have not been conducted throughout the SGP area, information regarding confirmed presence of special status plants will not be incorporated into this analysis.	The best available data includes a desktop review and baseline plant surveys and reporting based on a baseline vegetation study plan that included methodology approved by the USFS, including the botanist, as sufficient baseline data collection for the project. This information should be included.
6	4.11-7	4.11.2.1	1	MG	These losses would be most substantial at the mine site where each action alternative would remove approximately 31 percent of the existing wetlands within the contributing basin for the EFSFSR watershed above the Sugar Creek/EFSFSR confluence. While some wetlands at the upper periphery of the mine site contributing basin would remain, their hydrologic connectivity to downstream waters and associated vegetation would be removed or altered.	Proposed mitigation (Appendix D-2 - Conceptual Stream and Wetland Mitigation Plan) needs to be included in the description of impacts and how impacts would be mitigated.
7	4.11-9	4.11.2.1.1	2	MG	Specific reclamation designs would be developed for each wetland feature and would be incorporated into the CWA Section 404 permit application to address spatial and temporal loss of wetlands (refer to Section 4.11.3 and Appendix D-2 for additional information).	**Suggested Change:** Specific reclamation designs would be developed for each wetland feature and would be incorporated into the CWA Section 404 permit application to address spatial and temporal loss of wetlands. The CMP proposes replacement of wetland acres in a nearly 1:1 ratio (refer to Section 4.11.3 and Appendix D-2 for additional information).
8	4.11-10	4.11.2.1.2	5	MG	Wetlands that were estimated, rather than delineated, were not analyzed using MWAM.	Clarify how estimated wetlands were analyzed.
9	4.11-12	4.11.2.2	2	MG	Losses of wetland and riparian areas and their functions would occur throughout the construction and operation phases (refer to the Stream Functional Assessment (SFA) Ledger [Rio ASE 2019]).	Wetland acres and functional unit impacts are included in the wetland ledger, not the SFA ledger. Please revise.
10	4.11-13	4.11.2.2.1.1	1	MG	Loss of wetland acres under *Alternative1* would occur to approximately 31 percent of the 429 acres of wetlands identified in the mine site analysis area (Table 3.11-3a). This comment is applicable to all alternatives.	This statement does not match the number of wetland acres identified in Chapter 3. Table 3.11-3a *Wetland Resources Identified in the Mine Site Focus Area* indicates a total of 373 acres of wetlands identified in the mine site analysis area, not 429 as indicated in this statement. This comment is applicable to all alternatives as the statement is in all alternatives.
11	4.11-15	4.11.2.2.1.2	3	MG	Burntlog Route would be near Mud Lake, which is characterized by Idaho Fish and Game as a poor fen (Idaho Fish and Game 2004). Indirect impacts of road improvements and vehicle travel (i.e., increased dust) are likely to impact this fen and degrade its function as habitat for a fen-specific special status plant (Rannoch-rush [Scheuchzeria palustris]; Section 4.10.2.2.5.6, Rannoch-rush).	This paragraph should include mitigation measures that the USFS and Midas Gold proposed and are referenced in Appendix D-1, Table D-2 or make reference to Section 4.11.3.

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12	4.11-16	4.11.2.2.2	Table 4.11-5	MG	Functional unit impacts were calculated based on percentage of AA impacted; this calculation assumes equal distribution of functions over the area of a wetland.	Number 4 Table Notes: The functional units impacted appears to be incorrectly calculated based on the table notes. Assume the correct number should be 335.2 functional units. This comment holds true for all alternative tables that present the issue of impacts to Wetland and Riparian Functions. Additionally, the proposed wetland impacts (acres) total in this table do not equal those presented in Table 4.11-2. Please revise.
13	4.11-17	4.11.2.2.2	1	MG	An estimated total of 759.3 wetland functional units would be lost as a result of SGP construction under Alternative 1, approximately 486.1 of which would be due to impacts to highvalue wetlands (Table 4.11-5).	See comment above for Table I-1-1 *Wetland Functional Point Summary for all Assessment Areas* . The analysis area wetland category for AA 14 (Fiddle Creek Slope Wetlands) is incorrectly called category II when it should be a category III. Tetra Tech 2018 and HDR 2016 indicates this is a category III wetland. This wetland category should be corrected to be category III and the analysis updated to reflect this. This comment is applicable to all alternatives as the statement is in all alternatives.
14	4.11-29	4.11.2.3.2	Table 4.11-10	MG	Proposed Wetalnd Impacts (acres) Total	Total number represented in this table (130.7 acres) is not the same as presented in Table 4.11-7 (131.2 acres). Please correct.
15	4.11-54	4.11.4	1	MG	Transmission line upgrades in the West Central Mountain Electric Plan 2014, which follows the general location SGP transmission line route, have required removal of tall trees in the right-of-way for safe operation of the transmission line. Removal of tall trees has altered understory vegetation community composition and likely reduced functions of wetlands in these areas.	Table 4.11-22 uses "removal of tall trees in the right-of-way for safe operation of the transmission line", where descriptions of transmission line upgrades under the action alternatives uses "tall tree clearing". The actions should be described more similarly since the actions are similar.
16	4.11-56	4.11.4.3	2	MG	Alternative 3: Legacy mine waste material associated with the spent ore disposal area and Bradley tailings would not be removed, reused, or reprocessed under Alternative 3, and as such, potential water quality impacts from these features would be greater than under the other action alternatives where they would be removed. The absence of the Meadow Creek TSF under this alternative would likely result in lower overall cumulative water quality impacts in wetlands adjacent to Meadow Creek than under the other action alternatives.	These two sentences are contradictory, one saying greater cumulative impacts and the other saying lower cumulative impacts. Clarify and add justification.
17	4.11-58	4.11.6.1	1	MG	Construction and operation of the mine site would permanently fill more than 116 acres of wetlands under Alternative 1, resulting in a permanent loss of wetland functions and loss of long-term productivity of this resource.	The reference to 116 acres of impact under Alternative 1 appears to be incorrect as all previous references in Section 4.11.2.2 indicate approximately 130 acres of impacts. Please revise.
18	4.11-71	Global comment for Table 4.11-33		MG	Table 4.11-33 provides a summary comparison of wetlands and riparian resources impacts by issue and indicators for each alternative.	This table does not include mitigation efforts included in Appendix D to reduce impacts. Recommend adding a statement to the introductory sentence indicating the impacts are in absence of mitigation efforts described in Appendix D or adding rows/columns to show how mitigation would offset these impacts.
19	4.11	Appendix D&I		MG	Wetland area AA#42	This wetland area is indicated as impacted by the Logistics facility in Scott Valley which is incorrect. The Logistics facility was specifically designed around and so as to not impact the wetlands present. Please revise.

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1	3.13-14	3.13.2.4	3	MG	NA	Update MBTA opinion to reflect most recent changes in the interpretation of incidental take (i.e. the federal district court vacating this Opinion).
2	3.13-25	3.13.3.2.2.2	2	MG		Recommend stating that the known, disjunct population is not in the analysis area
3	3.13-25	3.13.3.2.2.2	3	MG		Please provide the reader and explanation of what the modeled habitat is based on and provide a reference for the model
4	3.13-25	3.13.3.2.2.2		MG		Recommend including the 2019 NIDGS summary report findings of amount of habitat actually suitable within the modeled habitat as well as result that no NIDGS were observed anywhere within the area surveyed.
5	3.13-91	3.13.3.6	Table 3.13-21	MG	NA	Table 3.13-21 is titled "Migratory Bird Species and Priority Habitats in Wildlife Analysis Area." The table title should read, "Idaho PIF Priority Habitats and High Priority Bird Species in Wildlife Analysis Area." This table is specific to the Ritter 2000 document, while the current title makes it seem applicable to all migratory birds being considered in this section. Please use the correct terminology as is used in the Ritter 2000 reference, i.e. "High Priority" species.
6	3.13-92	3.13.3.7	1	MG	"In more remote areas..., wildlife are likely not acclimated to such noise disturbances."	This statement appears to be getting into an effects analysis statement about new roads or new levels of noise that might extend further into currently undisturbed areas/wilderness areas compared to baseline conditions. Recommend removing this statement from Chapter 3.
7	3.13-93	3.13.3.9	3	MG	NA	This description of the analysis area should be included under Section 3.13.1.2 as it sets the stage for the baseline conditions.
8	4.13	NA	NA	MG	NA	In general, the repetitious use of text describing noise and light reducing mitigation measures adds unnecessary pages to this Section. Same can be said for the description of metal exposure to insectivorous birds and potential impacts on bird nests, eggs, and young during vegetation removal. Some, if not all, of these repetitious statements could be moved up front to Section 4.13.2.
9	4.13-1	4.13.1	NA	MG	NA	Please explain in this section the difference/planning guidance between the "Determination" made for TEPC and USFS Sensitive vs the "Summary of Impacts" statement made for focal/MIS species/SGCN/General Wildlife/Big Game.
10	4.13-1	4.13.1	3	MG	Acres of disturbance to other high-value habitats such as crucial and or high-value big game ranges, wetlands, and seep and spring areas.	Seep and spring areas are never mentioned in the analysis of impacts. Recommend removal of those terms here.
11	4.13-2	4.13.2	4	MG	Noise levels are measured in decibels on the A-weighted scale (dBA), which is meant for human perception. Wildlife species are likely more sensitive to these noise levels. Continuous (ongoing) noises would attenuate to ambient levels in 1 to 2 miles of construction/operation activities, while temporary disturbances (e.g., blasting, winter maintenance) would be short-term, but potentially carry a farther distance from the source and be louder in nature.	Please refer the reader to the source of this assumption. Based on the information in the Noise section, it is not explicitly clear what the basis for this assumption is. Please describe ambient levels assumed and whether the attenuation considers ground and atmospheric conditions.
12	4.13-3	4.13.2	2	MG		Please provide references for the level of sensitivity of wildlife species to noise and source of the dBA modeling numbers stated.
13	4.13-3	4.13.2	2	MG	For example, during construction, noise levels 1 mile from the mine site and 0.5 mile from the access roads would be 50 dBA higher than ambient levels. However, noise levels 2 miles from the mine site and 2 miles from the access roads would drop to 34 dBA during construction.	This statement is not supported by the analysis in the Noise section of the DEIS (see pages 4.6-5 - 4.6-8). Given that ground and atmospheric absorption should always be considered during impact discussions, the noise from the mine site and access road construction would attenuate to 55 dBA at distances much shorter than assumed in this statement (0.38 mile and 0.28 mile vs 1.0 mile and 0.5 mile, respectively), and the increase above ambient is nowhere near 50 dBA at those distances. Depending on the NSR/ambient noise level being assumed, 55 dBA at 0.38 mile for the mine and 0.28 mile from the road would be about 10-15 dBA above ambient. Please review the Noise section of the DEIS and ensure that these statements are accurate. Also, please point the reader to the exact Section or Table in the Noise analysis of the DEIS where this information is provided.
14	4.13-4	4.13.2	3	MG	For example, during construction, noise levels 1 mile from the mine site and 0.5 mile from the utilities constructed with a helicopter would be 58 dBA higher than ambient levels. Under this same scenario, noise levels would drop below ambient levels within 2 miles of the mine site and 2 miles of the utility construction activities, estimated to be 39 dBA.	Please disclose assumptions, reference reader to Section or Table in Noise section that supports this statement, ensure the accuracy of the statement using appropriate methods. Based on DEIS Noise section at Page 4.6.10, helicopter noise would attenuate to 55 dBA at 0.66 mile, which is 10-15 dBA above ambient.
15	4.13-5	4.13.2.1.1.1	3	MG	Direct and indirect effects to Canada lynx are analyzed within a 5-mile buffer of all alternative components within the LAUs, to assess all potential impacts, including noise disturbance.	Recommend citing scientific support/NEPA precedent for using this large of an analysis area.

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16	4.13-8	4.13.2.1.1.1	5	MG	Habitats along utility corridors would be maintained in low structure (e.g., low vegetation) condition, which would widen the right-of-way (ROW) effect for Canada lynx (Interagency Lynx Biology Team 2013).	Page 84 of the Lynx Conservation Assessment Strategy reference touches on utility corridors, and states, "When associated with highways and railroads, utility corridors may further widen the right-of-way." The new transmission line is not adjacent to a highway or railroad. If this statement is specific to the upgrades to the existing transmission line, recommend reviewing if the small change in ROW width warrants discussion of this effect.
17	4.13-12	4.13.2.1.2.1	3	MG	This buffer distance was developed using best professional judgment, in coordination with the USFWS, to encompass the area of potential indirect impacts from anthropogenic influences (e.g., noise, light, human presence) at the mine site and along access roads.	Please provide additional reference to support this statement for a 1-mile buffer for NIDGS direct and indirect impacts assessment. Based on research by Dr. Yensen, 300-m buffer is suitable based on unpublished data on the size of northern Idaho ground squirrel home ranges and average dispersal distances (Sagebrush Ecosystems LLC 2019)
18	4.13-12	4.13.2.1.2.1	5	MG	Warm Lake Road (CR 10-579) does cross modeled habitat, and the increased traffic could pose a direct risk of mortality due to collisions	A note should be added to this statement to inform readers that 2019 field surveys of this area did not show any occupancy or occurrence of NIDGS along the Warm Lake Road.
19	4.13-13	4.13.2.1.2.1	4	MG		Surveys were conducted in 2018 and 2019, and all modeled habitat within 300-meter of the alignments with modeled habitat were assessed. Although the 2018 surveys were completed outside of the optimal time period, the temperature was closely monitored and all surveys conducted within the temperature window. According to Dr. Yensen, the lack of observations "cannot be ascribed to inappropriate timing of the surveys. We saw Columbian ground squirrels active above ground at both sites, so northern Idaho ground squirrels should have been seen, if present." (Sagebrush Ecosystems LLC 2019). Please include the results from the 2019 surveys as well (Sagebrush Ecosystems LLC 2020).
20	4.13-14		Table 4.13-2	MG		Please provide evidence that a 1-mile buffer is an adequate buffer for indirect impacts for NIDGS
21	4.13-15	4.13.2.1.3.1	3	MG		Please provide references to support the 5-mile buffer distance as opposed to the home range distance as the buffer
22	4.13-15	4.13.2.1.3.1	3	MG	Direct and indirect effects to wolverine are analyzed within a 5-mile buffer of alternative components, to assess all potential impacts, including noise disturbance. This buffer distance was developed using best professional judgment, in coordination with the USFWS, to address potential indirect impacts from anthropogenic influences (e.g., noise, light, human presence) and to account for potential impacts to wolverines moving through the general SGP area.	Clarify why a 5-mile buffer was used to measure effects on wolverine. The Noise section of the DEIS does not support this distance.
23	4.13-20	4.13.2.1.3.1	4	MG	Under Alternative 2, the Burntlog Maintenance Facility would affect a small amount of habitat in the wolverine analysis area. It is likely that resident or transient wolverine individuals would naturally avoid the off-site facility areas. However, because there are known breeding territories in the wolverine analysis area and they would likely travel throughout the area, it is possible that they would be affected.	The BLR Maintenance Faculty , under Alt 2, was moved to a BLR borrow source area. Therefore, this statement needs to be clarified such that it does not infer additional impact above that defined by the borrow source area for the BLR Maintenance Facility.
24	4.13-22	4.13.2.2.1.1	3	MG		Please provide the buffer distance (and rationale/reference) for Habitat Family 1 indirect effects analysis.
25	4.13-23	4.13.2.2.1.1	4	MG	Direct take of adult birds, nests, eggs, or young due to construction or operational activities is unlikely, because white-headed woodpeckers are expected to be uncommon.	Use of the word "take" should be clearly defined somewhere in this Chapter as it relates to the MBTA and current court interpretations of incidental take. The mitigation measure committed to by Midas Gold in Appendix D, pages D-25 and D-26 should avoid/minimize incidental take of migratory birds associated with the utilities. That should be stated in this paragraph.
26	4.13-28	4.13.2.2.2.1	1	MG	Direct take of adult birds due to construction or operational activities is possible, but unlikely, because most individuals are expected to avoid areas of activity and they are rare in the mine site area.	Use of the word "take" should be clearly defined somewhere in this Chapter as it relates to the MBTA and current court interpretations of incidental take. This applies to all other avian impact analysis.
27	4.13-34	4.13.2.2.2.3	5	MG	Insects and insectivorous birds may be exposed to metals (e.g., mercury) and other elements from atmospheric emissions and tailings piles associated with gold and silver mining activities (Custer et al. 2009; Eagles-Smith et al. 2018; Jones and Miller 2005).	Exposure to metals is not an analysis indicator identified in Section 4.13.1, yet this text is repeated for several wildlife species. Consider adding to the 3rd issue listed in Section 4.13.1.
28	4.13-106	4.13.3	7	MG		Unclear how the USFS is considering the mitigation measures in Appendix D to minimize impacts by alternative in the preceding sections. Please revise to show the benefits of these measures would be offset by this mitigation or post-closure reclamation efforts or how activities would minimize indirect impacts on wildlife.

Attachment A: Stibnite Gold Project Other Resources DEIS Comments Compilation Table

A-11: Sections 3.14 and 4.14 - Timber Resources

Comment Number	Page # or Global	Section	Paragraph (count from top of page)	Commenter Initials	Relevant DEIS Text Excerpt (if applicable)	Comment
1	Global			MG	Extensive discussion of legal framework for Forest Service timber sale program/timber resource management	This section could be substantially shortened and simplified in the final EIS, and could better recognize that incidental timber harvest and use associated with SGP is consistent with Mining Law rights. Reason: SGP timber resource impacts are consistent with Mining Law rights, will be reasonably minimized with mitigation measures, and will not significantly affect ASQ or other components of the Forest Service timber management programs or timber resources on the PNF or BNF.
2	Global			MG	Discussion and tables depicting effects on timber resources	As shown in this section, SGP adverse effects on timber resources would be quite limited in acreage, volume, and otherwise, particularly when evaluated on a PNF and BNF-wide basis. MGII will work with the Forest Service, Idaho Department of Lands, and Valley County to use timber necessary to clear or harvest for the Project, reclaim lands suitable for future tree growth, and to continue to plant trees and otherwise restore lands that have been impacted by severe wildfires in the project area.
3	4.14-2, 3	4.14.1.1.2	4, 5	MG	Volume of timber was estimated in the analysis area by extracting sampled vegetation characteristics from the VCMQ mapping for the PNF and BNF, including timber dominance type, tree size, and canopy cover, from the GIS to create a set of unique stand conditions. The resulting 200 stand conditions represent all of the combinations of the eight timber types found in the analysis area, the five tree-size classes in the VCMQ (i.e., seedling, sapling, small, medium, and large); and the five canopy cover classes in the VCMQ (i.e., low, low-medium, medium, medium-high, and high). Only trees greater than 10 inches in diameter at breast height, which corresponds to medium and large trees, are considered merchantable sawtimber; seedling, sapling, and small trees are considered special forest products on the PNF and BNF. To estimate average volume per acre for each of the 200 stand conditions, generalized forest strata data were combined with available Forest Service inventory data, which provided estimates of trees per acre in each stand type; and estimates of volume per tree, by species and size class (Forest Service 2017c,d). The resulting stand-volume table, containing volume-per-acre estimates for all 200 unique stand conditions, was applied to mapped timberlands in the analysis area1. Timber volumes presented in the discussions are distinguished between sawtimber and sub-merchantable trees; however, a breakdown by species is not provided.	Suggest including high quality LIDAR of the area that includes full point cloud data which was provided to the Payette NF to supplement and expand upon the VCMQ estimates to provide more detailed estimates of canopy height, density, etc.
4	4.14-4	4.14.2	4	MG	Direct effects to timber resources on other federal, state, and private lands may include timber harvest practices on commercial timberlands that conflict with the Idaho Forest Practices Act and associated guidelines. Specifically, direct effects would include: 1. Removal of timber from commercial timberlands in ways that conflict with standards for logging operations, soil protection, stream protection, and restocking of stands. 2. Timber harvest practices that generally do not maintain and enhance natural resources.	SGP operations will not conduct harvest practices contrary to the IFPA. Please clarify that this is 1) an assumption and 2) that this would not likely be associated with SGP activities since the operator is required to abide by all applicable regulations including the IFPA.

Attachment A: Stibnite Gold Project Other Resources DEIS Comments Compilation Table

A-12: Sections 3.15 and 4.15 - Land Use and Land Management

Comment Number	Page # or Global	Section	Paragraph (count from top of page)	Commenter Initials	Relevant DEIS Text Excerpt (if applicable)	Comment
1	3.15-2	3.15.2.1.2		MG	Summary of the Organic Administration Act of 1897	The Organic Administration Act also provides for continued access and use of national forest lands for mining. 16 U.S.C.479, 482. Reason: This is important to note in evaluating proposed locatable mineral projects such as SGP.
2	3.15-2	3.15.2.1.4		MG	Summary of the Multiple Use Act of 1955	Mining operator rights to use the surface of unpatented mining claims for mining-related uses apply to SGP and other claims that post-date the 1955 statute; the 1955 statute limits rights to timber and provides otherwise for reasonable multiple use management by the Forest Service of the surface, subject to mining use rights. Reason: This is important to note in evaluating proposed locatable mineral projects such as SGP.
3	3.15-5	3.15.2.1.9		MG	Summary of Idaho Roadless Rule	It should be noted that the Idaho Roadless Rule provides that nothing in the Rule shall affect mining activities conducted pursuant to the Mining Law of 1872. 36 CFR 294.25(b). Reason: This is important to note in evaluating proposed locatable mineral projects such as SGP.
4	4.15-2	4.5.2.1.2.1	2	MG	Alternative 1 would occupy approximately 1,970 acres, 913 acres of which is historic disturbance and 1,057 acres of which would be new disturbance. Patented and unpatented mining claims are located in the analysis area, including within the mine site and throughout other areas of the Alternative 1 footprint. Under Alternative 1, SGP construction and operations would take place on approximately 2,215 acres of patented and unpatented mining claims (Table 4.15-2)	Paragraph (and referenced tables) indicate 1,970 acre footprint under Alternative 1 But then states construction and operations would take place on 2,215 acres. All construction and operations activities should be accounted for in the mine use footprint. Please revise.
5	4.15-3	4.15.2.1.2.1	1	MG	The mine site and its immediate surroundings are highly disturbed by past mining activities and show evidence of long-term mining operations as a dominant land use.	CLARIFICATION: There was also significant disturbance associated with the town of Stibnite (which at the time was the largest town in Valley County with a population of 1500 people) and commercial logging operations in the 1930-1950s. The logging operations were substantial and up to 9 million bf/annum were processed.
6	4.15-3	4.15.2.1.2.1	2	MG	the mine	CLARIFICATION: portions, not all areas have vehicular public access, although foot traffic may occur anywhere.
7	4.15-6	4.15.2.1.2.3	2	MG	Construction of the new transmission line ROW on private land would require a conditional use permit from Valley County.	Per county Code 9-3-1 Public utility distribution and collection lines are a Permitted use and do not require a Conditional Use Permit (CUP). However, the associated Sub-Stations do require a CUP. This same issue is repeated under each alternative.
8	4.15-8	4.15.2.1.2.5	5	MG	1,600 acres of previously undisturbed private, state, NFS, and Bureau of Reclamation land.	The 1,600 acres seems inaccurate and is inconsistent with other acreages identified in the DEIS. The PRO indicated 1,150.5 acres of undisturbed acres in Table ES-3 and 840.7 of previously disturbed ground. Section 3.15.3.2.1 indicates the proposed mine site contains 888 acres of existing disturbance. Please revise.
9	4.15-11	4.15.2.2.2.3	3	MG	Approximately 8.5 miles of new transmission line would be required for Alternative 2 from the Johnson Creek substation to the mine site.	Suggest sentence to read: Approximately 8.5 miles of the new transmission line from the Johnson Creek substation to the mine, as identified in Alternative 1, would remain in perpetuity to power the onsite water treatment plant operations.

Attachment A: Stibnite Gold Project Other Resources DEIS Comments Compilation Table
A-13: Sections 3.16 and 4.16 - Access and Transportation

Comment Number	Page # or Global	Section	Paragraph (count from top of page)	Commenter Initials	Relevant DEIS Text Excerpt (if applicable)	Comment
1	4.16-3	4.16.2	Bullet 3	MG	accidents with the forest transportation system	CLARIFICATION; in the USFS Transportation system in the analysis area, not the entire USFS Transportation system.
2	4.16-3	4.16.2	4th bullet	MG	Warm Lake Road experiences the highest incidents of accidents within the forest transportation system due to the higher traffic volumes and higher speeds observed	Amend to read "...within the forest transportation system **In the analysis area** due to...."
3	4.16-4	4.16.2.1.1	3	MG	including the Warm Lake Road from the SH 55 intersection), which is currently used for winter access to the mine site, would not be used as part of the SGP.	CLARIFICATION: Warm Lake Road would still be used under this alternative. Please revise.
4	4.16-6	4.16.2.1.1.1	2	MG	Reconstruction of the transmission line along Warm Lake Road and Johnson Creek Road to the mine site is estimated to occur in the third and fourth years of construction and would overlap at the end of the Alternative	The construction period is only for 3-years. Reconstruction of the transmission line along Warm Lake Road and Johnson Creek Road to the mine site will occur within the 3 year construction window. Please revise.
5	4.16-11	4.16.2.1.3.1	1	MG	Only a quarter of the vehicles traveling this one-lane, native-surfaced road would be heavy vehicles that could result in slower travel times for non-mine-related traffic and may deter travelers from using this roadway.	The Burntlog Route will not be a one-lane road. Please revise.
6	4.16-12	4.16.2.1.4	3	MG	For the duration of Alternative 1, the increase in total volume of mine-related vehicles, specifically heavy vehicles or trucks, on the Yellow Pine and Burntlog Routes would result in a greater safety risk for accidents occurring between vehicles due to degradation of the road with more frequent heavy vehicle travel and the one-lane constraints	Please provide support for this statement or delete. MG would have an agreement with Valley County to maintain this road; furthermore, there is no evidence presented to illustrate how road conditions impact accident frequency. Paragraph 5 on the same page is more accurate and thus contradictory to the cited statement.
7	4.16-12	4.16.2.1.4	6	MG	Emergency access would be maintained throughout the analysis area. Emergency access would be provided on the Yellow Pine Route during the first two years of construction and then on Burntlog Route for the remainder of the SGP. In the event of an emergency or when a threat to human life is identified (e.g., fires), roads would be temporarily closed, as appropriate.	The Yellow Pine Route should not be removed from consideration as an emergency access route after the first 2 years of construction. Please revise.
8	4.16-13	4.16.2.1.5.1	4	MG		The Air Transportation section should include a statement about the removal of the Stibnite Airstrip (ID41) as part of construction. While the airstrip is private it is still a change in air transportation options that are currently available within the analysis area.
9	4.16-16	4.16.2.2.2.2	2	MG	After mine construction is complete, a 12-foot-wide, approximately 3- to 4-mile gravel road connecting Stibnite Road to Thunder Mountain Road would be open to all vehicles year-round.	The public access road through the mine site would be seasonal, consistent with current access. Please revise.
10	4.16-17	4.16.2.3.1	6	MG	Traffic volume and public access impacts under Alternative 3 would be the same as those described under Alternative 1 for construction.	During construction of the Burntlog Route and Meadow Creek Lookout Road improvements, public access via Stibnite Road would be impacted, likely for several years, by the construction of the TSF in the EFSFSR drainage. Please revise.
11	4.16-22	4.16.2.4.4	1	MG	Additionally, access through the mine site under Alternative 4 would be through a single point of ingress and egress and would require safety considerations for mine deliveries and public access.	Amend wording as follows: "Additionally, access through the mine site under Alternative 4 would be through a single point of ingress and egress and would require safety considerations for **emergency evacuations (during forest fires) of personnel,** mine deliveries and public access." Reason: A single egress is a significant safety risk in the event of a forest fire
12	4.16-24	4.16.4.1	3	MG	The South Fork Restoration and Access Management Plan, the East Fork Salmon River Restoration and Access Management Plan, and the Big Creek Hazardous Fuel Reduction projects are located closer to the mine site.	Please provide context for what these cited Plans are, and how they impact traffic volumes.
13	4.16-25	4.16.6.1	5	MG		Please provide a definition as to what "road system productivity" is and whether it is considered as a beneficial impact or otherwise.
14	4.16-27	4.16.7.1	1	MG	Construction of the Yellow Pine Route would require approximately 4 years under Alternative 4, compared to 3 years of construction under Alternatives 1, 2, and 3 for the Burntlog Route.	Amend text to read: "Construction of the Yellow Pine Route would require approximately 4 years under Alternative 4, compared to 3 years of construction under Alternatives 1, 2, and 3 for the Burntlog Route. **However, the Burntlog Route would provide access to the mine site after the first year of construction and all traffic would use the Burntlog Route commencing Year 3 of construction.** " Reason: Clarification needed to make it clear that traffic goes off Yellow Pine Route completely in Year 3
15	4.16-28	4.16.7.3	4	MG		In the context of public access and public safety, the sharing of all mine-related traffic and public traffic on the Yellow Pine Route for the full life of the mine should be addressed.
16	4.16-32	4.16.7.4	Table 4.16-7	MG	YPR has a steeper topography and terrain that would require wider roads, more cut/fill sections, and more switchbacks.	There would not be an equivalent risk of accident along this route, even if improved. It parallels steep slopes over most of its route and is at the bottom where it would be more susceptible to landslides and avalanches that are difficult to predict but can be catastrophic. Please revise.

Attachment A: Stibnite Gold Project Other Resources DEIS Comments Compilation Table

A-14: Sections 3.17 and 4.17 - Cultural Resources

Comment Number	Page # or Global	Section	Paragraph (count from top of page)	Commenter Initials	Relevant DEIS Text Excerpt (if applicable)	Comment
1	Global	3.17		MG	Of the 34 previously recorded resources in the analysis area, 6 are considered historic properties	In the NHPA, the term "historic property" has the following definition: "§300308. Historic property In this division, the term "historic property" means any prehistoric or historic district, site, building, structure, or object included on, or eligible for inclusion on, the National Register, including artifacts, records, and material remains relating to the district, site, building, structure, or object." The 6 properties referred to have been recommended as eligible, but they are not actually eligible until ISHPO concurs. Reference concurrence letter from ISHPO or change the terminology to proposed historic properties.
2	Global	4.17		MG	The six known historic properties in the analysis area include the NRHP-listed Stibnite Historic District and five NRHP-eligible resources	The 6 properties referred to have been recommended as eligible, but they are not actually eligible until ISHPO concurs. Reference concurrence letter from ISHPO or change the terminology to potential historic properties.
3	Global			MG	Discussion indicating that Tribe ethnographic information is not public and not yet complete, that some cultural resource survey work remains to be completed, and that this work will be completed and reflected in the ROD, and a Programmatic Agreement with SHPO et al will be completed for NHPA 106 compliance.	MGII will continue to work with the Forest Service, SHPO, other agencies and the Tribes as applicable to complete further surveys as needed, the NHPA 106 process, and otherwise minimize to the extent feasible SGP effects on cultural resources in the project area.
4	4.17-4	4.17.2.1.1	4	MG	Direct effects to historic properties would also result from increased numbers of people in the SGP area for construction activities and, thus potential for accidental of intentional harm to cultural resources by the general public	The increased number of people will be Midas Gold employees and contractors who have received training that includes awareness and protection of cultural resources. This portion of the sentence should be deleted.
5	4.17-5	4.17.2.1.3	3	MG	This process would take a very long time....	The phrase "very long time" is not defined. Suggest providing a timeframe based on literature, for example: Church, S.E., von Guerard, Paul, and Finger, S.E., eds., 2007, Integrated investigations of environmental effects of historical mining in the Animas River watershed, San Juan County, Colorado: U.S. Geological Survey Professional Paper 1651, 1,096 p. plus CD-ROM. [In two volumes.]

