

Stibnite Gold Project EIS

SCOPING AND ISSUES SUMMARY REPORT

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List of Acronyms & Abbreviations

AIRFA	American Indian Religious Freedom Act
ARD	acid rock drainage
BLM	Bureau of Land Management
BURP	Beneficial Use Reconnaissance Program
CaO	cyanide, sulphuric and nitric acids, lime
CEQ	Council of Environmental Quality
CFR	Code of Federal Regulations
CWA	Clean Water Act
DRSF	Development Rock Storage Facility
EA	Environmental Assessment
EIS	Environmental Impact Statement
EFH	Essential Fish Habitat
EFSFSR	East Fork of the South Fork of the Salmon River
EO	Executive Order
EPA	U.S. Environmental Protection Agency
ESA	Endangered Species Act
FAQs	frequently asked questions
FEIS	Final Environmental Impact Statement
FLPMA	Federal Land Policy and Management Act
FMEA	Failure Modes Effects Analysis
FR	Federal Register
Forest Service	U.S. Forest Service
GDEs	groundwater dependent ecosystems
HAP	hazardous air pollutants
ID	interdisciplinary
IDEQ	Idaho Department of Environmental Quality
IDL	Idaho Department of Lands
IPCo	Idaho Power Company
IRA	Inventoried Roadless Areas
IRTs	idle-reduction technologies
MDT	Montana Department of Transportation's
Midas Gold	Midas Gold Idaho, Inc.

MSFCMA	Magnuson Stevens Fishery Conservation and Management Act
MWAM	Montana Wetland Assessment Method
NAAQS	National Ambient Air Quality Standards
NAGPRA	Native American Graves Protection and Repatriation Act
NEPA	National Environmental Policy Act
NFS	National Forest System
NGO	non-government organizations
NOI	Notice of Intent
NPDES	National Pollutant Discharge Elimination System
NRHP	National Register of Historic Places
OEMR	Office of Energy and Mineral Resources
PAG	Potentially Acid Generating
Plan	Stibnite Gold Project Plan of Restoration and Operations
PNF	Payette National Forest
POX	Pressure Oxidation
Project	Stibnite Gold Project
PSD	Prevention of Significant Deterioration
RCA	Riparian Conservation Area
RNA	Research Natural Areas
ROD	Record of Decision
SFSR	South Fork Salmon River
SHPO	State Historic Preservation Officer
SME	subject matter expert
TMDL	Total Maximum Daily Limits
TSF	tailings storage facility
TU	Trout Unlimited
U.S.	United States
USACE	U.S. Army Corps of Engineers

1 PROJECT OVERVIEW AND SCOPING PROCESS

1.1 BACKGROUND

The Payette National Forest (PNF) is preparing an Environmental Impact Statement (EIS) to evaluate and disclose the potential environmental effects from: (1) Approval of the “Stibnite Gold Project Plan of Restoration and Operations” (Plan) submitted by Midas Gold Idaho, Inc. (Midas Gold) in September 2016, to occupy and use National Forest System (NFS) lands for operations associated with open-pit mining and ore processing; and (2) related amendments to the Payette National Forest Land and Resource Management Plan (Payette Forest Plan 2003) and/or the Boise National Forest Land and Resource Management Plan (Boise Forest Plan, as amended 2010).

This report describes the strategy, methods, and techniques that were used to involve the public in scoping of the EIS; summarizes the input received from the public, agencies, Native American tribes, and other interested parties prior to and during the scoping period; and describes the process of identifying issues to be addressed in the EIS.

1.2 PROPOSED (FEDERAL) ACTIONS

The Responsible Official proposes to approve the Plan submitted by Midas Gold, with any modifications determined necessary through the analysis to comply with applicable laws and regulations. As described, the Plan would affect federal, state, and private lands.

The action proposed by the United States (U.S.) Forest Service (Forest Service) would only authorize approval of mining-related operations on NFS lands, because the Forest Service does not have jurisdiction to regulate mining operations that occur on private or state land. However, the EIS will consider and disclose environmental effects of mining-related operations that would occur on private and state lands. Connected actions related to the Plan, including but not necessarily limited to Clean Water Act (CWA) permitting by U.S. Army Corps of Engineers (USACE) and U.S. Environmental Protection Agency (EPA) and related amendments of the Payette and Boise Forest Plans, will be considered in the EIS. Impacts of past, present, ongoing, and reasonably foreseeable future actions in the Project area and vicinity will be considered in combination with the impacts of the Plan or alternatives to estimate the potential cumulative impacts of Project implementation.

The USACE will cooperate on the preparation of the EIS and evaluate its content to ensure that the EIS can be adopted by the USACE to support and eventual decision to either issue, issue with conditions, or deny a Department of the Army Permit under Section 404 of the CWA for the Plan. The EPA will cooperate on the preparation of the EIS and evaluate its content to ensure the EIS can be adopted in support of the decision-making process for issuance of a federal new source National Pollutant Discharge Elimination System (NPDES) Permit under Section 402 of the CWA.

1.3 PURPOSE AND NEED

1.3.1 Forest Service Purpose and Need

The purpose of the Forest Service's action is to provide for approval of the preliminary Plan, which would govern occupancy and use of NFS lands for operations that are reasonably incident to mining. The Forest Service's overall purpose and need is to process the proposed Plan and to follow all applicable laws, regulations, and policies pertaining to the processing of the proposal. The role of the Forest Service under its primary authorities in the Organic Administration Act, Locatable Regulations 36 Code of Federal Regulations (CFR) 228 Subpart A, and the Multiple Use Mining Act is to ensure that mining activities minimize adverse environmental effects on NFS surface resources and comply with all applicable environmental laws. The Forest Service has no authority to unreasonably circumscribe or prohibit reasonably necessary activities under the General Mining Law that are otherwise lawful.

Midas Gold submitted the Plan to the Forest Service in September 2016, in accordance with Forest Service regulations for locatable minerals set forth at 36 CFR 228 Subpart A. In order to comply with its statutory and regulatory obligations to respond to the Plan submitted by Midas Gold, the Forest Service must: (1) Evaluate the Plan; (2) consider requirements set forth at 36 CFR 228.8, including those to minimize adverse effects to the extent feasible, comply with applicable laws, regulations, and standards for environmental protection, and provide for reclamation; and (3) respond to the Plan as set forth at 36 CFR 228.5(a). The Responsible Official determined the Plan to be administratively complete in December 2016. Approval of the Plan and issuance of permits under the CWA would be major federal actions subject to the National Environmental Policy Act (NEPA). Accordingly, the federal land management and regulatory agencies must also prepare an EIS to consider and publicly disclose the potential environmental effects of the proposed action.

1.3.2 U.S. Environmental Protection Agency Purpose and Need

The purpose of EPA's proposed action, issuance of a federal new source NPDES permit for the Stibnite Gold Project (Project), is to regulate discharges to waters of the U.S. associated with the Plan, as required under CWA Section 402. EPA's proposed action is necessary because any action alternative would involve discharges to waters of the U.S., which is unlawful except in accordance with the terms and conditions of an NPDES permit.

1.3.3 U.S. Army Corps of Engineers Overall Purpose and Need

The USACE determination of the purpose and need of the proposed project is to produce gold, silver, and antimony from ore reserves within the Stibnite Mining District using modern mining processes, infrastructure, and logistics, to meet worldwide demands.

1.4 PLAN DESCRIPTION FROM NOTICE OF INTENT

The following description was included in the Notice of Intent (NOI) provided for the scoping period. The NOI also included a website address where an electronic copy of Midas Gold's Plan could be viewed or downloaded. Midas Gold's Plan includes a description of the following operations and activities to be conducted on NFS, state, and private lands:

- **Redevelopment and Construction (2 to 3 years):** Developing supporting infrastructure, including upgraded and reconstructed powerline, communication sites, upgraded and/or new roads (including a long-term, temporary mine access and public bypass route), maintenance facility, and onsite housing, oxygen plant, and water management infrastructure; relocation and reuse of spent ore and construction of a lined tailings storage facility (TSF); modifying stream channels to reduce sedimentation and restore wetland function and reestablish fish passage (including temporarily rerouting the East Fork of the South Fork of the Salmon River [EFSFSR] through a fish-passable tunnel); planting burned areas; initial mining of one open pit (which would require closure of the Stibnite road through the mine site); and constructing development rock storage and temporary ore stockpile facilities, crusher, and ore processing facilities.
- **Mining and Ore Processing (12 to 15 years):** Resuming mining from two historical and one new open pit at a rate of approximately 40,000 to 100,000 tons of material per day; processing up to 25,000 tons per day of ore to recover gold/silver dore and antimony concentrate; historical tailings reprocessing and clean-up; placing neutralized new and reprocessed tailings in the TSF; placing development rock in four engineered facilities, backfilling Yellow Pine pit; and concurrent reconstruction of stream channels, riparian areas, wetlands, and upland habitat, including restoring the EFSFSR to its approximate original gradient across the backfilled Yellow Pine pit.
- **Initial Closure and Reclamation (2 to 3 years):** Removing structures and facilities; decommissioning temporary roads; recontouring and drainage; wetland mitigation; reconstructing the Stibnite Road and various stream channels in the Project area; and growth media placement and revegetation.
- **Post-Closure and Monitoring (5 to 7 years):** Establishing a wetland on top of the TSF; reclaiming rock storage facilities; monitoring reclamation and remediation projects.

The Plan includes operational standards and practices to minimize, mitigate or eliminate the potential for negative impacts and environmental monitoring to document compliance and to facilitate a flexible management strategy through the redevelopment, mining, reclamation, and post-closure periods.

An initial review of the consistency of the Plan with both the Payette and Boise Forest Plans indicates that approval of the Plan as submitted would result in conditions that are inconsistent with these Forest Plan standards. Consistent with 36 CFR 219.13 – plan amendment and administrative changes, and 219.15 – project and activity consistency with the plan, site specific amendments to the Forest Plans may be required to address inconsistencies with Forest Plan

standards including standards for recreation, Inventoried Roadless Areas (IRAs), vegetation, visual quality, wildlife, and others.

1.5 SCOPING PROCESS

1.5.1 Scoping Process Overview

The purpose of the public scoping process is to provide agencies and members of the public with an opportunity to provide input on the scope of the Project and issues that may be addressed in the EIS. It is also an opportunity for the public and agencies to learn about the Plan as proposed by Midas Gold. In addition, the public scoping process helps identify any issues not already considered internally that could lead to the potential for development of alternatives to the Plan, or to additional analysis of resources in the EIS.

The scoping process included public scoping, internal Forest Service scoping, and cooperating agency and tribal scoping. An overview of the three scoping types follows:

- **Public Scoping:** The public scoping period commenced on June 5, 2017, with the Forest Service publication of a NOI to prepare an EIS on the proposed Stibnite Gold Mine Project in the Federal Register (FR). A 45-day public scoping comment period occurred from June 5, 2017, to July 20, 2017. During this time, the PNF solicited public comments on the proposed action and held four public meetings.
- **Internal Scoping:** Internal scoping efforts included several informal meetings, one formal review, and field trips with the NEPA interdisciplinary (ID) team. ID team members include Forest Service resource specialists and planners representing anticipated topics of analysis in the NEPA process, managers, and PNF line officers; the ID team is supported by subject matter experts (SMEs) and planners from AECOM. ID team members reviewed the issues and concerns developed from public and agency comments, and modified or added issue statements and concerns to address USFS internal scoping.
- **Cooperating Agency and Tribal Scoping:** Cooperating agency and tribal scoping was conducted with cooperating agencies through a cooperating agency kick-off meeting and through comments submitted by cooperating agencies and tribes during the public scoping comment period.

1.5.2 Opportunities for Public and Agency Comment

Members of the public and agencies were afforded several methods for providing comments during the scoping period. All comments were given equal consideration, regardless of method of transmittal.

At the public scoping meetings, handwritten comments could be recorded on comment forms, or submitted electronically on laptop computers that were made available, at each of the four

scoping meetings. Comment forms were provided to all meeting attendees and were also available throughout the meeting room, where attendees could write and submit comments during the meeting. There were two to three laptops available at the commenting station for each meeting, and staff were available to assist the public in electronically recording their comments during the meeting. Other methods to provide scoping comments included:

- Individual letters and comment forms that could be mailed via U.S. Postal Service to ATTN: Forest Supervisor Keith Lannom, Stibnite Gold EIS, 500 N. Mission St., McCall, Idaho 83638.
- Emailed comments sent to a dedicated email address: comments-intermtn-payette@fs.fed.us, with a subject line reading “Stibnite Gold EIS Scoping Comment”.
- Comments submitted by fax to: 1-208-634-0744.
- Comments submitted electronically through a web form on the project website: [Stibnite Gold Mine Project EIS website](#), then clicking the link “Comment/Objection on Project” on the right side of the page.

1.5.3 Legal Notice, Press Releases, and Other Media

A legal notice (Appendix A) was published in *The Idaho Statesman*, Boise, Idaho (the newspaper of record), and *The McCall Star News*, McCall, Idaho on June 1 and June 8, 2017. A Forest Service press release (Appendix A) was also sent to Idaho newspapers, television stations, and radio on May 30, 2017.

Part of the Project area description was incorrect in the legal notices. The Project area was described as being three miles **east** of the Frank Church-River of No Return Wilderness, when in fact it is located three miles **west**. Corrections were published on June 8, 2017 as legal notices with the correct Project area description in *The Idaho Statesman* and *The McCall Star News*. Postcards with the corrected information were also sent to the Project mailing list (Appendix A).

The Forest Service also placed a notification regarding the four public scoping meetings on the PNF Facebook page on May 30, 2017.

1.5.4 Scoping Mailing

The Forest Service prepared a scoping letter that summarized the Plan and proposed federal actions. The scoping letter also included information on participating in the public involvement process, including information on public scoping meetings. The letter contained a link to the Project website where more detailed information, including maps, could be obtained. The letter was mailed to approximately 400 potentially interested parties on May 30, 2017. As these documents also contained incorrect information regarding the Project area description, a postcard with the correct information was mailed to these parties on June 8, 2017. The mailing list of potentially interested parties was compiled from several recent Forest Service NEPA

mailing lists for projects in Valley County, as well as the mailing list for the Golden Meadows Project Environmental Assessment (EA), and property owners located along the access and transportation routes and the Idaho Power Company (IPCo) powerline associated with the Plan. The mailing list for the EIS also includes additional parties who might be interested in the Project such as adjacent land owners or land managers and non-government organizations (NGOs).

The scoping comment form included a place to indicate whether a party wished to be on the mailing list. Respondents who were not already on the list and who checked the form were added to the list. Non-governmental parties on the list who did not respond will be removed from the list. The mailing list may also be reduced in size during the EIS process by parties who indicate they would like to be removed or will obtain future Project information via the Project website.

1.5.5 Project Website

The Forest Service Stibnite Gold Mine Project EIS website: ([Stibnite Gold Mine Project EIS website](#)) was made available to the public in December 2016 after the Plan, as submitted by Midas Gold, was determined complete for NEPA purposes. The website is updated often to provide the public information about the Project and the EIS process. The following describes the general website content.

1.5.5.1 Project Navigation

- **Project Overview.** This page provides a brief summary of the Project and its location. There are three tabs under the heading “Project Documents”:
 - **Pre-Scoping.** Contains an electronic copy of Midas Gold’s Plan split out by main body of document and appendices. There is also a low resolution PDF of the entire document.
 - **Scoping.** This tab provides a copy of the Public Scoping Letter, the NOI published in the FR, copies of legal notices that appeared in the *Idaho Statesman* and the *McCall Star News*, the Public Scoping Notice package, and a copy of the Scoping Meeting Presentation. The tab also includes a handout provided by the EPA during the Scoping Meetings.
 - **Supporting.** This tab will contain various supporting documents for the process. It currently contains a copy of the press release for the Scoping Period.
- **Project Location.** Contains a brief description of the Project’s location and also a navigable map.
- **Meeting Notices.** This is where all meeting times and locations will be listed. This site currently contains the days, times, and locations for the Scoping Meetings. It will contain information for other meetings as the EIS process progresses.

1.5.5.2 Get Connected

- **Request More Info.** This page lists the current Forest Service public information officer (Brian Harris) who can be contacted to request additional information about the Project.
- **Comment/Object on Project.** Click on this link to submit comments during specific public comment periods such as Scoping and Draft EIS comment periods.
- **Public Comment/Objection Reading Room.** By clicking on this link you will be taken to the Project reading room where you can view all comment letters submitted during the comment periods.
- **Subscribe to Email Updates.** The website contains a form that allows you to sign up for updates or to access you subscriber preferences for this Project and other Forest Service projects. This is where you join the electronic mailing list for the Project.

