

# COMMENTS OF DRAFT EIS FOR MIDAS GOLD STIBNITE GOLD MINING PROPOSAL

October 27, 2020

Dear Payette National Forest Supervisor Linda Jackson,

I am writing to provide comments of the Draft EIS for the Stibnite Gold project being proposed by Midas Gold. In addition, I wish to state my objection to permitting this project to move forward. I am a local, full-time resident of McCall, ID and am very familiar with the USFS and private areas that would be impacted by this project. I would rather recreation opportunities continue unaffected and allow for ecological integrity not to be negatively impacted from this mine.

## Draft EIS Comments

1. The overly complicated organization of DEIS is atrocious and makes analyses very cumbersome and time consuming. It takes going back and forth between 3 volumes and tracking down imbedded, nested references to make sense of the assertion made in the text portions.
2. The proposed fish tunnel has never been implemented ANYWHERE ON PLANET EARTH, and there is unconvincing evidence presented to show that this approach will allow for fish passage.
3. The models used to predict fish population impacts, stream habitat changes and fish tunnel success are unproven and the assumptions used in developing these models are weak and not supported by the scientific literature given in the references sections. Further their own models suggest that greater than 100,000 fish will be killed in the 7 miles of analyzed affected fish habitat that would be permanently blocked or destroyed.
4. The diagrams presented in the DEIS do not depict the true extent of the proposed physical infrastructure buildout so it gives the reviewer an imprecise areal extent of the destruction that would be imposed.
5. Mining companies have a long legacy of abandoning projects without putting up enough bonding money to make sure the site is restored with ecological integrity. A bond of \$ 1 Billion USD needs to be made before the project is approved.
6. Do you really think that putting a re-routed stream on top of waste rock will

function like a natural system? Highly doubtful.

7. Holding ponds have a very high failure rate over long time periods, due to impoundments failing and liners leaking. It is highly likely that this mine will result in catastrophic aquatic pollution and die-offs of fish and wildlife downstream of the project site.

8. True ecological restoration of the site DOES NOT HAVE TO HAVE A MINE IN PLACE TO RESULT IN A SUCCESSFUL OUTCOME!

9. The supposed tax and job benefits accruing to the local economy are overstated. Most tax revenues will leave the local area resulting in Valley county property taxpayers covering the true costs of the project. Also, and over half the jobs will be filled by workers outside the local area, according to Midas Gold themselves.

Sincerely,

Jim Petterson  
302 Mather Rd  
McCall, ID 83638