Attachment A: Stibnite Gold Project Other Resources DEIS Comments Compilation Table

A-15: Sections 3.18 and 4.18 - Public Health and Safety

Comment Number	Page # or Global	Section	Paragraph (count from top of page)	Commenter Initials	Relevant DEIS Text Excerpt (if applicable)	Comment
1	4.18-20	4.18.2.1.1.5	3	MG	There are three permitted wells on the mine site and are controlled by Midas Gold: the Gestrin Airstrip mining well, the original temporary camp water supply well, and the new camp water supply well.	This sentence should read "There are three permitted water supply wells on the mine site controlled by Midas Gold: the Gestrin Airstrip mining well, the original temporary camp water supply well, and the new camp water supply well." Midas has more than 3 permitted wells in the analysis area when considering all the baseline monitoring wells, which number in excess of 75.
2	4.18-20	4.18.2.1.1.5	3	MG	Yellow Pine's public water system uses surface water from Boulder Creek, which is located approximately 15 miles downstream of Yellow Pine.	The text excerpt indicated should read: "Yellow Pine's public water system uses surface water from Boulder Creek, which is located approximately 15 miles downstream of Stibnite and is a tributary to the EFSFSR."
3	4.18-20	4.18.2.1.1.5	3	MG	Because groundwater is not currently used as a public drinking water source at the mine site **and is assumed to be unlikely to be used as a drinking water source in the future,** the.....	Please revise the bold text. The mentioned existing camp water supply well, and its associated public water system will be used as a source of drinking water for the early construction camp at Stibnite while the main worker housing facility is being constructed. The well, and associated drinking water system have been reviewed and signed off on by IDEQ.
4	4.18-21	4.18.2.1.1.6	3	MG	However, if a wildfire, avalanche, or landslide were to occur, the potential injury to the individual could be severe; therefore, the magnitude of effect is rated as "high." This results in an overall public health rating of "moderate." There are no differences in impact findings among the construction, operation, and closure and reclamation phases of the SGP.	Suggest rewording as follows: However, if a wildfire, avalanche, or landslide were to occur, the potential injury to the individual could be severe; therefore, the magnitude of effect is rated as "high." Given the differences between the risks of such related to the Burntlog Route and the Yellow Pine Route, this results in an overall public health rating of "low" for the Burntlog Route and "moderate" for the Yellow Pine Route. There are no differences in impact findings among the construction, operation, and closure and reclamation phases of the SGP. Reason: Yellow Pine Route and Burntlog Route have different impacts
5	4.18-22	4.18.2.1.2	1	MG	Conversely, the decrease in mine-closure related local employment and labor income also could have significant adverse effects on the local economy. Section 4.21.2, Direct and Indirect Effects, discusses the potential for adverse economic impacts on the local area's economy from the "bust" following the prior "boom."	Mine closures are phased with the schedule well known so workers are well positioned to seek alternative employment. Please revise.
6	4.18-25	4.18.2.1.4.1	1	MG	Recreation is a major use throughout much of the SGP area.	Reword: "Recreation is not a major use in the SGP itself, but people do transit through the site to access surrounding areas." Reason: Recreation is not a major use in the project area, except people transiting through the site.
7	4.18-30	4.18.4	1	MG	Evaluation of the potential public health and safety impacts associated with injury from disturbance of existing terrain and features (i.e., landslides, avalanches, and wildfires) would result in moderate negative impacts on the overall public health and safety;	Reword: "...would result in moderate negative impacts on the overall public health and safety for the Yellow Pine Route and minor negative impacts for the Burntlog Route" Reason: Yellow Pine Rote and Burntlog Route has different impacts

Comment Number	Page # or Global	Section	Paragraph (count from top of page)	Commenter Initials	Relevant DEIS Text Excerpt (if applicable)	Comment
1	4.19-2	4.19.1	7th bullet	MG	Sound from SGP activities at recreation sites/areas is based on estimated noise that does not consider the effects of topography or vegetation. Therefore, the noise impacts presented in the analysis may be more extensive than may actually occur given the topography and vegetation present in the analysis area.	The inverse of this statement is also true. The effects of topography and vegetation in the analysis could mitigate the impacts of noise within the analysis area. Both sides should be presented. Please revise.
2	4.19-6	4.19.2.1.1	1	MG		It is unclear how to identify the stated 13,452 acres on the N-2 Figures of what would be inaccessible to dispersed recreation. Which locations are impacted?
3	4.19-6	4.19.2.1.1.1	1	MG	Therefore, beginning at construction, approximately 13,452 acres of NFS lands (and approximately 775 acres of private patented lands within the Operations Area Boundary) would be inaccessible to dispersed recreation (see maps in Appendix N-2).	The 775 acres of private should not be deemed originally available for dispersed recreation to the general public because it is Private Property. So this would NOT result in a change of the associated Recreation Opportunity Spectrum (ROS) for that 775 acres. Please revise.
4	4.19-8	4.19.2.1.1.1	4	MG	The plowing of Johnson Creek Road would provide additional motorized access and winter recreation opportunities along this road, thereby potentially increasing winter recreational use along this road.	While this statement is true ALL the alternative winter access maps in Appendix N-2 (Construction, Operations, Reclamation, Winter routes East End, Alternatives 1-4) show the Warm lake road section from the existing snowmobile turn around up to Landmark as being closed to public access. The Map indicated this closure is a "Mitigation measure to close to public use from Warm Lake to Landmark". This mitigation measure is not described in appendix D. Please revise the mitigation measures and the recreation section.
5	4.19-8	4.19.2.1.1.1	4	MG	.....reach other OSV routes in the Landmark area, including along **Sand Creek Road (FR 437)**, Burnt Log Road (FR 447), **Horn Creek Road (FR 414)**, Warm Lake Road, or North Fork Sulphur Creek Road (FR 442). Therefore, plowing and construction traffic on Johnson Creek Road and Warm Lake Road would limit OSV access to the **Sand Creek Road,** Burnt Log Road, **Horn Creek Road**, Warm Lake Road, and North Fork Sulphur Creek Road OSV routes, resulting in reduced OSV opportunities and use.	The segments indicated in bold are not included on the BNF 2014 winter MVUM and therefore should not be included in the analysis as a valid OSVR. Please revise throughout this entire section.
6	4.19-9	4.19.2.1.1.1	1	MG	Ditch Creek Road (FR 410) is a groomed OSV route for 2 miles and is located off Johnson Creek Road (CR 10-413) just north of Trout Creek Campground. Due to the plowing of Johnson Creek Road during the construction of the Burntlog Route, OSV access to Ditch Creek Road would not be feasible on Johnson Creek Road from the south	The BNF 2014 winter MVUM does not include Ditch Creek (FR 410) as a groomed trail, though it is included on the of the Valley County winter recreation grooming map as an un-groomed trail. Please revise throughout this entire section.
7	4.19-15	4.19.2.1.1.2	4	MG	The Burntlog Route would generally be visible 2 to 3 miles east of the route, including some areas within the FCRNRW, and less than one mile west of the route and would introduce nighttime lighting to areas that currently do not have such lighting.	The new Burntlog Route extension is generally within 0.75 miles of FS 440 and would therefore not "introduce nighttime lighting to areas that currently do not have such lighting" as such lighting can be introduced from FS 440. Please revise.
8	4.19-16	4.19.2.1.1.2	1	MG	Wilderness users may be particularly affected by the Burntlog Route, because the recreation setting (including the nighttime setting) is of great importance for wilderness experiences and the primitive recreation opportunities provided by the FCRNRW.	Mine traffic is concentrated between 5am and 7pm thereby not impacting "nighttime settings" or impacting the quieter nighttime ambient sound levels. Please revise.
9	4.19-19	4.19.2.1.1.2	2	MG	For dispersed area visitors in the area surrounding the lookout, presence of the cell tower would have an adverse effect on the recreation setting due to the addition of modern man-made development adjacent to a historic building, thereby impacting visitor's recreation experiences.	There is already a large modern man made solar powered radio repeater site located at the Meadow Creek Lookout tower location. The addition of a Tree shaped cell tower or another radio repeater would not further alter a visitors recreational experience. The existing radio repeater site at Meadow Creek lookout is about 12 times larger than the radio repeaters Midas envisions using. Please revise.
10	4.19-20	4.19.2.1.1.2	1	MG	The upgraded transmission line would be a wider and taller (by 30 feet) facility with an expanded right-of-way (ROW) (by 50 feet, for a total ROW of up to 150 feet), and.....	The existing ROW is 50' but the expansion to that is 25' a side for a total width of 100'. Check all associated tables and disturbance calculations to correct to a 100' ROW.
11	4.19-20	4.19.2.1.1.2	2	MG	The upgraded FT 233 would connect to trail FT 097 and Horse Heaven Road (FR 416W). However, there would be a 2-mile gap in public motor use facilities between the end of FT 233 and the beginning of the OHV Trail and thus the upgraded FT 233 would not provide additional trail connections or loop opportunities (see maps in Appendix N-2)	The PRO states connecting the Horse Heaven trail to the Meadow Creek look out trail, so there should not be a 2-mile gap. See PRO page 6-9 last page. ALSO Table 2.2-1 in Chapter 2 of the DEIS states: Off-highway vehicle (OHV) Trail from Horse Heaven/Powerline to Meadow Creek Lookout Road (National Forest System Road [FR] 51290). Please revise.
12	4.19-30, 31		Tables 4.19-1, 2	MG		Difficult to connect the acres shown in these tables to the N-2 figures and know which locations are being considered impacted. Please clarify. Same comments for tables for Alternatives 2-5
13	4.19-62	4.19.3	3	MG		Unclear how the USFS is considering the mitigation measures in Appendix D to minimize impacts by alternative in the preceding sections. In addition, it could be useful for the reader to see the categories of mitigation at a minimum for vegetation without having to go to an appendix. Please add discussion to show the benefits of these measures, offset of impacts by this mitigation or post-closure reclamation efforts or how activities would minimize indirect impacts on recreation use.

Comment Number	Page # or Global	Section	Paragraph (count from top of page)	Commenter Initials	Relevant DEIS Text Excerpt (if applicable)	Comment
14	4.19-63, 64	4.19.4		MG		Unclear the magnitude (even qualitatively) what the cumulative impacts will be for recreation use when considering the activities listed. In addition, road improvements, in the long-term, will improve recreation in many areas and not just adversely impact in the short-term. Recommend considering how recreation will be improved in the long-term by these improvements. Please revise.

Attachment A: Stibnite Gold Project Other Resources DEIS Comments Compilation Table

A-17: Sections 3.20 and 4.20 - Scenic Resouces

Comment Number	Page # or Global	Section	Paragraph (count from top of page)	Commenter Initials	Relevant DEIS Text Excerpt (if applicable)	Comment
1	4-20-10	4.20.2.1.2	2	MG		KOP 9 is not located at Pistol Lake. Burnt Log Road and other project features are screened by topography from Pistol Lake. KOP 9 is located on the ridgeline approximately 0.5 miles NE of Pistol Lake at the boundary of the FCRNRW. Suggest in Final EIS renaming KOP 9 "Frank Church River of No Return Wilderness Boundary" to more accurately describe its location.
2	4.20.14	4.20.2.1.2.2	2	MG	The new roadway would not be visible from KOP 9	Burnt Log Road is visible from KOP 9 as indicated in sections 4.20.2.1.2 and 4.20.2.1.2.1. In addition, Appendix O, Scenic Resources Alternative 1 Burntlog Road Viewshed Analysis and Key Observation Points figure shows Burntlog Road visible from KOP 9. Suggest that in Final EIS statement that "the new roadway would not be visible from KOP 9" be removed.
3	4.20-16	4.20.2.1.2.3	2	MG	KOP 1: Meadow Creek Lookout Permanent visual contrast would be non-visible to weakly visible as viewed from KOP 9, because the portion of Burntlog Route visible from the KOP would be reclaimed to existing conditions	KOP 9 is should not be included in discussion of visual contrast as viewed from KOP 1. Suggest in Final EIS to correct analysis to include discussion of reclaimed Burntlog Road from KOP 1.

Comment Number	Page # or Global	Section	Paragraph (count from top of page)	Commenter Initials	Relevant DEIS Text Excerpt (if applicable)	Comment
1	3.21-13 to 14	3.21.3.3.1		MG	Description of Native American traditional use, rights, and communities	While traditional uses may occur at various locations in many portions of the analysis area, such uses have not been shown to occur "throughout" the analysis area as stated in this section. As indicated in Figure 3.21-2 and elsewhere in the DEIS, the three primary Tribe communities are located far from the SGP site and far outside the analysis area. MGII will continue to engage with the agencies and Tribes to address and resolve Tribe traditional use, access and other concerns and minimize effects to the extent feasible on traditional use areas and resources, consistent with any applicable Tribe treaty and other rights, to the extent that the Tribes share ethnographic and other information in a timely manner to facilitate that effort. Please revise appropriate text.
2	4.21-16	4.21.2.1.1.3	6	MG	Labor cost increases could adversely affect the capacity for public agencies that rely on lower paid, skilled workers for their operations (i.e., school bus drivers, garbage haulers, etc.) to continue providing their services. In addition to increasing their operating costs, in more serious cases the labor shortages could result in business contractions and reduced public services if their work positions remain unstaffed	However, increased tax revenues would in part if not completely mitigate this potential issue and new skilled workers could be trained or attracted to meet those needs. Please consider and revise.
3	4.21-18	4.21.2.1.1.4	2	MG	No property taxes are expected to be paid by Midas Gold until after the SGP facilities are completed and the mining operations begin.	Midas already pays property taxes and they would increase as infrastructure is built and updated annually during assessments. Please revise.
4	4.21-42	4.21.2.3.4	3	MG	As a result, the other benefits and costs' overall impacts under Alternative 3 would be the very similar as those identified for Alternative 1.	Please revise to mention impact of 2 year delay to operations under Alt#3.
5	4.21-43	4.21.2.4	1	MG	The net additional construction cost of the Yellow Pine Route is estimated to total $62.5 million. Midas Gold estimates that the overall net cost effect could reduce the SGP's value by up to $174 million due to the combined capital, operating (i.e., longer haul routes and increased roadway O&M) and financial costs (i.e., resulting from the extended construction period and delayed operations). However, the related employment, income, population, housing, public services, and government revenue impacts (which would be predominately related to the increase construction and operations spending) would be marginally higher than those identified under Alternative 1.	ADD TO END: "However, higher capital and operating costs would reduce the profitability of operations and therefore reduce federal, state and local taxes, most of which are profit based, reducing revenues to all levels of government. Lower profitability may also reduce the quantity of ore mined, as some becomes unprofitable, and the mine life is shortened, reducing some of the project benefits." REASON: There is a financial consequence to a 2-year delay and higher costs that needs to be identified in the text.
6	4.21-45	4.21.2.4.2	7	MG	The magnitude of the recreation use changes from these components of Alternative 4 are expected to be marginal and localized. As a result, there overall recreational impact is anticipated to be minimal and therefore no net change in local area's overall visitation and visitor spending would be expected. As a result, the tourism impact findings for the Alternative 4 operations would be expected to be the same as those determined for the Alternative 1	Please consider the potential impact of mine truck traffic routinely traveling along Johnson Creek Road, through the village of YP and along Stibnite Road during operations on recreationalists and village residents. Please revise.
7	4.21-51	4.21.7	1	MG	Alternative 4 would have substantial increased construction and O&M costs from use of the Yellow Pine Route. However, due to its longer construction period (5 years instead of 3 years) and the operating phase's extended duration, Alternative 4's resulting socioeconomic impacts (i.e., employment, income, population, housing, public services, and government revenue impacts) would be expected to be marginally higher than those identified under Alternative 1, 2, and 3.	ADD TO END: "However, higher capital and operating costs would reduce the profitability of operations and therefore reduce federal, state and local taxes, most of which are profit based, reducing revenues to all levels of government. Lower profitability may also reduce the quantity of ore mined, as some becomes unprofitable, and the mine life is shortened, reducing some of the project benefits." REASON: There is a financial consequence to a 2-year delay and higher costs that needs to be identified in the text.
8	4.21-51	4.21.7	4	MG	Alternative 4 has differences in SGP costs (both for construction and operations) and transportation impacts to the community of Yellow Pine due to the proposed upgrade of the existing Yellow Pine Route instead of construction of a new and more direct roadway to the mine site (i.e., the Burntlog Route) as proposed under Alternatives 1, 2, and 3. Alternative 4 also will potentially have both increased environmental benefits (e.g., less roadway-related surface disturbance, stream diversions and wetland impacts) and adverse impacts (increase public safety risks). Otherwise, Alternative 4 is expected to have overall resource impacts generally comparable to those under Alternative 1.	ADD TO END: "However, higher capital and operating costs would reduce the profitability of operations and therefore reduce federal, state and local taxes, most of which are profit based, reducing revenues to all levels of government. Lower profitability may also reduce the quantity of ore mined, as some becomes unprofitable, and the mine life is shortened, reducing some of the project benefits." REASON: There is a financial consequence to a 2-year delay and higher costs that needs to be identified in the text.

Comment Number	Page # or Global	Section	Paragraph (count from top of page)	Commenter Initials	Relevant DEIS Text Excerpt (if applicable)	Comment
1	4.22-2	4.22.2	2	MG	As discussed in Section 3.22, Environmental Justice Affected Environment, the following environmental justice communities were identified:	This section in Chapter 4 and the referenced section in Chapter 3 only describe potential impacts to tribal communities from the perspective of Environmental Justice, but does not cite nor recognize other low income (below poverty level and underemployed) communities that would also be effected, likely positively within the analysis area. Were those communities considered in this analysis?
2	4.22-3	4.22.2.1.1	3	MG	"Restricted access does not keep with tribal rights and trust responsibilities . . .	Correct the text to read: "Restricted access may present conflicts with tribal rights and trust responsibilities . . ." Reason: The phrase "does not keep with" is vague, and could suggest that tribal rights and interests regarding access to areas and resources are not resolvable. Limited access restrictions have been part of mining use at the SGP site for 100 years. The corrected phrasing reflects that MGII and the Forest Service will continue with consultation and other measures to minimize effects on access and otherwise work to resolve tribal concerns.
3	4.22-5	4.22.2.1.3	2	MG	Therefore, fishing opportunities and the types of fish available may be altered after reclamation. This in turn could have an adverse effect on tribal members	This mine site area is generally closed to fishing use, including subsidence use, currently. Restoring fish passage as outlined in the PRO would ultimately have beneficial effects by reopening formerly closed and inaccessible habitat. In addition, the project has extensive actions that would result in removal and proper encapsulation of existing metal sources likely causing increased loads which could have receptors in the aquatic food chain. Removal of the metal sources and reduced loading could and likely would have beneficial effects to fishing use. Please revise.
4	4.22-5 to 6	4.22.2.1.4		MG	"Many of these ["Tribe"] interests also are inherently incompatible with any resource changes . . . . Unlike displaced recreation use, there are no substitute resources or replacement opportunities for most of the Tribal interests and use of the local area."	MGII recognizes that there are some tensions and conflicts between mining related use in the project area and tribal member traditional uses and other interests. However, resource change related to mining use as well as natural and other factors have been and will continue irrespective of SGP, and as recognized on page 4.22-4 and elsewhere in the DEIS, SGP effects will be limited to small portions of the total area used by tribal members. As also recognized on page 4.22-6 and elsewhere in the DEIS, MGII and the Forest Service will continue with consultation and other measures to minimize effects on tribal interests and otherwise work to resolve tribal concerns.
5	4.22-5	4.22.2.1.4	Last	MG	Unlike displaced recreational use, there are no substitute resources or replacement opportunities for most of the Tribal interests and use of the local area.	Please revise: Unlike displaced recreational users, it may be harder to substitute resources for tribal members. However the Operations Area Boundary with restricted access represents a small portion of the total area within the Payette National Forest and Boise National Forest (2.3 million and 2.6 million acres, respectively) available to the Tribes to conduct their traditional use and access subsistence resources.
6	4.22-6	4.22.2.1.4	2	MG	Based on the restricted information provided to the Forest Service by the Tribes, it is expected that the SGP-related impacts would be of a type and/or magnitude to represent an adverse environmental justice impact to the Tribal environmental justice communities	In the long term the improvements to the local ecosystems and restoration of fish passage would presumably have long term positive effects not only for tribal members but for all stakeholders and users/members of the community. Please consider and revise.
7	4.22-6	4.22.2.2.1	5	MG	Approximately 13,446 acres of public lands within the Operations Area Boundary would be inaccessible to the Nez Perce Tribe, Shoshone-Bannock Tribes, and Shoshone-Paiute Tribes once construction begins.	There would be no significant change in access to this large acreage (13,446 ac) than the current situation as much of this large area is currently unroaded. To infer that it would be totally off limits for tribal use is not a correct assumption. Proposed mining activities would not change access for the majority of that acreage.
8	4.22-11	4.22.2.4.1	4	MG	Therefore, Tribal members may avoid these areas because of noise associated with activities and traffic along Warm Lake, McCall - Stibnite, and Johnson Creek roads.	Amend wording: "Therefore, Tribal members may avoid these areas because of noise associated with activities and traffic along Warm Lake, **Yellow Pine** - Stibnite, and Johnson Creek roads." Reason: McCall-Stibnite Road is wrong term
9	4.22-12	4.22.2.4.5	1	MG	There would be no new or upgraded access roads; no changes in location or upgrades to the existing transmission lines or substations; and no construction of the Stibnite Gold Logistics Facility and Landmark Maintenance Facility.	Add wording to end: "There would also be no reclamation or restoration of legacy and historic mining impacts; the tailings, waste dumps and pits would remain as they currently are; water quality issues would not be addressed; and there would be no restoration of fish passage to the headwaters of the EFSFSR." Reason: Current text did not discuss the reclamation/restoration components of the SGP.

Comment Number	Page # or Global	Section	Paragraph (count from top of page)	Commenter Initials	Relevant DEIS Text Excerpt (if applicable)	Comment
10	4.22-15	4.22.4.2	1	MG	These include ongoing and planned mining activities, exploratory drilling, reclamation and closure of mining and processing facilities, recreation and tourism, timber harvest on public lands, and transportation projects.	Delete "reclamation and closure of mining and processing facilities" Reason: Without one of Alt#1-4, there is no reclamation and closure possible or planned
11	4.22-15	4.22.5.1	4	MG	In addition, prohibiting use of a culturally important area for approximately 20 years over the life of the SGP could result in the irretrievable and irreversible loss of cultural practices	There is nothing in the PRO or alternatives that would prohibit public or tribal use of these lands for 20-years with the exception of areas that are part of active operations and for public safety. Much of those lands that would be affected are on privately owned lands anyway. Clarification of the statement is needed.
12	4.22-16	4.22.7	6	MG	There are no environmental justice minority or low-income communities in the SGP area. However, the SGP area is within the traditional subsistence range of Tribal minority and low-income populations from the Nez Perce Tribe, Shoshone-Bannock Tribes, and Shoshone-Paiute Tribes. Tribal members are more susceptible and likely to be impacted by local area resource changes due to both their use of the SGP area and their long-established cultural connections and attitudes to the local area resources. As a result, many of the SGP-related resource impacts would likely be perceived by Tribal members to have a greater and more long-term adverse impact than that by non-tribal users. For these reasons, Tribal members have a greater potential to be affected than the general population under all four action alternatives.	We believe that there will be net improvements in aquatics functions, water quality, vegetation characteristics in the long term from actions outlined in Alternatives 1,2&3. These are positive long term effects and should be noted, not just the potential perceived negative effects.

Comment Number	Page # or Global	Section	Paragraph (count from top of page)	Commenter Initials	Relevant DEIS Text Excerpt (if applicable)	Comment
1	3.23-25	3.23.3.2.2		MG	Citation to 36 CFR 219.7 for "Special Designations" evaluation of areas that may be suitable for Wilderness Designation.	Delete or modify this section or reference to be accurate. Reason: The current version of 36 CFR 219.7 does not use the term "Special Designations" and applies to forest plan revisions at the programmatic level; not project level NEPA and related evaluations
2	3.23-26	3.23.3.2.3		MG	Idaho Roadless Rule summary	It should be noted that the Idaho Roadless Rule provides that nothing in the Rule shall affect mining activities conducted pursuant to the Mining Law of 1872. 36 CFR 294.25(b). Reason: This is important to note in evaluating proposed locatable mineral projects such as SGP.
3	Global	4.23		MG		This section includes a generic statement that mitigation measures are in Appendix D (Sections 4.23.1.3, 4.23.2.3, 4.23.3.3, and 4.23.4.3) at the end of the impacts analysis section. Suggest introducing mitigation measures towards the front of the section after Section 4.23.1.2 Direct and Indirect Effects (similar to how 4.1 Introduction is organized). This way the reader knows at the beginning (before reading the impacts analysis) that mitigation has been taken into account for the effects analysis. Section 4.23.1 Wilderness addresses how mitigation measures have been taken into account to reduce impacts. Section 4.23.2 Wild and Scenic Rivers and Section 4. 23.3 Inventoried Roadless Areas only mention in one place (in each section) how mitigation would be taken into account to reduce impacts; more discussion of how mitigation will reduce impacts should be presented. Section 4.23.4 Research Natural Areas does not discuss at all how mitigation would be taken into account to reduce impacts; more discussion of how mitigation will reduce impacts should be presented.
4	Global	4.23		MG		Discussion of duration of impacts is sporadic throughout this Section. For consistency and comparative value to reader, suggest identifying upfront in Section 4.23.2.1 (similar to Section 4.23.3.1) and revisiting impacts analysis to describe duration of impacts consistently.
5	Global	4.23.3		MG	Discussion of impacts on IRAs	The Idaho Roadless Rule provides that nothing in the Rule shall affect mining activities conducted pursuant to the General Mining Law of 1872. 36 CFR 294.25(b).
6	Global	4.23		MG		Suggest including mitigation measures specific to each Special Designation (Wilderness, Wild and Scenic Rivers, Inventory Roadless Areas, and Research Natural Areas) within each section.
7	4.23-4	4.23.1.2.1.1.	2	MG	Lights from vehicles on Burntlog Route would be visible within the upper elevations of Big Chief Creek within the FCRNRW. Topography and vegetation could block or filter lights, reducing the area where lights are visible (Larkin 1996). The extent of change to natural dark skies from lights during mine operation and vehicle headlights on Burntlog Route is unknown.	Add to end: "However, Midas Gold would limit their vehicle traffic outside the mine site to between 5:00 am and 7:00 pm everyday so there would be no impact on natural dark skies along the Burntlog Route. Further, Midas Gold has undertaken a dark skies study and has pledged to implement its recommendations significantly mitigating any impacts from construction or operations on natural dark skies. Reason: Misses travel times set out in DEIS.
8	4.23-4	4.23.1.2.1.1	4	MG	The untrammeled quality of wilderness character would be impacted when noise and lights change wildlife species distribution and behaviors.	It should be noted that much of the FCRNRW adjacent to the project is area does not meet the definition of untrammeled given that it contains numerous old roads, trails and mine-related features.
9	4.23-5	4.23.1.2.1.2	3	MG	However, recreation traffic may not follow posted speed limits and speeds could be higher, which is associated with a higher amount of fugitive dust generated	Speculative: Recreation traffic already exists on this road. Please clarify how the assumption of increased dust is being made.
10	4.23-5	4.23.1.2.1.2	3	MG	During Burntlog Route construction, operation, and closure and reclamation, dust and sediment could be deposited on vegetation within the FCRNRW. AND The extent of dust and sediment deposition is unknown; however, the changes in vegetation would result in a long-term impact on the natural quality of wilderness character within the FCRNRW	REWORD: The extent of dust and sediment deposition is unknown; however**, it is likely to be restricted to a short distance from the Burntlog Route.** Any changes in vegetation **in that area** would result in a long-term impact on the natural quality of wilderness character within the FCRNRW
11	4.23-6	4.23.1.2.1.2	4	MG	Noise and the number of vehicles on Burntlog Route could change wildlife distribution in Big Chief drainage. Sound from mine traffic during the mine closure and reclamation also would be audible within the FCRNRW	REWORD: "Noise and the number of vehicles on Burntlog Route could change wildlife distribution in Big Chief drainage. Sound from mine traffic during the mine closure and reclamation also would be audible within the **margins of** FCRNRW **in close proximity to the road."** Reason: Noise impacts would be localized to within claims area, even blasting
12	4.23-6	4.23.1.2.1.2	3	MG	During construction, operation, and closure and reclamation of Burntlog Route, vegetation removal and excavation of soil and rock could increase sediment load into Big Chief Creek tributaries and affect fish and aquatic habitat.	Permits that are necessary for construction and operation of the road would have stipulations that increases in sedimentation cannot occur. So the likelihood of this is low and use of BMPs would be a requirement of continued operations to avoid this outcome. Please include these requirements in this discussion.
13	4.23-27	4.23.2.2.1.1		MG	Entire section	The first paragraph under Heading 4.23.2.2.1 Alternative 1 indicates that the analysis discussion is framed around where the activities have the potential to intersect with WSRs. However, Figure 4.23-1 Visual and Noise Impacts to Wilderness from the Burntlog Road (mistitled - see next comment) reflects large buffers that extend far beyond where the Alternative 1 activities have the potential to intersect with WSRs. Please revise.
14	4.23-28	4.23.2.2.1.1	5	MG	Construction activities could result in short-term impacts to the free-flowing condition as a result of culvert and bridge replacement on Burnt Log Road under Alternative 1.	Please identify how/why there would be short-term impacts to the free-flowing condition as a result of culvert and bridge replacement on Burnt Log Road under Alternative 1. Include discussion of mitigation and now it would reduce impacts and why.
15	4.23-29	4.23.2.2.1.1	4	MG		Please identify which ORVs (Chapter 3 identifies ORVs for scenery, wildlife, cultural, fish, geology, hydrology, ecological, or botanical resources) would be impacted and clarify why.

Comment Number	Page # or Global	Section	Paragraph (count from top of page)	Commenter Initials	Relevant DEIS Text Excerpt (if applicable)	Comment
16	4.23-30	4.23.2.2.1.1	3	MG	Noise is expected to adversely affect approximately 881 acres of the WSR corridor, and visual impacts would be noticeable from approximately 595 acres of the corridor.	Suggest deleting this sentence (noise and visual do not impact acres). The preceding text in paragraph states the impacts.
17	4.23-30	4.23.2.2.1.1	4	MG	Noise impact during construction would affect approximate 721 acres in this segment, and visual impacts would affect approximately 1,142 acres.	Suggest deleting this sentence (noise and visual do not impact acres). The preceding text in paragraph states the impacts.
18	4.23-32	4.23.2.2.1.1	5	MG	As discussed in Section 4.9, Surface Water and Groundwater Quality, expected permit stipulations from IDWR and IDEQ would require the use of erosion and sediment control BMPs associated with a SWPPP.	Author should identify that these "permit stipulations" are identified in Appendix D as proposed mitigations and should also identify how they would reduce impacts. Suggest citing Appendix D. This comment also applies to similar text on p. 4.23-33, paragraph 8.
19	4.23-35	4.23.22.1.2	6	MG	Approximately 77.5 acres of the Burntlog Creek watershed would be affected by road widening cut and fill activities.	For consistency, recommend discussing impacts to WSR corridor instead of watershed.
20	4.23-35	4.23.22.1.2	last	MG	As described above in Section 4.23.2.2.1.1, Alternative 1 - Construction, increased acreage of gravel roads and increased heavy vehicle traffic is associated with increases in sediment load delivery to streams (Reid and Dunne 1984).	Suggest deleting "As described above in Section 4.23.2.2.1.1, Alternative 1 - Construction..." as this was not described in Section 4.23.2.2.1.1.
21	4.23-52	4.23.3.2.1.3	3	MG	The 13 IRAs and lands contiguous to unroaded areas are large enough to provide outstanding opportunities for solitude and primitive recreation. Outstanding opportunities for solitude or primitive recreation vary throughout the roadless expanse depending on topography, vegetation, distance to roads and trails that allow motorized use, and other human structures. Forest visitors seeking outstanding opportunities for solitude could be displaced from IRAs and adjacent unroaded areas during construction, operation, and closure and reclamation of the SGP. The Operations Area Boundary includes approximately 8,874 acres of Sugar Mountain, Horse Heaven, and Meadow Creek IRAs combined and reduces the area available for outstanding opportunities for solitude or primitive recreation. The presence of workers, vehicles, and the sound of equipment would be high during the entire life of the SGP. The presence of workers, vehicles, and the sound of equipment would decrease the areas within Meadow Creek, Black Lake, Burnt Log, and Horse Heaven IRAs and adjacent unroaded areas with outstanding opportunities for solitude and primitive types of recreation.	Several of these IRAs are within eyesight and hearing distance of existing operations, roads, and large tracts of occupied private land. This emphasizes a near wilderness like setting which is really not the case for all IRAs. Please revise.
22	4.23-53	4.23.3.2.1.4	1	MG	The Chilcoot Peak Resource Natural Area (RNA) and eligible WSR segments of Burntlog Creek and Johnson Creek also could be indirectly affected by activities under Alternative 1 from invasive species and sediment loading changes creating changes to water quality.	Permits that are necessary for construction and operation of the road would have stipulations that increases in sedimentation cannot occur. So the likelihood of this is low and use of BMPs would be a requirement of continued operations to avoid this outcome. Please include these requirements in this discussion.

Attachment A: Stibnite Gold Project Other Resources DEIS Comments Compilation Table
A-21: Sections 3.24 and 4.24 -Tribal Rights and Interests

Comment Number	Page # or Global	Section	Paragraph (count from top of page)	Commenter Initials	Relevant DEIS Text Excerpt (if applicable)	Comment
1	Global	3.24		MG	Summaries and Descriptions of Tribal rights and interests	Any effects of SGP implementation on the broad Tribal rights and interests asserted in this Section will not necessarily be significant. As recognized elsewhere in the DEIS, mining has been a part of the Existing Condition land use and activities in the SGP area for 100 years, and SGP restoration of resources impacted by legacy mining will yield benefits for Tribe member use of the area. MGII will continue to engage with the agencies and Tribes to address and resolve Tribe traditional use, access and other concerns and minimize effects to the extent feasible on traditional use areas and resources, consistent with any applicable Tribe treaty and other rights, to the extent that the Tribes share ethnographic and other information in a timely manner to facilitate that effort.
2	4.24-2	4.24.2.1	4,5	MG		The information in these paragraphs do not accurately reflect the level of floodplain, stream, and riparian restoration that is described in the Conceptual Stream and Wetland Mitigation Plan (Appendix D). Please refer to comments on Section 4.12 and revise these paragraphs accordingly.
3	4.23-5	4.24.3	6	MG	The predeeding impact analysis has taken these mitigation measures into consideration, as well as measures routinely required through federal, state, or local laws, regulations or permitting	Although this paragraph states that the mitigation measures have been taken into consideration, there is very little reference to the effect of mitigation in the discussion of direct or indirect effects or in Table 2.24-2. The mitigation measures listed in Appendix D should be recognized with an analysis of how those measures will reduce impacts to tribal rights and interests. Further, the measures required by regulation and permit, particularly the Endangered Species Act, Clean Water Act, and Idaho State mining and reclamation regulations. Also, please refer to comments on sections 4.11, 4.11, 4.12, and 4.13.
4	4.24-8	4.24.4.2	2	MG		The non-SGP cumulative effects described in Table 4.24-1 should be reflected in this section, such as private land development, wildfires, noxious weeds, recreation since they are recognized in Section 4.24.4.1 All Action Alternatives.
5	4.24-10	4.24.7	6	MG	The Proposed Action also would impact endangered salmon and other aquatic species and essential fish habitat. Harm to fish, wildlife, and habitat would in turn impact availability and harvestability of these resources by tribes at their usual and accustomed fishing, hunting, and gathering areas.	Note previous comments on this section regarding accounting for mitigation to endangered salmon and other aquatic species and update this summary statement.
6	4.24-11	4.24.7	Table 4.24-2	MG		Update table to reflect proposed mitigation per previous comments.
7	4.24-10	4.24.7	6	MG	Statement that Forest Service has "concluded that the SGP would have adverse impacts to tribal rights under all action alternatives, and related summary.	The adverse impacts asserted in this section at this DEIS stage are not certain or necessarily significant. MGII recognizes that there are some tensions and conflicts between mining related use in the project area and tribal member traditional uses and other interests. However, resource change related to mining use as well as natural and other factors have been and will continue irrespective of SGP, and as recognized on page 4.22-4 and elsewhere in the DEIS, SGP effects will be limited to small portions of the total area used by tribal members. As also recognized on page 4.24-6 and elsewhere in the DEIS, MGII and the Forest Service will continue with consultation and other measures to minimize effects on tribal interests and otherwise work to resolve tribal concerns.

Attachment B

Midas Gold Suggested Edits (white rows) on DEIS Table ES4-1 Summary and Comparison of the Potential Environmental Impacts Associated with the Significant Issues by Alternative (grey rows)

DISCLAIMER: This table is a limited summary and comparison of effects associated with the alternatives evaluated in the Draft EIS.