There are also other links on the project page to additional Forest Service resources including information about the NEPA process and other planning projects the Forest is currently supporting.

1.6 PUBLIC SCOPING MEETINGS

Four public scoping meetings were held in Cascade, McCall, and Boise, Idaho:

- June 27, 2017, 5:00 – 7:00 p.m., Ashley Inn, Cascade, Idaho
- June 28, 2017, 5:00 – 7:00 p.m., Payette Forest Supervisor’s Office, McCall, Idaho
- June 29, 2017, two meetings, one 1:00 – 3:00 and another meeting 5:00 – 7:00 PM, Holiday Inn Express and Suites (Airport), Boise, Idaho
- July 15, 2017, 10:00 – 11:30 a.m., Yellow Pine, Idaho

The open house format meetings provided attendees with copies of the description of the Plan, an explanation of the NEPA process, the public scoping notice, and maps of the Project area. Posters were also used to depict the Plan proposal and to provide background information on current environmental conditions. Comment forms were available at the meetings.

Representatives of the Forest Service, cooperating agencies, and AECOM were present at each meeting to answer questions, discuss the Project, and accept public comments. In addition, representatives from Midas Gold were present to answer questions about their Plan. There were 33 attendees at the Cascade meeting, 48 attendees at the McCall meeting, 72 attendees total at the two Boise meetings that filled out the sign-in sheet, and approximately 42 attendees at the Yellow Pine meeting.

1.6.1 Meeting Description

1.6.1.1 Open House

The public scoping meetings were held in an open house format. Attendees were encouraged to provide the following information on a sign in sheet for the meeting: name, who they were representing, address, email, and phone number. The meetings included a formal slide presentation by the Forest Service, followed by a poster session that all attendees were invited to participate in. Fourteen posters describing various components of the EIS process and Midas Gold's Plan were set up around the meeting room. Forest Service personnel were stationed at the posters and in other areas of the room to answer questions and help attendees better understand the Project and the EIS process.

1.6.1.2 Presentation

Each meeting included a slide presentation by the Payette Forest Supervisor, the Forest Service project manager, and the Krassel District Ranger. This presentation lasted between 15 and 20 minutes and covered the Forest Service decision to be made; general Project information; and issues identification and information that can help the Forest Service in the NEPA process.

1.6.2 Meeting Materials Description

1.6.2.1 Presentation

The presentation by the Forest Service also included a Microsoft PowerPoint slideshow. The slideshow was used for all four meetings (see Appendix B).

1.6.2.2 Handout

Handouts provided to each attendee at the public meetings included a 31-page brochure on the Project (including 8.5 x 11 copies of the posters); a comment form; and a 8-page list of frequently asked questions (FAQs) and answers (see Appendix B).

1.6.2.3 Comment Form

Comment forms and a comment drop box were available at each public meeting (see Appendix B). Every person who attended the meetings was provided with a comment form in the handout materials. These comment forms could be filled out and turned in at the comment drop box, or mailed or faxed at a later date.

1.6.2.4 Posters

Large-format posters were displayed around each public meeting venue. The 14 posters provided additional information or visual maps for the public. Forest Service personnel were

stationed near the posters to answer questions. The posters are also available for viewing on the Project website and are provided in Appendix B of this report.

1.6.3 Additional Agency Involvement

Internal scoping has been ongoing throughout the project among the Forest Service, USACE, EPA, Idaho Department of Environmental Quality (IDEQ), Idaho Department of Lands (IDL), Governor's Office of Energy and Mineral Resources (OEMR), and Valley County. This has occurred via discussions during bi-monthly conference calls, as well as during other unscheduled calls, email, project site visits, and a formal review of the issues and concerns identified from the Scoping process. The discussions have focused on identifying potential issues, impacts, alternatives, and mitigation, and on modifying or adding to the issues and concerns identified through public scoping.

1.6.4 Government-to-Government Consultation

Per Executive Order (EO) 13175, Government-to-Government tribal consultation was conducted as part of the scoping process and will continue throughout the NEPA process. The lands involved with the Project are and have been lands traditionally used by several tribes. Tribal governments that have expressed interest and concern over the Plan include the Nez Perce, Shoshone-Bannock, and Shoshone-Paiute. The Project area is within the typical area-of-interest of these Tribes.

1.6.5 Next Steps in the NEPA Process

In considering public comments, the Forest Service will develop a range of preliminary reasonable alternatives that will be evaluated to determine which alternatives should be studied in detail in the EIS.

Once the alternatives have been developed, the studies and level of detail to be addressed for each of the issues will be determined. Data and information will be compiled from existing sources, and, in some cases, new data will be collected. Then, the impacts that could result from implementing any of the alternatives will be analyzed, and measures to mitigate those impacts will be identified. The findings will be documented in a Draft EIS.

The Draft EIS will be made available for public review. The availability of the Draft EIS will be announced in the FR and advertised in the local and regional media. Public comments will be accepted for a minimum of 45 days, during which public meetings will be held to receive comments on the adequacy of the Draft EIS. The Forest Service will review the comments and prepare responses to each. The document may or may not be modified based on public comments. In any case, all comments and responses will be incorporated into the Final EIS.

The Forest Service will release a draft ROD in conjunction with the final EIS. The draft ROD will address approval of the Plan, and any related Project-specific Forest Plan or Travel Plan amendments (36 CFR 219.13 and 219.15) that may be required. The draft decision will be subject to 36 CFR 218, "Project-Level Pre-decisional Administrative Review Process."

Depending on the nature of the forest plan amendments required, the draft decisions may also be subject to 36 CFR 219 Subpart B, "Pre-decisional Administrative Review Process." In addition, following the mandatory 30-day waiting period after issuance of a Final Environmental Impact Statement (FEIS) (40 CFR 1506.10[b][2]), the EPA will also issue a ROD documenting the EIS conclusions and the NPDES permit decision for any federal new source NPDES permit(s).

Following resolution of objections to the Forest Service's draft ROD, a final ROD will be issued. As the operator, Midas Gold would have an opportunity to appeal the decision as set forth at 36 CFR 214, "Post-decisional Administrative Review Process for Occupancy and Use of National Forest System Lands and Resources."

Prior to approval of the Plan, Midas Gold may be required to modify the September 2016 Plan to comply with the description of the selected alternative in the final ROD. In addition, the PNF Forest Supervisor would require Midas Gold to submit a reclamation bond or provide proof of other acceptable financial assurance to ensure that NFS lands and resources involved with the mining operation are reclaimed in accordance with the approved Plan and Forest Service requirements for environmental protection (36 CFR 228.8 and 228.13). After the Forest Service has determined that the Plan conforms to the ROD as well as other regulatory requirements, including acceptance of financial assurance for reclamation, it would approve the Plan. Implementation of mining operations that affect NFS lands and resources may not commence until the reclamation bond or other financial assurance is in place and a plan of operations is approved.

2 PUBLIC COMMENT SUMMARY

2.1 CHAPTER ORGANIZATION

This chapter contains a description of the public scoping comment analysis process and a summary of the public scoping comments received during the 45-day scoping period. The public comment summary in this chapter includes the following:

- Description of the public scoping content analysis process (description of the comment database, development of the coding structure, identification and coding of comments, comment summary process);
- Description and summary of comment submittals received; and
- Summary of public comment content for key topic areas.

2.2 SCOPING CONTENT ANALYSIS PROCESS

Public and agency comments on the Project were analyzed and categorized using a standard Forest Service process called “content analysis.” The four-phase content analysis process includes

1. Importing and organizing all submittal content in a comment database;
2. Developing a rationale coding structure;
3. Carefully reading each submittal and assigning codes to relevant comments; and
4. Preparing a narrative report of the results of the analysis.

The goals of the content analysis process are to: 1) ensure that every comment is considered, 2) identify the concerns raised by all respondents, 3) represent the breadth and depth of the public’s viewpoints and concerns as fairly as possible, and 4) present those concerns in a way that facilitates the Forest Service’s consideration of comments. It is important to note that the content analysis process is not and should not be considered a vote. All comments were treated evenly and were not weighted by number, organizational affiliation, “status” of the commenter, or other factors. Emphasis was on the content of a comment, rather than on who wrote it or the number of submitters who agreed with it.

2.2.1 Scoping Comment Database

Names, contact information, and letter text for all respondents who submitted comments were entered into an electronic comment database; each database entry is considered a “submission” in this report. The majority of the submissions were delivered to the Forest Service in electronic format (submitted through the project website, or via email), which expedited the creation of submission records in the database using various export and import procedures. Hard-copy submissions, including those delivered by postal service or at public meetings, were

entered into the database manually (commenter information and comment text). Each submission entered into the database was assigned a unique submission number with the individual commenter's information and affiliation indicated, if it was provided, in their submission. Submissions were then divided into the following three categories, depending on submission content: Unique, Duplicate, or Form Letter (see descriptions below).

The content of the electronic submission was filtered using various database queries and by reading through submission text, to identify potential form letters (see form letter discussion below). If the content of a submission was distinct from identified form letters or deviated from the original content of the form letter enough to change the meaning or intended message of the form letter, the submission was identified as "Unique."

Any submission identified as having the same commenter information and content, regardless of delivery format (e.g., hard-copy letter, email) or date, were counted as one submission: one record was categorized as "Unique," and all other copies of the identical submittal were categorized as "Duplicate."

2.2.2 Form Letters

Form letters are identified as any submission with the same content. The electronic submissions were pre-screened in the database, using various queries to identify any like content and potential form letters. As consistent content among submissions was identified, a form letter record with that content was created in the database and assigned a number; additional submissions with the same content were placed into that form letter category. The first form letter identified was marked "Master" and then coded for comment content. Only the form letter master comments are counted in the comment totals.

2.2.3 Development of the Coding Structure

A coding structure was developed to sort submission content into logical categories that represent respondents' concerns and rationale. Codes provide an efficient and accurate grouping of similar comments; coded concerns are referred to as "comments" in this report.

The coding structure identifies applicable Project elements, environmental resources, planning processes, and rationale in comment submittals. An initial coding structure was developed based on expected issues and concern; this structure evolved through the process of reading submittals and identifying new and additional concerns. Comment codes were assigned numeric values, which allows for quick access to comments on specific topics.

2.2.4 Identification and Coding of Comments

All Form Letter Master and Unique submissions were carefully read to identify comments that will be used to formulate the issues and analysis conducted in the EIS process. To identify how each submission was coded, a Submission and Comment Index (Appendix C) was created. This table contains the name associated with each submission, and the comment codes contained in that submission. Each individual statement identified as a comment was assigned

to a category/topic. For any submission received, there may have been several comments, each coded separately based on the issue and the specific rationale. This form of analysis allows for specific comments to be captured and then grouped under the umbrella of a general resource issue. It also allows for cross-referencing and comparison between specific proposed action components and resources concerns. Codes were assigned by staff members trained in this comment analysis process. Each discrete comment was entered into the comment database.

2.3 SUMMARY OF PUBLIC COMMENT SUBMITTALS

2.3.1 Submittals Received

In total 536 submissions were received during public scoping, 32 of these submissions were one of six form letters, and 504 letters contained unique content. Appendix C provides a table showing the comment codes for each of the unique submissions, and the six form letter submissions identified in the submittals received.

Government entities, tribes and non-governmental organizations that submitted comments include:

Government Entities

- U.S. Army Corps of Engineers
- U.S. Environmental Protection Agency
- U.S. Bureau of Reclamation
- State of Idaho Governor's OEMR representing the Idaho Department of Lands (IDL)
- OEMR representing the Idaho Department of Fish and Game
- OEMR representing the Idaho Department of Water Resources
- OEMR representing the Idaho Department of Parks and Recreation
- OEMR representing the Idaho Department of Environmental Quality
- Idaho Transportation Department – District Three
- Idaho Department of Labor
- Idaho Department of Commerce
- Idaho State Senate
- Idaho House of Representatives
- Valley County
- City of Donnelly
- City of Cascade

- Cascade Chamber of Commerce
- Cascade School District #422
- McCall City Council

Tribes

- Nez Perce Tribe
- Shoshone-Bannock Tribes

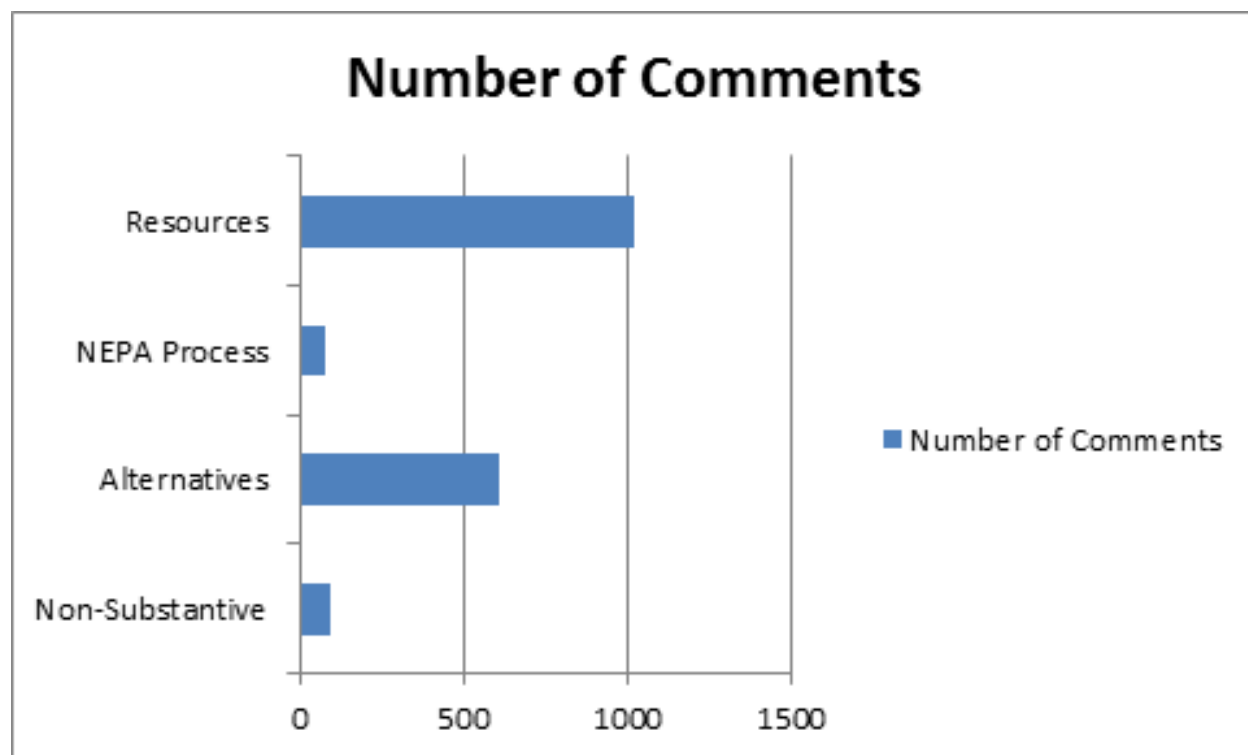
Non-Governmental Organizations

- Idaho Conservation League
- Trout Unlimited (TU)
- Sierra Club
- Warm Lake Users Association
- Idaho Rivers United (IRU)
- American Exploration and Mining Association
- West Mountain Snowmobile Club
- The Wilderness Society
- McCall Area Snowmobile Club
- Rocky Mountain Elk Foundation
- Idaho Recreation Council
- Idaho Mining Association
- Women's Mining Coalition
- Idaho Association of Commerce and Industry

2.3.2 Comments Identified

In total, 1,804 comments were coded from the unique submissions and form letter masters. A breakdown of the comments by major category is shown in Figure 1.

Figure 1: Comments Coded By Major Category



2.4 COMMENT SUMMARY PROCESS

The final phase of the public scoping process included summarizing the content of the comments into a narrative summary and preparing this report. The intent of the narrative comment summary is to provide representative summaries that capture, with a minimum of repetition, all major topic areas or concerns expressed during the public scoping period. The topic areas or concerns contained in the summary of public comment will be used to develop the issues, alternatives, and mitigation strategies that will be analyzed in the EIS process.

Development of the narrative comment summary began by exporting all of the coded comments from the comment database organized by code. Similar and related codes were combined into broader theme categories that represent the overall content of the comments.

