

The South Fork Salmon River



Dear Forest Service,

Please accept my comments for consideration in regards to the Midas Gold proposal for operations at the Stibnite Mine near Yellowstone, Idaho. I've been able to review a lot of the DEIS but not all of it. It has taken some time to get this far through it and the deadline for comments is midnight tonight. With more time I may have added more sugar to my delivery here.

I don't envy you. This has no doubt been an exhausting 10+ year process. I would guess that most of the hours have gone by thankless. I try to envision myself tackling your job with this proposal and I can't imagine lasting one week. And now you have to sort through upwards of 10,000 comments as you travel towards arguably one of the most difficult decisions in your professional careers. Anyways, big thanks from all of us.

You can summarize my thoughts on this proposal with: **Alternative 5 = no action alternative.**

This plan is incomplete. A goal without a plan is just a wish. There is critical information missing. There is too much at stake here. If there is going to be a mine it needs to be planned perfectly. We need the best possible version. I'm not a scientist. I'm not a mine technician. I don't need to be either to see the inadequacies in this proposal. I am a teacher. And if I were grading this EIS it would be heavily marked in red ink with the message at the bottom;

"This paper reflects an air of carelessness that I don't think you wish to convey.

Please try again."

There is no sliding scale on grading this paper. It's pass or fail. Some of my concerns are contained in the following pages. Thank you for your time.

~Nate Ostis

Missing Puzzle Pieces

Incomplete and Unavailable Information

Chapter 4.1.2. “The [Council on Environmental Quality] CEQ regulations state that, ‘when an agency is evaluating reasonably foreseeable significant adverse effects on the human environment in an environmental impact statement and there is incomplete or unavailable information, the agency shall always make clear that such information is lacking.’”



The incomplete and unavailable information is then outlined in Table 4.1-1.

- **uncertainty with modeling** *RED FLAG!*
- **disposal of groundwater** *RED FLAG!*
- **groundwater flow through pit backflow** *RED FLAG!*
- **surface water management** *RED FLAG!*
- **adequacy of leak detection** *RED FLAG!*
- **geotechnical data for access roads** *RED FLAG!*
- *...just to name a few.*

If data and information gaps exist, the work needs to be done to close those gaps. Because of the incomplete or unavailable information, the public is not able to understand the scope of these gaps and therefore unable to fully understand the scope of the project.

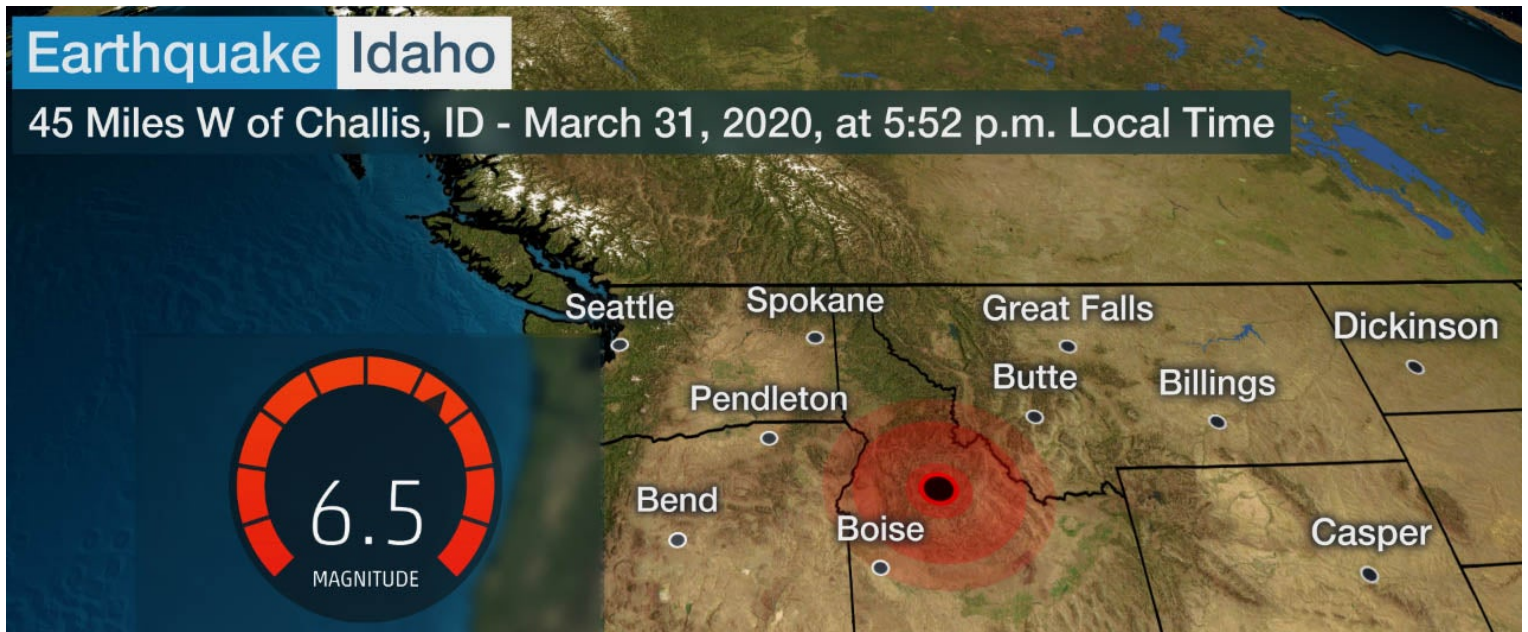
When will the incomplete information be addressed and accomplished?