Origin of Text	Issue	Indicator	Baseline Conditions	Alternative 1	Alternative 2	Alternative 3	Alternative 4	Alternative 5
	Surface Water and Groundwater Quantity							
DEIS Table ES4-1	**The SGP may cause changes in quantity of surface water and groundwater in all drainages within the analysis area.**	Stream flow characteristics (daily, seasonal, annual).	Surface waters include: the EFSFSR, Rabbit Creek, Meadow Creek, East Fork Meadow Creek (also known as Blowout Creek), Garnet Creek, Fiddle Creek, Midnight Creek, Hennessy Creek, West End Creek, and Sugar Creek. Monthly average seasonal low flows: Meadow Creek between TSF and Hangar Flats pit = 2.7 cfs. Meadow Creek below the diversion and above EFSFSR (mine years 7-10) = 3.8 cfs.	Meadow Creek monthly average low flow during operations = 2.3 cfs (15% reduction from baseline conditions). The primary predicted impact: reduction in streamflow along Meadow Creek near the Hangar Flats pit and pit lake close to the end of the mine operation and early post closure. Simulated flows vary from no predicted change to a 45% reduction in low flows during the mine operational period. Flows vary from no predicted change to a 100% reduction during the early post- closure period. In most areas, groundwater in the alluvial aquifers recover within 10 years after the cessation of mining. Large areas of the bedrock aquifer are also expected to recover. However, there is less confidence about overall long-term recovery of the bedrock aquifer.	Stream flow impacts partially mitigated for Meadow Creek in the vicinity of the Hangar Flats pit and pit lake relative to Alternative 1. Predicted stream low flows for Alternative 2 two times higher than the low flows under Alternative 1 during mine years 7 through 12. Across these years, the average monthly flow reduction relative to the existing conditions was predicted to be 32% for Alternative 2 and 47% for Alternative 1. In early post closure when the section of Meadow Creek is predicted to go dry under Alternative 1, predictions for Alternative 2 are a 26% reduction in the average monthly flow. Surface flows are generally predicted to recover to pre-mine conditions by approximately mine year 15 (3 years after operations cease).	Stream flow would be impacted by Alternative 3 within the analysis area. Simulated flows are similar to Alternative 1.	Stream flow would be impacted by Alternative 4 within the analysis area. Simulated flows are similar to Alternative 1.	Alternative 5 would result in no changes to existing stream flow characteristics.
Midas Gold Suggested Edits	**The SGP may cause changes in quantity of surface water and groundwater in all drainages within the analysis area.**	Stream flow characteristics (monthly, seasonal, annual).	The primary surface water streams in the study area include: the EFSFSR, Rabbit Creek, Meadow Creek, East Fork Meadow Creek (also known as Blowout Creek), Garnet Creek, Fiddle Creek, Midnight Creek, Hennessy Creek, West End Creek, and Sugar Creek. Streamflows were simulated using the hydrologic model, which was calibrated to measured streamflows at stream gage locations in Meadow Creek, EFSFSR, and Sugar Creek. Of primary concern is the potential impact to Meadow Creek from Hangar Flats pit dewatering activities and Hangar Flats pit lake filling. Simulated future streamflows without mining	There would be temporary reductions in Meadow Creek baseflows downstream of the Hangar Flats pit and pit lake towards the end of the period of mining operations and beginning of the period of post closure. The simulated Meadow Creek low flow monthly average streamflow in this reach is 2.1 cfs during the active Hangar Flats pit mining operations period compared to the current 3.8 cfs. The maximum simulated impact occurs in mine year 10 with a monthly average low flow of 1.6 cfs compared with 3.5 cfs under the No Action Alternative This reach of Meadow Creek is simulated to be dry in some low flow months during initial Hangar Flats pit lake filling in the first 3 years of the post-closure period.	Similar to Alternative 1, but streamflow reductions in Meadow Creek would be less due to the following measures: extension of the lining of the Meadow Creek channel an additional approximately 1,050 feet further downstream to prevent stream loss; routing Meadow Creek high flows to the Hangar Flats pit lake to fill the lake more rapidly; partial backfilling of the Hangar Flats pit lake to also aid in filling the lake more rapidly; and extending the period of flow to the Rapid Infiltration Basins (RIBs) to increase streamflow in the lower portion of Meadow Creek. Simulated Meadow Creek streamflow low flows for Alternative 2 downstream of the Hangar Flats pit	Streamflow impacts simulated for Alternative 3 are similar to Alternative 1. However, minor streamflow reductions in the EFSFSR upstream of its confluence with Meadow Creek were simulated owing to the presence of the liner beneath the TSF preventing recharge and collection of surface runoff at the TSF. Similar magnitudes of Meadow Creek streamflow increases are simulated over Alternative 1 upstream of the Hangar Flats pit and pit lake owing to the TSF not being located in the Meadow Creek valley in this alternative, but these simulated increases are negated downstream by	Streamflow impacts for Alternative 4 would be similar to Alternative 1 (Section 4.8.2.4).	No changes in the streamflow regimes in streams of the mining area (Section 4.8.2.5).

Origin of Text	Issue	Indicator	Baseline Conditions	Alternative 1	Alternative 2	Alternative 3	Alternative 4	Alternative 5
			operations (Alternative 5) provide the baseline conditions. The baseline simulated monthly average seasonal low flow for Meadow Creek between the downstream end of the lined diversion channel around the Hangar Flats pit/pit lake and the confluence with the EFSFSR is 3.8 cfs during the active Hangar Flats pit mining operations period (mine years 7 through 10).	Groundwater levels in the alluvial aquifer system are simulated to recover within approximately 7 years of the cessation of mine dewatering activities, and reductions in streamflow and groundwater contributions to streamflow end once the alluvial aquifer system beneath the stream has recovered (Section 4.8.2.1.1.1).	during the mining operations period are greater than two times higher than those for Alternative 1. During the early post-closure period, simulated Alternative 2 average monthly Meadow Creek streamflows downstream of the Hangar Flats pit are reduced by approximately 26% with no drying of the stream that was simulated in Alternative 1. For Alternative 2, surface water flows and groundwater levels in the alluvial aquifer system are simulated to recover within less than 2.5 years of the cessation of mine dewatering activities, and reductions in groundwater contributions to streamflow end once the alluvial aquifer system beneath the stream has recovered (Section 4.8.2.2.1.1).	the Hangar Flats pit (Section 4.8.2.3.1.1).		
DEIS Table ES4-1	**The SGP may cause changes in quantity of surface water and groundwater in all drainages within the analysis area.**	The extent, magnitude, and duration of groundwater level changes.	Groundwater flow in the analysis area occurs primarily in the Quaternary unconsolidated deposits filling the valleys and through the unconsolidated deposits covering the mountainsides.	Dewatering of the pits lowers groundwater levels in the alluvial and bedrock formations during the mining and post closure periods, and reduces flows in surface water streams that receive groundwater discharge. In most areas, groundwater in the alluvial aquifers recover within 10 years after the cessation of mining. Large areas of the bedrock aquifer are also expected to recover. However, there is less confidence about overall long-term recovery of the bedrock aquifer. Development of DRSFs and TSF within Meadow Creek valley would result in lowering water table levels by more than ten feet in some areas within their footprint, and in area close around, during production and post closure periods.	The extended liner reduces stream loss from Meadow Creek near the Hangar Flats pit, and reduces that pit's dewatering rates by more than 25%. Partial backfill of Hangar Flats pit with West End Development Rock and diversion of Meadow Creek high flow to the pit lake reduces the time of filling the pit with water from the Hangar Flats pit lake.	The TSF and Hangar Flats DRSF constructed in the EFSFSR valley would lower groundwater levels within their footprint. Hangar Flats pit dewatering rates and the rate of water infiltrating via the RIBs somewhat higher compared to Alternative 1. Hangar Flats pit fills with water somewhat quicker.	The extent, magnitude, and duration of groundwater level changes would be similar to Alternative 1.	Alternative 5 would result in no changes to existing (baseline) groundwater flow conditions.
Midas Gold Suggested Edits	**The SGP may cause changes in quantity of surface water and**	The extent, magnitude, and duration of groundwater level changes	Groundwater flow in the analysis area occurs primarily in the Quaternary	Dewatering activities lower the groundwater levels in the alluvium and bedrock during	The extended Meadow Creek streambed liner on the downstream side of	The TSF and Hangar Flats DRSF constructed in the EFSFSR valley are	The extent, magnitude, and duration of groundwater level changes would be	Alternative 5 would result in no changes to existing (baseline) groundwater

Origin of Text	Issue	Indicator	Baseline Conditions	Alternative 1	Alternative 2	Alternative 3	Alternative 4	Alternative 5
	groundwater in all drainages within the analysis area.	and changes in groundwater flow through the alluvial aquifer system and bedrock.	unconsolidated deposits filling the valleys and also through the thinner unconsolidated deposits covering the mountainsides. Some groundwater flow also occurs within the bedrock units. Groundwater levels and flow are simulated using the hydrologic model which was calibrated to groundwater levels measured within the study area. Simulated future groundwater levels and flow without mining operations (Alternative 5) provide the baseline conditions.	the mine operations period and early in the post-closure period. Groundwater levels in the alluvial aquifer system are simulated to recover within approximately 7 years of the cessation of mine dewatering activities. Groundwater levels in the bedrock are also simulated to recover except in the vicinity of the pit lakes because the lakes will inherently provide a lower level than the existing land surface to which the surrounding bedrock will discharge. Development of DRSFs and TSF within Meadow Creek valley would result in lowering water table levels by more than ten feet in some areas within and around their footprint during production and post closure periods. However, the overall volumes of water moving through the groundwater and surface water systems are expected to recover during the post-closure period other than evaporation from the surfaces of the pit lakes (Section 4.8.2.1.2).	Hangar Flats pit reduces Alternative 2 simulated stream loss and reduces the simulated Hangar Flats pit dewatering rates by over 25% compared with Alternative 1. Along with the extended streambed liner, the partial backfilling of Hangar Flats pit and diversion of Meadow Creek high flows directly to the pit lake reduce simulated pit lake filling time and recovery of the alluvial aquifer system to less than 2.5 years. Simulated groundwater-level changes in the vicinity of the DRSFs and TSF are similar to Alternative 1. As with Alternative 1, the overall volumes of water moving through the groundwater and surface water systems are expected to recover during the post-closure period other than evaporation from the surfaces of the pit lakes (Section 4.8.2.2.2).	simulated to lower groundwater levels within their footprint. Simulated Hangar Flats pit dewatering rates and the rate of water infiltrating via the RIBs is slightly higher compared to Alternative 1. Hangar Flats pit lake fills and alluvial aquifer system water levels recover slightly faster than Alternative 1 (less than 6 years) owing to the absence of TSF liner upgradient allowing more groundwater recharge. Simulated groundwater-level changes in the vicinity of the DRSFs and TSF are similar to Alternative 1, though the location of the TSF in this alternative is in the EFSFSR valley rather than the Meadow Creek valley. As with Alternative 1, the overall volumes of water moving through the groundwater and surface water systems are expected to recover during the post-closure period other than evaporation from the surfaces of the pit lakes (Section 4.8.2.3.2).	similar to Alternative 1 (Section 4.8.2.4).	flow conditions (Section 4.8.2.5).
DEIS Table ES4-1	**The SGP may affect water rights.**	Change in water rights availability in the SGP area.	Four existing water rights at the mine site owned by Midas Gold.	No changes in water rights availability in the SGP area.	No changes in water rights availability in the SGP area.	No changes in water rights availability in the SGP area.	No changes in water rights availability in the SGP area.	No changes in water rights availability.
Midas Gold Suggested Edits	**The SGP may affect water rights.**	Change in water rights availability in the SGP area.	There are four existing water rights held by Midas Gold with points of diversion in the SGP area. The existing water rights have priority dates in the 1980s. Midas Gold has acquired these water rights for use in the SGP.	Existing water rights are anticipated to be maintained and could be subject to transfer of point of diversion, place of use and/or beneficial use. Water right transfer will be accomplished through submittal of an application to transfer with the IDWR. No enlargement of existing water rights will be sought. Current water rights are discussed in section 3.8.3.3.	Same as Alternative 1.	Same as Alternative 1.	Same as Alternative 1.	No changes in water rights availability.
DEIS Table ES4-1	**The SGP may affect water rights.**	New water rights needed.	Existing water rights held by Midas Gold: 77-7285 - Groundwater right for storage and mining with diversion of 0.5 cfs for	An additional 2.39 cfs and 1,730 acre-feet of groundwater rights needed to support ore processing. An additional 0.34 cfs and 10 acre-feet of groundwater rights	Same as Alternative 1.	Same as Alternative 1.	Same as Alternative 1.	No new water rights required.

Origin of Text	Issue	Indicator	Baseline Conditions	Alternative 1	Alternative 2	Alternative 3	Alternative 4	Alternative 5
			a maximum total usage of 39.2 acre-feet. 77-7141 – Groundwater right for domestic with diversion of 0.2 cfs for a maximum total usage of 11.4 acre-feet. 77-7293 – Surface water right for storage and mining for diversion of 0.25 cfs and a maximum total usage of 20 acre-feet. 77-7122 – Surface water right for storage and mining for diversion of 0.33 cfs for a maximum total usage of 7.1 acre-feet.	needed for potable water supply. During drought conditions, temporary seasonal withdrawal of up to 5.63 cfs from groundwater. An additional water right for 3.47 cfs diversion of surface would be needed.				
Midas Gold Suggested Edits	**The SGP may affect water rights.**	New water rights needed.	Existing water rights held by Midas Gold: 77-7285 - Groundwater right for storage and mining with diversion of 0.5 cfs for a maximum total usage of 39.2 acre-feet. 77-7141 – Groundwater right for domestic with diversion of 0.2 cfs for a maximum total usage of 11.4 acre-feet. 77-7293 – Surface water right for storage and mining for diversion of 0.25 cfs and a maximum total usage of 20 acre-feet. 77-7122 – Surface water right for storage and mining for diversion of 0.33 cfs for a maximum total usage of 7.1 acre-feet.	New water rights will be sought for authorization to divert water to support mining and ore processing and potable supply. Ore processing water supply will be sourced from TSF reclaim water, contact water and groundwater. The water supply system for ore processing utilizes water generated by mining activities (TSF pool, contact water, water associated with pit dewatering) while potable water supply is from groundwater (Section 2.3.5.9, pages 2-52, 2-53). In addition to the TSF reclaim, hydrologic modeling indicates that an estimated additional 2.39 cfs and 1,730 acre-feet of groundwater rights would need to be secured to support ore processing during the life of the SGP (approximately 15 years of ore processing). Under certain conditions (prolonged severe drought occurring early in operations), an estimated temporary seasonal withdrawal of an additional 5.63 cfs may be required to maintain ore processing operations (Section 4.8.2.1.3.1 paragraph 1). Applications for permits to appropriate/divert up to 9.1 cfs of groundwater and diffuse runoff (i.e., contact water), to	Same as Alternative 1.	Same as Alternative 1.	Same as Alternative 1.	No new water rights required.

Origin of Text	Issue	Indicator	Baseline Conditions	Alternative 1	Alternative 2	Alternative 3	Alternative 4	Alternative 5
				store up to 500 acre-feet of diffuse runoff for industrial use, and to divert the 500 acre-feet of stored water to industrial use would be submitted. The applications would include a mitigation plan to protect existing instream water rights on the South Fork Salmon River and the Salmon River (Section 4.8.2.1.3.1 paragraph 3).				

Midas Gold Suggested Edits (white rows) on DEIS Table ES4-1 Summary and Comparison of the Potential Environmental Impacts Associated with the Significant Issues by Alternative (grey rows)

DISCLAIMER: This table is a limited summary and comparison of effects associated with the alternatives evaluated in the Draft EIS.

Origin of Text	Issue	Indicator	Baseline Conditions	Alternative 1	Alternative 2	Alternative 3	Alternative 4	Alternative 5
	Surface Water and Groundwater Quality							
DEIS Table ES4-1	**The SGP may affect soil and water resources through acid rock drainage and/or metals leaching from mineralized rock in the mine pits, DRSFs, and TSF.**	Volume and disposition of mineralized waste generated.	No new mining waste generated.	Development Rock: • TSF embankment (61 MT). • Hangar Flats DRSF and TSF buttress (81 MT). • Fiddle DRSF (68 MT). • West End DRSF (25 MT). • Yellow Pine Pit backfill (111MT). Tailings: • TSF (100 MT).	Development Rock: • TSF embankment (61 MT). • Hangar Flats DRSF and TSF buttress (81 MT). • Fiddle DRSF (68 MT). • Yellow Pine Pit backfill (111MT). • Midnight Pit backfill (6 MT). • Hangar Flats Pit partial backfill (18 MT). • On-site lime generation (1MT). Tailings: • TSF (100 MT).	Development Rock: • TSF embankment (61 MT). • EFSFSR DRSF and TSF buttress (81 MT). • Fiddle DRSF (68 MT). • West End DRSF (25 MT). • Yellow Pine Pit backfill (111MT). Tailings: • EFSFSR TSF (100 MT).	Same as Alternative 1.	No new mining waste generated.
Midas Gold Suggested Edits	**The SGP may affect soil and water resources through acid rock drainage and/or metals leaching from mineralized rock in the mine pits, DRSFs, and TSF.**	Volume and disposition of mineralized waste generated.	Mineralized waste from historical mining operations is located in several legacy facilities within Meadow Creek valley including the SODA and Bradley tailings (10 MT) and Hecla Heap (1 MT). Material within these facilities is generally non-acid generating but capable of leaching arsenic, antimony, aluminum, manganese, sulfate, total dissolved solids, copper, cadmium and zinc above water quality criteria (Section 4.9.2.1.1.4). The legacy facilities are currently impacting groundwater and surface water within Meadow Creek and EFSFSR drainages. Other legacy mine features such as historical waste rock piles also may contribute mass loading to surface water and groundwater.	Mining would generate new development rock and tailings material. The majority of the new development rock is non-acid generating. However, there is a potential to leach some metals under the neutral pH (e.g., arsenic and antimony) (Section 4.9.2.1.1.4). The development rock tonnages would be: • TSF embankment (61 MT of which 0% is PAG). • Hangar Flats DRSF and TSF buttress (81 MT of which 5.9% is PAG). • Fiddle DRSF (68 MT of which 9.5% is PAG). • West End DRSF (25 MT of which 0.4% is PAG). • Yellow Pine Pit backfill (111MT of which 0% is PAG). Approximately 100 MT of tailings material would be generated and placed in the TSF. Tailings are non-acid generating with a potential to leach some metals under the neutral pH conditions. Anticipated tailings process water chemistry and leachate chemistry are provided in Table 4.9-9. The potential for seepage from the TSF to impact groundwater would be managed through construction of an engineered liner beneath the TSF.	The quantity and geochemical properties of development rock and tailings generated during operations for Alternative 2 is the same as Alternative 1; however, the final disposition of development rock is different for some locations as follows: • The West End DRSF is eliminated in Alternative 2. • The Midnight Pit would be backfilled with 6 MT of development rock from the West End pit. • 18 MT of development rock from West End pit would be placed in the Hangar Flats partial backfill. • Approximately 1 MT of development rock from the West End pit would be sent to the on-site lime generation plant. The ratio of PAG to non-PAG development rock is the same as Alternative 1; however, eliminating the West End DRSF and reducing the exposed surface area of the final Hangar Flats and Midnight area pit walls would reduce the potential for surface water and groundwater quality impacts at the mine site (p. 4.9-68).	The quantity and geochemical properties of development rock generated during operations for Alternative 3 is the same as Alternative 1, but with TSF located in the upper EFSFSR valley. Due to relocation of the TSF for Alternative 3, tailings material would be placed in the EFSFS rather than the Meadow Creek drainage. However, the quantity and geochemical properties of the tailings material would be generally the same as for Alternative 1. The TSF embankment would contain the same amount of development rock planned for Alternatives 1 and 2 (61 MT, of which 0% is PAG). The Hangar Flats DRSF would be eliminated with all development rock (81 MT of which 5.9% is PAG) being placed in a new DRSF on the downstream side of the TSF. The volumes and locations of the Fiddle and West End DRSFs would be similar to Alternative 1 (p. 4.9-97).	The quantity, geochemical properties and disposition of development rock and tailings material generated during operations for Alternative 4 is the same as Alternative 1.	No new mining waste would be generated. Mineralized waste from historical mining operations will remain in several legacy facilities within Meadow Creek valley including the SODA and Bradley tailings (10 MT) and Hecla Heap (1 MT). Material within these facilities is generally non-acid generating but capable of leaching arsenic, antimony, aluminum, manganese, sulfate, total dissolved solids, copper, cadmium and zinc above water quality criteria (Section 4.9.2.1.1.4). The legacy facilities are currently impacting groundwater and surface water within Meadow Creek and EFSFSR drainages. Other legacy mine features such as historical waste rock piles also may contribute mass loading to surface water and groundwater. The potential for water quality improvement through removal and repurposing of legacy materials would not exist under Alternative 5.

Origin of Text	Issue	Indicator	Baseline Conditions	Alternative 1	Alternative 2	Alternative 3	Alternative 4	Alternative 5
				Underdrains would also be installed beneath the liner to collect groundwater flow from springs and seeps, collect any leakage from the tailings, and convey the water beneath the TSF. If installed properly, the engineered liner would minimize seepage through the base of the TSF. However, there could be manufacturing defects, post-installation damage, holes in the liner, or weaknesses along the seams that may allow minor amounts of seepage to occur (p 4.9-58).	A geosynthetic cover would be installed on top of the Hangar Flats and Fiddle DRSFs to restrict infiltration. As a result, solute loading from the development rock would be reduced relative to Alternative 1 (p. 4.9-93), (but some infiltration would still occur) (p. 4.9-71). Under Alternative 2, restricting infiltration through the Fiddle DRSF by installing a synthetic cover would improve surface water quality in Fiddle Creek. However, post closure arsenic concentrations at YP-T-11 (0.03 mg/L to 0.06 mg/L) (Brown and Caldwell 2019b) would still exceed both the arsenic water quality standard of 0.01 mg/L (p. 4.9-72). The quantity of tailings generated during operations would be the same as Alternative 1. The geochemical properties of the tailings material remain the same as Alternative 1. The liner design was modified for Alternative 2 to include a drainage layer that would function as a leakage collection and recovery system. The Alternative 2 design consists of a composite liner with a leakage collection system between the primary and secondary geomembranes. If the Alternative 2 liner system is designed properly, installed according to specifications, and functions as intended, seepage through the liner would be low compared to the natural rate of groundwater recharge, helping to maintain existing groundwater quality beneath the TSF(p 4.9-92).			
DEIS Table ES4-1	**The SGP may affect soil and water resources through acid rock drainage and/or metals leaching from mineralized**	Lithologic composition of final pit walls and exposure of potentially acid-generating material.	No known mapped extent of exposed lithologies in existing Yellow Pine and West End pits.	Area of Potentially acid-generating rock exposed in pit walls: • Hangar Flats Pit (37,076 m^2, 5.1% of total surface area).	Same as Alternative 1.	Same as Alternative 1.	Same as Alternative 1.	Not applicable.

Origin of Text	Issue	Indicator	Baseline Conditions	Alternative 1	Alternative 2	Alternative 3	Alternative 4	Alternative 5
	rock in the mine pits, DRSFs, and TSF.			• West End Pit. (3,333 m^2, 0.4%). • Midnight Area Pit (262 m^2, 0.1%). • Yellow Pine Pit (120, 424m^2, 10.5%)				
Midas Gold Suggested Edits	**The SGP may affect soil and water resources through acid rock drainage and/or metals leaching from mineralized rock in the mine pits, DRSFs, and TSF.**	Lithologic composition of final pit walls and exposure of potentially acid-generating material.	Surface area of exposed PAG in the existing Yellow Pine and West End pits has not been estimated. However, the neutral to alkaline pH values observed in streams near the mine site indicate that the geochemistry of the natural mineralized deposits is not conducive to widespread acid rock drainage (page 3.9-22).	The majority of the pit wall surface areas will consist of non-acid generating material. The total pit wall surface area that is predicted to be PAG includes: • Hangar Flats Pit (37,076 m^2, 5.1% of total surface area). • West End Pit. (3,333 m^2, 0.4%). • Midnight Area Pit (262 m^2, 0.1%). • Yellow Pine Pit (120, 424m^2, 10.5%) For the Hangar Flats, West End and Midnight Area pits, the quantity of PAG exposed in the pit walls would be limited and PAG material will be concentrated in the lower portions of the pit submerged by the pit lake. Submerging the PAG wall rock could help reduce surface water quality impacts by limiting further oxidation of the PAG material after it has been submerged (p. 4.9-13). The majority of PAG exposed in the Yellow Pine pit would be submerged after backfill material becomes saturated limiting further oxidation of the PAG material after it has been submerged.	Exposure of PAG in the pit walls would be the same for Alternative 2 as for Alternative 1, with the exception of the Midnight Area pit that would be backfilled at closure. In addition, the Hangar Flats pit would be partially backfilled. Backfilling will reduce the exposed surface area of the Hangar Flats and Midnight area pit walls and reduce surface water quality impacts by limiting further oxidation of the PAG material after it has been submerged.	Same as Alternative 1.	Same as Alternative 1.	Surface area of exposed PAG in the existing Yellow Pine and West End pits will remain the same as baseline conditions.
DEIS Table ES4-1	**The SGP may affect soil and water resources through acid rock drainage and/or metals leaching from mineralized rock in the mine pits, DRSFs, and TSF.**	Removal of legacy mine tailings and waste rock. Predicted leachate chemistry of development rock and tailings.	Legacy waste in Meadow Creek valley from historical mining operations, including SODA and Bradley tailings. Not Applicable.	SODA and Bradley tailings removed and repurposed. Development Rock: • Generally non-acid generating but capable of leaching arsenic, antimony, aluminum, manganese, sulfate, total dissolved solids, copper, cadmium and zinc above water quality criteria (Section 4.9.2.1.1.4). Tailings: • Anticipated tailings process water chemistry and	SODA and Bradley tailings removed and repurposed. Same as Alternative 1.	No removal of SODA and Bradley Tailings. Same as Alternative 1.	SODA and Bradley tailings removed and repurposed. Same as Alternative 1.	No removal of SODA and Bradley Tailings. Not applicable.

Origin of Text	Issue	Indicator	Baseline Conditions	Alternative 1	Alternative 2	Alternative 3	Alternative 4	Alternative 5
				leachate chemistry provided in **Table 4.9-9**.				
Midas Gold Suggested Edits	**The SGP may affect soil and water resources through acid rock drainage and/or metals leaching from mineralized rock in the mine pits, DRSFs, and TSF.**	Removal of legacy mine tailings and waste rock. Predicted leachate chemistry of development rock and tailings.	Legacy waste in Meadow Creek valley from historical mining operations, including SODA and Bradley tailings and Hecla Heap. In addition, legacy development rock is located throughout the EFSFSR drainage. Material within the legacy facilities is generally non-acid generating but capable of leaching arsenic, antimony, aluminum, manganese, sulfate, total dissolved solids, copper, cadmium and zinc above water quality criteria (Section 4.9.2.1.1.4). The legacy facilities are currently impacting groundwater and surface water within Meadow Creek and EFSFSR drainages.	Alternative 1 includes relocation and/or reprocessing legacy materials in the lower Meadow Creek basin – SODA, Bradley Tailings, and Hecla Heap, which would remove them as a source of arsenic and antimony to surface and groundwater. By removing, reprocessing, and properly disposing of these legacy waste materials, several existing sources of metals leaching would either be eliminated from the mine site or disposed in an on-site facility (such as the TSF embankment) where further degradation of water quality is less likely. The surface water and groundwater quality of the mine would be altered as a result of these actions (p 4.9-17). Development rock would be generally non-acid generating but capable of leaching arsenic, antimony, aluminum, manganese, sulfate, total dissolved solids, copper, cadmium and zinc above water quality criteria (Section 4.9.2.1.1.4). Tailings material would be non-acid generating but would have a potential to leach some metals above water quality criteria. Tailings process water chemistry and leachate chemistry is provided in Table 4.9-9.	As with Alternative 1, Alternative 2 includes relocation and/or reprocessing legacy materials in the lower Meadow Creek basin – SODA, Bradley Tailings, and Hecla Heap, which would remove them as a source of arsenic and antimony to surface and groundwater. By removing, reprocessing, and properly disposing of these legacy waste materials, several existing sources of metals leaching would either be eliminated from the mine site or disposed in an on-site facility (such as the TSF embankment) where further degradation of water quality is less likely. The surface water and groundwater quality of the mine would be altered as a result of these actions (p 4.9-17). The geochemical properties of new development rock and tailings material and the potential for ARDML are the same as for Alternative 1.	Due to relocation of the TSF, Alternative 3 would not include removal of the SODA or Bradley tailings. Not removing and repurposing these legacy mine wastes would result in continued impacts to surface water and groundwater from these facilities and would change future predictions of surface water and groundwater quality compared to Alternatives 1 and 2 (p. 4.9-97). The geochemical properties of new development rock and tailings material and the potential for ARDML are the same as for Alternative 1.	As with Alternative 1, Alternative 4 includes relocation and/or reprocessing legacy materials in the lower Meadow Creek basin – SODA, Bradley Tailings, and Hecla Heap. By removing, reprocessing, and properly disposing of these legacy waste materials, several existing sources of metals leaching would either be eliminated from the mine site or disposed in an on-site facility (such as the TSF embankment) where ongoing degradation of water quality is less likely (p 4.9-17). The geochemical properties of new development rock and tailings material and the potential for ARDML are the same as for Alternative 1.	Mineralized waste from historical mining operations will remain in several legacy facilities within Meadow Creek valley including the SODA and Bradley tailings (10 MT) and Hecla Heap (1 MT). Material within these facilities is generally non-acid generating but capable of leaching arsenic, antimony, aluminum, manganese, sulfate, total dissolved solids, copper, cadmium and zinc above water quality criteria (Section 4.9.2.1.1.4). The legacy facilities are currently impacting groundwater and surface water within Meadow Creek and EFSFSR drainages. Other legacy mine features such as historical waste rock piles also may continue to contribute mass loading to surface water and groundwater. The potential for water quality improvement through removal and repurposing of legacy materials would not exist under Alternative 5.
DEIS Table ES4-1	**The SGP may cause changes in surface water and groundwater quality.**	Surface water quality parameters (e.g., pH, temperature, major ions, total dissolved solids, metals, sediment content, and organic carbon).	EFSFSR[1]: • Aluminum (0.010 to 0.016 mg/L). • Antimony (0.012 to 0.031 mg/L). • Arsenic (0.025 to 0.063 mg/L). • Copper (0.00023 to 0.00032 mg/L). • Mercury (2.4E-6 to 5.7E-6 mg/L). • Summer Max Temperature(13.4 to 17.4°C). Access Roads:	EFSFSR Post Closure[1,2]: • Aluminum (0.003 to 0.014 mg/L). • Antimony (0.009 to 0.026 mg/L). • Arsenic (0.059 to 0.09 mg/L). • Copper (0.00005 to 0.00268 mg/L). • Mercury (2.04E-4 to 3.9E-4mg/L). • Summer Max Temperature(13.9 to 22.3°C). Access Roads:	EFSFSR Post Closure[1,2]: • Aluminum (0.007 to 0.018 mg/L). • Antimony (0.009 to 0.026 mg/L). • Arsenic (0.016 to 0.049 mg/L). • Copper (0.00005 to 0.00029 mg/L). • Mercury (5.9E-6 to 1.8E-5 mg/L). • Summer Max Temperature(13.9 to 21.7°C). Access Roads:	EFSFSR Post Closure[1,2]: • Aluminum (0.00047 to 0.020 mg/L). • Antimony (0.017 to 0.033 mg/L). • Arsenic (0.083 to 0.1 3mg/L). • Copper (0.000033 to 0.010 mg/L). • Mercury (7.7E-5 to 0.00014 mg/L). • Summer Max Temperature(23 to 25.5°C). Access Roads:	EFSFSR Post Closure: • Same as Alternative 1 Access Roads: • Mine access roads would cross 50 different streams. • 6.5 miles (16 percent) of mine operations access route within 100 feet of streams. • Sedimentation and fugitive dust similar in magnitude to Alternative 1, but would differ in location due to exclusive	Same as existing conditions.

Midas Gold Suggested Edits (white rows) on DEIS Table ES4-1 Summary and Comparison of the Potential Environmental Impacts Associated with the Significant Issues by Alternative (grey rows)

DISCLAIMER: This table is a limited summary and comparison of effects associated with the alternatives evaluated in the Draft EIS.

Origin of Text	Issue	Indicator	Baseline Conditions	Alternative 1	Alternative 2	Alternative 3	Alternative 4	Alternative 5
			• No mine-related traffic on existing Forest Service roads. Utilities: • No power line upgrades or new lines constructed.	• Mine access roads would cross 71 different streams. • 1.69 miles (4 percent) of mine operations access route w/in 100 feet of streams. • Sedimentation and fugitive dust predicted to be within the normal range of properly maintained Forest Service roads. Utilities: • Mine utility work would cross37 different streams. • Potential for transmission line-related erosion and sedimentation would be minimal.	• Mine access roads would cross 69 different streams. • 1.56 miles (4 percent) of mine operations access route within 100 feet of streams. • Sedimentation and fugitive dust likely lower than Alternative 1 due to approximate 31 percent reduction in heavy vehicle trips during mine operations. Utilities: • Mine utility work would cross36 different streams. • Potential for transmission line-related erosion and sedimentation would be minimal.	• Stream crossings same as Alternative 1. • 1.24 miles (2.8 percent) of mine operations access route within 100 feet of streams. Utilities: •Same as Alternative 1.	use of YPR for mine access. Utilities: • Same as for Alternative 1 except for communication sites that would be constructed/maintained using helicopters, limiting the need for new access roads to these facilities.	
Midas Gold Suggested Edits	**The SGP may cause changes in surface water and groundwater quality.**	Surface water quality parameters (e.g., pH, temperature, major ions, total dissolved solids, metals, sediment content, and organic carbon).	Existing Conditions water quality at EFSFSR assessment nodes YP-SR-2, -4, -6, -8, and –10: • Aluminum (0.010 to 0.016 mg/L). • Antimony (0.012 to 0.031 mg/L). • Arsenic (0.025 to 0.063 mg/L). • Copper (0.00023 to 0.00032 mg/L). • Mercury (2.4E-6 to 5.7E-6 mg/L). • Summer Max Temperature(13.4 to 17.4°C). Under baseline conditions, antimony and arsenic are above the Idaho water quality criteria for human health (water supply and fish consumption) in the EFSFSR at the site, and arsenic and mercury are above Idaho criteria in Sugar Creek. As a result, many stream segments at the site are listed as impaired for arsenic, antimony, and/or mercury in the Idaho 2016 Integrated 305(b) Report. There are no Idaho surface water criteria for aluminum; values are included here	Projected maximum annual average post-closure water quality at EFSFSR assessment nodes YP-SR-2, -4, -6, -8, and -10: • Aluminum (0.003 to 0.014 mg/L). • Antimony (0.009 to 0.026 mg/L). • Arsenic (0.059 to 0.09 mg/L). • Copper (0.00005 to 0.00268 mg/L). • Mercury (2.04E-4 to 3.9E-4mg/L). • Summer Max Temperature (13.9 to 22.3°C). These values do not consider effects of water treatment. Maximum annual average values may not necessarily represent typical or long-term water quality conditions. See Section 4.9 for more detailed evaluation. Alternative 1 is not projected to result in better water quality in EFSFSR with respect to arsenic, antimony, and mercury compared to baseline conditions. This is attributed to the fact that water quality modeling for Alternative 1 did not include the effects of water	Projected maximum annual average post-closure water quality at EFSFSR assessment nodes YP-SR-2, -4, -6, -8, and -10: • Aluminum (0.007 to 0.018 mg/L). • Antimony (0.009 to 0.026 mg/L). • Arsenic (0.016 to 0.049 mg/L). • Copper (0.00005 to 0.00029 mg/L). • Mercury (5.9E-6 to 1.8E-5 mg/L). • Summer Max Temperature (13.9 to 21.7°C). These values do not consider effects of water treatment. Maximum annual average values may not necessarily represent typical or long-term water quality conditions. See Section 4.9 for more detailed evaluation. There are no Idaho surface water criteria for aluminum; values are included here because they are relevant to the fisheries analysis. Alternative 2 was developed to include management and treatment of any mine-impacted water prior to	Projected annual average post-closure water quality at EFSFSR assessment nodes YP-SR-2, -4, -6, -8, and -10: • Aluminum (0.00047 to 0.020 mg/L). • Antimony (0.017 to 0.033 mg/L). • Arsenic (0.083 to 0.13mg/L). • Copper (0.000033 to 0.010 mg/L). • Mercury (7.7E-5 to 0.00014 mg/L). • Summer Max Temperature (23 to 25.5°C). Compared to Alternative 3, Alternative 1 and 2 water quality is better in the EFSFSR with respect to arsenic, antimony, and mercury. This is attributed to the fact that legacy facilities (SODA and Bradley tailings) will not be removed and will continue to contribute mass load to groundwater and surface water. These values do not consider effects of water treatment. Maximum annual average values may not necessarily represent typical or long-term water quality conditions. See	Projected maximum annual average post-closure water quality at EFSFSR assessment nodes YP-SR-2, -4, -6, -8, and –10 is the same as for Alternative 1. These values do not consider effects of water treatment. Maximum annual average values may not necessarily represent typical or long-term water quality conditions. See Section 4.9 for more detailed evaluation. The treatment basis developed for Alternative 2 could be adapted for this alternative. Alternative 4 would require substantial upgrades and widening of portions of the Stibnite Road, including construction in close proximity to EFSFSR. All traffic to the mine site would also use this access, rather than the Burntlog route in Alternatives 1, 2, and 3. This would yield an increased risk to water quality from increased traffic along Johnson Creek Road and Stibnite Road compared to the Burntlog route which would generally be located much farther away from perennial streams.	Surface water quality conditions would remain the same as Existing Conditions. Alternatives 1, 2, and 4 include relocation and/or reprocessing legacy materials in the lower Meadow Creek basin, which would remove them as a source of arsenic and antimony to surface and groundwater. This potential for surface water quality improvement would not exist under Alternative 5. There would be no new or upgraded roads or utilities.