During the summary writing process, comment analysts thoroughly read each comment to understand the overall content of the comment and to carefully identify topic areas or concerns in similar comments from different respondents. Similar comments were summarized into concise narrative statements and organized by the theme categories. The comment summary presents a fair representation of the wide range of views contained in the comments submitted, but it does not attempt to treat this input as if it were a vote or a statistical sample. It is important to note that during the process of identifying topic areas or concerns, all comments have been treated equally, and comments are not weighted by the number of respondents. It does not matter if an idea was expressed by hundreds of people or a single person.

Every effort was made to summarize the topic areas or concerns that were frequently mentioned, as well as those that were mentioned only once or twice. Statements such as “one,” “a few,” “multiple,” or “many” are used in the narrative writing to convey, in general terms, how often topic areas or concerns were expressed in the comments. Direct comment quotes are included in the narrative writing to serve as representative examples of the topic areas or concerns expressed by respondents, demonstrate commenters’ statements of opinions, and add interest and variety to the writing. For reference purposes, when a direct quote is used, the submission identification number is included in brackets at the end of the quote (e.g., “*What are the environmental impacts of the mine?*” (Submission 123)).

The summary of public comment in Sections 2.5 and 2.6 is organized as follows:

- Section 2.5, **Summary of Public Comment – Resources**. This section provides a detailed summary of public comments organized by resource topic (e.g., air quality, geochemical, wildlife, etc.). This section summarizes resource-specific comments, such as comments concerning wildlife habitat loss, loss of recreational access, and dust and emissions along the access roads and at the mine site.
- Section 2.6, **Summary of Public Comment – NEPA Process and Alternatives**. This section provides a summary of public comments on the NEPA process and also alternatives. NEPA process topics include the public involvement process, purpose and need, the Plan, best available science, cumulative impacts, connected actions, other laws and regulations, tribal consultation, cooperating agencies, and the no action alternative. Public comment suggestions for proposed action alternatives and mitigation measures are also included in this section.

2.5 SUMMARY OF PUBLIC COMMENT – RESOURCE TOPICS

2.5.1 General Resources

There were many general comments received indicating that the EIS should analyze the direct, indirect, and cumulative impacts on many resources located within the Project area as they pertain to Physical, Biological, and Social environments. These general comments are noted as part of the more specific comments within the sections that follow.

2.5.2 Physical Resources

There were many comments received indicating that the EIS should analyze the direct, indirect and cumulative impacts on many physical resources located within the Project area:

- Analyze the impacts from construction of the facilities and use of utilities (water, electric, sewage) and the ultimate fate of the buildings and housing units after the mine is closed;

- Geology, soils, excessive erosion, soil loss and reclamation cover materials;
- Water resources, including springs and seeps;
- Provide detailed water quality and quantity data for all potentially affected surface and ground waters, including full parameter/pollutant data sets, and hydrological conditions on the surface and subsurface; including impacts to geochemistry during construction, operations, reclamation, and post-closure periods;
- Will long-term water management and/or treatment be required to meet standards?
- An analysis of any mitigation that may be necessary if large pumps and wells for dewatering the Hangar Flat pit might affect ground water in upper Meadow Creek, and how using infiltration pits downstream near the EFSFSR to reintroduce the water may cause dewatering in the salmon spawning channel reconstruction in Meadow Creek;
- An assessment of the effects of downstream hydrology (both groundwater and surface water) of the EFSFSR. Specifically, a net loss of water from the recirculation of water from the basin for mining activities; loss of water to downstream areas and effects on fish populations and fish habitat and any associated change in the EFSFSR hydrograph;
- An analysis of restoration work including removal of tailings and channel stabilization in Sugar Creek as part of the mitigation plan;
- Analyze how the historic mine tailings will be reclaimed;
- Air quality data and impact analysis visibility and all potentially emitted pollutants including but not limited to all criteria pollutants subject to National Ambient Air Quality Standards, hazardous air pollutants (HAPs), and Volatile Organic Compounds;
- Climate Change;
- Impacts from noise;
- Impacts of blasting activities to resources including recreation, wildlife, air quality, water quality, and surface subsidence resulting from use of explosives at the site;
- Water rights;
- Hazardous materials stored and transported to and from the mine site;
- Long-term, post closure site management impacts to the physical environment; and
- Examine the possible/potential impacts resulting from spills, breaches, leakages, etc. from all facilities/activities at the site and transportation of fuels to the site.

2.5.2.1 Air Quality

Comments were received indicating that the Forest Service must include a robust analysis of the potential to affect air quality in the EIS. The EIS should summarize Project emissions from

construction, operational activities (i.e., dust from roads, tailings, blasting), and incinerator operations and roads related to the mine's operations, including any off-site processing and support activities, such as vehicle traffic and delivery trucks for fuels, maintenance supplies, and other materials, as well as cumulative emissions from other sources in the Project area.

The EIS should describe impacts to air quality including:

- *“Describe existing air quality in the project vicinity;*
- *Disclose current visibility conditions within any potentially affected Class I airshed;*
- *If project emissions are significant, near-field and far field air quality modeling should be conducted to assess project-related air quality and visibility impacts;*
- *Discuss the National Ambient Air Quality Standards (NAAQS) and Prevention of Significant Deterioration (“PSD”) increments applicable to air quality in the project area and in Class I areas potentially affected;*
- *Discuss Prevention of Significant Deterioration (PSD) applicability and whether a PSD permit might be required; and*
- *Explain impacts to the NAAQS and PSD increments from projected emissions of the project and alternatives, considering the effects from all aspects of mine exploration, excavation, construction, operation, and support activities, such as vehicle traffic, as well as cumulative emissions from other sources in the project area”. (Submission 500)*

Some comments were received asking the Forest Service to closely coordinate with IDEQ and other federal agencies regarding specific regulatory requirements and controls. The Forest Service should identify:

- Class I PSD areas located within 100 kilometers of the Project area;
- Consult with the Bureau of Land Management (BLM) and National Park Service for a determination of which areas could be adversely affected by the proposed action; and
- Potential impacts to Class I PSD areas, including visibility impacts and increment consumption, should be analyzed and discussed.

The Forest Service should include in the EIS an analysis of the estimated releases of volatile organic compounds and HAPs, including mercury, from the Project to air, soil, and water resources, including any off-site facilities instrumental to mine operations (i.e. any off site ore processing). The Forest Service should describe all possible sources of HAPs and the unit processes that generate this material, including major/thermal processing equipment including:

- How all HAPs would be controlled to reduce their emissions as much as possible;

- Identify measures and equipment that would be used to condense, capture, and/or treat HAPs, including mercury;
- Explain how these measures are effective in removing HAPs and making it unavailable for release into the environment and indicate how any captured mercury and other hazardous compounds would be disposed of;
- Discuss in the EIS the likely fate and transport of mercury air emissions from the Plan or alternatives; and
- Describe the cumulative amount of mercury that is annually emitted to the air in Idaho; and describe the HAPs monitoring that would be conducted, including locations and reporting requirements.

The Forest Service should “*coordinate with the State of Idaho, as well as EPA on potential modeling related to air quality impacts*”. (Submission 472) Modeling “*should be used to determine concentrations of criteria air pollutants for an accurate comparison with the NAAQS*”. (Submission 500)

The NEPA analysis should “*evaluate a [reasonable] range of alternatives and mitigation*” measures to minimize impacts to air. Further recommendations included measures such as: “*evaluating the use of latest on-road and non-road diesel engines with ultra-low sulfur diesel, considering the use of alternative fuels, establishing idling limits and prohibiting engine tampering.*” (Submission 500)

Comments specifically mentioned that visibility, as well as air quality, should be addressed both in disclosing current visibility conditions at potential affected Class I airsheds and in modeling visibility impacts to those airsheds.

2.5.2.2 Climate Change

Commenters indicated that the EIS should include disclosure and discussion of total atmospheric carbon emitted and total energy consumption by each alternative over the life of the project. The Forest Service “*needs to evaluate both short-term and long-term impacts and include a cost-benefit analysis of carbon and emissions for each alternative in the EIS. Midas Gold also needs to provide evidence to support the claim that their reforestation will sequester greenhouse gases to such an extent that it will provide a long-term benefit. The EIS must also evaluate the impacts to global climate change resulting from the creation and release of greenhouse gases resulting from the project*”. (Submission 500)

One commenter requested that the Forest Service conduct “*a full and complete analysis of the impacts associated with GHG emissions from the proposed mine, existing GHG emissions from historic activity and the current condition of the site, as well as the combined, cumulative impacts the would be caused by the proposed project in combination with other existing and proposed GHG emitting sources in the region. Specifically; it was requested that the Forest Service use the accepted social cost of carbon methodology in conducting this analysis. If the Forest Service refuses to use this methodology in its analysis, they requested that, prior to*

issuing an EIS for this project, the Forest Service promulgate a new methodology for assessing the impacts associated with GHG emissions for NEPA reviews. This new methodology should be subject to public comment and review prior to its adoption. The Forest Service should not proceed with this NEPA review until it adopts a new methodology for determining impacts associated with GHG emissions”. (Submission 500)

2.5.2.3 Geology

General comments on the geology of the Project area were made during scoping. Many commenters noted that the Forest Service should consider that the mine site is a major deposit of gold, antimony and tungsten and *“would become the country's only domestic antimony mine”*. (Submission 140) Another commenter remarked that the size of the deposit needs to be validated. (Submission 532)

Submission 472 commented that *“the NEPA analysis should describe the geotechnical stability of the tailings facility, waste rock storage facilities, and open pit walls during operations and closure. This would include a description of how these facilities are designed and how they would be operated, and closed to ensure stability. In addition, we [EPA] recommend that a Failure Modes Effects Analysis (FMEA) be conducted with the results summarized in the EIS. FMEA considers potential modes of failure and identifies the relative likelihood and consequences of the failure modes. The NEPA analysis should incorporate mitigation or alternatives to improve stability should FMEA identify failure modes, which are anything other than a tolerable risk”*.

The EPA recommended that the Forest Service should *“provide reliable projections of wastewater and solid wastes from the project, and that the physical and chemical characteristics of ore and wastes waste should be determined. Environmental samples used to support projections should represent a range of conditions that currently occur and that could occur in the future as a result of the project. Waste materials used for environmental projections should be representative of the material to be mined and related to the mine plan and proposed processing methods. Physical and chemical characterization should be conducted in a manner that provides environmentally conservative estimates of impacts”*. (Submission 472)

Comments were received asking the Forest Service to provide an analysis of the following in the EIS:

- Detailed description of the mineralogy of the deposit, including all the gangue (non-economic) and economic minerals in both the ore and waste rock;
- Particular attention should be given to the waste rock, which is proposed for disposal in areas without the ability to capture leachate. The Forest Service should *“present the distribution of various mineral assemblages to allow the reviewer the ability to access the possible impacts on leaching of these minerals on the environment”* (Submission 500);
- Present a thorough investigation of seismic activity including frequency, magnitude, and identification of faults with evidence of holocene movement;

- Conduct an analysis of the effects of maximum credible earthquakes on the mine, including possible pit wall failures, a possible collapse of the tunnel-bypass around the Yellow Pine pit, and mass wasting on mine infrastructure and the associated environment;
- A detailed assessment of methodologies to determine the stability of the proposed EFSFSR tunnel-bypass around the Yellow Pine pit;
- Describe plans to thoroughly evaluate *“possible geologic-structural problems affecting the stability of the tunnel and present a mitigation plan should there be bypass-tunnel collapse due either natural or man-made (e.g., terrorist) failures”* (Submission 500); and
- Include additional information on *“how activities will be designed to avoid, minimize and mitigate for landslide risks and what the impacts might be if a landslide were to occur at the medium and high-rated locations”*. (Submission 445)

Furthermore, the Forest Service should *“consider using EPA Region 10’s Sourcebook for Hardrock Mining for the EPA’s recommendations”* (Submission 472) related to the NEPA analyses and mining regarding characterization of geologic and mineralogy setting/aqueous geochemistry.

2.5.2.4 Geochemistry

Several comments were received asking the Forest Service to address the following issues related to geochemistry in the EIS:

- Baseline data exists at Stibnite from previous studies and ongoing monitoring. Evaluate the existing data to ensure they are of the appropriate type and quality to support existing, as well as designated uses;
- Disclose *“background/current conditions and how elevated contaminants of concern (e.g., arsenic), which exist at the site will be addressed to ensure compliance with the Clean Water Act”* (Submission 472);
- Describe the projected chemical characterization of water in open ponds that would be located at the site, including tailings ponds and long term tailings stability post closure;
- Describe the potential for such waters to enter external surface water features;
- Geochemically characterize any potential mixing of waste rock to assess potential leaching of materials if it is mixed with IDL regulated waste rock;
- Be consistency regarding the use of terms, such as waste rock and development rock;
- Analysis of any testing procedures that may be needed to screen and classify spent ore and existing waste rock prior to use as construction materials;

- A categorization of the waste rock into non-acid rock drainage (ARD)/non-leaching waste, potentially or positively ARD or water quality impacting waste rock, and the number of tons of each type of waste rock;
- An analysis of the measures taken to segregate waste rock and the steps taken to reduce water infiltration;
- Identify the measures taken to construct waste rock dumps;
- Identify the specific construction measures taken for the clean water diversions near waste rock dumps; and the measures taken to capture and route the springs and the seeps near the spent heap leach ore disposal area (SODA);
- Geochemically characterize any potential mixing of waste rock to assess potential leaching of materials if it is mixed with IDL regulated waste rock;
- Consider the condition brought about by the creation of an acid mine drainage problem during the mining and processing of sulfide ores;
- Address the needs for Potentially Acid Generating (PAG) waste rock storage cells;
- Identify *“if the EFSFSR bypass tunnel will pass through any material that will leach out contaminants”* (Submission 468);
- Acknowledge acid generation and metal leaching as two different chemical processes in terms of leaching to the environment and treating pit lakes;
- The EIS should contain a clear acid/base accounting, a discussion and analysis of the buffering capacity of the carbonate rock, the amount of such rock that will be available, and the method to insure adequate carbonate rock is incorporated and mixed with acid producing rock in waste rock dumps and the tailings impoundment;
- There should be *“a site-specific conceptual model that describes the system boundaries, time and length scales, hydraulic and chemical characteristics, sources of data and data gaps, and the mathematical relationships used to describe processes. The documentation should include:*
 - *tables of parameter values used in the model;*
 - *tables and graphs of results;*
 - *uncertainty and sensitivity analyses;*
 - *errors associated with both measured and assumed data; and recommendations for further analysis”* (Submission 472); and
- Review document submitted as comment that is *“USGS Stibnite Area Water Study”*. (Submission 487)

Other commenters noted that basic information about sources of water pollution at the site have not been gathered or disclosed and indicated that it should be in the EIS. The mine site is an area that was eligible for Superfund and while some remediation has occurred in the watershed, water quality problems persist and continue to impact aquatic resources at the site and downstream. Commenters stated that the Forest Service needs to document these conditions and factor them into its evaluation of the Project.