When will this information be presented to the public?

When can we comment on this? For how long will we be allowed to comment? Will you make hard copies available?

This is alarming. Particularly when you lump it together with an abbreviated comment period and access issues to the DEIS. Just doesn't smell quite right.

Earthquake



Seismic Hazard Analysis. Chapter 3.2.3.6.2 & chapter 4.2.2.1.1.3.

- The DEIS notes the M6.5 earthquake in March 2020
- The “site-specific seismic hazard analysis” is outdated (URS 2013).

Why aren't the full analysis details of the URS 2013 report available? *RED FLAG!*

Why isn't there a post March 2020 analysis? *RED FLAG!*

The USGS indicates that aftershocks can occur for years, even decades, after a large earthquake. It is reasonable and prudent to do an updated analysis to include the seismic activity that has been occurring for the past 8 months. There has been seismic activity in this project area every single week since March 2020.

What is the advantage of not doing this analysis? *RED FLAG!*

Why disregard recent seismic activity and patterns that have impacted the area already and will continue to impact it during the project? *RED FLAG!*

If additional analysis is going to occur, will there be an opportunity for public comment? No?.....*RED FLAG!*

Antimony

Project to provide critical minerals.

- Midas will mine gold, silver and antimony
- Midas promotes antimony as a strategic metal. A mineral deemed critical for national security and supply chain independence by the U.S. Department of Commerce. Currently, the U.S. relies on China and Russia to meet our needs.



The Alternative 2 Antimony Concentrate Transport section of the DEIS states:

“antimony concentrate would be transported via Burntlog Road to State Highway 55, and then to a commercial barge or truck loading facility depending upon the refinery location. It is assumed that the concentrate, when sold, would be shipped to facilities **outside of the U.S.** for smelting and refining because there are currently no smelters in the U.S. with capacity for refining the antimony concentrate.”

Why are critical minerals and national security part of the conversation when it is clear the antimony will be sold to and refined by a foreign entity? *RED FLAG!*

Shouldn't the focus be on antimony concentrations in the water, the soil, the plants and the animals? *RED FLAG!*

Why doesn't the DEIS adequately address antimony toxicity in the project area or downstream? *RED FLAG!*

Will there be further analysis on antimony toxicity from legacy and proposed mining activity?

Nomenclature

This proposal has latched on to the more environmentally appealing marketing pitch of “restoration”. The rest of the mining industry has historically referred to their mining operations falling under the label of reclamation, not restoration. The word “restore” can apply to their plans in some places. An example; “we intend to restore pathways for fish travel.” But overall this project should not be acknowledged as a “restoration project”.

Developing 3 open pit mines and impacting an area of 25,000 acres to include roads, bridges, and infrastructure cannot be called a “restoration project”. This is misleading. It’s manipulative. If this is the actual science stage of analysis here, vs. marketing & propaganda, then can we hold this document to a higher standard of semantics?

Restoration

the action of returning something to a former place or condition.

Reclamation

the combined process by which adverse environmental effects of mining are minimized and mined lands are returned to a beneficial end use. End uses may be open space, wildlife habitat, agriculture, or residential and commercial development.

Will you install definitions of Restoration vs. Reclamation for the public so that we can differentiate between the two? If they differ from above, then please share your definitions.

Will you ensure that these words are being applied to the plan appropriately and in the correct locations within the text?



our words
matter.

Length of Comment Period

NEPA allows 120 days. You should allow us 120 days.

The two extensions are appreciated. And they are inadequate:

- Global pandemic.
- Kids at home.
- Working from home.
- Local bandwidth issues from influx of Valley County residents.
- Hard copies not made available by the Forest Service.
- FS website has glitchy and time-consuming functionality.
- Do you want the narrative of this decision to include an abbreviated public comment period? *This is already the buzz on the streets.*
- Why is the comment period not the maximum allowable time?



Lack of Access

- The FS website did not always allow for full access of this DEIS. At times, some links would reset the session and send users back to the homepage. This was a known problem and one simple solution would have been to extend the comment period to full 120-days.
- Why were print copies of the DEIS not available in prominent locations throughout the area? Valley County, not to mention much of the country, has been experiencing poor internet connectivity for most of 2020.
- The increased reliance on national infrastructure and therefore the decrease in national bandwidth was no longer a surprise by August 2020 when the DEIS was released. Why did the Payette National Forest fail to consider internet constraints when releasing the DEIS by providing print copies?