Origin of Text	Issue	Indicator	Baseline Conditions	Alternative 1	Alternative 2	Alternative 3	Alternative 4	Alternative 5
			because they are relevant to the fisheries analysis. IDEQ temperature standards (Section 58.01.02) are evaluated for different species, life stages, seasons, and statistics. The maximum temperature protective of the COLD use is 22C, and under baseline conditions all of the reaches in the headwaters of the EFSFSR (upstream and including Sugar Creek) are compliant with this criterion when compared to the simulated daily maximums for the maximum weekly summer condition (Table 4.9-11, Existing Conditions/No Action). The average temperature for COLD is 19C, and all of the reaches are compliant with this criterion when compared to the simulated daily average for the maximum weekly summer condition (Table 4.9-11). For the SS use and Bulltrout use, the 13C criterion can be compared to the daily maximum for the maximum weekly summer condition and 9C can be compared to the daily average for the maximum weekly fall condition to assess use (species spawn at different times and more thorough comparisons are provided in the DEIS). Under baseline conditions, all of the evaluated streams except Fiddle Creek have daily maximum temperatures for the maximum weekly summer condition exceeding 13C (Table 4.9-11). Only reaches in upper EFSFSR (above Meadow Creek) and in Fiddle Creek have daily average temperatures for the maximum weekly fall condition that are less than 9C (Table 4.9-11).	treatment of mine-impacted water. There are no Idaho surface water criteria for aluminum; values are included here because they are relevant to the fisheries analysis. The treatment basis developed for Alternative 2 could be adapted for this alternative. As with Existing Conditions, for Alternative 1 for the long-term post-closure condition (Table 4.9-11, EOY112), none of the reaches have simulated daily temperature maximums for the maximum weekly summer condition that exceed the COLD criterion of 22C; Meadow Creek downstream of East Fork Meadow Creek has predicted daily averages for the maximum weekly summer condition 0.2C higher than the 19C criterion. As with the baseline condition, none of the stream reaches meet the SS/Bulltrout criterion of 13C as the daily maximum temperatures for the maximum weekly summer condition (Table 4.9-11). Fiddle Creek has predicted daily averages for the maximum weekly fall condition 0.2C higher than the 9C criterion (Table 4.9-11). The Upper EFSFSR is predicted to have an average of 9.1C for this period (Table 4.9-11). Roads would be constructed and managed with conventional stormwater management practices. Risk of water quality impacts from roads can be minimized with proper design, construction, and maintenance. Traffic-related dust and erosion/sedimentation would be within the normal range of properly maintained National Forest System roads. Power line upgrades would largely use existing routes and access. New power lines would be installed using conventional erosion prevention practices.	discharge to surface waters. The design basis for treatment included attaining all applicable Idaho surface water criteria. Active treatment proposed by Midas Gold for Alternative 2 is consistent with treatment approaches that have been proposed, installed, and demonstrated on other similar applications for treating arsenic, antimony, and mercury. These processes can easily be adapted and expanded with additional unit processes to enhance treatment if conditions at the mine site are not sufficient to achieve the required level of removal. (p. 4.9-70) During the mine operational period, treating water would result in lower antimony and arsenic concentrations in the EFSFSR. Modeling results suggest that water treatment would decrease predicted arsenic concentrations in the EFSRSR, particularly during mining years 7 through 10 when peak arsenic levels are expected to occur. For example, the maximum annual average arsenic concentration at YP-SR-10 would decrease from 0.047 mg/L without treatment to around 0.015 mg/L with treatment, which is less than the average baseline arsenic concentration at this node (0.025 mg/L). Similar reductions in arsenic concentrations are predicted to occur at the other four EFSFSR assessment nodes, with the predicted concentrations consistently falling below baseline levels. (p. 4.9-70) Alternative 2 is projected to result in better water quality in EFSFSR due to lower concentrations of antimony, arsenic, and mercury compared to baseline conditions.	Section 4.9 for more detailed evaluation. There are no Idaho surface water criteria for aluminum; values are included here because they are relevant to the fisheries analysis. The treatment basis developed for Alternative 2 could be adapted for this alternative. For Alternative 3 for the long-term, post closure period (Table 4.9-23, EOY112), the EFSFSR from its headwaters to Sugar Creek is predicted to exceed the COLD criterion of 22C based on the daily maximums for the maximum weekly summer condition, but Meadow Creek would be compliant. Nearly all of the simulated reaches would be compliant with the daily average criterion for the maximum weekly summer condition of 19C except Meadow Creek below East Fork Meadow Creek which has a simulated value 0.1C higher than the criterion (Table 4.9-23). As with Alternative 1 and 2 and baseline, none of the simulated reaches are compliant with a criterion of 13C for the SS/Bulltrout uses based on the daily maximum temperatures for the maximum weekly summer condition (Table 4.9-23). Under this alternative, none of the simulated streams except for Fiddle Creek would be compliant with the 9C daily average temperatures for the maximum weekly fall condition (Table 4.9-23). Effects for roads and utilities would be the same as for Alternative 1.	Temperatures for this Alternative are the same as Alternative 1. Effects for utilities would be the same as for Alternative 1.	

Origin of Text	Issue	Indicator	Baseline Conditions	Alternative 1	Alternative 2	Alternative 3	Alternative 4	Alternative 5
					For Alternative 2, the reaches with simulated daily temperature maximums for the maximum weekly summer condition that exceed the COLD criterion of 22C are limited to Meadow Creek in the long-term, post closure period with simulated maximums of 22.7C (Table 4.9-19, EOY112). All of the simulated reaches would be compliant with the daily average criterion for the maximum weekly summer condition of 19C (Table 4.9-19). As with Alternative 1 and baseline, none of the simulated reaches are compliant with a criterion of 13C for the SS/Bulltrout uses based on the daily maximum temperatures for the maximum weekly summer condition (Table 4.9-19). As with baseline, the upper EFSFSR above Meadow Creek would be compliant with the 9C daily average temperatures for the maximum weekly fall condition, and Fiddle Creek would be within 0.2C of the criterion (Table 4.9-19). Effects for roads and utilities would be the same as for Alternative 1.			
DEIS Table ES4-1	**The SGP may cause changes in surface water and groundwater quality.**	Groundwater quality parameters (e.g., pH, major ions, total dissolved solids, metals).	TSF[1]: • pH (7.57). • Arsenic (0.006 mg/L). • Antimony (0.0020 mg/L). • Mercury (5.6E-7 mg/L). Hangar Flats DRSF[1]: • pH (6.90). • Arsenic (0.006 mg/L). • Iron (2.63 mg/L). • Manganese (2.63 mg/L). West End DRSF[1]: • pH (8.15). • Arsenic (0.30 mg/L). • Antimony (0.019 mg/L). • Nitrate+nitrite (0.050 mg/L). Fiddle DRSF[1]: • pH (7.21).	TSF[1]: • pH (7.57). • Arsenic (0.007 mg/L). • Antimony (0.002 mg/L). • Mercury (1.8E-6 mg/L). Hangar Flats DRSF[1]: • pH (6.75). • Arsenic (0.23 mg/L). • Iron (1.75 to 2.01 mg/L). • Manganese (2.41 to 2.50mg/L). West End DRSF[1]: • pH (8.15). • Arsenic (0.70 mg/L). • Antimony (0.13 mg/L). • Nitrate+nitrite (0.05 to 19.7mg/L). Fiddle DRSF[1]:	TSF: • Same as Alternative 1 Hangar Flats DRSF[1]: • pH (6.76). • Arsenic (0.36 mg/L). • Iron (1.69 mg/L). • Manganese (2.39 mg/L). West End DRSF: • Eliminated (same as existing conditions). Fiddle DRSF[1]: • pH (7.37). • Arsenic (0.02 mg/L). Yellow Pine Pit Backfill[1]: • Same as Alternative 1.	TSF[1]: • No change to existing groundwater conditions in the upper. EFSFSR EFSFSR DRSF[1]: • pH (7.1). • Arsenic (0.089 mg/L). • All other constituents below groundwater standards. West End DRSF: • Same as Alternative 1. Fiddle DRSF: • Same as Alternative 1. Yellow Pine Pit Backfill: • Same as Alternative 1.	Same as Alternative 1.	Same as existing conditions.

Origin of Text	Issue	Indicator	Baseline Conditions	Alternative 1	Alternative 2	Alternative 3	Alternative 4	Alternative 5
			• Arsenic (0.087 mg/L). Yellow Pine Pit Backfill[1]: • pH (8.54). • Arsenic (0.32 mg/L). • Antimony (0.010 mg/L). • Mercury (3.8E-6 mg/L).	• pH (7.45). • Arsenic (0.015 mg/L). Yellow Pine Pit Backfill[1]: • pH (8.6 to 8.9). • Arsenic (2.12 mg/L). • Antimony (0.45 mg/L). • Mercury (0.0034 mg/L)	Midnight Area Pit Backfill[1]: • pH (8.7 to 8.9). • Arsenic (2.2 mg/L). • Mercury (0.0042 mg/L). • Antimony (0.42 mg/L).			
Midas Gold Suggested Edits	**The SGP may cause changes in surface water and groundwater quality.**	Groundwater quality parameters (e.g., pH, major ions, total dissolved solids, metals).	Existing Conditions groundwater quality at location of proposed facilities (see Section 4.9 for detailed evaluation): TSF: • pH (7.57). • Arsenic (0.006 mg/L). • Antimony (0.0020 mg/L). • Mercury (5.6E-7 mg/L). Hangar Flats DRSF: • pH (6.90). • Arsenic (0.006 mg/L). • Iron (2.63 mg/L). • Manganese (2.63 mg/L). West End DRSF: • pH (8.15). • Arsenic (0.30 mg/L). • Antimony (0.019 mg/L). • Nitrate+nitrite (0.050 mg/L). Fiddle DRSF: • pH (7.21). • Arsenic (0.087 mg/L). Yellow Pine Pit Backfill1: • pH (8.54). • Arsenic (0.32 mg/L). • Antimony (0.010 mg/L). • Mercury (3.8E-6 mg/L). While there are differences in the facility model water quality predictions for each of the alternatives compared to the existing conditions, the predictions are not directly comparable and need to be evaluated in the context of the overall site wide water chemistry model. For example, constituent concentrations increased in the Hangar Flats pit lake in	Projected post-closure groundwater quality at location of proposed facilities (see Section 4.9 for detailed evaluation): TSF: • pH (7.57). • Arsenic (0.007 mg/L). • Antimony (0.002 mg/L). • Mercury (1.8E-6 mg/L). Hangar Flats DRSF1: • pH (6.75). • Arsenic (0.23 mg/L). • Iron (1.75 to 2.01 mg/L). • Manganese (2.41 to 2.50mg/L). West End DRSF1: • pH (8.15). • Arsenic (0.70 mg/L). • Antimony (0.13 mg/L). • Nitrate+nitrite (0.05 to 19.7mg/L). Fiddle DRSF1: • pH (7.45). • Arsenic (0.015 mg/L). Yellow Pine Pit Backfill1: • pH (8.6 to 8.9). • Arsenic (2.12 mg/L). • Antimony (0.45 mg/L). • Mercury (0.0034 mg/L). Predicted values shown are the highest observed individual values from the Site-Wide Water Chemistry modeling and do not necessarily represent typical or long-term conditions over the mine life. All predicted concentrations presented in this section are based on the average precipitation model scenario. Concentrations are similar for	Projected post-closure groundwater quality at location of proposed facilities (see Section 4.9 for detailed evaluation): TSF: • Same as Alternative 1 Hangar Flats DRSF1: • pH (6.76). • Arsenic (0.36 mg/L). • Iron (1.69 mg/L). • Manganese (2.39 mg/L). West End DRSF: • Eliminated (same as existing conditions). Fiddle DRSF1: • pH (7.37). • Arsenic (0.02 mg/L). Yellow Pine Pit Backfill1: • Same as Alternative 1. Midnight Area Pit Backfill1: • pH (8.7 to 8.9). • Arsenic (2.2 mg/L). • Mercury (0.0042 mg/L). • Antimony (0.42 mg/L). Predicted values shown are the highest observed individual values from the Site-Wide Water Chemistry modeling and do not necessarily represent typical or long-term conditions over the mine life. All predicted concentrations presented in this section are based on the average precipitation model scenario. Concentrations are similar for the below average and above average precipitation scenarios, demonstrating that	Projected post-closure groundwater quality at location of proposed facilities (see Section 4.9 for detailed evaluation): TSF: • No change to existing groundwater conditions in the upper EFSFSR. EFSFSR DRSF: • pH (7.1). • Arsenic (0.089 mg/L). • All other constituents below groundwater standards. West End DRSF: • Same as Alternative 1. Fiddle DRSF: • Same as Alternative 1. Yellow Pine Pit Backfill: • Same as Alternative 1. Predicted values shown are the highest observed individual values from the Site-Wide Water Chemistry modeling and do not necessarily represent typical or long-term conditions over the mine life. All predicted concentrations presented in this section are based on the average precipitation model scenario. Concentrations are similar for the below average and above average precipitation scenarios, demonstrating that groundwater chemistry is unlikely to be affected by the amount of precipitation and subsequent recharge in any given year (p 4.9-58).	Projected post-closure groundwater quality is the same as for Alternative 1.	Groundwater quality conditions would remain the same as Existing Conditions. Alternatives 1, 2, and 4 include relocation and/or reprocessing legacy materials in the lower Meadow Creek basin, which would remove them as a source of arsenic and antimony to surface and groundwater. This potential for groundwater quality improvement would not exist under Alternative 5.

Origin of Text	Issue	Indicator	Baseline Conditions	Alternative 1	Alternative 2	Alternative 3	Alternative 4	Alternative 5
			Alternative 2 in comparison to Alternative 1 since Meadow Creek was routed around the pit and the pit was partially backfilled with development rock. Although the concentrations were simulated to increase in the pit lake in Alternative 2, the mitigation strategies applied (e.g., partially covering the Hangar Flats DRSF) reduced the overall loadings to Meadow Creak from the Hangar Flats pit lake resulting in an overall improvement to predicted constituent concentrations in Meadow Creek. Therefore, direct comparison of predicted concentrations from mine site facilities does not necessarily express the overall change occurring as a result of differences in the mine plan between each of the options. A holistic site wide evaluation is required to compare options. The differences in water quality for each of the options is more appropriately addressed at the water quality nodes downstream of the project footprint.	the below average and above average precipitation scenarios, demonstrating that groundwater chemistry is unlikely to be affected by the amount of precipitation and subsequent recharge in any given year (p 4.9-58) Maximum concentrations are not necessarily the most appropriate way to evaluate changes to water quality. For example, the maximum concentrations in the Yellow Pine pit backfill occur during the first year of post-closure but rapidly decrease. These concentrations represent the peak concentration in the first year of post-closure and not the remaining 99 post-closure years. In addition, a large concentration does not necessarily imply a large load to the downstream assessment locations. For example, when peak concentrations occur in the Yellow Pine Pit, the contribution of this water at YP-SR-2 (i.e., the next downstream assessment node) only accounts for 0.3% of the total flow at this location when the maximum predicted concentration occurs. Therefore, changes to water quality for each of the alternatives are more appropriately evaluated at the downstream assessment nodes.	groundwater chemistry is unlikely to be affected by the amount of precipitation and subsequent recharge in any given year (p 4.9-58) Site facility predictions for several parameters are similar to the Proposed Action model. While the mitigation strategies (e.g., capping and covering the DRSFs) result in a similar water quality in the facilities, these strategies increase the proportion of non-contact drainage relative to contact drainage. As a result, the overall loadings are reduced in Alternative 2 in comparison to Alternative 1 resulting in decreased concentrations at downstream assessment locations. In addition, treatment of site contact water for Alternative 2 during operations, reclamation/closure and post-closure also reduces loadings and improves water quality at downstream assessment locations relative to the other alternatives.			
DEIS Table ES4-1	**The SGP may cause increased mercury methylation in adjacent waterbodies through SGP- related emissions and activities.**	Predicted impact on methylmercury production.	Methylmercury not detected in 90 percent of baseline stream samples (<0.1 ng/L).	Post closure Methylmercury concentrations up to 7.8 ng/L in the EFSFSR without water treatment.	No detectable change in Methylmercury with water treatment.	Post closure Methylmercury concentrations up to 2.8 ng/L in the EFSFSR without water treatment.	Same as Alternative 1.	Same as existing Conditions.
Midas Gold Suggested Edits	**The SGP may cause increased mercury methylation in adjacent waterbodies through SGP- related emissions and activities.**	Predicted impact on methylmercury production.	Methylmercury not detected in 90 percent of baseline stream samples (<0.1 ng/L).	A detailed characterization was not conducted to predict potential mercury methylation. A simple analysis based upon observed ratios of methylmercury to total mercury in Sugar Creek suggests that methylmercury could be present at concentrations up to 7.8 ng/L in EFSFSR, however, the analysis does not consider the effect of treatment proposed for water in the TSF which would reduce the amount of mercury	Analogous simple estimate was conducted as for Alternative 1. Outside of the mine pits, active and passive water treatment would maintain surface water dissolved mercury concentrations at or below baseline levels. Alternative 2 would have no discernible effect on methylmercury concentrations in mine site streams. (p. 4.9-84)	Same as Alternative 1, but highest estimated concentration is 2.8 ng/L in EFSFSR. (p. 4.9-108)	Same as Alternative 1.	Same as baseline conditions.

Midas Gold Suggested Edits (white rows) on DEIS Table ES4-1 Summary and Comparison of the Potential Environmental Impacts Associated with the Significant Issues by Alternative (grey rows)
DISCLAIMER: This table is a limited summary and comparison of effects associated with the alternatives evaluated in the Draft EIS.

Origin of Text	Issue	Indicator	Baseline Conditions	Alternative 1	Alternative 2	Alternative 3	Alternative 4	Alternative 5
				moving to surface waters (p. 4.9-44).				

Midas Gold Suggested Edits (white rows) on DEIS Table ES4-1 Summary and Comparison of the Potential Environmental Impacts Associated with the Significant Issues by Alternative (grey rows)

DISCLAIMER: This table is a limited summary and comparison of effects associated with the alternatives evaluated in the Draft EIS.

Origin of Text	Issue	Indicator	Baseline Conditions	Alternative 1	Alternative 2	Alternative 3	Alternative 4	Alternative 5
	Vegetation							
DEIS Table ES4-1	**The SGP would remove whitebark pine individuals, and habitat conversion associated with the SGP would impact seed production, dispersal, and establishment of this species.**	Number of acres of whitebark pine occupied habitat impacted by the SGP.	Approximately 2,310 acres of occupied whitebark pine habitat were identified within the analysis area.	Alternative 1 would remove an estimated 257.8 acres of occupied whitebark pine habitat (11.2% of occupied habitat in the analysis area). This would be the largest extent of removal under the action alternatives.	Alternative 2 would remove an estimated 243.2 acres of occupied whitebark pine habitat (10.5% of occupied habitat in the analysis area). This would be the second largest extent of removal under the action alternatives.	Alternative 3 would remove an estimated 237.2 acres of occupied whitebark pine habitat (10.2% of occupied habitat in the analysis area). This would be the second smallest extent of removal under the action alternatives.	Alternative 4 would remove an estimated 123.6 acres of occupied whitebark pine habitat (5.4% of occupied habitat in the analysis area). This would be the smallest extent of removal under the action alternatives.	None.
Midas Gold Suggested Edits	**The SGP would remove whitebark pine individuals, and habitat conversion associated with the SGP would impact seed production, dispersal, and establishment of this species.**	Number of acres of whitebark pine occupied habitat impacted by the SGP.	Approximately 2,310 acres of occupied whitebark pine habitat occurs within the analysis area primarily along the ridgetops in the vicinity of the mine area.	Alternative 1 would remove an estimated 257 acres of occupied whitebark pine habitat (11.2% of occupied habitat in the analysis area). Disturbance in this occupied habitat would be primarily associated with the transmission line and construction of the new segment of Burntlog Road. Forest Service designated mitigation measures FS-56, FS-63, and FS-70 have been required to minimize the impacts to whitebark pine occupied habitat (Appendix D-1, Table D-1). Decommissioning and reclamation of portions of these features at the end of the project will allow for this species to recolonize where suitable habitat exists. During mining and reclamation, areas disturbed by historic mining, construction, and operation activities would be revegetated with seed mixtures would consist of certified weed-free native herb and grass species, adjusted to fit elevation and aspect ranges in the area, and would be approved by the Forest Service. Native trees and shrubs also would be planted, as well as disease-resistant whitebark pine seedlings. Once a preferred alternative is identified by the USFS, a biological assessment will be completed in compliance with the Endangered Species Act, which may identify additional mitigation measures to further avoid and minimize the impacts to whitebark pine and its habitat.	Alternative 2 would remove an estimated 243 acres of occupied whitebark pine habitat (10.5% of occupied habitat in the analysis area). Proposed mitigation and environmental protection measures are similar to Alternative 1.	Alternative 3 would remove an estimated 237 acres of occupied whitebark pine habitat (10.2% of occupied habitat in the analysis area). Proposed mitigation and environmental protection measures are similar to Alternative 1	Alternative 4 would remove an estimated 123 acres of occupied whitebark pine habitat (5.4% of occupied habitat in the analysis area). Proposed mitigation and environmental protection measures are similar to Alternative 1.	No impacts on whitebark pine would occur and seed production, dispersal, and establishment of WBP would remain as it is under the baseline conditions.
DEIS Table ES4-1	**The SGP would remove whitebark pine individuals, and habitat conversion associated with the SGP**	Estimated number of mature whitebark pine trees to be cut during SGP construction.	Approximately 2,310 acres of occupied whitebark pine habitat were identified within the analysis area.	An estimated 1,027 individual trees, 50 of which would be cone-bearing trees, would be removed under Alternative 1.	An estimated 997 individual trees, 15 of which would be mature, cone-bearing trees, would be removed under	An estimated 892 individual trees, 48 of which would be mature, cone-bearing trees, would be removed under	An estimated 613 individual trees, 48 of which would be mature, cone-bearing trees, would be removed under	None.

Origin of Text	Issue	Indicator	Baseline Conditions	Alternative 1	Alternative 2	Alternative 3	Alternative 4	Alternative 5
	would impact seed production, dispersal, and establishment of this species.			This would be the largest number of total whitebark pine individuals removed and cone-bearing individuals removed under the action alternatives.	Alternative 2. This would be the second largest number of total whitebark pine individuals removed and the lowest number of cone-bearing individuals removed under the action alternatives.	Alternative 3. This would be the second smallest number of total whitebark pine individuals removed and the second highest number of cone-bearing individuals removed under the action alternatives.	Alternative 4. This would be the smallest number of total whitebark pine individuals removed and the second highest number of cone-bearing individuals removed (the same as Alternative 3) under the action alternatives.	
Midas Gold Suggested Edits	**The SGP would remove whitebark pine individuals, and habitat conversion associated with the SGP would impact seed production, dispersal, and establishment of this species.**	Estimated number of whitebark pine trees to be cut during construction.	Approximately 2,310 acres of occupied whitebark pine habitat occurs within the analysis area, primarily along the ridgetops in the vicinity of the mine area.	An estimated 1,027 individual trees, 50 of which would be cone-bearing trees, would be removed under Alternative 1. Forest Service designated mitigation measures FS-56, FS-63, and FS-70 have been required to minimize the impacts to whitebark pine occupied habitat (Appendix D-1, Table D-1). Decommissioning and reclamation of portions of these features at the end of the project will allow for this species to recolonize where suitable habitat exists. During mining and reclamation, areas disturbed by historic mining, construction, and operation activities would be revegetated with seed mixtures would consist of certified weed-free native herb and grass species, adjusted to fit elevation and aspect ranges in the area, and would be approved by the Forest Service. Native trees and shrubs also would be planted, as well as disease-resistant whitebark pine seedlings. Once a preferred alternative is identified by the USFS, a biological assessment will be completed in compliance with the Endangered Species Act, which may identify additional mitigation measures to further avoid and minimize the impacts to whitebark pine and its habitat.	An estimated 997 individual trees, 15 of which would be mature, cone-bearing trees, would be removed under Alternative 2. Proposed mitigation and environmental protection measures are similar to Alternative 1.	An estimated 892 individual trees, 48 of which would be mature, cone-bearing trees, would be removed under Alternative 3. Proposed mitigation and environmental protection measures are similar to Alternative 1.	An estimated 613 individual trees, 48 of which would be mature, cone-bearing trees, would be removed under Alternative 4. Proposed mitigation and environmental protection measures are similar to Alternative 1.	No impacts on whitebark pine would occur under this alternative.
DEIS Table ES4-1	**The SGP would impact known occurrences of sensitive and forest watch plant species.**	Presence of known occurrences of special status plants or occupied habitat within 300 feet of the SGP disturbance area.	Rare Plant Geographic Information System Data are available for the SGP area (Idaho Fish and Wildlife Information System).	Alternative 1 would impact known occurrences of bent-flowered milkvetch, least moonwort, Sacajawea's bitterroot, Blandow's helodium, sweetgrass, and Rannoch-rush.	Same as Alternative 1.	Same as Alternative 1.	Alternative 4 would impact known occurrences of bent-flowered milkvetch, least moonwort and Sacajawea's bitterroot.	None.
Midas Gold Suggested Edits	**The SGP would impact known occurrences of sensitive and forest watch plant species.**	Occurrences of special status plants species potentially indirectly affected by project activities (i.e.,	Locational information of special status plant species is typically considered sensitive and not readily publicly available. These	Alternative 1 would impact known occurrences of bent-flowered milkvetch, least moonwort, Sacajawea's	Similar to Alternative 1.	Similar to Alternative 1.	Similar to Alternative 1 but impacts would occur in some different areas as described in Section 4.10.2.5.5.	No impacts to special status plants or occupied habitat.

Midas Gold Suggested Edits (white rows) on DEIS Table ES4-1 Summary and Comparison of the Potential Environmental Impacts Associated with the Significant Issues by Alternative (grey rows)

DISCLAIMER: This table is a limited summary and comparison of effects associated with the alternatives evaluated in the Draft EIS.

Origin of Text	Issue	Indicator	Baseline Conditions	Alternative 1	Alternative 2	Alternative 3	Alternative 4	Alternative 5
		within 300 feet of the project disturbance area.	data were made available for analysis through the Idaho Natural Heritage Program tracked plant list, the Idaho Fish and Game Conservation Data Center Website and the Idaho Fish and Wildlife Information System.	bitterroot, Blandow's helodium, sweetgrass, and Rannoch-rush. Section 4.10.2.2.5 indicates the impacts on these species and their habitat would be indirect and would not likely contribute to a trend towards ESA listing or loss of viability of the species within the planning area (i.e. BNF and PNF-administered lands). Appendix D-1, Table D-1, specifically: Forest Service designated mitigation measures FS-56, FS-63, FS-64, FS-68, FS-69 and FS-70 would be required to minimize the impacts to known occurrences of sensitive and forest watch plant species. Appendix D-1, Table D-2 are mitigation measures proposed by MGII to minimize the impacts to known occurrences of sensitive and forest watch plant species.				
DEIS Table ES4-1	**The SGP would result in a direct loss of modeled potential habitat for sensitive and forest watch plant species.**	Acres of modeled potential habitat for sensitive and forest watch plant species disturbed by the SGP.	Modeled potential habitat for special status plant species is available for the SGP area. Maps are included in **Appendix H-4**.	Alternative 1 would impact the largest extent of modeled potential habitat for scalloped moonwort, Cascade reedgrass, livid sedge, Idaho douglasia, Yellowstone draba, spoonleaf sundew, Kruckeberg's swordfern, Sierra sanicle, Tolmie's saxifrage, and Rannoch-rush. Alternative 1 would be equal to Alternative 2 in having the greatest extent of impacts to modeled potential habitat for bent-flowered milkvetch and swamp willow weed. Overall, Alternative 1 would impact the largest extent of modeled potential habitat for sensitive and forest watch species under the action alternatives.	Alternative 2 would impact the largest extent of modeled potential habitat for candystick, Shasta sedge, bulblet-bearing water hemlock, Blandow's helodium, sweetgrass, bank monkeyflower, and white beaksedge. Alternative 2 would be equal to Alternative 1 in impacting the largest extent of modeled potential habitat for bent-flowered milkvetch and swamp willow weed. Overall, Alternative 2 would impact the second largest extent of modeled potential habitat for sensitive and forest watch species under the action alternatives.	Alternative 3 would have the greatest extent of impacts to modeled potential habitat for slender moonwort and least moonwort, Sacajawea's bitterroot, Borch's stonecrop and Leiberg stonecrop, and short-style tofieldia. Overall, Alternative 3 would impact the second smallest extent of modeled potential habitat for sensitive and forest watch species under the action alternatives.	Alternative 4 would impact the largest extent of modeled potential habitat for beautiful bryum, green bug moss, giant helleborine orchid, and tufted penstemon. Overall, Alternative 4 would impact the smallest extent of modeled potential habitat for sensitive and forest watch species under the action alternatives.	None.
Midas Gold Suggested Edits	**The SGP would result in a direct loss of modeled potential habitat for sensitive and forest watch plant species.**	Acres of modeled potential habitat for sensitive and forest watch plant species disturbed by the SGP.	Modeled potential habitat for special status plant species is available for the SGP area and detailed in tables 4.10-4, 4.10-9, 4.10-13 and 4.10-17. Maps are included in Appendix H-4. Maps of the distribution of modeled potential habitat for sensitive and forest watch plant species are included in	Direct disturbance to approximately 4,173 acres of modeled potential habitat for sensitive and forest watch plant species. [Note that there may be overlap in areas by species, so this total may misrepresent the total area affected. See Table 4.10-4.] Impacts to habitats for sensitive and forest watch species would	Direct disturbance to approximately 4,076 acres of modeled potential habitat for sensitive and forest watch plant species. Proposed mitigation and environmental protection measures are similar to Alternative 1.	Direct disturbance to approximately 3,601 acres of modeled potential habitat for sensitive and forest watch plant species Proposed mitigation and environmental protection measures are similar to Alternative 1.	Direct disturbance to approximately 3,454 acres of modeled potential habitat for sensitive and forest watch plant species. Proposed mitigation and environmental protection measures are similar to Alternative 1.	No direct loss of modeled potential habitat for sensitive and forest watch plant species.

Midas Gold Suggested Edits (white rows) on DEIS Table ES4-1 Summary and Comparison of the Potential Environmental Impacts Associated with the Significant Issues by Alternative (grey rows)

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Origin of Text	Issue	Indicator	Baseline Conditions	Alternative 1	Alternative 2	Alternative 3	Alternative 4	Alternative 5
			Appendix H-4. The modeled habitats predominantly occur at the mine site, with lesser amounts along access roads and transmission lines, including in areas of tall tree clearing.	predominantly occur at the mine site, with lesser extents of impacts occurring along access roads and transmission lines, including in areas of tall tree clearing. Appendix D-1, Table D-1, specifically: Forest Service designated mitigation measures FS-56 and FS-70 have been required to minimize the impacts to modeled potential habitat for sensitive and forest watch plant species. Appendix D-1, Table D-2 includes mitigation measures proposed by MGII to minimize the impacts to known occurrences of sensitive and forest watch plant species.				

Midas Gold Suggested Edits (white rows) on DEIS Table ES4-1 Summary and Comparison of the Potential Environmental Impacts Associated with the Significant Issues by Alternative (grey rows)

DISCLAIMER: This table is a limited summary and comparison of effects associated with the alternatives evaluated in the Draft EIS.

Origin of Text	Issue	Indicator	Baseline Conditions	Alternative 1	Alternative 2	Alternative 3	Alternative 4	Alternative 5
	Wetlands and Riparian Areas							
DEIS Table ES4-1	**Loss of wetland and riparian areas.**	***Within the mine site focus area-*** Acres of wetland and riparian habitat lost through construction of Project alternative components – within the mine site.	There are 429 acres of wetlands delineated in the mine site focus area (**Table 3.11-3a**). Figures of these features and impacts under the alternatives are in **Appendix I**.	130.9 acres of wetlands would be lost at the mine site (31% of wetlands at the mine site) 675.6 acres of riparian areas would be lost at the mine site	131.2 acres of wetlands would be lost at the mine site (31% of wetlands at the mine site). 630.3 acres of riparian areas would be lost at the mine site.	132.3 acres of wetlands would be lost at the mine site (31% of wetlands at the mine site). 820.5 acres of riparian areas would be lost at the mine site.	130.2 acres of wetlands would be lost at the mine site (31% of wetlands at the mine site). 673.4 acres of riparian areas would be lost at the mine site.	None.
Midas Gold Suggested Edits	**Loss of wetland and riparian areas.**	***Within the mine site focus area-*** Acres of wetland and riparian habitat ***impacted*** through construction of Project alternative components – within the mine site.	429 acres of delineated wetlands occur in the mine site focus area (**Table 3.11-3a**). On-site delineated wetlands are depicted on Figures 3.11-2a-2d and in greater detail in Appendix D-2 of the DEIS which is the Conceptual Mitigation Plan for Streams and Wetlands prepared by MGII (Tetra Tech, 2019).	130.9 acres of wetlands would be impacted at the mine site (31% of wetlands at the mine site). 675.6 acres of riparian areas would be lost at the mine site Appendix D-2 of the DEIS is the Conceptual Mitigation Plan for Streams and Wetlands to fully compensate for impacts to wetlands and other WOTUS under this alternative which is MGII's proposed action. Between the mine site focus area and the off-site focus area, MGII is proposing to create 161.4 acres of wetlands. Once the preferred alternative is selected, MGII would address the loss of wetland acres in the Final Compensatory Mitigation Plan for Streams and Wetlands with the understanding that the USACE is considering replacement of functional unit loss rather than the loss of wetland acreage.	131.2 acres of wetlands would be impacted at the mine site (31% of wetlands at the mine site). 630.3 acres of riparian areas would be lost at the mine site. Compensatory mitigation as described under Alternative 1 would be completed by MGII.	132.3 acres of wetlands would be impacted at the mine site (31% of wetlands at the mine site). 820.5 acres of riparian areas would be lost at the mine site. Compensatory mitigation as described under Alternative 1 would be completed by MGII.	130.2 acres of wetlands would be impacted at the mine site (31% of wetlands at the mine site). 673.4 acres of riparian areas would be lost at the mine site. Compensatory mitigation as described under Alternative 1 would be completed by MGII.	No wetland or riparian areas would be impacted.
DEIS Table ES4-1	**Loss of wetland and riparian areas.**	***Within the off-site focus area -*** Acres of wetland and riparian habitat lost through construction of SGP alternative components.	Figures of these features and impacts under the alternatives are in **Appendix I**.	41.2 acres of wetlands would be lost within the off-site focus area. 453.5 acres of riparian areas would be lost within the off-site focus area.	31.3 acres of wetlands would be lost within the off-site focus area. 449.6 acres of riparian areas would be lost within the off-site focus area.	41.2 acres of wetlands would be lost within the off-site focus area. 472.6 acres of riparian areas would be lost within the off-site focus area.	28.0 acres of wetlands would be lost within the off-site focus area. 429.2 acres of riparian areas would be lost within the off-site focus area.	None.
Midas Gold Suggested Edits	**Loss of wetland and riparian areas.**	***Within the off-site focus area -*** Acres of wetland and riparian habitat impacted through construction of SGP alternative components.	Figures of the off-site focus area delineated wetlands are in Appendix D-2 of the DEIS in the Conceptual Mitigation Plan for Streams and Wetlands.	31.3 acres of wetlands would be impacted within the off-site focus area. 449.6 acres of riparian areas would be lost within the off-site focus area. Appendix D-2 of the DEIS is the Conceptual Mitigation Plan for Streams and Wetlands prepared by MGII (Tetra Tech, 2019) to fully compensate for temporary impacts to WOTUS under this alternative. Between the mine site focus area and the off-site focus area, MGII is	31.3 acres of wetlands would be impacted within the off-site focus area. 449.6 acres of riparian areas would be lost within the off-site focus area. Compensatory mitigation as described under Alternative 1 would be completed by MGII.	41.2 acres of wetlands would be impacted within the off-site focus area. 472.6 acres of riparian areas would be lost within the off-site focus area. Compensatory mitigation as described under Alternative 1 would be completed by MGII.	28.0 acres of wetlands would be impacted within the off-site focus area. 429.2 acres of riparian areas would be lost within the off-site focus area. Compensatory mitigation as described under Alternative 1 would be completed by MGII.	No wetland or riparian areas would be impacted.