The Forest Service should also *“assess if blasting will elevate the level of nitrates in the area which could have adverse impacts on water quality and fisheries”* (Submission 445). Additionally, *“potential sources of post-mining water contamination are waste rock, tailings, and new water/rock interactions in the remaining pit environment. Each one of the individual sources needs to be geochemically characterized, predictively modelled, and have effective mitigation measures designed if necessary. Although past mining of oxide ore has resulted in arsenic and antimony contamination without significant acid generation, this fact is of little predictive value since this project will be mining deeper sulfide ore which will produce an entirely different geochemical environment.”* (Submission 183)

In order to effectively analyze potential geochemistry and subsequent water quality impacts from the Plan or alternatives, commenters stated the Forest Service must *“review the data, assumptions, and modelling (both completed and proposed) that support any predictions of post mining water quality”* (Submission 183). Such a review should address the following modelling questions:

- *“Is the conceptual model reliable?”*
- *Have alternate conceptual models been considered?*
- *What are the uncertainties from the presumed conceptual model?*
- *Are there multiple working hypotheses for characterization and remediation scenarios?*
- *Has the worst case scenario been considered as well as the best case scenario?*
- *How reliable is the code? How has the code been tested? What test cases were used and why?*
- *Is the code appropriate for the problem?*
- *How good is the code database?*
- *What are all the assumptions made in the modeling computations for water solution partitioning? What equilibrium assumptions were made and are they warranted?*
- *What form of the precipitating phase was used in the computations? The most stable form or the least stable form? Justify the choice.*
- *Was sorption used? What sorption assumptions were made and why? Have these been tested for similar conditions? How was effective surface area determined?*

- *If pH was simulated, what assumptions were made? What evidence shows that these assumptions are reasonable?*
- *Was a comprehensible sensitivity analysis performed? What are the most sensitive factors for the model output? How does the uncertainty in these factors affect the results?*
- *What is the temporal variability in contaminant concentrations and discharges? Has this been included in the inputs?*
- *Are predictions being made for longer periods of time than the history matching/calibration period?*
- *If the computational model is a forward geochemical model, were any inverse geochemical models considered as well?*
- *Was water quality input data screened for quality, e.g. charge balance, consistency of element ratios, etc.?*
- *Are minerals considered in the model based on observation at the site or a reasonable analog site”? (Submission 183)*

Acid mine drainage and heavy metals leaching and mobilization (cyanide, arsenic, copper) were a concern and the potential associated effects to water and aquatic life. Commenters stated that the EIS should *“disclose and analyze the short-term and long-term direct, indirect, and cumulative impacts of the proposed action on mobilization of metals into surface and ground waters”*. (Submission 301) Commenters also stated that geochemical analysis and predictive modeling should be incorporated in the analysis of the Project. Water reaches to be monitored should include the South Fork Salmon River, East Fork South Fork Salmon River, and Johnson Creek. Metrics to be monitored should *“include turbidity, temperature, dissolved oxygen, conductivity and pH. Sufficient data needs to be collected to establish baseline conditions during spring, summer, winter and fall. Monitoring should also include pre and post-activity sampling”*. (Submission 445)

Specifically regarding the analysis that should be done in the EIS one commenter noted that: *“accurate characterization of the mine’s geochemistry is critical for properly identifying the Project’s potential impacts and addressing them through facility design and mitigation measures. The Forest should therefore discuss in the EIS the mine’s geochemistry, including the mineralogy and lithology, metals leaching potential, and neutralization/acid generation potential and nonacidic chemical leaching potential of the pit wall rock, waste rock, old and new tailings, and historic/existing mine workings. The Forest should also describe the static and humidity cell tests that have been conducted on waste rock and tailings to characterize them and provide a summary of the test results. The Forest should additionally explain how the geochemical testing procedures were designed to comply with all applicable guidance and instructional memoranda”*. (Submission 500)

2.5.2.5 Soils Resources

Several commenters noted that the EIS should consider the impacts of erosion, sedimentation and run off and the impacts from the haul and access road. A commenter noted that *“using Burntlog Road will reduce sediment from going into the streams and in turn help with efforts to improve water quality and fish habitat”*. (Submission 441) Conversely another commenter remarked that the *“extension of the Burntlog Road through what is currently a roadless area, crossing several very steep Creek Canyons, is likely to lead to erosion and degradation of watershed quality. If this is meant to be a year-round road there will be numerous avalanches triggered which will further compromise water quality”* (Submission 532) and the EIS should examine this as a result.

Another commenter remarked that *“The steepness of the terrain of the public route up the existing but primitive road that goes alongside Riordan Creek and on up through Horse Heaven is a concern that should be evaluated in the EIS as the unstable soil and past wild fires has made this area prone to erosion and any increases in erosion that are likely to occur. There could be an impact whereby excess soil depositing into Riordan Creek and as Johnson Creek results”*. (Submission 529)

One commenter noted that the Forest Service should evaluate how pit lake restoration may be impacted when upstream sediment settles into the pit and will eventually fills it leaving the downstream areas vulnerable to more unwanted erosion.

The EIS should consider mitigation measures for erosion and dust control measures that can be strictly enforced (Submission 20) and the planting of trees (Submission 441).

2.5.2.6 Noise

Commenters expressed concern regarding the impacts of noise pollution as a result of mine vehicle traffic through Warm Lake and use of air brakes in Landmark Summit area and mine activities (blasting). Commenters noted that this will impact the serenity of recreationists who seek this area because it is currently quiet and that there will not be more people present in this area. One commenter expressed concern regarding a *“hum generated from the powerline”*. (Submission 51) It was recommended that the Forest Service study and document noise levels at several locations around Warm Lake and along Warm Lake Highway:

- *“Noise levels of heavy vehicle traffic going up and down Warm Lake Summit grade and Warm Lake Highway to Cascade;*
- *Testing with the actual heavy vehicles to be utilized with anticipated loads; and*
- *Testing should be witnessed by stakeholders such as local residents”*. (Submission 409)

2.5.2.7 Hazardous Materials

The EIS needs to describe how hazardous materials will be transported, stored and used for the Plan or alternatives. The EIS must include and analyze:

- Expected and potential short-term and long-term direct, indirect, and cumulative impacts of the transportation of all hazardous materials, including but not limited to fuels, lubricants, blasting agents, chemicals and reagents, cyanide, mercury;
- *“Include a risk analysis of the likelihood of spills and analysis of the impacts of hazardous materials and spills and include mitigation, response planning, and monitoring programs to mitigate for expected problems and catastrophic events”* (Submissions 301, 445, 472 and 521);
- *“Oxygen is used in the Pressure Oxidation (POX) process and the EIS should describe if it is proposed to be generated onsite or if it proposed to be transported to the proposed project site”* (Submission 330);
- Include a detailed plan for cyanide management (Submission 487);
- Analysis should include the long term impacts of heap leach ore facility (Submission 487);
- Disclose all site assessments conducted pursuant to superfund and Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) and removal actions; and;
- *“Include a comprehensive survey and mapping of all legacy tailings at the site, the environmental impact of these legacy tailings in their current condition, and the potential for future environmental impacts resulting from future operations at the site”*. (Submission 500)

Impacts analysis in the EIS for the transportation of hazardous materials (cyanide, sulphuric and nitric acids, lime [CaO], copper sulfate, sodium hydroxide, Hydrogen peroxide (70%), Lead nitrate and ammonium nitrate) should *“focus on where Burntlog Road crosses the headwaters of Johnson Creek, which runs into the East Fork of the South Fork of the Salmon River”* (Submission 487) and other areas where an accidental release during transportation could impact the watershed of the Salmon River.

FUEL SPILLS RISK

Since the proposed action would require the transportation of hazardous materials, fuels, and other materials on Burntlog Road and FS Road 447 and increase the likelihood of spills and accidents occurring (Submission 85, 94, 98) commenters stated that the EIS must include and analyze the expected and potential short-term and long-term direct, indirect, and cumulative impacts of the transportation of all fuels, including but not limited to fuels, lubricants, blasting agents, chemicals and reagents, and cyanide. It should specifically explain the impacts of an accidental spill to Warm Lake and Landmark Summit areas and the South Fork of the Salmon River watershed and its resources. Commenters indicated the EIS must include a risk analysis of the likelihood of spills and analysis of the impacts of spills (Submission 222, 301). The EIS must include:

- *“A spill response plan;*
- *Description of spill mitigation measures to be employed including an analysis of mitigation effectiveness;*
- *Description of the nature of and location(s) of spill containment materials and equipment;*
- *Listing of spill response personnel and a description of the training and experience required of spill response personnel;*
- *Analyze the possibility of fuel capacity storage on site to reduce winter fuel transportation and the increased risks of a leak from an aboveground storage tank (including tank safety in the event of a wildfire or fire at the facility; and*
- *An Incident Command plan”.* (Submission 301)

2.5.2.8 Water Resources (Groundwater and Surface Water)

GENERAL WATER RESOURCES

Commenters expressed concern that the Forest Service needs to consider in the EIS the risks to the South Fork of the Salmon River and watershed of the Salmon River and that the site is already contaminated by old tailings. The EIS should provide a detailed analysis and discussion of the physical and chemical impacts on all water resources (including the pit wall and lake) and addresses the potential failure of reclamation efforts with regards to protecting water quality/quantity. This includes *“determining whether the Plan of Operation adequately analyzes the probable hydrologic consequences of the mining for the projected life of the mine and disclosing and evaluating those effects in the EIS”.* (Submission 222) Commenters stated the EIS should describe how *“putting the East Fork of the South Fork of the Salmon River underground for short distance may improve the water quality”.* (Submission 298)

Commenters indicated the Forest Service should develop in the EIS *“a thorough understanding of baseline surface and groundwater quality and quantity and groundwater/surface water interaction. The EIS should evaluate the impacts of this proposed project to surface water, as well as ground water quantity and quality from all aspects of the proposed operations and alternatives. This includes pit dewatering and backfilling, waste rock and tailings management and disposal, water management, and transportation aspects. The Forest should also describe in the EIS the reclamation and closure of all subsurface infrastructure, including underground drill stations, dewatering wells, vent raises, access drifts, stopes, load centers, pump stations, sumps, explosive storage areas, fuel storage areas, refuge stations, connector drifts, muck bays, laydown areas, and other associated material, and equipment storage areas. The Forest Service should also discuss in detail the amount and method of backfill, including how the use of waste rock, compressed waste rock, and/or cemented rock fill would impact mine hydrology and water quality post-closure. This discussion should include the measures taken to prevent surface access to underground workings”.* (Submission 500)

Commenters also stated the EIS should discuss all direct, indirect, and cumulative impacts to surface water and groundwater quality and quantity from the Plan and from the alternatives the Forest Service develops, both during operations and after closure including, but not limited to the following:

- Describe the potential impact of predicted pollutant levels to human and aquatic health, using relevant water quality standards.
- Discuss the potential for contamination of meteoric water that contacts existing and proposed pit wall rock, waste rock, tailings, roads, and other mine facilities.
- Analyze the fate and transport of any such water and discuss the possibility for fisheries and wildlife exposure to mine influenced waters.
- Assess and describe potential impacts to groundwater, surface water, fisheries, and wildlife resulting from the formation of pit lakes following mine closure. This analysis should include a thorough geochemical analysis of pit wall and groundwater chemistries, a comprehensive ecological risk assessment, and hydrogeological modeling demonstrating whether the pit lake would likely represent a perpetual sink, or whether through-flow may occur.

Commenters stated the EIS should provide a complete hydrologic characterization of the Project area and vicinity and the cumulative impact area, describing all existing water resources and baseline groundwater and surface water quality, quantity, flow regimes, and groundwater/surface water adjudication. Information on groundwater properties and groundwater/surface water connections (e.g., springs, seeps, depth to groundwater under different seasonal conditions, geology and locations of aquifers and their hydraulic conductivity ranges, groundwater discharge locations in streams, and interception of the water table by existing or proposed mine pits, etc.) are needed to identify and assess potential impacts to water resources and risks to receptors of contaminants.

Commenters also stated the EIS should discuss all direct, indirect, and cumulative impacts to surface water and groundwater quality and quantity from the Plan and from the alternatives developed both during operations and after closure that including the following:

- Describe all potential project-related discharges, seepage, temporary ponding, diversions, and groundwater pumping, as well as the potential effects of these activities on water rights, quality, and flow; beneficial uses; fisheries; and wildlife;
- Impacts to water quantity resulting from operation of an on-site water supply system must be analyzed and access to water rights documented with the design and location of the system disclosed along with any environmental impacts resulting from construction and operation, including sludge disposal, air emissions, wetlands impacts, and water pollution discharges;
- Develop quantitative predictions of how the project would “*change pollutant levels in surface and groundwater, based on estimates of pollutant levels in predicted wastewater*”

releases from mine facilities, including the open pit, waste rock piles, tailings disposal facilities, and leach facilities” (Submission 500);

- Evaluate the potential effects of the project on groundwater dependent ecosystems (GDEs), including wetlands, seeps, springs, floodplains, and riparian areas;
- Describe the designs of the proposed run-on/runoff channels, seepage collection systems, collection and sedimentation ponds, pump back systems, and any necessary treatment or disposal of these solutions. Depict these facilities on a map and describe all required monitoring/maintenance necessary to ensure proper functioning;
- Analyze the impacts associated with the TSF, including the local and downstream watersheds that would be adversely affected by a release from the TSF at any point in the future;
- Discuss the potential for and effects of movement of any contaminated surface water to the subsurface, including through the pit bottom and through land subsidence fissures;
- Describe the potential impacts to *“safety of dams, stream channel protection, ground water protection, including changes in hydrology, groundwater drawdown from dewatering the pit during operations, dredge and fill, water rights and failure of dams and mine tailing impoundment structures, both existing and proposed, could have on downstream life and property” (Submission 468);*
- Disclose whether or not the project would require long-term water treatment; and
- If the EIS process identifies potentially adverse effects in any of these program areas, the EIS should also address how the Plan can be implemented to minimize such adverse effects, consistent with 36 CFR 228.8.

The EIS should address *“recent exploration activities in which a substantial loss of circulation have resulted in drilling mud discharging at the ground surface downslope of the drill hole”*. (Submission 445)

GROUNDWATER (QUANTITY AND QUALITY)

Commenters expressed concern that water quality is threatened by the previous activity and leaching tailings at the mine site and that previous mining activities in the Salmon River watershed have caused leaks, blowouts, and spills that have impacted water quality. Specifically commenters asked that the Forest Service address in the EIS the following:

- Identify where the groundwater from pit dewatering be disposed of, especially if it exceeds contaminant standards;
- Disclose if treatment would be required if discharge to surface water is necessary;

- Describe how the dewatering wells around the Hanger Flats pit would avoid dewatering all the up-gradient alluvial aquifers in the Meadow Creek valley and any effect on Groundwater Dependent Ecosystems;
- Provisions for preventing inflow of contaminated groundwater from fault zones that may be crossed by the EFSFSR diversion tunnel and impacts in the event of ungroutable entries;
- Disclose if aquifers with artesian conditions have been encountered during previous exploration activities;
- Analyze the possibility of encountering additional artesian flows and the effects if these flows are uncontrolled for various periods of time; and
- Include hydrogeologic modeling that describes, and graphically depicts, the cone of depression likely to result from dewatering of the mine pit and from well field pumping (for a supplemental water supply).

Commenters stated the Forest Service should characterize the geology and location of aquifers, their thickness, and their hydraulic conductivity ranges; identify direct, indirect, and cumulative impacts to surface water flow, water supply wells, wetlands, springs and seeps, vegetation, wildlife, and other groundwater-dependent resources as a result of groundwater pumping associated with the Plan; and describe, and graphically depict, post closure groundwater elevation recovery and include a discussion of evaporative losses from any surface water feature.

The EIS should provide detailed information regarding *“the potential for groundwater contamination and the potential that groundwater, contaminated by the proposed project, will reach surface water and assess the threat this could cause to fisheries”*. (Submission 500)

Regarding the analysis of impacts to groundwater, commenters requested that the EIS provide detailed information on the following:

- Completed a groundwater-dependent ecosystem inventory for this area;
- Include a *“detailed water balance accounting for the project area including the pits, the tailings impoundment, the waste rock dumps, and the processing and housing areas, and roads”*;
- *Address the need for new wells to accomplish the Plan and evaluate the impacts wells, well construction, and injection activities could have on ground water quality”* (Submission 248);
- Identifying and characterizing pollution sources that already exist at the mine site area;
- Assess and describe the actual levels of dissolved arsenic and antimony from locations described in the Golden Meadows EA and note if the levels have changed as a result of reclamation activities;

- Evaluate the likelihood of the proposed restoration activities in successfully removing all the contaminants;
- Describe methods to address any remaining subsurface contamination;
- Disclose the likelihood that the Plan, or alternatives, could inadvertently release additional contaminants;
- Hydrology of the area should be well understood and evaluated, including detailed ground water transmissivity studies, waste rock characterization and pit lake analyses for future water quality;
- Obtain baseline groundwater studies that examine impacts and presence of element contamination, data, and perform an analysis that includes “*a baseline hydrogeologic study to examine the existing density and extent of bedrock fractures, the hydraulic conductivity of the local geologic formations, and [measures of] the local groundwater levels to estimate groundwater flow directions*” (Submission 500); and
- Conduct groundwater modeling for the entire proposed mining area, as well as downstream, to predict possible contamination of the underground aquifer from construction and mining operations.
- The Forest Service should coordinate a thorough water quality assessment with the IDEQ and Midas Gold at the mine site. A thorough water quality sampling effort would evaluate a broad suite of parameters and contaminants that are known to be common in the area and that are specific to extraction and beneficiation methods associated with prior mining operations in the area. The water quality sampling effort should evaluate compliance with mercury water quality standards in the water column, streambed sediment, as well as in fish tissue. This thorough assessment should identify the current cause(s) of the water quality impairment at the mine site and how mining activities could exacerbate the existing impairment.

SURFACE WATER (QUANTITY AND QUALITY)

Commenters stated that the EIS should analyze the short-term and long-term direct, indirect, and cumulative impacts of the proposed action on the hydrology of “*all surface waters in all drainages affected by the proposed action. Both quantity and timing of streamflows, current surface water quality, temperature, direct sediment delivery to streams at crossings and natural background conditions should be discussed*”. (Submission 472) Commenters requested the EIS include detailed information in regards to the impacts of altering current hydrology due to the removal of vast sums of rock and placing that material in developed rock storage facilities and tailing storage facilities. Concerns were expressed regarding filling in Upper Meadow Creek, Fiddle Creek, and West End Creek valleys with material removed from alternate locations that could alter the current hydrology at the site, alter plant communities, wildlife, and fisheries. It was requested that this also be examined in the EIS.

Commenters asked that the Forest Service provide the following in the EIS related to surface water impacts:

- An evaluation of the stream channel alteration proposals in the plan for potential impacts on fish and wildlife habitat, aquatic life, recreation, aesthetic beauty, and water quality (Submissions 248 and 468);
- Detailed *“information regarding how surface water will be protected during and after construction and mining operations”* (Submission 500);
- *“Quantify and identify potential sediment delivery from the proposed project to area streams”* (Submission 500);
- *“Explain how design features will limit sediment transport to streams at crossings”*. (Submission 463)

The Forest Service should consider that *“the management area is within a TMDL-assigned sub-basin. Explain how explain how the proposed use of sand for winter traction on the Warm Lake highway (FH-22) in the South Fork Salmon River (SFSR) drainage (FH- 22 travels parallel to Trail Creek, Curtis Creek- both tributaries to the SFSR), and the crossing of the South Fork Salmon River (SFSR), meets the condition where the “sub-watersheds were listed in 1998 as impaired under Section 303(d) of the Clean Water Act”*. (Submission 330) Additionally, *“The Forest Service will need to consider in the EIS Total Maximum Daily Limits (TMDLs) assessments that the Idaho Department of Environmental Quality may be outdated data as the South Fork Salmon River last had the TMDL Implementation Plan's State-mandated 5-yr Review in 2011 and further improvements have likely been made. Their Beneficial Use Reconnaissance Program (BURP) is updated regularly. The Forest Service will need to evaluate their differences in order to obtain the best, most current perspective on water quality and TMDLs”*. (Submission 480)

2.5.2.9 Water Rights

Commenters indicated the EIS should evaluate the *“state of water rights in the basin, whether the basin is already over appropriated, the impact the water use by Midas Gold could have on downstream users, and the impact to surface and groundwater at the site from use of additional water rights. The EIS needs to identify potential water sources and the amount of water needed for the project and describe the potential impacts associated with using these sources”*. (Submission 500)

A recommendation was made that the EIS address the need for new or changed water rights to divert and use surface water or ground water to accomplish the Plan. If project development would require new or changed water rights, the EIS should address *“the local public interest as it relates to the water resources that may be dedicated to the project”*. (Submissions 468 and 248)

2.5.3 Biological Resources

Many comments were received noting that the EIS should describe the direct, indirect and cumulative impacts of the following resources as they relate to the Biological Environment:

- Botanical resources including wetlands and riparian areas;
- Timber resources;
- Restoration of habitat; including habitat for Endangered Species Act (ESA) listed fish and wildlife species and indicator plant species;
- Fish and wildlife populations, including data/analysis on migrations/movements and population trends for endangered, threatened, sensitive, and indicator species that may reside in, or travel to/through the area;
- An assessment of the effects of the fish passable tunnel on upstream and downstream fish populations, both pre- and post-construction;
- Clarification of what data was used to develop estimates of fish production included in the Plan, and detailed descriptions of channel design and application of these to develop projections of fish production;
- Analysis of how the proposed action might affect the persistent contamination of fish in the EFSFSR;
- A thorough analysis of potential effects to wolverine populations and their habitats, as well as any potential mitigations;
- Assessment of the potential impacts to wolverines from increased recreation resulting from expanded access associated with the project, and quantification of recreation data in a systematic way over several years once access routes are established;
- Disclosure of the predicted loss of roadless areas and effects of this loss to big game security and wolverine habitat;
- *“Habitat impacts from the construction and presence of the powerline and two new substations (Johnson Creek Airport and project millsite), helipad and avian electrocution and collisions caused by the existing and proposed power lines and electromagnetic fields. The Forest Service needs to provide a mitigation plan for powerline impacts to habitat and wildlife”* (Submission 500);
- An assessment of existing habitat types present currently, with associated values of those habitat types for fish and wildlife. It was recommend that changes in habitat type amounts and functions be used as a metrics for analysis across alternatives; and

- Include data/studies of benthic macroinvertebrates and other aquatic life necessary for a sustainable stream environment and is related to the baseline conditions for surface water quality.

2.5.3.1 Botanical Resources (including Threatened, Endangered, and Sensitive Species)

Commenters expressed concern about vegetation, plant species of conservation concern, timber resources, forest health, and forest restoration methods (thinning, selective logging).

Specific areas of concern related to vegetation resources include:

- Long-term forest health, including insect concerns within the mining area;
- Project-related tree harvesting;
- Forest restoration methods (thinning, selective logging, passive restoration, etc.); and
- Forest fires and their potential connection to human activities at the site.

It was recommended that the EIS analyze the baseline condition of the Forest in the Project area prior to the forest fires referenced in the Plan, as well as the condition of the Forest after the fires, whether there has been any change to the condition of the Forest since the fires, and the potential impacts of future fires on the Forest and the Project area.

Commenters recommended that the EIS address the potential direct, indirect, and cumulative impacts to vegetation, including but not limited to:

- Direct removal of vegetation;
- Direct and indirect alteration of plant habitat and landscape conditions (erosion, hydrology, successional processes, community composition and diversity, etc.);
- Direct and indirect changes in habitat connectivity and gene flow;
- Introduction and spread of exotic or invasive plant species; and
- Effects on any populations of bent-flower milkvetch (species of conservation concern) and whitebark pine (candidate species) in the disturbance areas.

The Idaho Conservation League requested that the Forest Service develop a plant conservation strategy which avoids, minimizes and mitigates impacts to bent-flower milkvetch that includes a monitoring program to track milkvetch populations within and around the site. *“The Project should reestablish milkvetch in areas where individuals may be lost and establish formal protections around populations outside of the project footprint to ensure they are not accidentally impacted by other activities.”* (Submission 445)

2.5.3.2 Wetlands and Riparian Areas

Commenters expressed concern about the Project's impacts on wetlands, noting the importance of wetland and riparian habitat for fisheries and wildlife needs. Specific concerns include:

- Impacts on wetlands that have been restored at the site. *"Because wetlands act as sinks, collecting sediment and toxins, destroying on-site wetlands could have monumental impacts once the sediment and toxins are removed or released."*

Commenters indicated the EIS should include a map of surface waters in the Project area, including wetlands, and include a discussion of the type/function of wetlands that would be impacted, and recommended the EIS should:

- Quantify the amount of wetland and riparian habitat that will be lost due to project impacts;
- Present an inventory of all wetlands (size and quality) by alternative;
- Include an independent wetland assessment. *"In Appendix F of the PRO, Midas outlines the categorical rating system used by the Montana Department of Transportation's (MDT) Montana Wetland Assessment Method (MWAM). Categorizing wetlands for their water quality and habitat capabilities must be done externally. Midas Gold has a vested interest in rating site wetlands low to perpetuate language of a degraded system that needs to be fixed. IRU insists that this categorical analysis be done externally to ensure environmental assessment objectivity. MDT MWAM categorical analysis will be redone before construction can commence to truly understand the state of the wetlands in the Project area"* (Submission 487); and
- Identify any non-jurisdictional wetland or riparian habitats adjacent to, or within, the Project area and describe how these waters have already been affected by existing operations, the extent to which the functions of these waters have been degraded, and the extent to which each action alternative might further degrade or contribute to an improvement in the quality of these resources.

Concern was expressed about the mitigation and reclamation plans, specifically:

- The reclamation plans call for the development of new wetlands and riparian habitat, but development could prove difficult due to the short growing season and limited soil available at the mine site;
- The Forest Service should therefore put in place contingency plans for wetland and riparian habitat restoration; these should use locally-sourced plants for genetic stock; and
- The Forest Service should also discuss measures for the avoidance, minimization, and mitigation of losses and address strategies for improving the quality and size of these areas. If important habitat will be adversely affected by the Plan or alternatives, the

Forest Service should include a detailed mitigation plan for habitat replacement, identifying:

- Acreage and habitat type that would be created or restored;
- Resources needed to maintain the mitigation area;
- Revegetation plans, including the number and age of each species to be planted;
- Maintenance and monitoring plans, including performance standards to determine mitigation success;
- Mitigation zones, including their size and location;
- Responsible parties for the plan's success; and
- Contingency plans should the original plan fail.

2.5.3.3 Wildlife (including Threatened, Endangered, and Sensitive Species)

Commenters noted species that occur in the Project area and expressed concern about the potential direct, indirect, and cumulative impacts to wildlife that the Forest Service should analyze in the EIS, including but not limited to:

- Direct wildlife mortality (vehicle collisions, depredation actions, etc.).
- Direct and indirect alteration of wildlife habitat conditions (displacement, disturbance, community composition, diversity, etc.).
- Short-term and long-term direct, indirect, and cumulative impacts of the proposed action and each alternative on wildlife movement corridors.
- Fugitive emissions, incidental releases of mercury, noise, and vibrations.
- Direct and indirect changes in habitat connectivity and gene flow.
- Introduction of exotic or invasive wildlife species.
- Impacts from increased road traffic with large trucks and mining equipment, and new road-building, especially on elk, wolves, and wolverines.
- Potential impacts from heavy metals and sediment in the rivers, affecting water quality and harming not only humans that live and recreate downstream of Stibnite] but also heavily impact flora and fauna of the region negatively.
- The use of explosives on site has the potential to impact wildlife.
- Impacts on wildlife habitat, including habitat fragmentation.
- Evaluate the impacts on habitat for:

- Birds;
- Migration areas for deer and elk;
- Calving elk and deer;
- Wolves;
- Moose;
- Bighorn sheep;
- Small mammals;
- *“The proposed Burntlog haul road will cut through some of the best elk, deer, bear, moose and cougar habitat in all of Idaho, and certainly the finest in Valley County (to say nothing about the endangered species such as Lynx and that have habitat there.)”* (Submission 440);
- Impacts on Columbia spotted frogs in springs and seeps from arsenic contamination, and predators that prey on them, such as birds. Pressurization from drilling activities could increase spring flows and arsenic levels, or alternatively decrease these flows. The Forest Service should conduct a baseline study not only examining water quantity and quality but also the levels of arsenic in amphibians and other organisms in the area. Monitoring would track these metrics throughout the project implementation and reclamation; and
- The impacts of light and noise on wildlife resources.

Impacts on threatened or endangered species were a concern that should be analyzed including the following:

- Idaho Rivers United urges the Forest Service to require Midas Gold to do a proper species identification analysis and provide a detailed report of anticipated impacts to ESA listed fish and other local wildlife, such as lynx and documented wolverines. IRU expects to see special consideration for ESA listed Chinook salmon, bull trout and steelhead to be included in the EIS;
- Commenters recommended that the Forest work closely with the Fish and Wildlife Service and the Tribe to determine potential direct, indirect, and cumulative impacts of the Project on plant and wildlife species classified as threatened, endangered, proposed, or candidate species under the ESA as well as Idaho Species of Greatest Conservation Need, Forest Service Intermountain Region Sensitive Species, and Forest Management Indicator Species;
- What are the effects on threatened and endangered species, specifically from the new road construction, road improvements, snow plowing, and heavy year-round traffic on the Thunder Mountain/Burntlog access route; and

- The Forest Service needs to find additional ways to avoid minimize and mitigate for potential impacts to lynx and other wildlife from the increase in areas accessible to lynx competitors.

Several commenters recommended specific analysis that the EIS should include. Specifically The State of Idaho would like to see the following issues addressed in the EIS:

- Identifying any measures needed to prevent wildlife from accessing on-site waste;
- A thorough summary of all new routes associated with this project, as well as an analysis of potential cumulative impacts to fish and wildlife resources. Potential access plans include new motorized routes, particularly during winter. The Burntlog route for example includes development of an additional groomed snow machine trail in Trout Creek/Cabin Creek and a new access through Horse Heaven;
- An analysis, coordinated with the IDFG, describing potential impacts and mitigation of establishing a new community at Stibnite on both game and nongame wildlife including increased hunting pressure, increased potential for illegal take of fish and wildlife, and disturbance of the same;
- A thorough analysis of potential effects to wolverine populations and their habitats, as well as any potential mitigations;
- An assessment of the potential impacts to wolverines from increased recreation resulting from expanded access associated with the Plan and alternatives, and quantification of recreation data in a systematic way over several years once access routes are established; and
- Disclosure of the predicted loss of roadless areas and effects of this loss to big game security and wolverine habitat.

Other commenters asked that the following issues be included in the analysis:

- What precautions will be set to prevent the potential to contaminate wildlife habitat and drinking water in perpetuity;
- Describe impacts to goshawks - the Golden Meadows EA noted an active goshawk nest tree. The Forest Service should develop a series of design features to accommodate goshawk use of the Project area;
- Identify potential impacts to species protected under the Bald and Golden Eagle Protection Act and the Migratory Bird Treaty Act for each alternative in the EIS;
- The Project's consistency with existing resource management plans applicable to the Project area, including the goals, objectives, land use allocations, and management decisions and actions prescribed in such plans;

- How surveys were conducted for each species, their findings, and all follow-up surveys and monitoring that would be conducted before, during, and after mining;
- Incorporate the biological assessment and biological opinion (if developed) in the EIS by reference or as an appendix and demonstrate that the preferred alternative is consistent with that assessment or opinion;
- Include detailed mitigation measures in the EIS to address impacts to Special Status Species and their habitats that could not be avoided; and
 - How will lynx be protected from increased traffic?

Some commenters noted that the chance for a private company to perform restoration at the site as unique, and should be taken advantage of. The potential benefits to wildlife from restoration of past damage were noted, including tree planting, adding wetlands and riparian habitat, reduction in sediment from Blowout Creek, re-establishment of fish migration, streamflow restoration.

2.5.3.4 Fish (including Threatened, Endangered, and Sensitive Species)

Commenters expressed concern that the EIS should evaluate the impacts to fish and fish habitat in the Project area, specifically:

- The potential for water quality degradation;
- Potential impacts on spawning habitat in Johnson Creek from dust, potential fuel spills and sediment;
- Increased risk of leeching cyanide, mercury, and arsenic from the existing site;
- Increased risk of fuel and chemical spills, and also the risk of introducing slugs of sediment-laden water;
- How the alteration of waterways will affect fish;
- Impacts to spawning habitat in Meadow Creek and EFSFSR;
- Re-establishment of fish access upstream of the Yellow Pine pit, both during and after mining. Is it necessary; is it a benefit to fish?
- Impacts on listed salmon species, including direct, indirect, and cumulative impacts from other issues they face on their migration, when numbers in the area are already low;
- Impacts on listed bull trout and bull trout critical habitat;
- Impacts on spawning habitat for threatened and endangered fish;

- Concerned that the withdrawal of water and associated impacts from mine development may violate the Forest Service's duty to protect water quality and fisheries under the CWA, the 1897 Organic Act and 36 CFR Part 228 mining regulations. In addition, the project may violate the Maximum Modification (MM) standards in the Payette Forest Plan;
- Damage to the water quality and migratory patterns of the species present there could have a severe impact even as far downstream as to the South Fork of the Salmon River;
- Need for additional surveys to be conducted all streams that will be impacted by the proposed mine;
- Impacts to Burntlog Creek as it supports the same three salmonid species listed under the federal ESA as Johnson Creek does. A spill along the proposed road could be disastrous for fish populations from Burntlog Creek through Johnson Creek, through the EFSFSR, along the lower mainstem South Fork, and downstream into the mainstem Salmon River through the Wild and Scenic River corridor; and,
- Will sediment loads increase during road construction, at stream crossings, and from protracted erosion of a much larger road surface and cut and fill areas, potentially degrading salmon and other aquatic habitat?