Midas Gold Suggested Edits (white rows) on DEIS Table ES4-1 Summary and Comparison of the Potential Environmental Impacts Associated with the Significant Issues by Alternative (grey rows)

DISCLAIMER: This table is a limited summary and comparison of effects associated with the alternatives evaluated in the Draft EIS.

Origin of Text	Issue	Indicator	Baseline Conditions	Alternative 1	Alternative 2	Alternative 3	Alternative 4	Alternative 5
				proposing to create 161.4 acres of wetlands. Once the preferred alternative is selected, MGII would address the loss of wetland acres in the Final Compensatory Mitigation Plan for Streams and Wetlands with the understanding that the USACE is considering replacement of temporary functional unit loss rather than the loss of wetland acreage.				
DEIS Table ES4-1	**Impacts on wetland and riparian functions.**	Functional units of wetlands, including high-value wetlands (i.e., Category I and II per Montana Wetland Assessment Method), lost due to SGP construction.	Existing Wetland Functions and Values of AAs assessed for the SGP are presented in **Appendix I** (**Table I-1-1**).	759.3 functional units would be lost, including 486.1 high-value functional units.	761.5 functional units would be lost, including 488.1 high-value functional units.	Based on partial availability of functional assessment data, 444.6 functional units would be lost, including 142.5 high-value functional units. However, as wetland functional assessment information is not available for wetlands potentially impacted by the EFSFSR DRSF and TSF (Alternative 3-specific components), the total functional units lost under Alternative 3 is not comparable to total functional units lost under other action alternatives.	756.3 functional units would be lost, including 485.4 high-value functional units.	None.
Midas Gold Suggested Edits	**Impacts on wetland and riparian functions.**	Functional units of wetlands, including high-value wetlands (i.e., Category I and II per Montana Wetland Assessment Method), **impacted** due to SGP construction.	The Existing Wetland Functions and Values of Assessment Areas are presented in Appendix I, Table I-1-1 and total approximately 3,526 functional units for delineated wetlands in the on-site and off-site focus areas.	759.3 wetland functional units would be impacted, including 486.1 high-value functional units. Appendix I-2 of the DEIS contains the functions and values of the impacted wetlands associated with this alternative. Appendix D-2 of the DEIS is the Conceptual Mitigation Plan for Streams and Wetlands prepared by MGII to fully compensate for impacts to WOTUS under this alternative. Between the mine site focus area and the off-site focus area**, MGII is proposing to create 1218.9 functional units**, resulting in a surplus of wetland functional units. MGII would address the loss of wetland functional units in the Final Compensatory Mitigation Plan for Streams and Wetlands. MGII would ensure at a minimum, **the 759.3 functional units lost would be replaced.**	Similar to Alternative 1, 761.5 wetland functional units would be impacted, including 488.1 high-value functional units. Appendix I-3 of the DEIS contains the functions and values of the impacted wetlands associated with this alternative MGII would address the temporary loss of wetland functional units in the Final Compensatory Mitigation Plan for Streams and Wetlands. MGII would ensure at a minimum, **the 761.5 functional units lost would be replaced.**	The total functional units lost under Alternative 3 is not comparable to total functional units lost under other action alternatives because wetland functional units are not available for the EFSFSR DRSF and TSF. However, MGII would address the temporary loss of wetland functional units in the Final Compensatory Mitigation Plan for Streams and Wetlands. MGII would ensure at a minimum, the **functional units lost would be replaced.** Appendix I-4 of the DEIS contains the functions and values of the impacted wetlands associated with this alternative.	Similar to Alternative 1, 756.3 functional units would be impacted, including 485.4 high-value functional units. Appendix I-5 of the DEIS contains the functions and values of the impacted wetlands associated with this alternative. MGII would address the temporary loss of wetland functional units in the Final Compensatory Mitigation Plan for Streams and Wetlands. MGII would ensure at a minimum, **the 756.3 functional units lost would be replaced.**	No impact to wetland or riparian area functions and values.

Midas Gold Suggested Edits (white rows) on DEIS Table ES4-1 Summary and Comparison of the Potential Environmental Impacts Associated with the Significant Issues by Alternative (grey rows)

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Origin of Text	Issue	Indicator	Baseline Conditions	Alternative 1	Alternative 2	Alternative 3	Alternative 4	Alternative 5
DEIS Table ES4-1	**Wetland and riparian area fragmentation.**	Number of wetlands crossed by new roads.	Figures of these features and impacts under the alternatives are in **Appendix I**.	139 wetlands would be crossed by new roads.	86 wetlands would be crossed by new roads.	181 wetlands would be crossed by new roads.	62 wetlands would be crossed by new roads.	None.
Midas Gold Suggested Edits	**Wetland and riparian area fragmentation.**	Number of wetlands crossed by new roads.	On-site focus area delineated wetlands are depicted on Figures 3.11-2a-2d and in greater detail for both on-site and off-site focus areas in Appendix D-2 of the DEIS.	139 wetlands would be crossed by new roads. The functional loss of all directly impacted wetlands is addressed in the Conceptual Mitigation Plan for Streams and Wetlands. This document is found in Appendix D-2 of the DEIS. Once the preferred alternative is selected, MGII would address the loss of wetland acres in the Final Compensatory Mitigation Plan for Streams and Wetlands with the understanding that the USACE is considering replacement of functional unit loss rather than the loss of wetland acreage.	86 wetlands would be crossed by new roads. Compensatory mitigation as described under Alternative 1 would be completed by MGII to replace these wetlands and their functional values.	181 wetlands would be crossed by new roads. Compensatory mitigation as described under Alternative 1 would be completed by MGII to replace these wetlands and their functional values.	62 wetlands would be crossed by new roads. Compensatory mitigation as described under Alternative 1 would be completed by MGII to replace these wetlands and their functional values.	No impact to wetland or riparian areas.
DEIS Table ES4-1	**Wetland and riparian area fragmentation.**	Total area (in acres) of wetlands that would be lost.	Extents of wetlands and riparian resources are presented in Chapter 3 (**Table 3.11-3a** through **Table 3.11-3e**). Figures of these features and impacts under the alternatives are in **Appendix I**.	172.2 wetland acres lost.	162.5 wetland acres lost.	173.4 wetland acres lost.	158.3 wetland acres lost.	None.
Midas Gold Suggested Edits	**Wetland and riparian area fragmentation.**	Total acreage of wetland and riparian areas impacted within the on-site and off-site focus areas.	Acreage of wetlands and riparian areas are presented in Chapter 3 (Table 3.11-3a through Table 3.11-3e). On-site focus area delineated wetlands are depicted on Figures 3.11-2a-2d and in greater detail for both on-site and off-site focus areas in Appendix D-2 of the DEIS.	172.2 wetland acres impacted. Appendix D-2 of the DEIS is the Conceptual Mitigation Plan for Streams and Wetlands prepared by MGII (Tetra Tech, 2019) to fully compensate for impacts to WOTUS under this alternative. Between the mine site focus area and the off-site focus area, MGII is proposing to create 161.4 acres of wetlands. Once the preferred alternative is selected, MGII would address the loss of wetland acres in the Final Compensatory Mitigation Plan for Streams and Wetlands with the understanding that the USACE is considering replacement of functional unit loss rather than the loss of wetland acreage.	162.5 wetland acres impacted. Compensatory mitigation as described under Alternative 1 would be completed by MGII.	173.4 wetland acres impacted. Compensatory mitigation as described under Alternative 2 would be completed by MGII.	158.3 wetland acres impacted. Compensatory mitigation as described under Alternative 1 would be completed by MGII.	No wetland or riparian areas would be impacted by fragmentation.
DEIS Table ES4-1	**Alteration of wetland and riparian areas due to changes in water balance.**	Wetland acres within indirect impact area that would be affected by groundwater drawdown (maximum extent of drawdown under all years).	Extents of wetlands are presented in Chapter 3. Figures of simulated alluvial drawdown at years 6, 7 and 12 are presented in Section	48.6 acres of wetlands would be affected by drawdown. The entirety of these wetlands also would be subject to direct impacts from alternative component construction.	46.7 acres of wetlands would be affected by drawdown. The entirety of these wetlands also would be subject to direct impacts from	40.3 acres of wetlands would be affected by drawdown. The entirety of these wetlands also would be subject to direct impacts from	48.6 acres of wetlands would be affected by drawdown. The entirety of these wetlands also would be subject to direct impacts from	None.

Origin of Text	Issue	Indicator	Baseline Conditions	Alternative 1	Alternative 2	Alternative 3	Alternative 4	Alternative 5
			4.8 (**Figures 4.8-23** to **4.8-25**).		alternative component construction.	alternative component construction.	alternative component construction.	
Midas Gold Suggested Edits	**Alteration of wetland and riparian areas due to changes in water balance.**	Wetland acres with the potential for indirect impacts due to alteration of localized groundwater levels. The DEIS assumes that the wetlands within the indirect effects area are groundwater recharge wetlands and by lowering the groundwater via drawdown it will indirectly and adversely affect the wetlands. The Conceptual Mitigation Plan for Streams and Wetlands (Appendix D-2 of the DEIS) indicates MGII would monitor these wetlands for indirect impacts during mining.	Areas with the ***potential*** for indirect impacts due to alteration of localized groundwater levels are shown in Figures of simulated alluvial drawdown at years 6, 7 and 12 are presented in Section 4.8 (Figures 4.8-23 to 4.8-25).	48.6 acres of wetlands would be affected by drawdown. Page 4.12-3 of the DEIS states that Drawdowns would be created by networks of dewatering wells; however, there is uncertainty in dewatering rates caused by these assumptions. Ultimately, operational dewatering rates may be higher or lower than currently predicted. The Conceptual Mitigation Plan for Streams and Wetlands (Appendix D-2 of the DEIS) indicates MGII would monitor these wetlands for indirect impacts during mining.	46.7 acres of wetlands would be affected by drawdown. Efforts to monitor the indirect impacts to wetlands by changes in water balance would be similar to those described under Alternative 1.	40.3 acres of wetlands would be affected by drawdown. Efforts to monitor the indirect impacts to wetlands by changes in water balance would be similar to those described under Alternative 1.	48.6 acres of wetlands would be affected by drawdown. Efforts to monitor the indirect impacts to wetlands by changes in water balance would be similar to those described under Alternative 1.	No indirect impact to wetland and riparian areas from groundwater drawdown.
DEIS Table ES4-1	**Alteration of wetland and riparian areas due to changes in water quality.**	Quantitative analysis of estimated changes in water quality parameters based on predictive water modelling in areas coincident with wetlands within the indirect impact area.	Refer to Water Quality section (Section 4.9) for anticipated baseline and predicted water quality parameters.	The SGP would impact water quality, which would in turn impact wetlands and RCAs. See Surface Water and Groundwater Quality section (Section 4.9).	Water quality effects on wetlands and riparian areas would be similar as under Alternative 1 though design features would minimize water quality impacts.	Water quality effects on wetlands and riparian areas would be similar to as described under Alternative 1 with slight differences due to location of SGP features. Alternative 3 would experience greater impacts to water quality from the lack of reprocessing of spent ore disposal area and Bradley tailings.	Water quality effects on wetlands and riparian areas would be similar as under Alternative 1, though no construction or use of Burntlog Route would eliminate water quality impacts in that area, but would increase the impacts along the Yellow Pine Route that is parallel and near EFSFSR and Johnson Creek.	None.
Midas Gold Suggested Edits	**Alteration of wetland and riparian areas due to changes in water quality.**	Modeling of estimated change in water quality that would affect wetlands and riparian areas.	Appendix I-1 of the DEIS shows the range of functional water quality indices of the wetland assessment areas in the on-site and off-site focus areas. These indices show a range of current water quality function for wetlands ranging from no contribution to water quality improvements (score of 0) to high contribution to water quality improvements (score of 1).	The SGP would impact water quality, which would in turn impact wetlands and RCAs. As section 4.11.2.1 of the DEIS indicates, Midas Gold has prepared a Water Quality Management Plan (Brown and Caldwell 2020) to describe a means of protecting water quality criteria throughout operations and beyond site closure and reclamation. Similarly, they have presented plans that describe a means of accounting for lost wetland and riparian functions and plans for replacing those functions to avoid a net loss over time.	Water quality effects on wetlands and riparian areas would be similar as under Alternative 1 though design features would minimize water quality impacts. Efforts to mitigate effects from water quality on wetlands would be similar to Alternative 1.	Water quality effects on wetlands and riparian areas would be similar to as described under Alternative 1 with slight differences due to location of SGP features. Alternative 3 would experience greater impacts to water quality from the lack of reprocessing of spent ore disposal area and Bradley tailings. Efforts to mitigate effects from water quality on wetlands would be similar to Alternative 1.	Water quality effects on wetlands and riparian areas would be similar as under Alternative 1, though no construction or use of Burntlog Route would eliminate water quality impacts in that area, but would increase the impacts along the Yellow Pine Route that is parallel and near EFSFSR and Johnson Creek. Efforts to mitigate effects from water quality on wetlands would be similar to Alternative 1.	Under this alternative, no alteration of wetland and riparian areas due to changes in water quality would occur.

Midas Gold Suggested Edits (white rows) on DEIS Table ES4-1 Summary and Comparison of the Potential Environmental Impacts Associated with the Significant Issues by Alternative (grey rows)

DISCLAIMER: This table is a limited summary and comparison of effects associated with the alternatives evaluated in the Draft EIS.

Origin of Text	Issue	Indicator	Baseline Conditions	Alternative 1	Alternative 2	Alternative 3	Alternative 4	Alternative 5
	Fish Resources and Fish Habitat							
DEIS Table ES4-1	**The SGP may cause changes in fish habitat in the analysis area that may affect aquatic species, including federally listed fish species and aquatic habitat (e.g., critical habitat) and Management Indicator Species within and downstream of the SGP area.**	Length (km) of stream and lake habitat directly impacted by removal.	Not applicable.	EFSFSR: 1.6 km. Fiddle Creek: 1.8 km. Meadow Creek: 5.6 km. East Fork Meadow Creek: 1.8 km. Yellow Pine Pit Lake: 1.9 hectares.	Same as Alternative 1.	EFSFSR: 9.5 km. Fiddle Creek: 1.8 km. Meadow Creek: 0.6 km. East Fork Meadow Creek: 7.7 km. Rabbit Creek: 0.8 km. Fern Creek: 0.6 km. Yellow Pine Pit Lake: 1.9 hectares.	EFSFSR: 2.9 km. Fiddle Creek: 1.8 km. Meadow Creek: 6.3 km. East Fork Meadow Creek: 1.8 km (surface diversion would incorporate step pool channel enhancements rather than a rock drain). Yellow Pine Pit Lake: 1.9 hectares.	No stream channel changes.
Midas Gold Suggested Edits		Change in length in of stream and lake habitat affected by removal, diversion and enhancement/restoration	There are approximately 23.9 miles of stream within the SGP area in the EFSFSR sub-watershed upstream of the confluence with Sugar Creek (Table 3.8-1). There are approximately 7.1 miles of Sugar Creek upstream of the confluence with EFSFSR. The Yellow Pine Pit is approximately 1.9 hectares in size. Historic mining has impacted many of these streams and still have ongoing legacy effects.	The EFSFSR Tunnel Fishway, diversions associated with the Hangar Flats pit lake and TSF/DRSF, Fiddle DRSF, West End DRSF, there will be lengths of stream and lake habitat that will be temporarily diverted through EOY 15 but enhanced or restored through EOY 20. Because of these activities the following streams will be affected by diversion (Table 4.12-2a): EFSFSR – 1.6 km diverted through 2.1 km for diversion over 14 years. Following year 14, 3.3 km of stream restoration will replace the diversion Fiddle Creek – 1.8 km for 8 years with no enhancements following this period Meadow Creek – 5.6 km through 2.4 km diversions for 16 years with 0.72 km of restoration following this period East Fork of Meadow Creek – 1.8 km with no diversion with 4.6 km of enhancement following this period. Removal of 1.9 hectares of Yellow Pine Pit	Same as Alternative 1.	Similar to Alternative 1, the EFSFSR Tunnel Fishway, diversions associated with the EFSFSR TSF/DRSF, Fiddle DRSF, West End DRSF, and Hangar Flats Pit lake there will be lengths of stream and lake habitat that will be temporarily diverted through EOY 15 but enhanced or restored through EOY 20. Because of these activities the following streams will be affected by diversion (Table 4.12-44): EFSFSR – 9.5 km diverted through 1.3 km for diversion over 14 years. Following year 14, 4.0 km of stream restoration will replace the diversion Fiddle Creek – 1.8 km for 8 years with no enhancements following this period Meadow Creek – 0.6 km for 8 years with no enhancements following this period East Fork of Meadow Creek – 7.7 km with no diversion with 0.61 km of enhancement following this period. Rabbit Creek - 0.8 km with no diversion or enhancement Fern Creel – 0.6 km with no diversion or enhancement Removal of 1.9 hectares of Yellow Pine Pit	The EFSFSR Tunnel Fishway, diversions associated with the Hangar Flats pit lake and TSF/DRSF, Fiddle DRSF, West End DRSF, there will be lengths of stream and lake habitat that will be temporarily lost through EOY 15 but enhanced or restored through EOY 20. Because of these activities the following streams will be affected by diversion (Table XXX): EFSFSR – 2.9 km lost through XX km for diversion over XX years. Following year XX, XX km of stream restoration will replace the diversion Fiddle Creek – 1.8 km for 8 years with no enhancements following this period Meadow Creek – 5.6 km through 2.4 km diversions for 16 years with 0.72 km of restoration following this period East Fork of Meadow Creek – 1.8 km with step pool channel enhancements of XX km Removal of 1.9 hectares of Yellow Pine Pit NOTE: An analogous table did not appear in the DEIS for this alternative, so placeholders were left here for edits for the USFS.	No change in the length in of stream and lake habitat.
DEIS Table ES4-1		Change in amount of total useable Chinook salmon	18.61 km.	Loss of 1.78 km (9.6 percent).	Loss of 0.93 km (5 percent).	Loss of 5.17 km (27 percent).	Same as Alternative 1.	No changes from baseline.

Origin of Text	Issue	Indicator	Baseline Conditions	Alternative 1	Alternative 2	Alternative 3	Alternative 4	Alternative 5
		Intrinsic Potential (IP) habitat in km.						
Midas Gold Suggested Edits		Change in amount **and accessibility** of useable Chinook salmon Intrinsic Potential (IP) habitat in km.	Of the streams assessed for Intrinsic Potential (IP), there is a total of 18.6 km of IP habitat; 11.4 km IP in upper EFSFSR, 6.1 km of IP in Sugar Creek watershed and 1.1 km to the downstream extent modeled on EFSFSR downstream of Sugar Creek. All IP downstream of the YPP and in Sugar Creek is currently accessible. Approximately 10.2 km of IP habitat exists upstream of the Yellow Pine pit lake that is inaccessible by volitional fish passage due to the existing passage barrier at the Yellow Pine pit lake (Section 3.12.4.2.5.2, Table 3.12-6).	An additional 10.2 km of IP habitat becomes available to anadromous salmonids as a result of construction of the EFSFSR Fishway (Year -1) and removal of other fish barriers within the 10.2 KM of IP habitat. Later during mining (Year 2) 1.8 km of IP habitat is permanently lost due to diversions and the project facilities (Table 4.12-10) primarily due to the TSF/DRSF. There is a long-term net gain 8.4 km of IP habitat as a result of providing volitional fish passage in Year 12. Overall, the IP habitat quality decreases between baseline and Year 20 (Table 4.12-10) Removal of barriers allows for free movement and access to habitat for both upstream and downstream, and in turn, can improve genetic diversity of isolated populations, improve overall productivity by increasing access to critical habitat, and improve access to feeding and refuge areas, and may facilitate reclamation of upstream habitat and biodiversity (p. 4.12-9). Along the Burntlog Route, upgrading of culverts along reconstructed portions of the existing road may improve access by Chinook salmon to currently inaccessible but usable IP habitat (p. 4.12-74).	Similar to Alternative 1, but with a long-term net gain of 9.3 km of volitionally accessible IP habitat (Table 4.12-29).	Similar to Alternative 1, but with a long-term net gain of 5 km of volitionally accessible IP habitat (Table 4.12-48).	The EFSFSR tunnel would not include a Fishway and so volitional access by migratory salmonids, and associated benefits, would not occur until the 14th Year of mining when the EFSFSR would be restored over the top of the backfilled Yellow Pine pit. Thereafter, effects on Chinook salmon IP habitat would be as described for Alternative 1, with a net gain of 8.4 km of volitionally accessible IP habitat.	No change in the amount of accessibility of IP habitat for Chinook salmon. Accessibility to Chinook salmon and associated benefits may continue through periodic stocking when excess hatchery fish are available.
DEIS Table ES4-1		Direct loss of Chinook salmon critical habitat.	26.49 km.	Loss of 5.5 km (20.8 percent) – permanent barrier from Meadow Creek TSF/DRSF.	Loss of 5.5 km (20.8 percent) – permanent barrier from Meadow Creek TSF/DRSF.	Loss of 6.9.km (26.0 percent) – permanent barrier from EFSFSR TSF/DRSF.	Same as Alternative 1.	No changes from baseline.
Midas Gold Suggested Edits		Change in amount **and accessibility** of Chinook salmon critical habitat.	There is a total of 46 km of modeled Chinook salmon critical habitat (Table 3, Appendix J-6). Approximately 27.7 km of critical habitat is within the EFSFSR sub-watershed upstream of the confluence with Sugar Creek. 26.5 km of exists upstream of the Yellow Pine pit lake and is not accessible by volitional fish passage due to the existing passage barrier at the Yellow Pine pit lake (p. 3.12-17).	An additional 26.5 km of critical habitat becomes available to anadromous salmonids as a result of construction of the EFSFSR Fishway (Year -1) and removal of other fish barriers within the 26.5 km of critical habitat. Later during mining (Year 2) 5.5 km of IP habitat is permanently lost due to diversions and the project facilities (Table 4.12-13)) primarily due to the TSF/DRSF. There is a long-term net gain 21 km of critical habitat as a result	Same as Alternative 1	Similar to Alternative 1, but with a long-term net gain of 19.6 km of volitionally accessible critical habitat.	The EFSFSR tunnel would not include a Fishway as so volitional access by migratory salmonids, and associated benefits, would not occur until the 14th Year of mining. Thereafter, effects on Chinook salmon IP habitat would be as described for Alternative 1, with a net gain of 21 km of volitionally accessible IP habitat.	No change in the amount of accessibility of IP habitat for Chinook salmon. Accessibility to Chinook salmon and associated benefits may continue through periodic stocking when excess hatchery fish are available.

Origin of Text	Issue	Indicator	Baseline Conditions	Alternative 1	Alternative 2	Alternative 3	Alternative 4	Alternative 5
			Chinook salmon periodically stocked upstream of the YPP barrier depending on the availability of surplus hatchery stock from the Johnson Creek Artificial Propagation Enhancement Project (Table 3.12-3).	of providing volitional fish passage in Year 20. Removal of barriers allows for free movement and access to habitat for both upstream and downstream, and in turn, can improve genetic diversity of isolated populations, improve overall productivity by increasing access to critical habitat, and improve access to feeding and refuge areas, and may facilitate reclamation of upstream habitat and biodiversity (p. 4.12-9). Along the Burntlog Route, upgrading of culverts along reconstructed portions of the existing road may improve access by Chinook salmon to currently inaccessible but usable critical habitat (p. 4.12-74).				
DEIS Table ES4-1	**The SGP may cause changes in fish habitat in the analysis area that may affect aquatic species, including federally listed fish species and aquatic habitat (e.g., critical habitat) and Management Indicator Species within and downstream of the SGP area.**	Change in total useable steelhead trout IP habitat.	17.90 km.	Gain of 1.41 km (8 percent).	Gain of 2.3 km (13 percent).	Gain of 0.8 km (4.4 percent).	Same as Alternative 1.	No changes from baseline.
Midas Gold Suggested Edits		Change in amount **and accessibility** of steelhead trout Intrinsic Potential (IP) habitat.	Of the streams assessed for Intrinsic Potential (IP), there is a total of 17.9 km of IP habitat; 9.7 km IP in upper EFSFSR, 7.2 km of IP in Sugar Creek watershed and 1 km to the downstream extent modeled on EFSFSR downstream of Sugar Creek. All IP downstream of the YPP and in Sugar Creek is currently accessible. Approximately 8.8 km of IP habitat exists upstream of the Yellow Pine pit lake that is inaccessible by volitional fish passage due to the existing passage barrier at the Yellow Pine pit lake (Section 3.12.4.3.5.1, Table 3.12-9). Approximately 113 km were assessed for IP habitat for steelhead trout (Section 3.12.4.3.5.1). Under existing conditions, approximately 17.9 km of usable steelhead trout IP habitat occurs in the project area (Section 3.12.4.3.5.1). Based on baseline sampling events, Chinook salmon were not observed in Fiddle Creek, upper EFSFSR, Meadow Creek at or upstream of the TSF, or upper EFMC.	An additional 8.8 km of critical habitat becomes available to anadromous salmonids as a result of construction of the EFSFSR Fishway (Year -1) and removal of other fish barriers within the 8.8 km of IP habitat. Later during mining (Year 2) 1.8 km of IP habitat is permanently lost due to diversions and the project facilities (Table 4.12-12) primarily due to the TSF/DRSF. However, by Year 20, a gain 1.4 km of IP habitat occurs due to stream enhancement/restoration activities. There is a long-term net gain 10.6 km of IP habitat as a result of providing volitional fish passage in Year 20. Overall, the IP habitat quality increases between baseline and Year 20 (Table 4.12-14). Removal of barriers allows for free movement and access to habitat for both upstream and downstream, and in turn, can improve genetic diversity of isolated populations, improve overall productivity by increasing access to critical habitat, and improve access to feeding and refuge areas, and may facilitate reclamation of upstream habitat and biodiversity (p. 4.12-9).	Similar to Alternative 1, but with a long-term net gain of 11.1 km of volitionally accessible IP habitat (4.12-29).	Similar to Alternative 1, but with a long-term net gain of 9.6 km of volitionally accessible IP habitat (Table 4.12-53).	The EFSFSR tunnel would not include a Fishway as so volitional access by migratory salmonids, and associated benefits, would not occur until the 14th Year of mining. Thereafter, effects on Chinook salmon IP habitat would be as described for Alternative 1, with a net gain of 10.6 km of volitionally accessible IP habitat.	No change in the amount of accessibility of IP habitat for steelhead trout.

Midas Gold Suggested Edits (white rows) on DEIS Table ES4-1 Summary and Comparison of the Potential Environmental Impacts Associated with the Significant Issues by Alternative (grey rows)

DISCLAIMER: This table is a limited summary and comparison of effects associated with the alternatives evaluated in the Draft EIS.

Origin of Text	Issue	Indicator	Baseline Conditions	Alternative 1	Alternative 2	Alternative 3	Alternative 4	Alternative 5
			Approximately 8.8 km of potential IP habitat are not currently accessible to natural migration of steelhead beyond the Yellow Pine pit cascade barrier (Section 3.12.4.3.5.1). Approximately 15.3 km of IP habitat exists in the Sugar Creek watershed, of which will not be affected or changed by any alternative (Table 3.12-9).	Along the Burntlog Route, upgrading of culverts along reconstructed portions of the existing road may improve access by Chinook salmon to currently inaccessible but usable critical habitat (p. 4.12-74).				
DEIS Table ES4-1		Length of bull trout habitat (km).	Baseline Stream Reach 1: 10.45 km. Stream Reach 2: 15.10 km. Stream Reach 3: 16.15 km. Stream Reach 5: 41.70 km.	Post-closure (EOY 112) Stream Reach 1: 10.43 km. Stream Reach 2: 14.61 km. Stream Reach 3: 16.15 km. Stream Reach 5: 41.19 km.	Post-closure (EOY 112) Stream Reach 1: 10.92 km. Stream Reach 2: 14.72 km. Stream Reach 3: 16.16 km. Stream Reach 5: 41.80 km.	Post-closure (EOY 112) Stream Reach 1: 10.88 km. Stream Reach 2: 13.86 km. Stream Reach 3: 17.20 km. Stream Reach 5: 41.94 km.	Same as Alternative 1.	No changes from baseline.
Midas Gold Suggested Edits		Length of potential bull trout habitat (km) based on Occupancy Modeling (distance-weighted average summarized at the subwatershed level)	At baseline, available bull trout habitat equals 41.70 km based on a distance-weighted average of occupancy modeling (OM) in the Headwaters EFSFSR subwatershed (Table 3.12-13). The occupancy model determines the probability of bull trout occupancy within streams based on suitable stream discharge, channel slopes, and stream temperature. The indicator is based on suitable habitat for bull trout expressed in kilometer (km) within stream reaches (e.g. 1, 2, and 3) and the Headwaters EFSFSR subwatershed (i.e., stream reach 5). Baseline Stream Reach 1 (EFSFSR from Sugar Ck. to Meadow Ck.): 10.45 km. Stream Reach 2 (Meadow Ck. and tributaries): 15.10 km. Stream Reach 3 (EFSFSR from Meadow Ck. to headwaters): 16.15 km. Stream Reach 5 (Reaches 1-3): 41.70 km.	At closure, there is a net decrease (-0.51 km) in available habitat in the Headwaters EFSFSR subwatershed (see Table 4.12-17). Total available bull trout habitat in the Headwaters EFSFSR subwatershed varies overtime with Alternative 1: Baseline: 41.70 km EOY 6: 28.91 km EOY 12: 33.07 km EOY 18: 41.19 km Closure: 41.19 km At closure, changes in available bull trout habitat by stream reach for Alternative 1: Reach 1 (-0.02 km) Reach 2 (-0.49 km) Reach 3 (0.00 km)	At closure, there is a net increase (+0.10 km) in available habitat in the Headwaters EFSFSR subwatershed (see Table 4.12-37). Total available bull trout habitat in the Headwaters EFSFSR subwatershed varies overtime with Alternative 2: Baseline: 41.70 km EOY 6: 28.83 km EOY 12: 32.60 km EOY 18: 41.80 km Closure: 41.80 km At closure, changes in available bull trout habitat by stream reach for Alternative 2: Reach 1 (+0.47 km) Reach 2 (- 0.38 km) Reach 3 (0.00 km)	At closure, there is a net increase (+0.24 km) in available habitat in the Headwaters EFSFSR subwatershed (see Table 4.12-57). Total available bull trout habitat in the Headwaters EFSFSR subwatershed varies overtime with Alternative 3: Baseline: 41.70 km EOY 6: 28.37 km EOY 12: 31.95 km EOY 18: 41.87 km Closure: 41.94 km At closure, changes in available bull trout habitat by stream reach for Alternative 3: Reach 1 (+0.43 km) Reach 2 (- 1.24 km) Reach 3 (+1.04 km)	Same as Alternative 1.	No change from baseline.
DEIS Table ES4-1		Bull trout occupancy probability (percent).	Baseline Stream Reach 1: 9.51%.	Post-closure (EOY 112) Stream Reach 1: 8.40%.	Post-closure (EOY 112) Stream Reach 1: 6.56%.	Post-closure (EOY 112) Stream Reach 1: 7.16%.	Same as Alternative 1.	No changes from baseline.