Commenters listed the fish species they believe could be affected which included: Snake River spring/summer Chinook salmon, Columbia River bull trout, westslope cutthroat trout, Pacific lamprey, Snake River summer steelhead (rare B-run fish), redband trout, and rainbow trout. DNA results taken by the Nez Perce Tribe that show bull trout are present in the EFSFSR above and below the Yellow Pine pit and in tributaries such as Fiddle Creek, Meadow Creek, and West End Creek and this should be examined in the EIS.

Several comments were submitted regarding how the EIS should analyze the fish in the Yellow Pine pit. *"People now fish in the unnaturally-colored Glory Hole, and you can keep fish from lakes... but I sure wouldn't eat fish from that old Yellow Pine pit, and I would -love- to see it filled in"* (Submission 68). One commenter reported seeing numerous large, healthy bull trout near the inlet, and salmon swimming through the Glory hole and spawning in the gravel at the inlet.

Several commenters questioned the need for, the effectiveness, and the feasibility of the proposed fish bypass tunnel around the Yellow Pine pit during mine operation, one noting that *"mitigation measures, especially fish specific, seem to be extreme, excessive, and lack any economic or resource benefit analysis."* (Submission 265) Some commenters noted that nearly a mile of lighted tunnel to be temporarily built for fish passage until the stream channel can be reestablished does not seem reasonable. There were questions submitted by commenters about the cost of the tunnel and how many fish would be affected. TU noted that they know of another tunnel of this scale being installed and are skeptical that it will work as planned; adding that further analysis of the efficacy of the bypass tunnel and its alternatives is warranted. One commenter asked that the Forest Service provide Midas Gold guidance and direction regarding mitigation measures. Another commenter requested that the Forest Service provide examples

where this type of passage has been successful. One commenter noted that the tunnel must be carefully engineered to be successful. Other issues for the EIS to examine included:

- Will fish use the tunnel
- If the mine fails financially, will the river forever be stuck in a tunnel;
- How will the tunnel's "environment" be monitored for dissolved oxygen, nutrients and temperature; and
- Would the Forest Service require bonding for this project that covers restoration of this portion of the river?

Commenters would like the following issues evaluated the EIS:

- Cumulative impacts analysis on salmon including the existing high levels of arsenic from previous mines, and the sediment pollution from the timber roads, the impacts of previous projects that devastated these fisheries which are now recovering, due to years of conservation efforts by Idaho Fish and Game and the Nez Perce Tribe. It has culminated in stream and fisheries restoration which were decimated by those last mining operation(s) at the Stibnite site;
- Discuss and list in a table format the ESA listed species and Essential Fish Habitat (EFH) that occur in the Project area. The EIS should describe impacts to ESA species and EFH and discuss what activities are being proposed to avoid, minimize, mitigate, and monitor listed and proposed species and EFH;
- Thoroughly analyze potential impacts to fisheries, including downstream impacts to locations outside of the proposed mine site;
- Provide extensive baseline information on the health of these species and their habitat in the action area, and consider how Midas Gold's Project as whole impacts these species and how it aligns with the goals and objectives to maintain and recover these species set in the Forest Plan and under the ESA;
- Given the length of mining operations, and the possible extension of the mine life associated with their exploration plans, the EIS must identify the potential effects to these fish species at different stages throughout the mine life, and post-closure;
- Consider the cumulative effects associated with climate change (e.g., increase in water temperatures, potential decrease in stream flows, etc.), on these species;
- The EIS should fully describe the unique importance of the South Fork Salmon River watershed;
- Forest Plan Objective SWOB15 directs the Forest to "Maintain and update species occurrence and habitat maps for Forest species (e.g. MIS and Region 4 Sensitive species) during fine and site/project scale analyses." Forest Plan, p. III-20. *The Forest*

Service needs to update its bull trout information, and also needs to describe bull trout populations in the area and their trends, and evaluate the impacts of Midas Gold's Project on these populations. We are particularly concerned about impacts to a unique affluvial population of bull trout that has formed in the last several decades that use the Glory Hole as part of its life cycle. The dewatering of this stretch of the East Fork South Fork Salmon and the loss of the Glory Hole as the river is reengineered may have permanent impacts on this population of bull trout.” (Submission 445);

- Provide extensive baseline data to characterize existing sediment conditions in streams that could be affected by mine activities, to evaluate the potential short and long-term effects of increased sediment from mine activities. Bull trout are particularly sensitive to changes in temperature;
- Analyze the potential effects on stream temperature from mine operations, including reduced stream flows, loss of groundwater inputs, discharge temperatures;
- Evaluate how changes in hydrology could affect threatened species, including loss of groundwater upwellings that bull trout prefer for spawning;
- Consider the impacts of moving of Meadow Creek must be included in the EIS;
- Explain how the EFSFSR channel is to be restored. Are there residuals in the old spoil material that, if used to restore the channel, would preclude healthy fish habitat; and
- Evaluate the claims and net benefits of the restoration effort on salmon populations, including any impact of the temporary diversion through a tunnel.

The Nez Perce Tribe (Submission 500) and the EPA (Submission 472) asked that the EIS provide in the analysis the following:

- Quantify and disclose the amount of incidental and direct take regarding ESA listed and resident fish species due to the impacts of this proposed mine. Clearly understanding how fish take estimates are calculated will be critical to evaluating the EIS. If post-reclamation annual fish population estimates are provided such as those listed on Table 5-1 of the PRO,158 then details of how those estimates are calculated needs to be included;
- Detailed information regarding the proposed water withdrawals, from both groundwater and surface water sources, for mining-related activities. Details on the frequency of water withdrawals, and how surface water withdrawal rates will be monitored, are needed in the EIS;
- The EIS should present a map of the present distribution of fish species in the Project area. It is critical to understanding how fish species can be affected by the current proposed mining operations such as fuel and chemical transport, sediment delivery to streams, tailing and waste rock facilities located on streams currently occupied by ESA-listed fish, and pit lakes impacting water quality;

- Data showing the distribution of fish species in the Project area should use all known fishery data such as Environmental DNA results taken by the Tribe that show bull trout are present in the EFSFSR above and below the Yellow Pine pit and in tributaries such as Fiddle Creek, Meadow Creek, and West End Creek; and
- Special consideration should be given to listed and proposed species under the ESA and EFH under the Magnuson Stevens Fishery Conservation and Management Act (MSFCMA). The NEPA regulations require that EISs be prepared concurrently with environmental analyses required by the ESA and other environmental laws (40 CFR 1502.25). Both the MSFCMA regulations (50 CFR 600.92 (c)(f)) and ESA regulations (50 CFR 402.06) encourage coordination with other environmental reviews.

The State of Idaho remarked that they would like the following items addressed in the EIS:

- An assessment of the effects of the fish passable tunnel on upstream and downstream fish populations, both pre- and post-construction;
- An assessment of existing habitat types present currently, with associated values of those habitat types for fish and wildlife. We recommend that changes in habitat type amounts and functions be used as a metrics for analysis across alternatives;
- An assessment of the effects of downstream hydrology (both groundwater and surface water) of the EFSFSR. Specifically, will there be a net loss of water from the recirculation of water from the basin for mining activities? Will a loss of water to downstream areas have effects on fish populations and fish habitat? Is there an associated change in the EFSFSR hydrograph;
- A detailed analysis of how the proposed action might affect the persistent contamination of fish in the EFSFSR;
- An analysis of any mitigation that may be necessary if large pumps and wells for dewatering the Hangar Flat pit might affect ground water in upper Meadow Creek, and how using infiltration pits downstream near the EFSFSR to reintroduce the water may cause dewatering in the salmon spawning channel reconstruction in Meadow Creek;
- A clarification of what data was used to develop estimates of fish production included in the Plan, and detailed descriptions of channel design and application of these to develop projections of fish production; and
- Disclosure of the potential increased traffic to Riordan Lake, and associated effects to bull trout.

Commenters suggested alternatives or mitigation measures to avoid or reduce impacts to fish or fish habitat that included:

- The Forest Service needs to examine alternative ways of storing potentially toxic tailings and waste rock so that spawning habitat is protected; and

- Find alternatives to the fish bypass tunnel.

Some commenters mentioned the benefits of the Plan on fish, such as the proposed stream restoration, including the significance of the intention to open a fish migration route that has been blocked since 1938, allowing access to nearly six miles of stream channel. By mining the site, Midas Gold plans to restore the natural flow and gradient of the EFSFSR to reconnect historical spawning grounds. The company would repair Blowout Creek, permanently solving a source of massive sedimentation and habitat degradation. Other commenters questioned the value of restoration in relation to additional impacts, *“While Midas Gold has promised to restore fish passage to headwater streams, the current project proposes burying over a mile of spawning habitat under hundreds of feet of mining waste and tailings”*. (Submission 107). Commenters also noted the Project provides an opportunity to improve and perhaps stop on-going discharges to these waters and address other existing habitat concerns of past mining. Commenters noted that if the Plan is not permitted, access to habitat upstream of the Yellow Pine pit would not be re-established since passage is currently blocked, and EFSFSR would continue to flow straight into an abandoned mine pit. They also commented that millions of tons of legacy spent ore, waste rock and tailings would remain a potential source of water contamination, and hundreds of tons of sediment would continue to wash into our rivers and streams.

2.5.4 Social Resources

The EIS should describe the direct, indirect and cumulative impacts of the following resources as they relate to the Social Environment:

- Consider economic impact versus environmental impact of the proposed action and examine influx of people to area as a result of mine development;
- Recreation;
- Wilderness and public lands;
- Federal land management and environmental protection;
- Impacts to wild and scenic rivers;
- Aesthetics and visual resources, including light pollution or dark skies;
- Access and transportation;
 - Transportation and road maintenance including an analysis of the access routes identified and considered in the Plan using consistent metrics across all alternatives;
 - An access analysis should include a description of potential mitigation measures associated with route- related impacts;

- Consider and disclose the methods and benefits of making Johnson Creek a safe alternative for fish and water quality and mitigation measures which could alleviate potential effects of opening a new, year-round Burntlog Road route;
- A detailed description of where the potential closure on the EFSFSR road between Yellow Pine and Stibnite will occur as this will affect hunter access to the area;
- Disclosure of the potential increased traffic to Riordan Lake, and associated effects to bull trout;
- Cultural and heritage resources; recreational and cultural usage of the site and surrounding area;
- Environmental justice;
- Public health and safety;
- Land use;
- Recreation;
- Roadless and wilderness resources;
- Socioeconomics including and an analysis, coordinated with the IDFG, describing potential impacts and mitigation of establishing a new community at Stibnite on both game and nongame wildlife including increased hunting pressure, increased potential for illegal take of fish and wildlife, and disturbance of the same; and
- Consider that mining activity would contribute to development of greener energy technologies by providing mineral resources for products.

It was noted that the agency should not rely on future monitoring or mitigation measures to avoid full compliance with NEPA's baseline data/analysis requirements.

2.5.4.1 Transportation and Access

Scoping comments expressed concern that a higher traffic volume and increased use of large trucks on Warm Lake Road, South Fork Road, and Johnson Creek would generally decrease safety. Specific concerns to address in the EIS included:

- Current roads were not designed for this type of heavy use;
- The highways have no turnouts or passing zones, which could present a safety hazard as drivers attempt to pass large and slow Midas Gold trucks;
- Accidents with trucks carrying fuel could cause fires;
- The safety of cyclists would be compromised;
- Winter driving would be more hazardous; and

- In this remote area, emergency response for accidents would be far away.

Conversely, one commenter commended Midas for the company's plan to use Burntlog Road and limit the number of daily trips by busing employees into the site and have them stay there during their shifts. It was noted that this seemingly small decision would reduce the number of vehicles on the road and help prevent accidents.

Many comments noted the negative effects of changes in access that the EIS should examine including:

- Consideration for the adverse social impacts from increased traffic and the increased public access to Thunder Mountain, Cinnabar, and Warm Lake;
- Rehabilitation of roads could be detrimental for silt and debris management, and may not be satisfactorily removed. The road should stay after the project because there may be other environmental, recreational, and commercial benefits to the area for the road that are discovered during the use period;
- Effects of the proposed action on county, state, and Forest Service roads, including analysis of costs for road construction, upgrade, and maintenance for the life of the proposed action and who would bear those costs. Maintenance during winter should be discussed;
- Access to Yellow Pine if the Stibnite road is closed, and effects on multiple recreation opportunities;
- Use of the East Fork road, as done under previous mining operations (or allowing a road from Yellow Pine to, and through, Stibnite);
- The alternate public route alongside Riordan Creek and through Horse Heaven that cuts off all access via horse trailers and two wheel vehicles; and
- A Road Analysis that includes inventory of existing roads and trails by class (full-size vehicle, ATV, motorcycle, non-motorized trails) and how each alternative would change that inventory.

One commenter noted that *“Building of double lane roads or creating new roads to accommodate private mining interests is not in the best interest of wildlife especially when the road(s) border wilderness areas”*. (Submission 92)

Others commenters stated that Burntlog Road is the best option of what is available to provide safe transportation to the site. It avoids travel adjacent to fish-bearing waterways, and provides recreation access to Thunder Mountain area as.

- *“The Burntlog Route would avoid travel adjacent to Johnson Creek and the South Fork of the Salmon River, with minimal travel adjacent to the EFSFSR that would be necessary in the final approach to the Project site. This routing would also bypass the*

community of Yellow Pine and residences along the Johnson Creek road, thus eliminating (or greatly reducing) Project-related traffic in those communities.”
(Submission 438)

The State of Idaho noted that they would like to see the following items addressed in the EIS:

- *“A more thorough analysis of projected daily and annual traffic volume that includes likely public use of new roads and trails beyond those expected by an increase in Midas employees.*
- *An assessment of potential effects of new roads and road closures on hunting, fishing, and trapping including effects of new roads on stream channel and wildlife habitats.*
- *An examination of designating the Sugar Creek Road as open to all motor vehicles in order to provide a more direct access to Thunder Mountain from Yellow Pine.*
- *An examination of the upgrades necessary to the Cabin Creek Road to provide for a groomed snowmobile trail.”* (Submission 513)

2.5.4.2 Cultural and Heritage Resources (including Tribal Treaty and Trust Responsibilities)

Section 106 of the National Historic Preservation Act requires cultural resource surveys and determination of effect. This survey must be completed prior to the commencement of work in all disturbance areas, including trench excavations, testing sites, off road travel corridors, drill pads and sumps, onsite facility locations, and areas of overland travel to get to the site.

Identification and evaluation of historical and cultural locations and sites that may be impacted by this Plan or any alternatives must be conducted in consultation between the Federal archaeological manager/consultant and the Tribal staff. Without this information, direct, indirect, and cumulative impacts to resources cannot be protected.

Specific areas of concern to evaluate in the EIS include:

- The impacts of the Burntlog Road and proposed recreation trails and snowmobile routes on traditional cultural properties and sacred sites;
- The Stibnite Mining District, which is listed on the National Register of Historic Places (NRHP); and
- Landmark Guard Station.

One commenter remarked that *“The Tribes have an expanded definition of cultural resources, through a holistic perspective, that encompasses plants, air, water, soil, animals and humans, and the relationship existing between them. Simply stated, a cultural resource is any resource of cultural character, including social institutions, subsistence practices, beliefs, religious practices, sacred landscapes and objects, archaeological sites, natural resources and their use, view*

sheds, intellectual property, oral traditions, language, historical documents and structures, and secular and non-secular items. An expanded definition of these cultural resources is warranted in the EIS to ensure all resources are analyzed for impacts by project activities.” (Submission 429)

The Forest Service should also consider obligations under the 1855 Treaty with the Nez Perce Tribe regarding the Tribe’s treaty-reserved right to take terrestrial and aquatic resources on open and unclaimed land presumes the continued existence of those resources. The 1855 Treaty secures to the Tribe the continued existence of those biological conditions necessary for the resources that are the subject matter of the treaties. Submission 500 asserted that “*the current baseline conditions of all potentially affected resources be fully analyzed*”.

2.5.4.3 Public Health and Safety

Many commenters were concerned about the health and safety issues that could result from the Project. Specific issues include:

- The harmful health effects of mercury, lead, arsenic, and other chemicals;
- The harmful health effects from the increased electromagnetic field when the 69-kv line is increased to a 138-kv line as proposed as studies show and increase in leukemia rates in children living within 200 meters of high-voltage transmission lines;
- An increase of visitors to Warm Lake would bring a rise in crime, including theft, vandalism, and litter;
- More law enforcement resources would be needed;
- Safety concerns over the possibility of the holding pond breaking;
- One commenter recommended developing an evacuation plan and identify potential safe zones in the event of a wildfire;
- All vehicles should have firefighting tools and methods of fire suppression;
- Additional recreation activities from mine workers, specifically the safety of recreational shooting; and
- Contamination of subsistence resources harming the health of consumers.

Other commenters noted the benefits of the Plan and beneficial impacts to consider include that health and safety in the region:

- Midas Gold provides some emergency services; these partnerships are needed to keep communities safer; and
- The community of Cascade would benefit from an expansion of the medicals services of the Cascade Medical Center.

2.5.4.4 Recreation

Recreation was noted by commenters to be an important resource for this region, both as a lifestyle and as an economic driver and that this should be considered in the EIS. Commenters expressed concern that there would be overall adverse impacts to recreation, including crowding at Warm Lake, which is already experiencing an increase of use. Retaining access to current recreation was also important to commenters. The relatively pristine setting is one reason people recreate in the area, and there is worry that it could be compromised. As one commenter noted *“The East Fork of the South Fork of the Salmon River is a very special place to me. When my husband and I were dating, it was the first spot we went camping together. It was the first place I saw a Cedar Waxwing, and it was the only place I’ve sustained a kayaking injury that required stitches. All of these were profound experiences in my life.”* (Submission 75)

Other concerns and suggestions to examine in the EIS included:

- Post closure retrofit mining living quarters into resort for future recreational use;
- Consider that recreational cabins could see a decrease in security;
- Noise and lights should be regulated to minimize impacts to recreation; and
- Some commenters noted that the project would increase access to recreational opportunities.

General remarks and comments regarding recreational activity use in the area that the Forest Service should evaluate in the EIS included:

- The Salmon River draws thousands of rafters and kayakers from all over the country and internationally each season. Whitewater enthusiasts are concerned about the impacts to the river and river basin for paddling;
- The South Fork of the Salmon River is one of the key locations in Idaho to which anglers travel to fish for salmon and steelhead. Most the fishing activity is on the South Fork of the Salmon River, but the mine threatens to impact that activity from traffic and by threatening the health of fish;
- Concern for how the project could impact hunting and trapping, both access and wildlife habitat;
- The snowmobiling community commented on the possibility for additional access to some areas for snowmobiles, the restriction to other areas, and the potential safety hazards (avalanches) in the proposed route; and
- Describe how the proposed roads would open more opportunities for motorized recreation.

One commenter remarked that *“The South Fork of the Salmon River basin is also a prized whitewater recreation destination. Each spring and summer thousands of kayakers and rafters*

travel from all over the world to experience this remote, challenging river system. The East Fork of the South Fork is considered one of the most challenging collections of rivers in Idaho and is sought after by elite paddlers who flock like pilgrims year after year. Idaho is known for its whitewater rivers, to compromise the accessibility or water quality would be ill-advised and foolish. Idaho Rivers United represents anyone who cherishes this unique and magnificent river network and stresses that the integrity of these remote regions be upheld.” (Submission 487)

2.5.4.5 Visual and Aesthetic Resources

Commenters remarked that the primary recognized asset at Warm Lake is the pristine quality of the Warm Lake area itself. The Project could impact the aesthetics of the area and also introduces light and noise pollution and would reduce the enjoyment of quiet and solitude.

Some commenters requested that a viewshed analysis be conducted with full participation and input from all stakeholders, including Tribes. They noted that there is an appearance from provided documentation that visual resources for this area have not been evaluated or classified and that this should be evaluated in the EIS. New roads through a roadless area should be considered as they may impact the landscape character at a higher level than improving existing roads. The visual analysis should also include impacts from the proposed powerline upgrades and construction. As one commenter stated: *“The Tribes have a unique perspective on the cultural value of the visual landscape, as also considered from seasonal and daily key observation points... When addressing surface mining activities, it is imperative to include Tribal perspectives to ensure that accurate mitigation and reclamation are required of the mining company.”* (Submission 429)

2.5.4.6 Land Use and Federal Land Management

Commenters noted the importance of managing public lands to promote the best use for the most number of people for the longest period and for the best health of the land itself.

Additionally, commenters noted the planning criteria for the EIS must include the Fort Bridger Treaty and the provisions of the treaty must be carried through the environmental analyses and decisions. Commenters state that the Forest Service must fully protect Tribal rights and interests throughout the Project by implementing management activities (surveys, inspections, and monitoring) that demonstrate a commitment to the federal trust responsibility. To make land management decisions for resource use on federal lands, the Forest Service must understand that Tribal traditional and contemporary uses and customs depend upon the health of natural resources.

Specific land management practices that the Forest Service should consider include:

- Consistency with the current Forest Plan (ES-27);
- Restrictions regarding fuel haul along the South Fork Salmon River;

- If construction of the Burntlog road would comply with the management area direction for this area in the Boise Forest Plan.

2.5.4.7 Special Designations

Comments were received associated with areas with a special designation: IRAs, Research Natural Areas (RNAs), Wilderness, and Wild and Scenic Rivers. Some issues include:

- The Forest Service must ensure that the project (roads and powerlines) does not compromise the values of the IRAs;
- Many commenters were concerned about the proximity of the mine site to the Frank Church-River of No Return Wilderness;
- The Plan provides inadequate detail, considering the amount of designated Wilderness in the area;
- The Forest Service must complete a suitability study for the Wild and Scenic eligible South Fork Salmon River, as required by Forest Plan Standard WSST01;
- There is a concern about impacts to the Outstanding Remarkable Values of the EFSFSR;
- Comments wanted to know whether Burntlog Road is in the Chilcoot Peak RNA and if it meets the purpose of a RNA and General Standard 2105 of Management Area 21, Lower Johnson Creek; and
- The waters of EFSFSR flow into the Salmon River, a Wild and Scenic River.

One commenter remarked that *“The proposed area buffers one of the most important wilderness areas in the Lower 48, the Frank Church River of no Return Wilderness. The area between the South Fork road and the wilderness boundary is not a sacrifice zone and all and every effort should be made to minimize the impacts of this project.”* (Submission ID 517)

INVENTORIED ROADLESS AREAS

Commenters noted that the remote location of the mine site as well as its close proximity to the Frank Church-River of No Return Wilderness and IRAs present difficulties for accessing and maintaining an operation of this scale. The planned route would rebuild and/or resite portions of Burntlog and Thunder Mountain roads as well as the construction of new road segments to connect these routes through IRAs that fall under the Idaho Roadless Rule. The specific IRAs affected would be: Burntlog, Black Lake, and Meadow Creek, all of which are classified as Backcountry Restoration under the rule.

Commenters are concerned that roadless values stated in the Roadless Area Conservation National Forest Systems Lands FEIS will be compromised by this project. “Although the Idaho Roadless Rule does allow for “temporary” road construction within IRAs, TU questions whether the 20 year use of this road qualifies as temporary” (Submission 512).

Commenters requested the Forest Service further analyze compliance with the Idaho Roadless Rule. Impacts of the roads year-round use on the Frank Church-River of No Return Wilderness and the Burntlog Creek eligible wild and scenic river corridor also deserve further analysis.

“These roadless area disturbances will be there forever when the project is stalled or mothballed. This should be analyzed in the DEIS.” (Submission 112)

2.5.4.8 Socioeconomic

Commenters expressed concern about some social aspects of the Project, including:

- Theft and vandalism of property;
- Transparency in the Midas Gold Plan; and
- Concerns of unethical practices from Midas Gold.

Some commenters remarked that they have a historical attachment to the mine and feel the Forest Service does not do enough to protect mining history.

Commenters asked the Forest Service to consider that the Project could improve the local, regional, and state economy by providing jobs. Year-round employment (as opposed to seasonal tourist jobs) would bring financial security to an economically depressed region. In addition to direct employment, the mine would indirectly boost the economy. Some commenters were concerned that the EIS may not fully portray the economic benefits.

Socioeconomic benefits of the Project could include:

- The commitment from Midas Gold to hire locally;
- The recovery and sale of domestic resources reduces U.S. dependence on foreign imports;
- The company would pay for the reclamation of the site;
- The Project would contribute millions of dollars in state and local taxes;
- Impact to regional housing would be minimal, since housing would be provided on-site;
- Midas Gold has shown commitment to the community for the past several years through sponsorships, donations, volunteer work, and providing emergency services;
- The proposed improvements to the road/transportation infrastructure may also improve future access to these areas of the National Forests; and
- Midas Gold indicates they expect to ramp up and ramp down employment in a measured way, so that there would be little effect of the "bust" phenomenon.

“The Stibnite Gold Project is an opportunity for industry to offer a win/win solution to an area in significant need of repair. As proposed, the project finances and provides the

workforce and resources necessary to complete the much-needed environmental reclamation while at the same time extracting valuable and vital minerals we use daily.”
(Submission 64)

Commenters expressed concerns with adverse effects to some industries, in particular tourism, if the natural setting changes, including impacts to the fisheries, or too many people come to the area.

“Communities surrounding the proposed mine area have established vital economies based on recreation and tourism. Protection of clean water, air, and viable wildlife are the foundation of this success. The proposed mine threatens all aspects of these inherent resources. These economies have proven to be sustainable. Mining is a short term financial boost, but the fallout is that history has shown them to be detrimental to these values in the long term. Lack of accountability and follow through are the legacy of mining, and this does not promote these communities in the long term.” (Submission 109)

Other socioeconomic concerns noted in the comments include:

- Historically, mining creates a detrimental boom and bust cycle to local communities.
- Success of the mine is dependent on the price of gold staying high.
- Midas Gold is a Canadian company.
- There could be damage and long term costs to the economy (replacing damaged roads, the exorbitant cleanup costs of just a single accidental spill, etc.).
- The long term effects to the environment are not worth the short term economic boom.
- Despite the commitment to hire locally, most employees will be from out of state, especially the higher-paying jobs.
- Nearby property values would decline.
- An influx of workers and project-related activities would strain local and county services like road maintenance and schools.

“I implore the decision makers to take into account how this project would profoundly change the lives, fortunes and futures of the residents of the Valley County backcountry and of the many businesses that would suffer, rather than prosper, if this project were to go forward as proposed.” (Submission 440)

Commenters were also concerned that the use of taxpayer money that has already been spent on the site reclamation could be undermined. This mine could leave another site that would need reclamation, as has happened in the past at several mines throughout the country.

Many expressed concern that closing the Stibnite Road and building a bypass via the Burntlog Route would increase tourism traffic around Yellow Pine, which would negatively affect businesses there, while also restricting recreational access to the area.

2.5.4.9 Environmental Justice

EO 12898 requires federal agencies to identify minority and low-income populations potentially affected by a project. It also requires federal agencies to assess whether any project alternatives would cause a disproportionate adverse impact on the population, such as displacement, changes in existing resources or access, or community disruption. Agencies must also explore potential mitigation measures for any adverse environmental justice effects. Commenters stated that the Forest Service should specify in the EIS whether it is meeting the requirements of their environmental justice strategy.

POWERLINE UPGRADE

Residents that live near the proposed powerlines are concerned about the lack of detail and communication thus far. The powerlines could influence property use, appearance, and value negatively. Commenters requested that the EIS disclose and analyze the short-term and long-term direct, indirect, and cumulative impacts of the upgrade of the existing power line and the construction of the new power line.

One commenter noted that the power needs of the Plan would require huge investment into the local power grid.

2.6 SUMMARY OF PUBLIC COMMENT – NEPA PROCESS AND ALTERNATIVES

2.6.1 NEPA Process General

There were several comments received that indicated the EIS should be prepared in accordance with the NEPA process and should ensure all short-term, long-term, direct, indirect, and cumulative effects resulting from the proposed action or alternatives are disclosed and analyzed.

Some commenters were concerned about the proposed schedule to complete the EIS and that it was not a long enough period to complete the requisite studies and analysis. *"We strongly suggest that the Forest Service and other permitting agencies adjust the project timelines to ensure that impacts to public resources are properly analyzed and that the impacts can be avoided, minimized and mitigated"* (Submission 445). And, one comment was received that *"encouraged you [USFS] to conduct a NEPA process that thoroughly vets the Stibnite PRO [Plan of Restoration and Operations] but that does not make the mistake of assuming that longer and more ponderous is better"* (Submission ID 451).

Several comments were received in regards to streamlining the permitting process for this Project as they believe the process should be *"condensed and streamlined to bring projects into development with less delay."* (Submission 119)

2.6.2 Purpose and Need

The development of the purpose and need statement is mentioned a couple times in the comments. It is noted that *"the NEPA analysis should include a clear and concise statement of the underlying purpose and need for the proposed action, consistent with the implementing regulations for NEPA (see 40 CFR 1502.13)"* (Submission 472). Comments were also received asking why Midas Gold wanted to re-open the mine. And one respondent wanted to ensure that the Forest Service purpose and need was clearly distinguished from Midas Gold's purpose and need stated in the Plan.

2.6.3 Connected Actions

A comment was received noting *"the Draft EIS must also fully review the impacts from the transportation and processing of ore/concentrate. The fact that Midas Gold may seek or obtain a state-issued permit for Project emissions/discharges, whether on-site or offsite, does not mean that the Forest can avoid a detailed review of these, or any, impacts under NEPA"* (Submission 500).

2.6.4 Public Involvement

Commenters are concerned that not all property owners adjacent to the Project area, particularly along the powerline upgrade route and the mine access routes, were notified of the Scoping Period and opportunity to comment. Some comments were received indicating that the public would like more cooperation between the Forest Service and the affected communities, particularly Yellow Pine.

One commenter expressed concern that *"people don't share their comments or thoughts because we have been conditioned to stay silent and doubt that our comments would make a difference." and that the project is a "done deal"* (Submission 117). There is also concern that only a small portion of the U.S. public has heard of or knows about the Project because, *"the remoteness and wildness of this area means that only a very small portion of the US public has heard of or knows about it"* (Submission 198).

Some comments were received that expressed concern that not enough "weight" was being given to local comments or only *"those with passionate and extreme views, and those with special interests, participate disproportionately,"* (Submission 451) in the comment periods, and the, *"unintended effect, then, is to give greater voice to the extremes and to mute the more moderate views of the vast majority of Americans"* (Submission 451). Commenters request that *"All of the stakeholder's needs and concerns are taken [into] consideration"* (Submission 409), baseline data/analysis are completed, and that the appropriate agency and government-to-government consultations occur before the public comment period on the Draft EIS begins. For

example, *"what the current CWA discharge points are or whether the site discharges are covered by the appropriate permits"* (Submission 500).

One comment was received suggesting that *"There is no concept of how the mining industry plays and I would like to see PSAs on this thru National and International Mining Institutions"* (Submission 277).

There were also some general comments made by several individuals and organizations noting that reclamation plans and other information developed by Midas Gold during the process should be made available to the public as part of the EIS process. And, *"The Tribe and the public should be allowed to review and comment upon all technical analyses and assumptions made in quantifying and analyzing these impacts"* (Submission 500).

2.6.4.1 Adequacy of Comment Period

Commenters expressed concern that there was not enough advance public notification of the scoping period and that the length of scoping period was not adequate.

2.6.5 Tribal Consultation

Because of the cultural resources, Indian tribal treaty, trust resources, and traditional cultural property concerns surrounding the Project area, multiple respondents specifically commented about the tribal consultation process. One commenter states, *"The NEPA process should be conducted in consultation with all affected tribal governments,"* (Submission 472). Another commenter stated, *"The Project area is also located with the [Nez Perce] Tribe's area of exclusive use and occupancy, as adjudicated by the Indian Claims Commission. The Forest thus has a trust responsibility to ensure that its actions, including implementation of the Project, are fully consistent with the 1855 Treaty, executive orders, departmental regulations, and other federal laws implicating the United States' unique relationship with the Tribe"* (Submission 500).

The Nez Perce Tribe specifically commented that *"The Forest should work with the Tribe and SHPO [State Historic Preservation Officer] to address any....concerns identified in the archaeological survey reports."* and *"The Forest must also complete ethnographic surveys to identify traditional cultural properties, sacred sites, and historic properties of religious and cultural significance to the Tribe through the Project APE [Area of Potential Effect]. The Forest should have an expansive APE that covers all proposed Project activities and locations, and it must be developed in consultation with the Idaho SHPO and the Tribe"* (Submission 500).

In addition, the Shoshone-Bannock state, *"The Tribes expect formal government-to-government consultation with the Forest Service and other federal agencies"* (Submission 429).