Origin of Text	Issue	Indicator	Baseline Conditions	Alternative 1	Alternative 2	Alternative 3	Alternative 4	Alternative 5
			Stream Reach 2: 6.27%. Stream Reach 3: 9.34%. Stream Reach 5: 8.31%.	Stream Reach 2: 4.76%. Stream Reach 3: 8.81%. Stream Reach 5: 7.27%.	Stream Reach 2: 4.37%. Stream Reach 3: 7.40%. Stream Reach 5: 6.11%.	Stream Reach 2: 5.22%. Stream Reach 3: 3.77%. Stream Reach 5: 5.13%.		
Midas Gold Suggested Edits		Bull trout occupancy probability (percent).	At baseline, the probability of bull trout occupancy was 8.31% in stream habitats in the Headwaters EFSFSR subwatershed. The occupancy model determines the probability of bull trout occupancy within streams based on suitable stream discharge, channel slopes, and stream temperature. The probability of occupancy can range from 0-100%. The indicator is based on distance-weighted average probability of occurrence within suitable habitat for bull trout expressed in percent (%) within stream reaches (e.g. 1, 2, and 3) and the Headwaters EFSFSR subwatershed (i.e., stream reach 5). Baseline Stream Reach 1: 9.51%. Stream Reach 2: 6.27%. Stream Reach 3: 9.34%. Stream Reach 5: 8.31%.	At closure bull trout occupancy probability is reduced from 8.31% at baseline to 7.27% at closure for the Headwaters EFSFSR subwatershed (see Table 4.12-16). Change in probability of occurrence overtime for bull trout in stream habitats of the Headwaters EFSFSR subwatershed with Alternative 1: Baseline: 8.31% EOY 6: 8.42% EOY 12: 8.19% EOY 18: 6.43% Closure: 7.27% Changes in probability of occurrence in stream habitats from baseline to closure for bull trout by stream reach for Alternative 1: Reach 1 (9.51% to 8.40%) Reach 2 (6.27% to 4.76%) Reach 3 (9.34% to 8.81%)	At closure bull trout occupancy probability is reduced from 8.31% at baseline to 6.11% at closure for the Headwaters EFSFSR subwatershed (see Table 4.12-36). Change in probability of occurrence overtime for bull trout in stream habitats of the Headwaters EFSFSR subwatershed with Alternative 2: Baseline: 8.31% EOY 6: 7.04% EOY 12: 6.76% EOY 18: 5.42% Closure: 6.11% Changes in probability of occurrence in stream habitats from baseline to closure for bull trout by stream reach for Alternative 2: Reach 1 (9.51% to 6.56%) Reach 2 (6.27% to 4.37%) Reach 3 (9.34% to 7.40%)	At closure bull trout occupancy probability is reduced from 8.31% at baseline to 5.13% at closure for the Headwaters EFSFSR subwatershed (see Table 4.12-56). Change in probability of occurrence overtime for bull trout in stream habitats of the Headwaters EFSFSR subwatershed with Alternative 3: Baseline: 8.31% EOY 6: 5.82% EOY 12: 6.52% EOY 18: 5.11% Closure: 5.13% Changes in probability of occurrence in stream habitats from baseline to closure for bull trout by stream reach for Alternative 3: Reach 1 (9.51% to 7.16%) Reach 2 (6.27% to 5.22%) Reach 3 (9.34% to 3.77%)	Same as Alternative 1.	No changes from baseline.
DEIS Table ES4-1		Direct loss of bull trout critical habitat	17.11 km.	Loss of 4.7 km (27.5 percent).	Loss of 4.7 km (27.5 percent).	Loss of 11.9 km (69.5 percent).	Same as Alternative 1.	No changes from baseline.
Midas Gold Suggested Edits		Loss or gain and accessibility of bull trout designated critical habitat	There is a total of 33.7 km of bull trout critical habitat in the project area (Section 4.12.2.3.6.5). Approximately 17.11 km of exists upstream of the Yellow Pine pit lake and is not accessible by volitional fish passage due to the existing passage barrier at the Yellow Pine pit lake (Table 4.12-22).	An additional 17.11 km of critical habitat becomes available bull trout as a result of construction of the EFSFSR Fishway (Year -1) and removal of other fish barriers within the 17.11 km of critical habitat. Later during mining (Year 2) 4.7 km of IP habitat is permanently lost due to diversions and the project facilities (Table 4.12-22) primarily due to the TSF/DRSF. There is a long-term net gain 12.4 km of critical habitat as a result of providing volitional fish passage in Year 20.	Same as Alternative 1	Similar to Alternative 1, but with a long-term net gain of 5.2 km of volitionally accessible critical habitat (Table 4.12-66).	Same as Alternative 1	No change in the amount of accessibility of critical habitat for bull trout.
DEIS Table ES4-1		Change in access to bull trout lake habitat.	Bull trout can currently use the Yellow Pine pit lake.	The existing bull trout habitat in the Yellow Pine pit Lake would be permanently lost.	Under Alternative 2, Meadow Creek would not be routed through the Hangar Flats pit lake so there would be no	Alternative 3 would have similar conditions for bull trout	The EFSFSR Tunnel would not be designed as fish passable, so bull trout would have no access to Hangar	Bull trout would continue to use Yellow Pine pit lake.

Origin of Text	Issue	Indicator	Baseline Conditions	Alternative 1	Alternative 2	Alternative 3	Alternative 4	Alternative 5
				Access to the Hangar Flats pit lake would begin in year 20; however, potentially warmer water temperatures and less foraging habitat in comparison to the Yellow Pine pit lake may make the lake habitat less suitable for bull trout.	connection between Meadow Creek and the Hangar Flats pit lake except as occasional outflow from the lake through a channel that would reconnect with lower Meadow Creek downstream of the lake, which may be insufficient to provide for passage of bull trout for most of the year.	access to lakes as Alternative 1.	Flats pit lake habitat until after the EFSFSR stream is fully constructed in Mine Year 13.	
Midas Gold Suggested Edits		Change in access to bull trout lake habitat.	Bull trout have access into and out of the Yellow Pine pit but cannot traverse upstream out of the pit. The lake is approximately 2 hectares in size, and based on 2018 and 2019 fish monitoring of the YPP, the population in YPP is approximately 25 to 69 individuals (Section 3.12.4.4.4) (Brown and Caldwell 2019a)	The existing bull trout habitat in the Yellow Pine pit Lake would be permanently lost. Access to the Hangar Flats pit lake would begin in year 20; The lake will be approximately 27 hectares; however, projected changes to stream flow, water temperature, access to habitat, and prey species abundance may make the lake habitat less suitable for bull trout.	Under Alternative 2, Meadow Creek would not be routed through the Hangar Flats pit lake so there would be no connection between Meadow Creek and the Hangar Flats pit lake except as occasional outflow from the lake through a channel that would reconnect with lower Meadow Creek downstream of the lake, which may be insufficient to provide for passage of bull trout for most of the year.	Alternative 3 would have similar conditions for bull trout access to lakes as Alternative 1.	The EFSFSR Tunnel would not be designed as fish passable, so bull trout would have no access to Hangar Flats pit lake habitat until after the EFSFSR stream is fully constructed in Mine Year 14.	Bull trout would continue to use Yellow Pine pit lake.
DEIS Table ES4-1		Length of cutthroat trout habitat (km).	Baseline Stream Reach 1: 10.45 km. Stream Reach 2: 15.10 km. Stream Reach 3: 16.15 km. Stream Reach 5: 41.70 km.	Post-closure (EOY 112) Stream Reach 1: 10.43 km. Stream Reach 2: 14.61 km. Stream Reach 3: 16.15 km. Stream Reach 5: 41.19 km.	Post-closure (EOY 112) Stream Reach 1: 10.92 km. Stream Reach 2: 14.72 km. Stream Reach 3: 16.16 km. Stream Reach 5: 41.80 km.	Post-closure (EOY 112) Stream Reach 1: 10.88 km. Stream Reach 2: 13.86 km. Stream Reach 3: 17.20 km. Stream Reach 5: 41.94 km.	Same as Alternative 1.	No changes from baseline.
Midas Gold Suggested Edits		Length of cutthroat trout habitat (km) based on Occupancy Modeling.	At baseline, available westslope cutthroat trout habitat equals 41.70 km based on a distance-weighted average of occupancy modeling (OM) in the Headwaters EFSFSR subwatershed (Table 3.12-14). The occupancy model determines the probability of westslope cutthroat trout occupancy within streams based on suitable stream discharge, channel slopes, and stream temperature. The indicator is based on suitable habitat for westslope cutthroat trout expressed in kilometer (km) within stream reaches (e.g. 1, 2, and 3) and the Headwaters EFSFSR subwatershed (i.e., stream reach 5). Baseline	At closure, there is a net decrease (-0.51 km) in available habitat in the Headwaters EFSFSR subwatershed (see Table 4.12-17). Total available westslope cutthroat trout habitat in the Headwaters EFSFSR subwatershed varies overtime with Alternative 1: Baseline: 41.70 km EOY 6: 28.91 km EOY 12: 33.07 km EOY 18: 41.19 km Closure: 41.19 km At closure, changes in available westslope cutthroat trout habitat by stream reach for Alternative 1: Reach 1 (-0.02 km) Reach 2 (-0.49 km)	At closure, there is a net increase (+0.10 km) in available habitat in the Headwaters EFSFSR subwatershed (see Table 4.12-42). Total available westslope cutthroat trout habitat in the Headwaters EFSFSR subwatershed varies overtime with Alternative 2: Baseline: 41.70 km EOY 6: 28.83 km EOY 12: 32.60 km EOY 18: 41.80 km Closure: 41.80 km At closure, changes in available westslope cutthroat trout habitat by stream reach for Alternative 2: Reach 1 (+0.47 km)	At closure, there is a net increase of (+0.24 km) in available habitat in the Headwaters EFSFSR subwatershed (see Table 4.12-57). Total available westslope cutthroat trout habitat in the Headwaters EFSFSR subwatershed varies overtime with Alternative 3: Baseline: 41.70 km EOY 6: 28.37 km EOY 12: 31.95 km EOY 18: 41.87 km Closure: 41.94 km At closure, changes in available westslope cutthroat trout habitat by stream reach for Alternative 3: Reach 1 (+0.43 km)	Same as Alternative 1.	No change from baseline

Midas Gold Suggested Edits (white rows) on DEIS Table ES4-1 Summary and Comparison of the Potential Environmental Impacts Associated with the Significant Issues by Alternative (grey rows)

DISCLAIMER: This table is a limited summary and comparison of effects associated with the alternatives evaluated in the Draft EIS.

Origin of Text	Issue	Indicator	Baseline Conditions	Alternative 1	Alternative 2	Alternative 3	Alternative 4	Alternative 5
			Stream Reach 1 (EFSFSR from Sugar Ck. to Meadow Ck.): 10.45 km. Stream Reach 2 (Meadow Ck. and tributaries): 15.10 km. Stream Reach 3 (EFSFSR from Meadow Ck. to headwaters): 16.15 km. Stream Reach 5 (Reaches 1-3): 41.70 km.	Reach 3 (0.00 km)	Reach 2 (- 0.38 km) Reach 3 (0.00 km)	Reach 2 (- 1.24 km) Reach 3 (+1.04 km)		
DEIS Table ES4-1		Cutthroat trout occupancy probability (percent).	Baseline Stream Reach 1: 63.73%. Stream Reach 2: 64.06%. Stream Reach 3: 63.59%. Stream Reach 5: 63.79%.	Post-closure (EOY 112) Stream Reach 1: 64.40%. Stream Reach 2: 62.90%. Stream Reach 3: 63.65%. Stream Reach 5: 63.57%.	Post-closure (EOY 112) Stream Reach 1: 63.66%. Stream Reach 2: 63.90%. Stream Reach 3: 63.04%. Stream Reach 5: 63.51%.	Post-closure (EOY 112) Stream Reach 1: 63.37%. Stream Reach 2: 64.62%. Stream Reach 3: 62.83%. Stream Reach 5: 63.57%.	Same as Alternative 1.	No changes from baseline
Midas Gold Suggested Edits		Cutthroat trout occupancy probability (percent).	At baseline, the probability of westslope cutthroat trout occupancy was 63.79% in stream habitats in the Headwaters EFSFSR subwatershed. The occupancy model determines the probability of westslope cutthroat trout occupancy within streams based on suitable stream discharge, channel slopes, and stream temperature. The probability of occupancy can range from 0-100%. The indicator is based on distance-weighted average probability of occurrence within suitable habitat for westslope cutthroat trout expressed in percent (%) within stream reaches (e.g. 1, 2, and 3) and the Headwaters EFSFSR subwatershed (i.e., stream reach 5). Baseline Stream Reach 1: 63.73% Stream Reach 2: 64.06% Stream Reach 3: 63.59% Stream Reach 5: 63.79%	At closure westslope cutthroat trout occupancy probability is reduced from 63.79% at baseline to 63.57% at closure for the Headwaters EFSFSR subwatershed (see Table 4.12-23). Change in probability of occurrence overtime for westslope cutthroat trout in stream habitats of the Headwaters EFSFSR subwatershed with Alternative 1: Baseline: 63.79% EOY 6: 63.80% EOY 12: 64.04% EOY 18: 62.40% Closure: 63.57% Changes in probability of occurrence in stream habitats from baseline to closure for westslope cutthroat trout by stream reach for Alternative 1: Reach 1 (63.73% to 64.04%) Reach 2 (64.06% to 62.90%) Reach 3 (63.59% to 63.65%)	At closure westslope cutthroat trout occupancy probability is reduced from 63.79% at baseline to 63.51% at closure for the Headwaters EFSFSR subwatershed (see Table 4.12-41). Change in probability of occurrence overtime for westslope cutthroat trout in stream habitats of the Headwaters EFSFSR subwatershed with Alternative 2: Baseline: 63.79% EOY 6: 63.45% EOY 12: 63.64% EOY 18: 62.32% Closure: 63.51% Changes in probability of occurrence in stream habitats from baseline to closure for westslope cutthroat trout by stream reach for Alternative 2: Reach 1 (63.73% to 63.66%) Reach 2 (64.06% to 63.90%) Reach 3 (63.59% to 63.04%)	At closure westslope cutthroat trout occupancy probability is reduced from 63.79% at baseline to 63.57% at closure for the Headwaters EFSFSR subwatershed (see Table 4.12-61). Change in probability of occurrence overtime for westslope cutthroat trout in stream habitats of the Headwaters EFSFSR subwatershed with Alternative 3: Baseline: 63.79% EOY 6: 62.24% EOY 12: 62.84% EOY 18: 63.54% Closure: 63.57% Changes in probability of occurrence in stream habitats from baseline to closure for westslope cutthroat trout by stream reach for Alternative 3: Reach 1 (63.73% to 63.37%) Reach 2 (64.06% to 64.62%) Reach 3 (63.59% to 62.83%)	Same as Alternative 1.	No changes from baseline.
DEIS Table ES4-1	**The SGP may cause changes in fish habitat in the analysis area that may affect aquatic species, including federally listed**	Changes in monthly discharge during the August-March low flow period (percent change in cfs).	Mean monthly discharge at baseline at 6 locations: EFSFSR above Meadow: 5.0 cfs.	Change in mean monthly discharge from baseline to post-closure at 6 locations: EFSFSR above Meadow:	Change in mean monthly discharge from baseline to post-closure at 6 locations: EFSFSR above Meadow:	Change in mean monthly discharge from baseline to post-closure at 6 locations:	Same as Alternative 1.	Trends in baseline stream flows would continue.

Origin of Text	Issue	Indicator	Baseline Conditions	Alternative 1	Alternative 2	Alternative 3	Alternative 4	Alternative 5
	fish species and aquatic habitat (e.g., critical habitat) and Management Indicator Species within and downstream of the SGP area.		EFSFSR at Stibnite: 10.6 cfs. EFSFSR above Sugar Creek: 15.4 cfs. Sugar Creek: 11.7 cfs. Meadow Creek: 3.1 cfs. Meadow Creek MC-6: 5.3 cfs.	-0.2%. EFSFSR at Stibnite: +1.3%. EFSFSR above Sugar Creek: -4.5%. Sugar Creek: -3.5%. Meadow Creek: -83.1%. Meadow Creek MC-6: +1.5%.	+1.9%. EFSFSR at Stibnite: +2.5%. EFSFSR above Sugar Creek: +1.7%. Sugar Creek: -0.9%. Meadow Creek: -78.6%. Meadow Creek MC-6: +0.1%.	EFSFSR above Meadow: -0.8%. EFSFSR at Stibnite: +2.7%. EFSFSR above Sugar Creek: +2.0%. Sugar Creek: -1.8%. Meadow Creek: -2.5%. Meadow Creek MC-6: +3.1%.		
Midas Gold Suggested Edits		Changes in monthly discharge during the August-March low flow period (percent change in cfs).	Analysis of mean monthly discharge at baseline for the active mine site evaluated utilizing the four USGS stream gage locations that are active throughout the mine site and the MC-6 SFA reach: EFSFSR above Meadow Creek: 5.0 cfs EFSFSR at Stibnite: 10.6 cfs EFSFSR above Sugar Creek: 15.4 cfs Sugar Creek: 11.7 cfs Meadow Creek MC-6: 5.3 cfs	Flows vary per reach per individual mine year based on mine activities. Throughout a subwatershed flow may be lost in one reach and gained in a downstream reach. Flows have been evaluated at the downstream most location of a subwatershed to show the overall effect of the project leaving that subwatershed. The change in mean monthly discharge from baseline to post-closure is shown below at four locations: EFSFSR above Meadow: -0.2% EFSFSR above Sugar Creek: -4.5% Sugar Creek: -3.5% Meadow Creek MC-6: +1.5%	Flows vary per reach per individual mine year based on mine activities. Throughout a subwatershed flow may be lost in one reach and gained in a downstream reach. Flows have been evaluated at the downstream most location of a subwatershed shows the overall effect of the project leaving that subwatershed. The change in mean monthly discharge from baseline to post-closure is shown below at four locations: EFSFSR above Meadow: +1.9% EFSFSR above Sugar Creek: +1.7% Sugar Creek: -0.9% Meadow Creek MC-6: +0.1%	Flows vary per reach per individual mine year based on mine activities. Throughout a subwatershed flow may be lost in one reach and gained in a downstream reach. Flows have been evaluated at the downstream most location of a subwatershed shows the overall effect of the project leaving that subwatershed. The change in mean monthly discharge from baseline to post-closure is shown below at four locations: EFSFSR above Meadow: -0.8% EFSFSR above Sugar Creek: +2.0% Sugar Creek: -1.8% Meadow Creek MC-6: +3.1%	Same as Alternative 1.	Assume trends in baseline stream flows would continue.
DEIS Table ES4-1		Changes in water temperature (ºC).	Summer Maximum Temperatures (ºC): Upper EFSFSR (above MC): 13.4. Meadow Creek (above EFMC): 17.9. Meadow Creek (below EFMC): 19.8. Middle EFSFSR (between Meadow and Fiddle Creeks): 17.4. Lower EFSFSR (between Fiddle and Sugar Creek): 17.4. EFSFSR downstream of Sugar Creek: 14.9.	Change in Summer Maximum from Baseline to post-closure (ºC): Upper EFSFSR (above MC): +0.5. Meadow Creek (above EFMC): +2.0. Meadow Creek (below EFMC): +1.4. Middle EFSFSR (between Meadow and Fiddle Creeks): +2.6. Lower EFSFSR (between Fiddle and Sugar Creek): +4.2. EFSFSR downstream of Sugar Creek: +4.4.	Change in Summer Maximum from Baseline to post-closure (ºC): Upper EFSFSR (above MC): +0.5. Meadow Creek (above EFMC): +4.8. Meadow Creek (below EFMC): +2.6. Middle EFSFSR (between Meadow and Fiddle Creeks): +2.4. Lower EFSFSR (between Fiddle and Sugar Creek): +3.3. EFSFSR downstream of Sugar Creek: +4.1.	Change in Summer Maximum from Baseline to post-closure (ºC): Upper EFSFSR (above MC): +9.0. Meadow Creek (above EFMC): +0.9. Meadow Creek (below EFMC): +1.4. Middle EFSFSR (between Meadow and Fiddle Creeks): +4.9. Lower EFSFSR (between Fiddle and Sugar Creek): +4.8. EFSFSR downstream of Sugar Creek: +4.5.	Same as Alternative 1.	Not applicable.
Midas Gold Suggested Edits		Changes in water temperatures (ºC)	Summer Maximum Temperatures (ºC):	Change in Summer Maximum from Baseline to post-closure (ºC):	Change in Summer Maximum from Baseline to post-closure (ºC):	Change in Summer Maximum from Baseline to post-closure (ºC):	Same as Alternative 1.	Not applicable.

Midas Gold Suggested Edits (white rows) on DEIS Table ES4-1 Summary and Comparison of the Potential Environmental Impacts Associated with the Significant Issues by Alternative (grey rows)

DISCLAIMER: This table is a limited summary and comparison of effects associated with the alternatives evaluated in the Draft EIS.

Origin of Text	Issue	Indicator	Baseline Conditions	Alternative 1	Alternative 2	Alternative 3	Alternative 4	Alternative 5
			Upper EFSFSR (above MC): 13.4. Meadow Creek (above EFMC): 17.9. Meadow Creek (below EFMC): 19.8. Middle EFSFSR (between Meadow and Fiddle Creeks): 17.4. Lower EFSFSR (between Fiddle and Sugar Creek): 17.4. EFSFSR downstream of Sugar Creek: 14.9. Based on the WCIs summarized in Table 3.12-20, water temperatures across the study area (Stream Reach 5) are rated Functioning at Risk for steelhead, Chinook, and bull trout. Stream temperatures for the baseline condition are summarized in Chapter 3.9 and Chapter 4.9 in tables, including Table 4.9-11. Simulated daily maximums for the maximum weekly summer condition range from 13.4 ºC in Upper EFSFSR (above MC) to 19.8 ºC in Meadow Creek (below EFMC). The presence of the YPP lake mitigates the diurnal variability of daily maximum stream temperatures, and daily maximum summer temperatures in the EFSFSR downstream of the YPP are 14.9 ºC. Upstream of the YPP in the river, daily maximum summer temperatures are 17.4 ºC. Daily average temperatures for the maximum weekly summer condition range from 9.2C to 13.4 ºC across the study area. The warmest daily average for this period (13.4 ºC) is observed in Meadow Creek below East Fork Meadow Creek. Daily maximums for the maximum weekly fall	Upper EFSFSR (above MC): +0.5. Meadow Creek (above EFMC): +2.0. Meadow Creek (below EFMC): +1.4. Middle EFSFSR (between Meadow and Fiddle Creeks): +2.6. Lower EFSFSR (between Fiddle and Sugar Creek): +4.2. EFSFSR downstream of Sugar Creek: +4.4. Simulated stream temperatures for Alternative 1 are summarized in Table 4.9-11. During operations and post closure, simulated daily maximum summer temperatures are similar in the Upper EFSFSR for Alternative 1 compared to baseline because of limited disturbance in that area. In Meadow Creek and Fiddle Creek, daily maximum summer temperatures increase by up to 12.2 ºC due to the open diversion channels around the TSF and DRSFs. For the long-term post closure condition, daily maximum summer temperatures are predicted to be up to 1.4 ºC higher in Meadow Creek and 4.4 ºC higher in the EFSFSR downstream of Sugar Creek. The removal of YPP lake contributes to the increase in daily maximum temperatures in the summer and fall. Daily average temperatures for the maximum weekly summer condition are predicted to increase by less than 2 ºC for most of the study area. Exceptions occur in Fiddle Creek post closure where averages increase by up to 4.3 ºC during operations due to the open diversion channels and in Meadow Creek post closure when daily summer averages increase by up to 5.8 ºC due to the restoration of reaches on the TSF.	Upper EFSFSR (above MC): +0.5. Meadow Creek (above EFMC): +4.8. Meadow Creek (below EFMC): +2.6. Middle EFSFSR (between Meadow and Fiddle Creeks): +2.4. Lower EFSFSR (between Fiddle and Sugar Creek): +3.3. EFSFSR downstream of Sugar Creek: +4.1. Alternative 2 improves temperatures during operations compared to Alternative 1 because low flows are carried in pipes along diversion channels, and these pipes provide shade to the water (Table 4.9-19). In some areas like Meadow Creek where stream shading is relatively low and water temperatures are warm under the baseline condition, temperatures are improved during operations where low-flow pipes are used. In Meadow Creek, daily maximum temperatures are up to 3.3 ºC cooler than baseline for the maximum weekly summer condition. In Fiddle Creek, when the low flow pipes are in place during operations, stream temperatures are similar to baseline. Once the diversion channels are removed for closure, simulated water temperatures for Alternative 2 are similar to Alternative 1 except for Meadow Creek. Pit lakes buffer diurnal variability in water temperature and therefore reduce daily maximum temperatures and increase daily average temperatures. For the maximum weekly summer condition, routing Meadow Creek around Hangar Flats pit lake rather than thru it has	Upper EFSFSR (above MC): +9.0. Meadow Creek (above EFMC): +0.9. Meadow Creek (below EFMC): +1.4. Middle EFSFSR (between Meadow and Fiddle Creeks): +4.9. Lower EFSFSR (between Fiddle and Sugar Creek): +4.8. EFSFSR downstream of Sugar Creek: +4.5. Alternative 3 moves the Hangar Flats TSF and DRSF to the minimally disturbed reaches of the upper EFSFSR; simulated temperatures are summarized in Table 4.9-23. During operations, water temperatures in Meadow Creek would be similar to baseline, but for the maximum weekly summer condition, daily maximum temperatures in the upper EFSFSR would increase by 7.1 ºC and daily average temperatures would increase by 2 ºC. For the post closure period, daily maximum temperatures in the upper EFSFSR would increase by 9 ºC and daily average temperatures would increase by 3.1 ºC. Daily fall maximums in the upper EFSFSR would increase by up to 4.9 ºC; daily averages would increase by less than 1 ºC. Alternative 3 also results in warmer temperatures along the EFSFSR from Meadow Creek to Sugar Creek compared to Alternative 1. Once Sugar Creek enters the system, temperatures are similar to Alternative 1.		

Origin of Text	Issue	Indicator	Baseline Conditions	Alternative 1	Alternative 2	Alternative 3	Alternative 4	Alternative 5
			condition range from 9.9 ºC to 16.2 ºC, and daily averages for this period range from 8.2 ºC 10.8 ºC. The warmest fall temperatures are also observed in Meadow Creek below East Fork Meadow Creek.	In the fall, daily maximum temperatures are projected to increase by up to 8.9 ºC due to open diversion channels that active during operations. The long-term increases post closure are greatest in Fiddle Creek (3.6 ºC). Simulated daily maximums increase by 2.5 ºC post closure on the EFSFS downstream of YPP. Daily averages for the maximum weekly fall condition increase by less than 1 ºC except for Fiddle Creek which has an increase of 2 ºC during operations due to the open diversion channels.	the result of increasing daily maximum stream temperatures by up to 1.2 ºC and decreasing daily average stream temperatures up to 3.8 ºC relative to Alternative 1. Daily maximum and daily average temperatures in the fall are less than Alternative 1 because the water that has been stored through the summer in the pit lake is a smaller portion of the stream flow. For the fall condition, simulated temperatures are within 0.5 ºC of baseline. Alternative 2 also includes an analysis of stream temperature changes associated with discharge from the CWTP. These changes are not reflected in the summary provided in this table. In the summer and fall, the discharge often has little impact on water temperature in the EFSFSR, though sometimes the discharge cools the water by 1.5 ºC to 2 ºC. In the winter, the discharge could increase stream temperatures by 4 ºC, but engineering controls leveraging cold air temperatures can be used to lower temperatures prior to discharge.			
DEIS Table ES4-1		Chinook Salmon - Changes in Lengths (km) of Stream Reaches within Temperature Threshold Categories at EOY 112 Note: + = added length within threshold from baseline; - = less length within threshold from baseline	Adult Migration - Lethal (1-week exposure) – (0.00 km) Adult Spawning - Field Observed Spawning Temperature – (16.72 km) Incubation/Emergence – Optimal – (4.99 km) Juvenile Rearing – Optimal – (16.72 km) Common Summer Habitat Use – Optimal – (16.72 km) Total Available Habitat – (16.72 km)	Adult Migration - Lethal (1-week exposure) – (+2.65 km) Adult Spawning - Field Observed Spawning Temperature – (-5.63 km) Incubation/Emergence – Optimal – (+2.58 km) Juvenile Rearing – Optimal – (-9.05 km) Common Summer Habitat Use – Optimal – (-9.05 km) Total Available Habitat – (-4.02 km)	Adult Migration - Lethal (1-week exposure) – (0.00 km) Adult Spawning - Field Observed Spawning Temperature – (-4.6 km) Incubation/Emergence – Optimal – (-0.58 km) Juvenile Rearing – Optimal – (-6.43 km) Common Summer Habitat Use – Optimal – (-6.43 km) Total Available Habitat – (-4.6 km)	Adult Migration - Lethal (1-week exposure) – (+6.49 km) Adult Spawning - Field Observed Spawning Temperature – (-6.11 km) Incubation/Emergence – Optimal – (-4.99 km) Juvenile Rearing – Optimal – (-11.13 km) Common Summer Habitat Use – Optimal – (-11.13 km) Total Available Habitat – (-4.5 km)	Same as Alternative 1	Not applicable
Midas Gold Suggested Edits		Chinook Salmon - Changes in Lengths (km) of Stream Reaches within Temperature Threshold Categories at EOY 112 Note: + = added length within threshold from baseline; - =	Adult Migration - Lethal (1-week exposure) – (0.00 km) Adult Spawning - Field Observed Spawning Temperature – (16.72 km)	Adult Migration - Lethal (1-week exposure) – (0.00 km) Adult Spawning - Field Observed Spawning Temperature – (-5.63 km)	Adult Migration - Lethal (1-week exposure) – (0.00 km) Adult Spawning - Field Observed Spawning Temperature – (+4.6 km)	Adult Migration - Lethal (1-week exposure) – (0.00 km) Adult Spawning - Field Observed Spawning Temperature – (-6.11 km)	Same as Alternative 1	Not applicable

Origin of Text	Issue	Indicator	Baseline Conditions	Alternative 1	Alternative 2	Alternative 3	Alternative 4	Alternative 5
		less length within threshold from baseline	Incubation/Emergence – Optimal – (4.99 km) Juvenile Rearing – Optimal – (16.72 km) Common Summer Habitat Use – Optimal – (16.72 km) Total Available Habitat – (16.72 km) Chinook salmon temperature tolerances vary by life stage. There were 113 km of streams in the upper EFSFSR watershed evaluated for potential Chinook salmon habitat. There were 18.6 km of stream that contained potential Chinook salmon habitat. There were 16.7 km of Chinook salmon habitat assessed for baseline temperature conditions. Table 3.12-2 shows that 16.7 km of potential habitat is within the temperature thresholds for adult migration, adult spawning, juvenile rearing, and common summer habitat use; however, only 4.99 km (30 percent) is within the water temperature threshold for incubation and emergence. Based on baseline sampling events, Chinook salmon were not observed in Fiddle Creek, upper EFSFSR, Meadow Creek at or upstream of the TSF, or upper EFMC.	Incubation/Emergence – Optimal – (+2.58 km) Juvenile Rearing – Optimal – (-9.05 km) Common Summer Habitat Use – Optimal – (-9.05 km) Total Available Habitat – (-4.02 km) Under Alternative 1 as with baseline, none of the simulated reaches have a daily average temperature for the maximum weekly summer condition exceeding the adult migration threshold (I.e., >21 C) for Chinook Salmon during operations or post closure (Table 4.9-11). As Stated in Appendix J-2, “The analysis used the summer maximum time period modeling runs (end of July) for water temperatures greater than 21°C. Therefore, the results for these criteria would be the number of kilometers of stream in the analysis area that would have **average** water temperatures during the summer maximum period of over 21°C.” and "The lethal temperature criterion for Chinook is set for a 1-week exposure to water temperatures 21 to 22°C. If the maximum water temperature in a day or week reaches that temperature, it does not mean it would be lethal to fish. However, it is a measure of stress on fish." **None of the daily averages for the maximum weekly summer condition exceed 21C** for any alternative or period, but there are some reaches that have simulated daily maximums that exceed 21C. For the long-term, post closure condition, water temperatures simulated for Alternative 1 (Table 4.12-12, EOY112) reduce approximately 5.6 km of habitat for adult spawning and increases habitat by 2.6 km for incubation/emergence relative to baseline. Habitat available for juvenile rearing and common summer use decreases by 9 km. Total available habitat decreases by 4 km.	Incubation/Emergence – Optimal – (-0.58 km) Juvenile Rearing – Optimal – (-6.43 km) Common Summer Habitat Use – Optimal – (-6.43 km) Total Available Habitat – (-4.6 km) Under Alternative 2 as with baseline and Alternative 1, none of the simulated reaches have a daily average temperature for the maximum weekly summer condition exceeding the adult migration threshold for Chinook Salmon during operations or post closure (Table 4.9-19). For the long-term, post closure condition, water temperatures simulated for Alternative 2 (Table 4.12-31) increase 4.7 km of habitat for adult spawning and decrease 0.6 km for incubation/ emergence relative to baseline. Habitat available for juvenile rearing and common summer use decreases by 6.4 km. Total available habitat decreases by 4.6 km.	Incubation/Emergence – Optimal – (-4.99 km) Juvenile Rearing – Optimal – (-11.13 km) Common Summer Habitat Use – Optimal – (-11.13 km) Total Available Habitat – (-4.5 km) Under Alternative 3 as with baseline and Alternatives 1 and 2, none of the simulated reaches have a daily average temperature for the maximum weekly summer condition exceeding the adult migration threshold for Chinook Salmon during operations or post closure (Table 4.9-23). For the long-term, post closure condition, water temperatures simulated for Alternative 3 (Table 4.12-51) reduce an additional 0.5 km of habitat available for adult spawning and total available habitat compared to Alternative 1. An additional reduction of 2 km of habitat is available for juvenile rearing and common summer use compared to Alternative 1. Rather than increase available habitat for incubation/emergence, Alternative 3 reduced habitat by 5 km relative to baseline.		

Midas Gold Suggested Edits (white rows) on DEIS Table ES4-1 Summary and Comparison of the Potential Environmental Impacts Associated with the Significant Issues by Alternative (grey rows)

DISCLAIMER: This table is a limited summary and comparison of effects associated with the alternatives evaluated in the Draft EIS.

Origin of Text	Issue	Indicator	Baseline Conditions	Alternative 1	Alternative 2	Alternative 3	Alternative 4	Alternative 5
DEIS Table ES4-1		Steelhead Trout – Changes in Lengths (km) of Stream Reaches within Temperature Threshold Categories at EOY 112 Note: + = added length within threshold from baseline; - = less length within threshold from baseline	Juvenile Rearing – Optimal – (2.13 km) Common Summer Habitat Use – Optimal – (2.13 km) Total Available Habitat – (2.13 km)	Juvenile Rearing – Optimal – (+5.54 km) Common Summer Habitat Use – Optimal – (+5.54 km) Total Available Habitat – (+10.57 km)	Juvenile Rearing – Optimal – (+8.16 km) Common Summer Habitat Use – Optimal – (+6.98 km) Total Available Habitat – (+9.99 km)	Juvenile Rearing – Optimal – (+3.46 km) Common Summer Habitat Use – Optimal – (+3.46 km) Total Available Habitat – (+10.09 km)	Same as Alternative 1	Not applicable
Midas Gold Suggested Edits		Steelhead Trout – Changes in Lengths (km) of Stream Reaches within Temperature Threshold Categories at EOY 112 Note: + = added length within threshold from baseline; - = less length within threshold from baseline	Juvenile Rearing – Optimal – (2.13 km) Common Summer Habitat Use – Optimal – (2.13 km) Total Available Habitat – (2.13 km) Steelhead temperature tolerances vary by life stage. Of the streams in the upper EFSFSR watershed evaluated for potential steelhead habitat, there were 17.9 km of stream that contained potential steelhead habitat but only 2.13 km was assessed for temperature conditions downstream from the YPP fish passage barrier. Stream temperatures within that steelhead habitat did not exceed temperature thresholds for adult migration, adult spawning, juvenile rearing, and common summer habitat use. The temperature threshold for incubation and emergence was exceeded for 2.13 km.	Juvenile Rearing – Optimal – (+5.54 km) Common Summer Habitat Use – Optimal – (+5.54 km) Total Available Habitat – (+10.57 km) Alternative 1 improves the temperature conditions for steelhead trout during operations and post closure (Table 4.12-15, EOY112). Thermally suitable habitat is increased by 5.5 km for juvenile rearing and common summer use, and total available habitat increases by 10.6 km for the post-closure condition. Under Alternative 1 total available habitat increases from 2.13 km to 12.7 km by EOY 18 (i.e., barrier removal and stream restoration). Habitat with suitable stream temperatures for juvenile rearing and common summer habitat use increases by 5.5 km for a total of 7.67 km by EOY 112 (see Table 4.12-15).	Juvenile Rearing – Optimal – (+8.16 km) Common Summer Habitat Use – Optimal – (+6.98 km) Total Available Habitat – (+9.99 km) Alternative 2 results in additional improvements in habitat length for steelhead trout compared to Alternative 1 during operations and post closure. Relative to the baseline condition for the long-term post-closure condition, thermally suitable habitat is increased by 8.2 km for juvenile rearing, 7.0 km for common summer use, and total available habitat increases by 10.0 km. Under Alternative 2 total thermally suitable available habitat increases from 2.13 km to 12.12 km by EOY 112 (i.e., barrier removal and stream restoration). Habitat with suitable stream temperatures for juvenile rearing increases by 8.16 km for a total of 10.29 km. thermally suitable common summer habitat use increases by 6.98 km for a total of 9.11 km by EOY 112 (see Table 4.12-35).	Juvenile Rearing – Optimal – (+3.46 km) Common Summer Habitat Use – Optimal – (+3.46 km) Total Available Habitat – (+10.09 km) Alternative 3 is less beneficial to steelhead trout in terms of habitat with appropriate thermal regime compared to Alternative 1. Approximately 2 km less thermally suitable habitat would be available for juvenile rearing and common summer habitat use; total habitat available is 0.5 km less than Alternative 1. Under Alternative 3 total available habitat increases from 2.13 km to 12.22 km by EOY 18 (i.e., barrier removal and stream restoration). Habitat with suitable stream temperatures for juvenile rearing and common summer habitat use increases by 3.46 km for a total of 5.59 km by EOY 112. However, poor stream temperature conditions are present within 7.52 km and are considered lethal after 1-week of exposure (see Table 4.12-55).	Same as Alternative 1	Not Applicable
DEIS Table ES4-1		Bull Trout - Changes in Lengths of Stream Reaches within Temperature Threshold Categories at EOY 112 Note: + = added length within threshold from baseline; - = less length within threshold from baseline	Adult Spawning – Functioning Appropriately – (1.61 km) Adult Spawning – Functioning at Risk – (8.69 km) Adult Spawning – Functioning at Unacceptable Risk – (18.69 km)	Adult Spawning – Functioning Appropriately – (-1.61 km) Adult Spawning – Functioning at Risk – (-4.28 km) Adult Spawning – Functioning at Unacceptable Risk – (-7.01 km) Incubation/Emergence – Functioning at Unacceptable Risk – (-12.9 km) Juvenile Rearing – Functioning Appropriately – (-7.80 km)	Adult Spawning – Functioning Appropriately – (-1.61 km) Adult Spawning – Functioning at Risk – (-4.28 km) Adult Spawning – Functioning at Unacceptable Risk – (-6.98 km)	Adult Spawning – Functioning Appropriately – (-1.61 km) Adult Spawning – Functioning at Risk – (-7.10 km) Adult Spawning – Functioning at Unacceptable Risk – (+0.13 km)	Same as Alternative 1	Not applicable

Midas Gold Suggested Edits (white rows) on DEIS Table ES4-1 Summary and Comparison of the Potential Environmental Impacts Associated with the Significant Issues by Alternative (grey rows)

DISCLAIMER: This table is a limited summary and comparison of effects associated with the alternatives evaluated in the Draft EIS.

Origin of Text	Issue	Indicator	Baseline Conditions	Alternative 1	Alternative 2	Alternative 3	Alternative 4	Alternative 5
			Incubation/Emergence – Functioning at Unacceptable Risk – (28.99 km) Juvenile Rearing – Functioning Appropriately – (13.66 km) Juvenile Rearing – Functioning at Risk – (12.89 km) Juvenile Rearing – Functioning at Unacceptable Risk – (2.44 km) Common Summer Habitat – Use – Spawning Initiation – (8.66 km) Total Available Habitat – (28.99 km)	Juvenile Rearing – Functioning at Risk – (-10.31 km) Juvenile Rearing – Functioning at Unacceptable Risk – (+5.21 km) Common Summer Habitat – Use – Spawning Initiation – (-2.80 km) Total Available Habitat – (-12.9 km)	Incubation/Emergence – Functioning at Unacceptable Risk – (-12.87 km) Juvenile Rearing – Functioning Appropriately – (-7.25 km) Juvenile Rearing – Functioning at Risk – (-9.85 km) Juvenile Rearing – Functioning at Unacceptable Risk – (+4.23 km) Common Summer Habitat – Use – Spawning Initiation – (-2.25 km) Total Available Habitat – (-12.87 km)	Incubation/Emergence – Functioning at Unacceptable Risk – (-8.58 km) Juvenile Rearing – Functioning Appropriately – (-8.71 km) Juvenile Rearing – Functioning at Risk – (-6.95 km) Juvenile Rearing – Functioning at Unacceptable Risk – (+7.08 km) Common Summer Habitat – Use – Spawning Initiation – (-3.71 km) Total Available Habitat – (-8.58 km)		
Midas Gold Suggested Edits		Bull Trout - Changes in Lengths of Stream Reaches within Temperature Threshold Categories at EOY 112 Note: + = added length within threshold from baseline; - = less length within threshold from baseline	Adult Spawning – Functioning Appropriately – (1.61 km) Adult Spawning – Functioning at Risk – (8.69 km) Adult Spawning – Functioning at Unacceptable Risk – (18.69 km) Incubation/Emergence – Functioning at Unacceptable Risk – (28.99 km) Juvenile Rearing – Functioning Appropriately – (13.66 km) Juvenile Rearing – Functioning at Risk – (12.89 km) Juvenile Rearing – Functioning at Unacceptable Risk – (2.44 km) Common Summer Habitat – Use – Spawning Initiation – (8.66 km) Total Available Habitat – (28.99 km) The occupancy model (OM) (estimate of the probability that one or more bull trout would occur in a given stream reach) indicates that under existing conditions, there are 28.9 km of potential habitat available for bull trout based on suitable channel	Adult Spawning – Functioning Appropriately – (-1.61 km) Adult Spawning – Functioning at Risk – (-4.28 km) Adult Spawning – Functioning at Unacceptable Risk – (-7.01 km) Incubation/Emergence – Functioning at Unacceptable Risk – (-12.9 km) Juvenile Rearing – Functioning Appropriately – (-7.80 km) Juvenile Rearing – Functioning at Risk – (-10.31 km) Juvenile Rearing – Functioning at Unacceptable Risk – (+5.21 km) Common Summer Habitat – Use – Spawning Initiation – (-2.80 km) Total Available Habitat – (-12.9 km) At post closure, total available habitat for bull trout would decrease by 12.90 km relative to baseline conditions (see Table 4.12-20) for a total available habitat of 16.09 km. About 5.86 km of the total is suitable for bull trout spawning initiation, about two thirds of the reduced total habitat is unsuitable for spawning, and all of the habitat is FUR for incubation /emergence, and	Adult Spawning – Functioning Appropriately – (-1.61 km) Adult Spawning – Functioning at Risk – (-4.28 km) Adult Spawning – Functioning at Unacceptable Risk – (-6.98 km) Incubation/Emergence – Functioning at Unacceptable Risk – (-12.87 km) Juvenile Rearing – Functioning Appropriately – (-7.25 km) Juvenile Rearing – Functioning at Risk – (-9.85 km) Juvenile Rearing – Functioning at Unacceptable Risk – (+4.23 km) Common Summer Habitat – Use – Spawning Initiation – (-2.25 km) Total Available Habitat – (-12.87 km) Similar to Alternative 1 (see Table 4.12-20).	Adult Spawning – Functioning Appropriately – (-1.61 km) Adult Spawning – Functioning at Risk – (-7.10 km) Adult Spawning – Functioning at Unacceptable Risk – (+0.13 km) Incubation/Emergence – Functioning at Unacceptable Risk – (-8.58 km) Juvenile Rearing – Functioning Appropriately – (-8.71 km) Juvenile Rearing – Functioning at Risk – (-6.95 km) Juvenile Rearing – Functioning at Unacceptable Risk – (+7.08 km) Common Summer Habitat – Use – Spawning Initiation – (-3.71 km) Total Available Habitat – (-8.58 km) At post closure, total available habitat for bull trout would decrease by 8.58 km relative to baseline conditions (see Table 4.12-59) for a total available habitat of 20.41 km. About 4.59 km of the total is suitable for bull trout	Same as Alternative 1	No change in the lengths of stream reaches within temperature threshold

Origin of Text	Issue	Indicator	Baseline Conditions	Alternative 1	Alternative 2	Alternative 3	Alternative 4	Alternative 5
			slope, temperature, and discharge for bull trout. The OM values for reaches in the mine site area range from zero to about a 25%, and bull trout occur in primarily occur in Meadow Creek and EFSFSR upstream of Meadow Creek. Currently, about 8.66 km of the total is suitable for bull trout spawning initiation, about half of the total habitat is unsuitable for spawning, and all of the habitat is FUR for incubation /emergence, and most of the total habitat is suitable for juvenile rearing (Table 4.12-20) . FA – Functioning Acceptably FR – Functioning at Risk FUR – Functioning at Unacceptable Risk	nearly half of the reduced total habitat is suitable or marginally suitable for juvenile rearing (Table 4.12-20).		spawning initiation, most of the reduced total habitat is unsuitable for spawning (FUR), and all of the habitat is FUR for incubation /emergence, and nearly half of the reduced total habitat is suitable or marginally suitable for juvenile rearing (Table 4.12-59).		
DEIS Table ES4-1		Changes in water chemistry (above analysis criteria), at the mine site	Refer to **Table 3.12-24** for baseline measurements.	Predicted post-closure exceedance by constituent of concern: Aluminum: No exceedance. Copper: EFSFSR – 0.00265 mg/L and Meadow Creek – 0.005 mg/L. Antimony: Exceedance at YP-T-27 (0.225 mg/L) and YP-SR-4 (0.051 mg/L). Arsenic: Exceeds at all but 2 nodes, highest concentration at YP-T-11:Fiddle Creek (0.79 mg/L). Mercury: Exceeds at all but 1 node, highest concentration at YP-T-6:West End Creek (9.0E-06).	During post-closure YP-SR-4 seasonally exceeds the analysis criteria for antimony, arsenic, and mercury. YP-SR-2, YP-T-11, and YP-T-6 exceed the analysis criteria for mercury.	Similar to Alternative 1, except the spent ore and legacy tailings in Meadow Creek Valley would not be removed. Chemical constituent levels in Meadow Creek would likely be similar to baseline conditions.	Same as Alternative 1.	No changes from baseline.
Midas Gold Suggested Edits		Changes in water chemistry (above analysis criteria), at the mine site	Average measured constituent concentrations were measured at several key nodes for the following constituents of concern – aluminum, copper, antimony, arsenic and mercury (Table 3.12-24). The values were compared to the analysis criteria: Aluminum – analysis criteria of 0.38 mg/L and no exceedances at any location	Predicted post-closure exceedance of respective criteria by constituent of concern (based upon maximum predicted values without consideration of water treatment): Arsenic: Exceeds at all but 2 stream nodes, highest concentration at YP-T-11: Fiddle Creek (0.79 mg/L). Antimony: Exceedance at YP-T-27 (0.225 mg/L) and YP-SR-4 (0.051 mg/L).	Predicted post-closure exceedance of respective criteria by constituent of concern (based upon maximum predicted values without consideration of water treatment): During post-closure, stream node YP-SR-4 seasonally exceeds criteria for antimony, arsenic, and mercury. Stream nodes YP-SR-2 and YP-T-11 are predicted to	Similar to Alternative 1, except the spent ore and legacy tailings in Meadow Creek Valley would not be removed. Chemical constituent levels in Meadow Creek would likely be similar to baseline conditions.	Same as Alternative 1.	Alternatives 1, 2, and 4 include relocation and/or reprocessing certain legacy materials in the lower Meadow Creek basin, which would remove them as a source of arsenic and antimony to surface and groundwater. This potential for surface water and groundwater quality improvement would not exist under Alternative 5.

Origin of Text	Issue	Indicator	Baseline Conditions	Alternative 1	Alternative 2	Alternative 3	Alternative 4	Alternative 5
			Copper – analysis criteria of 0.0024 mg/L with one calculated exceedance using the Biotic Ligand model at YP-T-1 in Sugar Creek Antimony – analysis criteria of 0.0056 mg/L with two exceedances in Meadow Creek (YP-T-27 and YP-T-22) Arsenic – analysis criteria of 0.01 mg/L with exceedances at nine locations in Meadow Creek, EFSFSR, West End Creek, and Sugar Creek (YP-T-27, YP-T-22, YP-SR-10, YP-SR-8, YP-SR-6, YP-SR-4, YP-T-6, and YP-T-1) Mercury – analysis criteria of 2.0E-06 mg/L (total mercury) with exceedances at six locations in EFSFSR and West End Creek (YP-SR-10, YP-SR-8, YP-SR-6, YP-SR-4, YP-SR-2, and YP-T-6)	Mercury: Exceeds at all but 1 node, highest concentration at YP-T-6: West End Creek (9.0E-06). Copper: EFSFSR – 0.00265 mg/L; Meadow Creek – 0.005 mg/L. Aluminum: No exceedances. Antimony exceedances at YP-T-27 occur as the TSF consolidation water discharge occurs. As the consolidation water contribution decreases in post-closure, concentrations of antimony decrease. Peak antimony concentrations at YP-SR-4 occur seasonally throughout post-closure. However, the peak concentrations are less than the maximum measured antimony concentration (0.062 mg/L) at YP-SR-4. Exceedances of arsenic and mercury in Meadow Creek and the EFSFSR are related to release of the TSF consolidation water. Toe seepage from the Fiddle DRSF results in exceedances of arsenic and mercury in Fiddle Creek. Although arsenic is predicted to exceed the strictest water quality standard in West End Creek, concentrations are predicted to be less than the minimum baseline arsenic concentration. This occurs because the West End Pit only discharges infrequently during two years of post-closure and the majority of the water in West End Creek during post-closure is from natural catchment runoff. Mercury is not predicted to exceed surface water quality criteria at this location.	exceed the analysis criteria for mercury. Node YP-T-6 is also predicted to exceed the arsenic criterion. Application of water treatment in Alternative 2 did not result in exceedances of arsenic and mercury concentrations at YP-T-11. Arsenic and mercury and are predicted to exceed surface water quality criteria at YP-SR-2; however, concentrations are within the range of concentrations observed at this location under existing conditions. Peak arsenic concentrations are less than the maximum measured concentration and in general are similar to the average measured baseline concentration at this location. Outside of the first year of post-closure, mercury is predicted to be consistently similar to the average existing conditions concentration at YP-SR-2. Mercury concentrations are less than the maximum measured concentration at YP-SR-2 during the first year of post-closure. Management of the consolidation water in the Alternative 2 precludes occurrence of peak concentrations seen for Alternative 1. For Alternative 2 consolidation water will be collected and treated, which will reduce exceedances of arsenic and mercury in Meadow Creek and the EFSFSR seen for Alternative 1. For Alternative 1, toe seepage from the Fiddle DRSF results in exceedances of arsenic and mercury in Fiddle Creek. These exceedances are eliminated through collection and treatment of the toe seepage as proposed in Alternative 2.			

Origin of Text	Issue	Indicator	Baseline Conditions	Alternative 1	Alternative 2	Alternative 3	Alternative 4	Alternative 5
					Although arsenic is projected to be greater than surface water quality criterion, it is predicted to be less than the minimum measured baseline concentration in West End Creek. This occurs because discharge from the West End Pit is only modelled to occur during two years of post-closure and West End Creek is mainly composed of natural catchment runoff during post-closure.			
DEIS Table ES4-1	**The SGP may affect fish species by degrading water quality in waterways adjacent to access roads.**	Amount of increased traffic (average daily traffic).	Refer to **Table 3.16-2**.	Increases in AADT over baseline: Construction Phase = 65 vehicles. Operations Phase = 68 vehicles. Closure and Reclamation Phase = 25 vehicles. Post Closure Phase = 6 vehicles.	Increases in AADT over baseline: Construction Phase = 65 vehicles. Operations Phase = 50 vehicles. Closure and Reclamation Phase = 25 vehicles. Post Closure Phase = 6 vehicles. Water Chemical Delivery = 40 trucks per year (Operations and Closure and Reclamation phases).	Same as Alternative 1.	Same as Alternative 1 except the traffic level on Burnt Log Road would remain at baseline since it would not be used for mine site access. The access road traffic during operations would shift from the Burntlog Route to the Yellow Pine Route.	No change from baseline.
Midas Gold Suggested Edits	**The SGP may affect fish species by degrading water quality in waterways adjacent to access roads.**	Amount of increased traffic (average annual daily traffic) is used as an indirect surrogate measure of the potential increase in contribution of access roads because insufficient data exists to estimate this directly	The baseline condition includes the existing contribution of existing roads to water quality based on existing road conditions and existing average annual daily trips (AADT) (Table 3.16-2).	Increases in AADT over baseline: Construction Phase = 65 vehicles. Operations Phase = 68 vehicles. Closure and Reclamation Phase = 25 vehicles. Post Closure Phase = 6 vehicles. Mine access roads would be subject to a number of Forest Service required designs and BMPs, including details for road crossings, and would be constructed and managed with conventional stormwater management practices. Risk of water quality impacts from roads can be minimized with proper design, construction, and maintenance When properly applied, forest road BMPs can significantly reduce sediment production and transport. Appropriate road design, location, construction,	Similar to Alternative 1, but with lesser increases in trips. Increases in AADT over baseline: Construction Phase = 65 vehicles. Operations Phase = 50 vehicles. Closure and Reclamation Phase = 25 vehicles. Post Closure Phase = 6 vehicles. Water Chemical Delivery = 40 trucks per year (Operations and Closure and Reclamation phases).	Similar to Alternative 1.	Alternative 4 would require substantial upgrades and widening of portions of the Stibnite Road, including construction in close proximity to EFSFSR and Johnson Creek. All traffic to the mine site would use this access route, rather than the Burntlog route in Alternatives 1, 2, and 3, which would yield an increased risk to water quality from increased traffic along Johnson Creek Road and Stibnite Road because stream density is greater than Burntlog Route and streams are closer to the road than along Burntlog Route.	No change to the road network or ADDT from baseline.

Origin of Text	Issue	Indicator	Baseline Conditions	Alternative 1	Alternative 2	Alternative 3	Alternative 4	Alternative 5
				and maintenance can help ensure forest roads achieve their intended use without negatively impacting water quality; existing BMP programs have proven successful in reducing the effects of sedimentation from forest roads (Orndorff 2017).				
DEIS Table ES4-1		Changes in migratory patterns of fish.	Several barriers exist on the EFSFSR and Meadow Creek, including the gradient barrier at the Yellow Pine pit lake, which currently blocks 10.4 km of Chinook salmon habitat, 8.8 km of steelhead trout habitat, and 39.7 km of bull trout and cutthroat trout habitat.	Fish passage at Yellow Pine pit lake would initially be provided in a the EFSFSR tunnel, then ultimately by backfilling the Yellow Pine pit and building a new stream channel over the top of the backfill, thereby providing permanent fish passage through the area. The Meadow Creek diversions and then construction and operation of TSF/DRSF and the construction/operation of the DRSF in Fiddle Creek would create new barriers to natural fish movement that would be permanent.	Same as Alternative 1, except Meadow Creek would be permanently routed around the Hangar Flats pit lake likely creating a barrier to bull trout lake habitat.	Same as Alternative 1, except the existing partial barrier in Meadow Creek would remain in perpetuity, blocking 9.5 km of fish habitat, and the TSF/DRSF would be located in the upper EFSFSR drainage where it would create a barrier that would permanently block 15.7 km of fish habitat to natural migration.	Same as Alternative 1, except the EFSFSR tunnel would not be designed as fish passable. Natural migration up or downstream through the Yellow Pine pit area would not be available until after full reclamation of the EFSFSR through the Yellow Pine pit area is complete in Mine Year 13. The Yellow Pine pit barrier would continue to block access to 10.4 km of Chinook salmon habitat, 8.8 km of steelhead habitat, and 39.7 km of bull trout and cutthroat trout habitat.	No change from baseline.
Midas Gold Suggested Edits	**The SGP may affect fish populations through establishment of fish access upstream of the Yellow Pine pit.**	Changes in habitat access for migratory fish.	Several barriers exist in the Upper EFSFSR watershed at baseline that limit fish access to useable habitat and streams designated as critical habitat (DCH) under ESA. <u>Blocked Habitat:</u> Useable Habitat (see Appendix J-3): 10.2 km - Chinook Salmon 8.5 km - Steelhead 39.7 km - Bull trout 39.7 km - Westslope cutthroat trout DCH (see Appendix J-3): 26.5 km - Chinook Salmon 0.0 km - Steelhead 17.1 km - Bull trout	Fish passage at Yellow Pine pit lake would initially be provided in the EFSFSR tunnel during operations, then ultimately by backfilling the Yellow Pine pit and building a new stream channel over the top of the backfill, thereby providing permanent volitional fish passage through the area. The Meadow Creek diversions and then construction and operation of TSF/DRSF and the construction/ operation of the DRSF in Fiddle Creek would create new barriers to natural fish movement that would be permanent. <u>Blocked Habitat:</u> Useable Habitat (see Appendix J-3): 0.0 km - Chinook Salmon 1.9 km - Steelhead 15.6 km - Bull trout 15.6 km - Westslope cutthroat trout DCH (see Appendix J-3):	Same as Alternative 1 except Meadow Creek would be permanently routed around Hangar Flats pit lake likely creating a barrier to lake habitat for all fish. <u>Blocked Habitat:</u> Useable Habitat (see Appendix J-3): 0.0 km - Chinook Salmon 1.9 km - Steelhead 13.2 km - Bull trout 13.2 km - Westslope cutthroat trout DCH (see Appendix J-3): 5.7 km - Chinook Salmon 0.0 km - Steelhead 4.7 km - Bull trout	Same as Alternative 1, except the existing partial barrier in Meadow Creek would remain in perpetuity, blocking 9.5 km of fish habitat, and the TSF/DRSF would be located in the upper EFSFSR drainage where it would create a barrier that would permanently block 15.7 km of fish habitat to natural migration. <u>Blocked Habitat:</u> Useable Habitat (see Appendix J-3): Chinook salmon (not provided in DEIS) 1.9 km - Steelhead 29.2 km - Bull trout 29.2 km - Westslope cutthroat trout DCH (see Appendix J-3): 18.5 km - Chinook Salmon 0.0 km - Steelhead 11.9 km - Bull trout	Same as Alternative 1, except the EFSFSR tunnel would not be designed as fish passable. Natural migration up or downstream through the Yellow Pine pit area would not be available until after full reclamation of the EFSFSR through the Yellow Pine pit area is complete in Mine Year 13. The Yellow Pine pit barrier would continue to block access to 10.4 km of Chinook salmon habitat, 8.8 km of steelhead habitat, and 39.7 km of bull trout and cutthroat trout habitat. <u>Blocked Habitat:</u> Useable Habitat (see Appendix J-3): 0.0 km - Chinook Salmon 1.9 km - Steelhead 15.6 km - Bull trout 15.6 km - Westslope cutthroat trout DCH (see Appendix J-3):	No change from baseline.

Midas Gold Suggested Edits (white rows) on DEIS Table ES4-1 Summary and Comparison of the Potential Environmental Impacts Associated with the Significant Issues by Alternative (grey rows)

DISCLAIMER: This table is a limited summary and comparison of effects associated with the alternatives evaluated in the Draft EIS.

Origin of Text	Issue	Indicator	Baseline Conditions	Alternative 1	Alternative 2	Alternative 3	Alternative 4	Alternative 5
				5.7 km - Chinook Salmon 0.0 km - Steelhead 4.7 km - Bull trout			5.7 km - Chinook Salmon 0.0 km - Steelhead 4.7 km - Bull trout	
DEIS Table ES4-1		Length of suitable habitat upstream of the Yellow Pine pit lake (km).	Chinook salmon IP modeled habitat:11.4 km Steelhead trout IP modeled habitat: 8.8 km. Bull trout and cutthroat trout OM habitat: 39.7 km.	Chinook salmon IP modeled habitat: 6.9 km. Steelhead trout IP modeled habitat: 8.9 km. Bull trout and cutthroat trout OM habitat: 39.8 km.	Same as Alternative 1.	Same as Alternative 1.	Same as Alternative 1, except that access to all fish habitat upstream of the Yellow Pine pit lake would remain blocked until Mine Year 13.	Same as Baseline.
Midas Gold Suggested Edits		Length of suitable habitat upstream of the Yellow Pine pit lake (km).	The length of suitable habitat was assessed by the intrinsic habitat potential (IP) model for Chinook salmon and steelhead. Suitable habitat was assessed by the Occupancy Model (OM) for bull trout and westslope cutthroat trout. <u>Suitable Habitat</u> 11.4 km – Chinook salmon 8.8 km – Steelhead 39.7 km – Bull trout 39.7 km – Westslope cutthroat trout None of this habitat is currently accessible through volitional upstream movement.	<u>Suitable Habitat</u> 6.9 km – Chinook salmon 8.9 km – Steelhead 39.8 km – Bull trout 39.8 km – Westslope cutthroat trout	Same as Alternative 1.	Same as Alternative 1.	Same as Alternative 1, except that access to all fish habitat upstream of the Yellow Pine pit lake would remain blocked until Mine Year 13.	Same as Baseline.
DEIS Table ES4-1	**The SGP may affect fish health through hazardous material spills at the mine site or along the access roads.**	Length of Chinook salmon IP habitat within 91 meters of access routes.	Not applicable.	Yellow Pine Route: 36 km. Burntlog Route: 7.3 km. Warm Lake Road: 9.2 km.	Yellow Pine Route and Warm Lake Road, same as Alternative 1. Burntlog Route: 5.91 km.	Yellow Pine Route and Warm Lake Road, same as Alternative 1. Burntlog Route: 4.83 km.	Yellow Pine Route and Warm Lake Road, same as Alternative 1. Potential impacts would be for all phases of SGP. The Burntlog Route would not be constructed under Alternative 4.	Not applicable.
Midas Gold Suggested Edits		Length of Chinook salmon IP habitat within 91 meters of access routes.	Existing roads are a combination of paved routes (Warm Lake Road) and existing native surface roads which together with their proximity to streams, number of trips, routes used, and materials hauled establish a baseline probability of spill and consequences of spill and consequences materials hauled establish a baseline	The amount of Intrinsic Potential that occurs within 91 meters (300 feet) of stream crossings from low to high IP along each of the routes for Alternative 1 are the following: Yellow Pine Route: 36 km. Burntlog Route: 7.3 km. Warm Lake Road: 9.2 km (Table 4.12-3).	The amount of Intrinsic Potential that occurs within 91 meters (300 feet) of stream crossings from low to high IP along each of the routes is the same as alternative 1 with the exception of Burntlog Route, which will 5.9 km of habitat (Table 4.12-26). In addition, this alternative will have the least amount of	The amount of Intrinsic Potential that occurs within 91 meters (300 feet) of stream crossings from low to high IP along each of the routes is the same as alternative 1 with the exception of Burntlog Route, which will 4.8 km of habitat (Table 4.12-45a).	The amount of Intrinsic Potential that occurs within 91 meters (300 feet) of stream crossings from low to high IP along each of the routes for Alternative 4 are the following: Yellow Pine Route: 36 km. Burntlog Route: 0 km	No change from baseline conditions.

Origin of Text	Issue	Indicator	Baseline Conditions	Alternative 1	Alternative 2	Alternative 3	Alternative 4	Alternative 5
			risk given the trip frequency, routes, and materials hauled under baseline, including Midas Gold's currently authorized uses.	For the first 1-3 years, access would be via the Yellow Pine Route with minor upgrades, then switching to the Burntlog Route (16.5 km) for the remaining years of operations through post-closure. Burntlog Route (16.5 km), which would be used for the remainder of the mine life is shorter, is shorter, has fewer landslide and rockslide areas and no mapped avalanche paths, and a lower density of Chinook salmon habitat close to the road (DEIS Table 4.12-3), and so represents the route with the lowest risk for spill and adverse effects on salmon habitat generally and IP habitat specifically, as well as risk to fish health. The overall direct and indirect effects of hazardous materials and other substances would likely be minor, but the effects could increase depending on the location where a spill occurs, and the amount and type of material released. Following regulatory requirements and plans for spill containment, control, and response would reduce the potential (probability) for spills and for impacts associated with those spills. Following regulatory requirements and plans for spill containment, control, and response would reduce the potential for spills and for impacts associated with those spills (p. 4.12-19).	truck traffic, which would reduce the risk of spills (p. 4.12-99). .		Warm Lake Road: 9.2 km (Table 4.12-64). Truck traffic would be similar as Alternative 1 and all would be on Yellow Pine Road, which has more Chinook salmon IP that could be impacted from a vehicle spill (p. 4.12-184). Yellow Pine Route would be upgraded and used for mine site access throughout life of mine instead of the Burntlog Route. The Yellow Pine Route is longer (36 km), has a higher potential for road hazards, including landslide areas, rockfall areas, and avalanche paths (DEIS Section 4.2.2.4.3; Table 4.7-3), and a higher density of Chinook salmon habitat close to the road (DEIS Table 4.12-3), and so represents the route with the highest risk for spill and adverse effects on salmon habitat generally and IP habitat specifically, as well as risk to fish health. Following regulatory requirements and plans for spill containment, control, and response would reduce the potential for spills and for impacts associated with those spills (p. 4.12-19).	
DEIS Table ES4-1		Length of critical habitat for steelhead and bull trout within 91 meters of access routes.	Not applicable.	Yellow Pine Route: Steelhead Trout-32.3 km, and Bull Trout - 33.7 km. Burntlog Route: Steelhead Trout – 1.62 km, and Bull Trout – 8.87 km. Warm Lake Road: Steelhead Trout – 4.06 km, and Bull Trout – 9.05 km.	Yellow Pine Route and Warm Lake Road, same as Alternative 1. Burntlog Route: Steelhead Trout – 1.23 km, and Bull Trout – 7.67 km.	Yellow Pine Route and Warm Lake Road, same as Alternative 1. Burntlog Route: Steelhead Trout – 1.23 km, and Bull Trout – 5.74 km.	Yellow Pine Route and Warm Lake Road, same as Alternative 1. Potential impacts would be for all phases of SGP. The Burntlog Route would not be constructed under Alternative 4.	Not applicable.
Midas Gold Suggested Edits		Length of critical habitat for steelhead and bull trout	Existing roads are a combination of paved routes (Warm Lake Road) and	For the first 1-3 years, access would be via the Yellow Pine Route with minor upgrades, then	Similar to Alternative 1, with reroute of a 5.3-mile segment of the Burntlog Route	Similar to Alternative 1, with some rerouting but no change in the relative risk of	Yellow Pine Route would be upgraded and used for mine site access throughout life of	No change from baseline conditions.

Origin of Text	Issue	Indicator	Baseline Conditions	Alternative 1	Alternative 2	Alternative 3	Alternative 4	Alternative 5
		within 91 meters of access routes.	existing native surface roads which together with their proximity to streams, number of trips, routes used, and materials hauled establish a baseline probability of spill and consequences of spill and consequences materials hauled establish a baseline risk given the trip frequency, routes, and materials hauled under baseline, including Midas Gold's currently authorized uses.	switching to the Burntlog Route (16.5 km) for the remaining years of operations through post-closure. The Yellow Pine Route is longer (36 km), has a higher potential for road hazards, including landslide areas, rockfall areas, and avalanche paths (DEIS Section 4.2.2.4.3; Table 4.7-3), and a higher density of critical habitat for steelhead and bull trout close to the road (DEIS Table 4.12-3), and so represents the route with the lowest risk for spill and adverse effects on salmonid habitat generally and steelhead and bull critical habitat specifically, as well as risk to fish health. Burntlog Route (16.5 km), which would be used for the remainder of the mine life is shorter, is shorter, has fewer landslide and rockslide areas and no mapped avalanche paths, and a lower density of critical habitat for steelhead and bull trout close to the road (DEIS Table 4.12-3), and so represents the route with the lowest risk for spill and adverse effects on salmonid habitat generally and steelhead and bull critical habitat specifically, as well as risk to fish health. The overall direct and indirect effects of hazardous materials and other substances would likely be minor, but the effects could increase depending on the location where a spill occurs, and the amount and type of material released. Following regulatory requirements and plans for spill containment, control, and response would reduce the potential (probability) for spills and for impacts associated with those spills.	(Riordan Creek Segment), but same relative risk of spill described under Alternative 1.	spill described under Alternative 1.	mine instead of the Burntlog Route. The Yellow Pine Route is longer (36 km), has a higher potential for road hazards, including landslide areas, rockfall areas, and avalanche paths (DEIS Section 4.2.2.4.3; Table 4.7-3), and a higher density of Chinook salmon habitat close to the road (DEIS Table 4.12-3), and so represents the route with the highest risk for spill and adverse effects on salmon habitat generally and IP habitat specifically, as well as risk to fish health. Following regulatory requirements and plans for spill containment, control, and response would reduce the potential for spills and for impacts associated with those spills.	

Midas Gold Suggested Edits (white rows) on DEIS Table ES4-1 Summary and Comparison of the Potential Environmental Impacts Associated with the Significant Issues by Alternative (grey rows)

DISCLAIMER: This table is a limited summary and comparison of effects associated with the alternatives evaluated in the Draft EIS.

Origin of Text	Issue	Indicator	Baseline Conditions	Alternative 1	Alternative 2	Alternative 3	Alternative 4	Alternative 5
	Access and Transportation							
DEIS Table ES4-1	**The SGP may affect access to public lands during mine construction, operations, and closure and reclamation.**	Number, location, and description of changes in access due to new and improved roadways.	See **Table 3.16-1** and **Figure 3.16-1.**	- Burnt Log Road (plowed). - No public access through the mine site during operations. Loss of winter groomed OSV trail on Warm Lake Road to Landmark.	Same as Alternative 1 except: - Mine site public access during operations (Option 1 and 2) (not plowed). Rerouted Riordan Creek Segment on Burntlog Route (plowed).	Same as Alternative 1 except: EFSFSR TSF public access or mine access route upon closure and reclamation.	Same as Alternative 1 except: - no Burntlog Route, only Yellow Pine Route (plowed).	No change from baseline conditions.
Midas Gold Suggested Edits	**The SGP may affect access to public lands during mine construction, operations, and closure and reclamation.**	Number, location, and description of changes in access due to new and improved roadways.	See **Table 3.16-1** and **Figure 3.16-1.**	Construction: Stibnite Road (CR 50-412) and Burntlog Road (FR-447) to remain open with temporary closures to accommodate construction. Construction of an off-highway vehicle (OHV) connector from Horse Heaven/ Powerline to Meadow Creek Lookout Road (FR 51290) and completion of Burntlog Route to provide alternative public access to Thunder Mountain Road (FR 50375) in late construction through operations (DEIS Sec 2.3.4.3, and Sec 2.3.4.4). Operations: Through-site public access closed. Access to Meadow Creek Lookout Road (FR 51290) via Burntlog Route and OHV connector. Groomed OSV trail using Cabin Creek Road to replace lost Warm Lake to Landmark OSV route (DEIS Sec 2.3.5.15). Reclamation and Post-Closure: Following closure and reclamation, new sections of the Burntlog Route would be decommissioned; a new public access road will be constructed over the backfilled Yellow Pine Pit reconnecting the Stibnite Road to Thunder Mountain Road (DEIS Sec 2.3.7.12).	Construction: Same as Alternative 1 (DEIS Sec 2.4.4.2). Operations: Same as Alternative 1 except: Rerouted Riordan Creek Segment on Burntlog Route (plowed); and through-site public access established from Stibnite Road (CR 50-412) to Thunder Mtn Road (FR 50375) (not plowed and periodic access restrictions) (DEIS Sec 2.4.5.8). Reclamation and Post-Closure: Same as Alternative 1.	Construction: Same as Alternative 1 (DEIS Sec 2.5.4.3). Operations: Same as Alternative 1 except no OHV trail. Also, Meadow Creek Lookout Road (FR 51290), from Burntlog Route at the upper portion of Blowout Creek drainage to the intersection with Thunder Mountain Road (FR 50375) would be improved for public access (DEIS Sec 2.5.5.9). Reclamation and Post-Closure: Same as Alternative 1, except public access across Yellow Pine pit connected to Thunder Mtn Road via EFSFSR TSF pipeline route or public access route through Blowout Creek drainage (DEIS Sec 2.5.6.3).	Construction and Operations: No Burntlog Route. Stibnite Road (CR 50-412) to remain open with temporary closures to accommodate construction of new combined mine access/public access road west of Yellow Pine Pit connecting Stibnite Road (CR 50-412) to Thunder Mtn. Road (FR 50375). Seasonal public access. Reclamation and Post-Closure: New public access road will be constructed over the backfilled Yellow Pine Pit reconnecting the Stibnite Road to Thunder Mountain Road.	No change from baseline conditions.
DEIS Table ES4-1	**The SGP may change the miles of roads and trails, the amount of use, and types of vehicles on each road or trail.**	Miles of new road for public use.	Forest Service = 1,557 miles. Valley County = 278 miles. State = 131 miles.	Forest Service = no change. Valley County = 2.5 miles[1]. State = no change. Private = 15 miles[2].	Forest Service = no change. Valley County = 2.5 miles[1]. State = no change. Private = 13.5 miles (with an additional 3 to 4 miles through the mine site)[3].	Forest Service = 7.6-9 miles[4]. Valley County = 2.5 miles[1]. State = no change. Private = 19.6 miles[2].	Forest Service = no change. Valley County = 2.5 miles[1]. State = no change. Private = 4 miles through the mine site[5].	No change from baseline conditions.
Midas Gold Suggested Edits	**The SGP may change the miles of roads and trails, the amount of use, and**	Miles of new road for public use.	Forest Service = 1,557 miles.	Forest Service = no change. Valley County = 2.5 miles[1].	Forest Service = no change. Valley County = 2.5 miles[1].	Forest Service = 7.6-9 miles[4].	Forest Service = no change. Valley County = 2.5 miles[1].	No change from baseline conditions.

Origin of Text	Issue	Indicator	Baseline Conditions	Alternative 1	Alternative 2	Alternative 3	Alternative 4	Alternative 5
	types of vehicles on each road or trail.		Valley County = 278 miles. State = 131 miles.	State = no change. Private = 15 miles[2].	State = no change. Private = 13.5 miles (with an additional 3 to 4 miles through the mine site)[3]	Valley County = 2.5 miles1. State = no change. Private = 19.6 miles[2].	State = no change. Private = 4 miles through the mine site[5].	
DEIS Table ES4-1	**The SGP may affect public safety on the roads used by mine vehicles during construction, operations, and closure and reclamation activities.**	Approximate miles of roads used by mine vehicles.	Yellow Pine Route = 70 miles South Fork Salmon River Road = 83 miles. Burntlog Route = 0 mile (does not exist).	Yellow Pine Route = 70 miles. Burntlog Route = 73 miles.	Yellow Pine Route = 70 miles. Burntlog Route = 71 miles.	Yellow Pine Route = 70 miles. Burntlog Route = 75 miles.	Yellow Pine Route = 70 miles. Burntlog Route = 0 mile.	No change from baseline conditions.
Midas Gold Suggested Edits	**The SGP may affect public safety on the roads used by mine vehicles during construction, operations, and closure and reclamation activities.**	Approximate miles of roads used by mine vehicles.	Yellow Pine Route = 70 miles South Fork Salmon River Road = 83 miles. Burntlog Route = 0 mile (does not exist).	Construction: Yellow Pine Route = 70 miles. Construction, Operations and Reclamation/Post-Closure: Burntlog Route = 73 miles.	Construction: Yellow Pine Route = 70 miles. Construction, Operations and Reclamation/Post-Closure: Burntlog Route = 71 miles.	Construction: Yellow Pine Route = 70 miles. Construction, Operations and Reclamation/Post-Closure: Burntlog Route = 75 miles.	Construction, Operations and Reclamation/Post-Closure: Yellow Pine Route = 70 miles. Burntlog Route = 0 mile.	No change from baseline conditions.
DEIS Table ES4-1	**The SGP may affect public safety on the roads used by mine vehicles during construction, operations, and closure and reclamation activities.**	Change in traffic volume. (AADT).	Refer to **Table 3.16-2**.	Construction = 65 (45 HV). Operations = 68 (49 HV). Closure-Reclamation = 25 (13 HV). Post-Closure = 6 (0 HV).	Construction = 65 (45 HV). Operations = 50 (33 HV). Closure-Reclamation = 25 (13 HV). Post-Closure = 6 (0 HV). *Additional 40 truck trips (O and C-R) per year required to deliver chemicals for water treatment.	Same as Alternative 1.	Same as Alternative 1.	No change from baseline conditions.
Midas Gold Suggested Edits	**The SGP may affect public safety on the roads used by mine vehicles during construction, operations, and closure and reclamation activities.**	Change in traffic volume. (AADT).	Refer to Table 3.16-2.	During construction, mine traffic would generate an estimated annual average daily traffic (AADT) of 65 vehicles (45 heavy vehicles [HV] and 20 light vehicles [LV]). During operations, mine traffic would generate an AADT of 68 vehicles (49 HV and 19 LV). During reclamation and closure, an estimated 25 AADT would be needed (13 HV and 12 LV). Construction = 65 (45 HV). Operations = 68 (49 HV). Closure-Reclamation = 25 (13 HV). Post-Closure = 6 (0 HV). Tables 2.3-2, 2.3-7, 2.3-8	Traffic volumes during construction and reclamation/closure would be the same as those described under Alternative 1. Due to the generation of lime at the mine site, operational traffic would see a 26% decrease in vehicle trips. Construction = 65 (45 HV). Operations = 50 (33 HV). Closure-Reclamation = 25 (13 HV). Post-Closure = 6 (0 HV). *Additional 40 truck trips (O and C-R) per year required to deliver chemicals for water treatment. Tables 2.3-2, 2.4-3, 2.3-8	Same as Alternative 1.	Same as Alternative 1.	No change from baseline conditions.

Midas Gold Suggested Edits (white rows) on DEIS Table ES4-1 Summary and Comparison of the Potential Environmental Impacts Associated with the Significant Issues by Alternative (grey rows)

DISCLAIMER: This table is a limited summary and comparison of effects associated with the alternatives evaluated in the Draft EIS.

Origin of Text	Issue	Indicator	Baseline Conditions	Alternative 1	Alternative 2	Alternative 3	Alternative 4	Alternative 5
DEIS Table ES4-1	**The SGP may change the miles of roads and trails, the amount of use, and types of vehicles on each road or trail.**	Change in amount of use.	See **Table 3.16-1** for existing roads.	Yellow Pine Route = 5 mine-related vehicles/hr (Construction). Burntlog Route = 5 mine-related vehicles/hr (Operations); 2 mine-related vehicles/hr (Closure-Reclamation).	Same as Alternative 1 except: Burntlog Route = 4 mine-related vehicles/hr (Operations).	Same as Alternative 1.	Same as Alternative 1 except all phases occurring on Yellow Pine Route.	No change from baseline conditions.
Midas Gold Suggested Edits	**The SGP may change the miles of roads and trails, the amount of use, and types of vehicles on each road or trail.**	Change in amount of use.	See Table 3.16-1 for existing roads.	Yellow Pine Route = 5 mine-related vehicles/hr (Construction). Burntlog Route = 5 mine-related vehicles/hr (Operations); 2 mine-related vehicles/hr (Closure-Reclamation).	Same as Alternative 1 except: the Burntlog Route would experience a volume decrease of approximately 25% when compared to Alternative 1.	Same as Alternative 1.	Same as Alternative 1 except all phases occurring on Yellow Pine Route. The Yellow Pine Route would experience an increase in vehicle interaction with mine vehicles throughout the mine life. Current AADT volumes (Table 3.16-2) are approximately 3.5 times greater on the Yellow Pine Route than the Burnt Log Road.	No change from baseline conditions.
DEIS Table ES4-1	**The SGP may affect public safety on the roads used by mine vehicles during construction, operations, and closure and reclamation activities.**	Number of accidents, both current and projected.	Warm Lake Road = 8/year. Johnson Creek Road = 2/year. Stibnite Road = 1/year.	Midas Gold would implement safety measures to reduce accidents including radio communication.	On-site lime generation would result in fewer mine-related vehicle trips and a decrease in the likelihood of being in an accident.	Same as Alternative 1.	Yellow Pine Route has a steeper topography and terrain that would require wider roads, more cut/fill sections, and more switchbacks.	No change from baseline conditions.
Midas Gold Suggested Edits	**The SGP may affect public safety on the roads used by mine vehicles during construction, operations, and closure and reclamation activities.**	Number of accidents, both current and projected.	Warm Lake Road = 8/year. Johnson Creek Road = 2/year. Stibnite Road = 1/year.	Midas Gold would implement safety measures to reduce accidents including radio communication. For example, the Burntlog Route would be widened to 26 feet, tight corners would be straightened to allow for improved safety and traffic visibility, grades would be maintained at less than 10 percent, and placement of sub-base material and surface with gravel would occur to provide a stable long-term roadway. Measures would be implemented that would help reduce traffic and the incidence of accidents, including busing and/or van pooling to the mine site, housing workers at the mine site to minimize the frequency of SGP worker vehicle trips, driver training, and equipping staff traveling to and from the mine site with two-way radios to communicate positions, relay information about road conditions, and warn of public vehicles traveling on Burntlog Route (or Yellow Pine Route during construction). This also would	Same as Alternative 1, except: On-site lime generation would result in 25% fewer mine-related vehicle trips and a decrease in the likelihood of being in an accident. Also, an alternate public access route through the mine site is proposed for public use thus reducing the potential for accidents on the Burntlog Route. During operations, public traffic would be separated from mine traffic on the road through the mine site thereby reducing potential safety issues (DEIS Section 4.16.2.2.4).	Same as Alternative 1.	Similar measures will be implemented as described in Alternative 1. However, Alternative 4 would have greater safety and emergency impacts than the Burntlog Route due to additional safety considerations required to use the Yellow Pine Route exclusively, which is in steeper terrain than the Burntlog Route and subject to avalanches and landslides. The Yellow Pine Route would experience an increase in public vehicle interaction with mine vehicle traffic throughout the mine life. Existing traffic volumes are approximately 3.5 times greater on the Yellow Pine Route than the existing Burnt Log Road (Table 3.16-2).	No change from baseline conditions.

Origin of Text	Issue	Indicator	Baseline Conditions	Alternative 1	Alternative 2	Alternative 3	Alternative 4	Alternative 5
				allow for rapid response in the event of an accident.				
DEIS Table ES4-1	**The SGP may affect public safety on the roads used by mine vehicles during construction, operations, and closure and reclamation activities.**	Change in emergency access.	N/A.	Additional access routes via public access through the mine site upon closure (Closure-Reclamation). Removal of Warm Lake OSV (Construction/Operations/Closure-Reclamation) and Johnson Creek OSV (Construction).	Same as Alternative 1 except: - public access through mine site.	Same as Alternative 1.	Same as Alternative 1.	N/A.
Midas Gold Suggested Edits	**The SGP may affect public safety on the roads used by mine vehicles during construction, operations, and closure and reclamation activities.**	Change in emergency access.	N/A.	The addition of the Burntlog Route would provide an additional point of emergency access for the Stibnite/Thunder Mountain area. Emergency access would be provided on the Yellow Pine Route during the first two years of construction and then on Burntlog Route for the remainder of the SGP. In the event of an emergency or when a threat to human life is identified (e.g., fires), roads would be temporarily closed, as appropriate. Staff traveling to and from the mine site with two-way radios to communicate positions, relay information about road conditions, and warn of public vehicles traveling on Burntlog Route (or Yellow Pine Route during construction). This also would allow for rapid response in the event of an accident. Removal of the existing Warm Lake and Johnson Creek OSV routes will be mitigated by adding a new OSV route along Cabin Creek Road and parallel to Johnson Creek Road between Trout Creek Campground and Landmark.	Same as Alternative 1 except: - public access through mine site would provide an alternative emergency access route through the mine site.	Same as Alternative 1.	No change in current emergency access. Access through the mine site would be through a single point of ingress and egress for both public and mine related traffic. This would require safety considerations for mine deliveries and public access. The steep climb to provide access around the Yellow Pine pit would require a wider road with more switchbacks to accommodate the heavy trucks transporting mine supplies and may increase hazardous driving conditions for crew rotation, emergency responses, and wildfire. Under Alternative 4, the public and mine related traffic will share the Yellow Pine Route beginning in construction through closure. The Stibnite Road segment would require additional safety considerations for geotechnical hazards, landslides, and avalanche zones and may result in periods of road closure. The risk of damage, injury, or loss of life from mass wasting events along the Yellow Pine Route would be increased due to its location, particularly Stibnite Road (CR 50-412), because the route is within the runout zone for avalanches. Twelve avalanche paths were identified along Stibnite Road.	N/A.

Midas Gold Suggested Edits (white rows) on DEIS Table ES4-1 Summary and Comparison of the Potential Environmental Impacts Associated with the Significant Issues by Alternative (grey rows)

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Origin of Text	Issue	Indicator	Baseline Conditions	Alternative 1	Alternative 2	Alternative 3	Alternative 4	Alternative 5
	Scenic Resources							
DEIS Table ES4-1	**The SGP may cause changes to scenic resources.**	Visual contrast.	Landscape is characterized by valley floors surrounded by mountains with steep terrain broken up by narrow gorges and streams. Vegetation includes grass and evergreens. Existing modifications include the existing mine site, forest roads, transmission lines, and residences in the western portion of the analysis area.	New disturbances within the footprint of existing modifications would appear similar to existing modifications but at a larger scale. Visual contrast would increase due to larger road width, more vegetation removal, and new retaining walls. New right-of-way for a new transmission line and wider right-of-way of the upgraded transmission line would introduce high visual contrast. SGP components would result in a high level of change to the characteristic landscape during operations; permanent changes, although less than during operations, would result.	Similar to Alternative 1, except there would be slightly less visual contrast from the mine site due to absence of West End DRSF, and residents of the Thunder Mountain Estates development would experience fewer changes due to location of the transmission line away from the development.	Similar to Alternative 1 except visibility of changes from the mine site would differ as the Hangar Flats TSF would be located in the EFSFSR drainage and not visible from the Meadow Creek Lookout. There would be no public access through the mine site and, therefore, no new viewing platform providing foreground views of the mine site. The new transmission line would result in a lower level of visual change than Alternative 1 where it would follow an existing access road.	Changes associated with the mine site would be the same as Alternative 1. There would be no visual changes from Burntlog Route, because that would not be constructed. Landscape changes would result from the upgrades to Yellow Pine Route. Visual change from utilities would be the same except for additional periodic impacts from helicopters during construction and maintenance activity for communications sites.	The landscape character would not be changed by mine site activity or new or improved access roads, transmission lines, or offsite facilities associated with the mine.
Midas Gold Suggested Edits	**The SGP may cause changes to scenic resources.**	Visual contrast.	Landscape is characterized by valley floors surrounded by mountains with steep terrain broken up by narrow gorges and streams. Vegetation includes grass and evergreens. Existing modifications include the existing mine site, forest roads, transmission lines, and residences in the western portion of the analysis area.	New disturbances within the footprint of existing modifications would appear similar to existing modifications but at a larger scale. Visual contrast would increase due to larger road width, more vegetation removal, and new retaining walls. New right-of-way for a new transmission line and wider right-of-way of the upgraded transmission line would introduce high visual contrast. SGP components would result in a high level of change to the characteristic landscape during operations; permanent changes, although less than during operations, would result. Measures to minimize these impacts at the end of mine life are presented in the Reclamation and Closure Plan in Section 2.3.7 of the DEIS.	Similar to Alternative 1, except there would be slightly less visual contrast from the mine site due to absence of West End DRSF, and residents of the Thunder Mountain Estates development would experience fewer changes due to location of the transmission line away from the development. Measures to minimize these impacts at the end of mine life are presented in the Reclamation and Closure Plan in Section 2.3.7 of the DEIS.	Similar to Alternative 1 except visibility of changes from the mine site would differ as the Hangar Flats TSF would be located in the EFSFSR drainage and not visible from the Meadow Creek Lookout. There would be no public access through the mine site and, therefore, no new viewing platform providing foreground views of the mine site. The new transmission line would result in a lower level of visual change than Alternative 1 where it would follow an existing access road. Measures to minimize these impacts at the end of mine life are presented in the Reclamation and Closure Plan in Section 2.3.7 of the DEIS.	Changes associated with the mine site would be the same as Alternative 1. There would be no visual changes from Burntlog Route, because that would not be constructed. Landscape changes would result from the upgrades to Yellow Pine Route. Visual change from utilities would be the same except for additional periodic impacts from helicopters during construction and maintenance activity for communications sites. Measures to minimize these impacts at the end of mine life are presented in the Reclamation and Closure Plan in Section 2.3.7 of the DEIS.	The landscape character would not be changed by mine site activity or new or improved access roads, transmission lines, or offsite facilities associated with the mine.
DEIS Table ES4-1	**The SGP may cause changes to scenic resources.**	SGP component visibility.	Nighttime lighting in the analysis area is minimal and generally limited to residential areas in the western portion of the analysis area.	Nighttime lighting would increase substantially in the mine site. Additional nighttime light sources would include the maintenance facilities and vehicle headlights as they travel on mine access roads.	Similar to Alternative 1, except lighting from vehicles would occur to a slightly different area as a result of the 5.28-mile re-route of Burntlog Route. Lighting from the maintenance facility would be further east due to the different location of the maintenance facility.	Similar to Alternative 1, except lighting from worker housing would be located further west in the East Fork Meadow Creek drainage. Effects to skyglow would be the same.	Similar to Alternative 1, except SGP vehicle lights from vehicles traveling to and from the mine site would occur along the Yellow Pine Route, north and west of the Burntlog Route.	Nighttime lighting in the analysis area would not change as a result of the mine site or associated traffic or maintenance buildings.

Midas Gold Suggested Edits (white rows) on DEIS Table ES4-1 Summary and Comparison of the Potential Environmental Impacts Associated with the Significant Issues by Alternative (grey rows)

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Origin of Text	Issue	Indicator	Baseline Conditions	Alternative 1	Alternative 2	Alternative 3	Alternative 4	Alternative 5
Midas Gold Suggested Edits	**The SGP may cause changes to scenic resources.**	SGP component visibility.	Nighttime lighting in the analysis area is minimal and generally limited to residential areas in the western portion of the analysis area.	Nighttime lighting would increase substantially in the mine site. Additional nighttime light sources would include the maintenance facilities and vehicle headlights as they travel on mine access roads. Appendix D-1, Table D-1, specifically: For all alternatives, Forest Service designated mitigation measures FS-121 and FS-142 have been proposed to minimize the impacts from lights associated with permanent and portable infrastructure. These measures are proposed to reduce nighttime light impacts to people and wildlife.	Similar to Alternative 1, except lighting from vehicles would occur to a slightly different area as a result of the 5.28-mile re-route of Burntlog Route. Lighting from the maintenance facility would be further east due to the different location of the maintenance facility. For all alternatives, Forest Service designated mitigation measures FS-121 and FS-142 have been proposed to minimize the impacts from lights associated with permanent and portable infrastructure.	Similar to Alternative 1, except lighting from worker housing would be located further west in the East Fork Meadow Creek drainage. Effects to skyglow would be the same. For all alternatives, Forest Service designated mitigation measures FS-121 and FS-142 have been proposed to minimize the impacts from lights associated with permanent and portable infrastructure.	Similar to Alternative 1, except SGP vehicle lights from vehicles traveling to and from the mine site would occur along the Yellow Pine Route, north and west of the Burntlog Route. For all alternatives, Forest Service designated mitigation measures FS-121 and FS-142 have been proposed to minimize the impacts from lights associated with permanent and portable infrastructure.	Nighttime lighting in the analysis area would not change as a result of the mine site or associated traffic or maintenance buildings.

Midas Gold Suggested Edits (white rows) on DEIS Table ES4-1 Summary and Comparison of the Potential Environmental Impacts Associated with the Significant Issues by Alternative (grey rows)

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Origin of Text	Issue	Indicator	Baseline Conditions	Alternative 1	Alternative 2	Alternative 3	Alternative 4	Alternative 5
	Inventoried Roadless Areas (IRAs)							
DEIS Table ES4-1	**The SGP may impact roadless character in IRAs and lands contiguous to unroaded areas.**	Miles and acres of new roads in IRAs or contiguous unroaded lands.	Thirteen IRAs within the analysis area are managed for roadless character.	During construction and mine operation a total of 17 miles (215 acres) of access roads within five IRAs (Meadow Creek, Horse Heaven, Black Lake, Burnt Log, and Reeves Creek). Within Meadow Creek, Black Lake, and Burnt Log IRAs, 1.5 miles of soil nail walls would be constructed in association with Burntlog Route. After mine closure 1.5 miles of retaining wall (soil nail wall) would remain within the IRAs.	During construction and mine operation a total of 13 miles (204 acres) of access roads within five IRAs (Meadow Creek, Horse Heaven, Black Lake, Burnt Log, and Reeves Creek). Within Meadow Creek, Black Lake, and Burnt Log IRAs, 0.5 miles of soil nail walls would be constructed in association with Burntlog Route. After mine closure, 0.5 miles of retaining walls, and 3.1 miles of access road for the new transmission line would remain within the IRAs.	Total of 17 miles (167 acres) of access roads within five IRAs (Meadow Creek, Horse Heaven, Black Lake, Burnt Log, and Reeves Creek). Within Meadow Creek, Black Lake, and Burnt Log IRAs, 1.5 miles of soil nail walls would be constructed in association with Burntlog Route. After mine closure 1.5 miles of retaining walls and 2.2 miles of Burntlog Route would remain in the IRAs.	No access roads within IRAs.	No new roads within IRAs.
Midas Gold Suggested Edits	**The SGP may impact roadless character in IRAs and lands contiguous to unroaded areas.**	Miles and acres of new roads in IRAs or contiguous unroaded lands.	Thirteen IRAs within the analysis area are managed for roadless character. Under the Idaho Roadless Rule regulations, PNF and BNF forest plans, and 36 CFR 228A regulations, locatable mineral activities are allowed in the portions of these IRAs where proposed for the SGP, with mitigation of effects.	During construction and mine operation a total of 17 miles (215 acres) of access roads within five IRAs (Meadow Creek, Horse Heaven, Black Lake, Burnt Log, and Reeves Creek). Within Meadow Creek, Black Lake, and Burnt Log IRAs, 1.5 miles of soil nail walls would be constructed in association with Burntlog Route. Following mine closure, the Burntlog Route would be decommissioned. The existing upgraded sections of Burnt Log Road would be narrowed to their pre-mining widths. The new roadway portions of the Burntlog Route would be obliterated; this would include pulling back and re-contouring road cuts to slopes, removing culverts and bridges from all stream crossings, and removing safety berms, retaining walls (although soil nail walls would remain), mile markers, guardrails, signs, and the roadbed (Section 4.16.2.1.3). After mine closure 1.5 miles of retaining wall (soil nail wall) would remain within the IRAs to maintain slope stability.	During construction and mine operation a total of 13 miles (204 acres) of access roads within five IRAs (Meadow Creek, Horse Heaven, Black Lake, Burnt Log, and Reeves Creek). Within Meadow Creek, Black Lake, and Burnt Log IRAs, 0.5 miles of soil nail walls would be constructed in association with Burntlog Route. Following mine closure, the Burntlog Route would be decommissioned similar to Alternative 1. After mine closure, 0.5 miles of retaining walls, and 3.1 miles of access road for the new transmission line would remain within the IRAs to provide electrical power for post-closure WTP operation.	Total of 17 miles (167 acres) of access roads within five IRAs (Meadow Creek, Horse Heaven, Black Lake, Burnt Log, and Reeves Creek). Within Meadow Creek, Black Lake, and Burnt Log IRAs, 1.5 miles of soil nail walls would be constructed in association with Burntlog Route. Following mine closure, the Burntlog Route would be decommissioned similar to Alternative 1. After mine closure 1.5 miles of retaining walls and 2.2 miles of Burntlog Route would remain in the IRAs.	No access roads within IRAs.	No new roads within IRAs.
DEIS Table ES4-1	**The SGP may impact roadless character in IRAs and lands contiguous to unroaded areas.**	Number and acres of proposed SGP facilities in IRAs or contiguous unroaded lands.	Thirteen IRAs within the analysis area are managed for roadless character.	Total of 752 acres of SGP facilities within six IRAs (Meadow Creek, Horse Heaven, Black Lake, Burnt Log, Caton Lake, and Reeves Creek). After mine closure 491 acres of TSF and DRSFs structures	Total of 740 acres of SGP facilities within six IRAs (Meadow Creek, Horse Heaven, Black Lake, Burnt Log, Caton Lake, and Reeves Creek).	Total of 650 acres of SGP facilities within six IRAs (Meadow Creek, Horse Heaven, Black Lake, Burnt Log, Caton Lake, and Reeves Creek).	Total of 531 acres of SGP facilities within four IRAs (Meadow Creek, Horse Heaven, Caton Lake, and Reeves Creek). After mine closure 491 acres of TSF and DRSFs	No new facilities within IRAs.

Origin of Text	Issue	Indicator	Baseline Conditions	Alternative 1	Alternative 2	Alternative 3	Alternative 4	Alternative 5
				would remain in Meadow Creek and Horse Heaven IRAs.	After mine closure 524 acres of TSF and DRSFs and transmission line structures would remain in Meadow Creek and Horse Heaven IRAs.	After mine closure 455 acres of TSF and DRSFs structures would remain in Meadow Creek and Horse Heaven IRAs.	structures would remain in Meadow Creek and Horse Heaven IRAs.	
Midas Gold Suggested Edits	**The SGP may impact roadless character in IRAs and lands contiguous to unroaded areas.**	Number and acres of proposed SGP facilities in IRAs or contiguous unroaded lands.	Thirteen IRAs within the analysis area are managed for roadless character. Under the Idaho Roadless Rule regulations, PNF and BNF forest plans, and 36 CFR 228A regulations, locatable mineral activities are allowed in the portions of these IRAs where proposed for the SGP, with mitigation of effects.	Total of 752 acres of SGP facilities within six IRAs (Meadow Creek, Horse Heaven, Black Lake, Burnt Log, Caton Lake, and Reeves Creek). After mine closure 491 acres of TSF and DRSFs structures would remain in Meadow Creek and Horse Heaven IRAs.	Total of 740 acres of SGP facilities within six IRAs (Meadow Creek, Horse Heaven, Black Lake, Burnt Log, Caton Lake, and Reeves Creek). After mine closure 524 acres of TSF and DRSFs and transmission line structures would remain in Meadow Creek and Horse Heaven IRAs.	Total of 650 acres of SGP facilities within six IRAs (Meadow Creek, Horse Heaven, Black Lake, Burnt Log, Caton Lake, and Reeves Creek). After mine closure 455 acres of TSF and DRSFs structures would remain in Meadow Creek and Horse Heaven IRAs.	Total of 531 acres of SGP facilities within four IRAs (Meadow Creek, Horse Heaven, Caton Lake, and Reeves Creek). After mine closure 491 acres of TSF and DRSFs structures would remain in Meadow Creek and Horse Heaven IRAs.	No new facilities within IRAs.

Midas Gold Suggested Edits (white rows) on DEIS Table ES4-1 Summary and Comparison of the Potential Environmental Impacts Associated with the Significant Issues by Alternative (grey rows)

DISCLAIMER: This table is a limited summary and comparison of effects associated with the alternatives evaluated in the Draft EIS.

Origin of Text	Issue	Indicator	Baseline Conditions	Alternative 1	Alternative 2	Alternative 3	Alternative 4	Alternative 5
	Tribal Rights and Interests							
DEIS Table ES4-1	**The SGP would impact tribal resources, restrict tribal access, and reduce viability and/or availability of culturally significant fish, wildlife, and plants.**	Changes in tribal access due to the restricted access Operations Area Boundary.	Tribal access and use of the region has long-standing and on-going cultural importance and subsistence value. Currently there is no restricted access on NFS lands in the SGP area. Some restrictions are in place on private lands.	The SGP would restrict tribal access in the 3,533-acre SGP footprint and the 13,446 acres of public land within the Operations Area Boundary. Burntlog Route, a new off-highway vehicle connector, and new over-snow vehicle groomed trails would provide new and/or improved access to the SGP area and vicinity, which could have a positive impact by providing tribes year-round access to previously inaccessible traditional use areas. There would not be a public access road through the mine. Length of time of restricted access is 20 years. This could result in loss of tribal cultural practices important to tribal identity.	Same as Alternative 1, except for: • The SGP footprint would occupy 3,423 acres. • Public access would be provided through the mine site. The Riordan Creek Segment of the Burntlog Route could result in increased use of the Black Lake area and No Return Wilderness by recreational users, impacting tribal members if there is an actual or perceived decrease in their access to, availability, and/or quality of tribal resources.	Same as Alternative 1, except for: • The SGP footprint would occupy 3,610 acres. • The public land within the SGP Operations Area Boundary would occupy a larger area of 17,034 acres. • Closure and reclamation would include a permanent roadway around the TSF that would provide improved SGP area access.	Same as Alternative 1, except for: • The Project footprint would occupy 3,219 acres. • Burntlog Route would not be constructed. • Public access would be provided through the mine site. Stibnite Road would not be returned to its pre-mining width and traffic would be greatly reduced. This could encourage use of tribal resources east of the mine.	Except for the Golden Meadows Exploration mine site area, future access to subsistence resources and for cultural uses in the existing SGP area would remain unchanged.
Midas Gold Suggested Edits	**The SGP would impact tribal resources, restrict tribal access, and reduce viability and/or availability of culturally significant fish, wildlife, and plants.**	Changes in tribal access due to the restricted access Operations Area Boundary.	Tribal access and use of the region have long-standing and on-going cultural importance and subsistence value. Currently there is no substantial restricted access on NFS lands in the SGP area. Some restrictions are in place on private lands.	The SGP would restrict tribal access in the 3,533-acre SGP footprint and the 13,446 acres of public land within the Operations Area Boundary. Burntlog Route, a new off-highway vehicle connector, and new over-snow vehicle groomed trails would provide new and/or improved access to the SGP area and vicinity, which could have a positive impact by providing tribes year-round access to previously inaccessible traditional use areas. There would not be a public access road through the mine. The upgraded Meadow Creek Lookout Road portion of the Burntlog Route could result in increased use of the River of No Return Wilderness by recreational users, impacting tribal members if there is an actual or perceived decrease in their access to, availability, and/or quality of tribal resources. Length of time of restricted access is 20 years. This could result in loss of tribal cultural	Same as Alternative 1, except for: • The SGP footprint would occupy 3,423 acres. • Public access would be provided through the mine site. The Riordan Creek Segment of the Burntlog Route could result in increased use of the Black Lake area and River of No Return Wilderness by recreational users, impacting tribal members if there is an actual or perceived decrease in their access to, availability, and/or quality of tribal resources.	Same as Alternative 1, except for: • The SGP footprint would occupy 3,610 acres. • The public land within the SGP Operations Area Boundary would occupy a larger area of 17,034 acres. • Closure and reclamation would include a permanent roadway around the TSF that would provide improved SGP area access.	Same as Alternative 1, except for: • The Project footprint would occupy 3,219 acres. • Burntlog Route would not be constructed. • Public access would be provided through the mine site. Stibnite Road would not be returned to its pre-mining width and traffic would be greatly reduced. This could encourage use of tribal resources east of the mine.	Except for the Golden Meadows Exploration mine site area, future access to subsistence resources and for cultural uses in the existing SGP area would remain unchanged.

Origin of Text	Issue	Indicator	Baseline Conditions	Alternative 1	Alternative 2	Alternative 3	Alternative 4	Alternative 5
				practices important to tribal identity. Access through the SGP site would be re-established post-mining. The impacts described for tribal rights and interests regarding each alternative are potential effects that will be further addressed and may be further mitigated or otherwise resolved through further ongoing consultation and other measures between the draft and final EIS and ROD for the SGP.				

Midas Gold Suggested Edits (white rows) on DEIS Table ES4-1 Summary and Comparison of the Potential Environmental Impacts Associated with the Significant Issues by Alternative (grey rows)

DISCLAIMER: This table is a limited summary and comparison of effects associated with the alternatives evaluated in the Draft EIS.

Acronyms:

AADT = annual average daily traffic; cfs = cubic feet per second; °C = degrees Celsius; DRSF = development rock storage facility; EFSFSR = East Fork South Fork Salmon River; EOY = end of year; hr = hour; HV = heavy vehicles; IP = intrinsic potential; IRA = inventoried roadless area; km = kilometers (1 km = .62 mile); m^2 = meters squared; mg/L = milligrams per liter; MT = million tons; N/A = not applicable; NFS = National Forest System; ng/L = nanograms per liter; OHV = off-highway vehicle; OSV = over-snow vehicle; % = percent; SODA = spent ore disposal area; TSF = tailings storage facility

Table Notes Surface and Groundwater Quality:

1 Bolded concentration values exceed the respective water quality standard.

2 Concentration data for the EFSFSR represent the maximum annual average (Alternatives 1 and 2) or the average (Alternative 3) post closure concentrations predicted for the EFSFSR assessment nodes (YP-SR-10, YP-SR-8, YP-SR-6, YP-SR-4, and YP-SR-2), and do not include effects of water treatment. (Concentration summaries for each individual node by alternative are provided in **Figures 4.9-1, 4.9-12, 4.9-14, and Tables 4.9-10, 4.9-18, and 4.9-22**). Although not discussed in the text of Section 4.9, Surface Water and Groundwater Quality, predicted concentrations are presented in the summary table above for aluminum since aluminum concentrations are relevant to the fish impacts analysis (Section 4.12, Fish Resources and Fish Habitat).

Table Notes Access and Transportation:

1 Additional miles of new road for public access post-closure would require revision to the existing FRTA easement with Valley County.

2 The newly constructed Burntlog Road would be a temporary road necessary for mining purposes (pursuant to 36 CFR 228A[f]). The duration for public access on private roads outside of the mine site (i.e., temporary mining access roads associated with the Project) when other public access roads are blocked by mine operations would only occur during the life of the mine.

3 The newly constructed Burntlog Road would be a temporary road necessary for mining purposes (pursuant to 36 CFR 228A[f]). The duration for public access on private roads outside of and through the mine site (i.e., temporary mining access roads associated with the Project) when other public access roads are blocked by mine operations would only occur during the life of the mine.

4 Additional miles of new road for public access post-closure attributed to the EFSFSR TSF public access or mine access routes.

5 During the life of the mine, mine traffic would utilize the existing road network. No new roads would be constructed outside of the mine site; however, public access would be provided on private roads through the mine site (i.e., temporary mining access roads associated with the Project) when other public access roads are blocked by mine operations for the duration of the Project.