2.6.6 Interagency Coordination/Cooperating Agencies

Several commenters provided recommendations for cooperating agencies and suggested that the PNF consult with the following agencies during the EIS development process: USACE, the EPA, Idaho state regulatory agencies, U.S. Fish and Wildlife Service, and the National Oceanic

and Atmospheric Administration (NOAA) National Marine Fisheries Service (NMFS). These agencies were suggested for their technical expertise in hydrology, geology, wildlife, water quality, and other resources.

Several comments were received suggesting other potential Cooperating or coordinating agencies. *"The Forest Service should also reinitiate consultation with the US Fish and Wildlife Service and NOAA fisheries on this issue [water quality]"* (Submission 445). A comment was received that asked to, *"Please study their Comprehensive Plan and consider Idaho County to be a partner in the development of your Record of Decision" and went on to say, "The Stibnite and the Warm Lake Mining Districts are legal entities, as are all 183 Mining Districts in Idaho. Please consult with their Board of Directors and members throughout the process"* (Submission 480).

The EPA, as a Cooperating Agency on this project, requests that *"our schedules be considered when planning meetings involving our areas of concern."* And they encourage *"engagement early and often"*. *Some "critical points to engage and consider EPA's availability include presentations of baseline and modeled effects to water and air resources, CWA Section 404[(b)1 Guidelines requirements], geochemical characterization of and geotechnical stability of the tailings, ESA, and EFH related actions, and cooperating agency meetings."* The EPA also, *"recommend the Federal action agencies [USFS, EPA, and USACE] work together to ensure that a single BA [biological assessment] is developed that meets each agency's needs, and we also work together during the ESA and EFH consultation processes by having joint meetings with the US Fish and Wildlife Service and National Marine Fisheries Service"* (Submission 472).

2.6.7 Relationship to Other Planning and Permitting Processes

There were only a few comments received in this category; however, they were quite wide ranging in their concerns.

One comment suggested the EIS should consider the relationship of the Project to other planning and permitting processes such as *"applicable water quality permits and state-adopted, EPA-approved, water quality standards"* (Submission 500). And the EPA "recommends that 404 (b)1 analysis be conducted concurrently with the EIS" (Submission 472).

A comment received from the Bureau of Reclamation suggested the *"EIS should also address the potential need to obtain a new or amended easement from Reclamation to accommodate the upgraded transmission line, along a portion of the existing 69 kV transmission line on the east side of Lake Cascade"* (Submission 350).

Another commenter was concerned about permitting delays and what that might mean to the viability of the Plan. *"A challenge to the mining industry is and always has been the ever changing value of the minerals being mined. Oftentimes permitting delays will negatively affect a potential project's ability to move forward and hence its financial viability"* (Submission 294).

"The Forest Service should also insure that an Underground Injection Control Permit has been acquired" (Submission 445).

2.6.8 Relationship to Applicable Laws, Regulations, and Policy

The impact of other laws and regulations on the EIS development process and the decision-making process are of interest to the respondents.

The State of Idaho and other commenters requests that, *"the following items are addressed in the EIS: the NPDES/IPDES and 404 permits in significant detail; Identification of all IDAPA rules pertaining to the project; and Analysis on whether the "rapid infiltration basins" identified in the PRO will need IDWR permitting as injection wells, and identifying the discharge standards that need to be met to adequately satisfy the proposed wetlands mitigations"* (Submission 468)

Additionally, commenters requested that the EIS detail the effects of the Plan's implementation on Forest Service obligations under these laws. Specific laws, regulations, and plans mentioned in the comments include the following:

- Federal, General Resources: Mining Law of 1872; ESA; Migratory Bird Treaty Act (MBTA) and EO 13186, "Responsibilities of Federal Agencies to Protect Migratory Birds;" CWA; Clean Air Act; Resource Conservation and Recovery Act; and the Organic Act.
- Federal, Cultural Resources: NHPA; American Indian Religious Freedom Act (AIRFA); Native American Graves Protection and Repatriation Act (NAGPRA); EO 12898, "Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations;" EO 13007, "Indian Sacred Sites;" and various treaties with Native American tribes.
- Federal, Forest Service Specific: The Federal Land Policy and Management Act (FLPMA); the Forest Service's implementing mining regulations at 36 CFR Part 228; the Payette National Forest Land and Resource Management Plan (Payette NF LRMP); and the Boise National Forest LRMP.

Some commenters questioned whether the construction of Burntlog Route is consistent with the Idaho Roadless Rule and also the Boise NF LRMP. Another commenter asked *"Has the mine site been declared a brownfield by EPA?"* (Submission 458)

The Nez Perce Tribe is also concerned about, *"the Forest Service's obligation to protect the Tribe's treaty-reserved resources"* (Submission 500).

Several comments were received noting the need to incorporate CWA Section 404 permit and analysis, including 404 (b)(1) guidelines and requirements, into the development of the EIS, *"We strongly recommend the 404 permit process and NEPA information and analysis be consistent and conducted concurrently to the extent possible"* (Submission 472).

Several comments were received in regards to the NPDES permit. Comments were received asking *"Will the NPDES permit require the project to meet the state standards" for arsenic and who will be responsible for compliance*" (Submission 183). And, *"the NPDES permit should also be compliant with Idaho's water quality standards found in IDAPA 58.01.02"* (Submission 445). In addition, *"The Forest should discuss the applicability of the EPA's NPDES Multi-Sector General Permit for Stormwater Discharges Associated with Industrial Activities to the Project. The Forest should also develop and include a stormwater pollution prevention plan along with the EIS for public comment"* (Submission 500)

2.6.9 Forest Service Management Consideration

Commenters noted that *"the EIS should identify and discuss the rationale for the amendments to the Payette and Boise National Forest plans that the proposed action will necessitate"* (Submission 222). And there were comments received asking if "amendments to the current Forest Plan" would necessitate a separate public process.

Another commenter noted, *"The Boise LRMP also requires preservation of the outstandingly remarkable values of the Burntlog Creek eligible wild and scenic river corridor"* (Submission 201).

2.6.10 Use of Science/Best Available Science

A few comments were received indicating potential information that could be used during the NEPA analysis such as, *"The EPA's [document titled] Technical Document Acid Mine Drainage Prediction. This document has been produced by the EPA to deal with the possibility of AMD in the U.S."* (Submission 199) Another commenter indicated, *"The U.S. Geological Survey has conducted a significant amount of work.....that has informed many aspects of the submitted plan and should aid the Forest Service in addressing the analyses for geochemistry and hydrology"* (Submission 382).

Another commenter noted that the assessment will likely find data gaps that need to be answered and, *"I would hope and suggest that the proponent be provided opportunity to gather other reasonable and scientifically necessary information without having to restart the permitting process"* (Submission 294).

One commenter asked if, *"the Environmental Baselines for the Watershed Condition Indices" would be made available to the public, and if they are going to be updated"*. (Submission 330).

2.6.11 Cumulative Impacts

The EIS cumulative impact analysis is of concern for respondents. One respondent asks, *"What are the cumulative impacts of past mining operations in the area for the four items listed? [Wetlands, biology, water quality and air quality] What are the recurring effects of mine development of the four items listed throughout the past and future?"* (Submission 352) Additionally, *"The Cumulative Effects section should quantify effects and not just provide a qualitative overview."* (Submission 445).

Several respondents provide additional projects or activities that should be included as past, present, and future projects that should be considered in the cumulative impacts, including: Big Creek Roads Plan of Operations, Golden Hand Project, logging, grazing, recreation, mineral/energy exploration and development, and transportation projects.

The cumulative impact analysis *"must take a hard look at all actions."* (Submission 500) and the EPA notes that both "Federal and non-Federal" projects should be taken into account in the cumulative impact analysis and they *"recommend a...watershed approach when identifying, quantifying and mitigating cumulative impacts. EPA has issued guidance on how we provide comments on the assessment of cumulative impacts. The guidance is a good tool to assess the adequacy of the cumulative impacts assessment."* (Submission 472)

2.6.12 Alternatives Development

Commenters provided the following recommendations for the Forest Service to consider regarding the development of alternatives to the proposed action:

- Include clear and distinct alternatives to the proposed action and not a mere reshuffling of components of the proposed action;
- Develop all reasonable alternatives to address concerns the public raises including the number of pits, pit design, access routes, tailings storage options, tailings storage locations, waste rock storage locations, replacement access for snowmobilers and motorized users, mitigation for fish and wildlife, and project duration;
- Consider that while the Plan proponents have proposed construction of the Burntlog road to move mining traffic away from anadromous fish-bearing streams, the overall result could appear to be one of pitting aquatic species against terrestrial species;
- Develop meaningful alternatives regarding the most significant environmental risks;
- There must be a meaningful range of Alternatives in the Draft EIS. These alternatives should be developed to avoid some or all of the adverse environmental effects, including the costs and benefits of each. Each should assess the cumulative long-term effects, including its relationship to short-term use of the environment versus the environment's long-term productivity;
- In the event of a short-term halt to mining or suspension of production, "care and maintenance" procedures need to be spelled out for each alternative;
- For every phase of mine life, develop a series of alternatives in which the restoration components can be pursued without ongoing mine development activities; and
- The EPA suggested that the Forest Service organize an alternatives workshop so that all cooperating agencies may discuss the potential alternatives comprehensively, and that development of practicable alternatives occur concurrently with determining the range of

alternatives that would be evaluated under the CWA 404(b)(1) Guidelines for the USACE's permitting process.

2.6.13 No Action Alternative

Numerous commenters discussed the No Action alternative; some noting that it should receive special scrutiny in the EIS because it forms the baseline against which the Project impacts must be assessed. Others felt that selection of the No Action Alternative would result in a lost opportunity to use private-sector resources to restore the environmentally degraded Project area and would perpetuate the environmental problems caused by legacy mining. Commenters noted that without the Project, “the EFSFSR will be forever contaminated, and fish will never again migrate freely to the Meadow Creek spawning grounds.” (Submission 347) “Millions of tons of legacy spent ore, waste rock and tailings will remain a potential source of water contamination. Hundreds of tons of sediment will continue to wash into our rivers and streams.” (Submission 406) Other commenters remarked that they believe that, “the true no-action alternative is not that the site will remain polluted/degraded, since Midas Gold is under an obligation to remediate all of the pollution/impacts under its broad, current liability.” (Submission 500) In the no-action alternative, the Forest needs to fully review Midas Gold’s current liabilities and the extent of remediation that would be accomplished if Midas Gold met its current liabilities, independent of approval of the PRO.” (Submission 500)

Other commenters asked if the Forest Service, as part of the EIS, provide an estimate as to the cost of these activities should the Plan not be approved, and who would do these and how would they be paid for. Commenter asked if the mining plan is not approved would this restoration be done, what the cost would be, and who would pay for it.

2.6.14 Proposed Action

Many commenters asked questions about the details of the proposed action, including more information regarding: waste disposal, employee recruitment, housing, processes to keep antimony product out of aquatic systems, the valence state of antimony, who would designate which streams do/do not require fish passage structures, and how this would be determined, and what fish passage structure type(s) are proposed to be used beside bridges.

The State of Idaho, including the OEMR, asked that *“the Forest Service address in the EIS, how spent ore and other cover materials will be segregated from the old tailings during excavation, type of construction to be done with the spent heap leach ore disposal area material, where the SODA material will be stored, how the site landfill will be used, how the Blowout Creek channel will be constructed with a gradient of 2%, and how the excavated material from access roads to Blowout Creek will be used.”* (Submission 513)

The Nez Perce Tribe asked that the Forest Service describe in the EIS: all closure and post-closure activities associated with the open pits, waste rock piles, tailings facility, groundwater management, surface water management, water treatment, and other facilities. *“This description should detail how drain-down fluids from the tailings storage facility would be captured, treated,*

and controlled over the closure and post-closure period. It should also include the commitments Midas Gold and government agencies have made regarding operation and maintenance of caps/covers, drain-down systems, water treatment, fencing and wildlife protection measures, diversion channels, underdrain systems, and wells, etc. The description should describe Project implementation, performance, and effectiveness monitoring, and the follow-up actions that will be taken should destabilization or contamination be detected at the Project site” (Submission 500).

The USACE (Submission 1539) made specific comments on the Proposed Alternative as described in Appendices F and G of the Plan and stated:

- *The alternatives analysis as described in Appendix G, describes multiple processes for Tailings Dewatering Technology. What relation does the method of dewatering have to the TSF footprint (Embankment Height, Volume, Spatial Extent), and would an alternative process such as the Paste Tailings reduce impacts to a WOUS [Waters of the U.S.], specifically the PFO wetlands in the upper reaches of Meadow Creek.*
- *The Development Rock Storage Facility (DRSF) for the Yellow Pine Pit, as proposed in the PRO, is located within the Fiddle Creek Drainage, and the West End Pit DRSF is located within the West End Drainage. Criteria considered for placement of the DRSF include but are not limited to, haulage profile (500 vertical feet), handling (Cost), and distance from source (1 mile). The West End DRSF appears to meet this criteria in part for development rock from the Yellow Pine Pit, and the Yellow Pine DRSF appears to exceed these criteria in part for certain locations. Given the general proximity of these features to each other, what is the ability to consolidate DRSF’s to limit impacts within each drainage, specifically what is the potential to consolidate the Fiddle DRSF in the West end Drainage? Is it practicable to split haulage routes to reduce the impacts, and better meet the described criteria (east side of the Yellow Pine Pit to West End DRSF)?*
- *The PRO describes the need to limit rehandling of development rock to meet project purpose and need. Given the criteria for DRSF listed in the PRO, the Corps expects a review of potential rehandling opportunities that may meet other criteria such as Maximizing Restoration Opportunities and Area of Previous Disturbance. Specifically the Corps would like the proponent to address the feasibility of backfilling all or part of the West End Pit with the West End DRSF. This action would meet in part, certain criteria such as empty trucks moving up gradient, close proximity to pit etc., and would allow for less open water and maximize wetland restoration potential. In addition the Corps would like the proponent to address the potential to partially backfill the Yellow Pine Pit with the Meadow Creek DRSF. The Corps acknowledges the intended multipurpose as a buttress to the TSF impoundment; however the Corps expects a further evaluation to determine if a minor slope or volume reduction would affect the safety of the design. The potential reuse of the DRSF may have the same benefit as described above, and result in a reduction to permanent loss of functions and values.*

- *Appendix G, Page 20, Footnote 7, is incorrect. The Corps provided an Approved Jurisdictional Determination for WOUS and adjacent wetlands identified within the project impact area. The Corps did not make a jurisdictional determination for WOUS or adjacent wetlands for waters within the project area that would not be affected by the project. The Corps provided a Preliminary Jurisdictional Determination for waters of the United States and adjacent wetlands identified with the various access roads and power line alignments. The jurisdictional determination for the logistics center is pending.*

2.6.14.1 Ore Processing

Comments received regarding specific Project components that the Forest Service should evaluate in the EIS regarding ore processing included:

- The company is proposing to process all gold and silver on site, creating an opportunity for further environmental contamination. The company should be forced to provide details for the EIS and NEPA process in order to create and present an alternative that involves off-site processing, so that the potential environmental effects of on-site processing can be made clear for the agencies and the public; (Submission 198)
- If the project is constructed, *“it may be possible that at some time in the future, for the mine operators propose converting from vat leaching to heap leaching; and the EIS should consider and discuss this.”* (Submission 301) and
- Midas Gold commented that the Plan is not a heap leach operation and that they propose to recover gold and antimony by flotation methods.

2.6.14.2 Tailings Storage Facility

Comments received regarding specific Project components that the Forest Service should evaluate in the EIS regarding the TSF included:

- *“Will the mine tailings dam meet Idaho and Federal dam safety regulations in its siting, foundation analysis, structural design, materials and construction quality control and testing, and possibility of a public warning system to downstream residences and businesses? Since it is in a seismically active zone (Intermountain Seismic Belt), will the dam’s design withstand, by an appropriate factor of safety, the ground accelerations of the maximum credible earthquake?”* (Submission 51);
- *“In addition to handling hydrologic events, we recommend that the tailings facility be designed to handle significant seismic events beyond the 6.5 earthquake magnitude events.”* (Submission 445);
- *“The safety and long-term maintenance and monitoring of the tailings facility needs to be described further.”* (Submission 354);
- *“Given the significant negative issues of placing the Tailings Storage Facility in the Upper Meadow Creek stream, wetlands, and Riparian Conservation Area (RCA), the*

Forest Service should develop an alternative that essentially limits tailings production to the volume that can be safely stored without inundating wetlands, RCAs or streams.”
(Submission 445);

- *“Analyze an option for refilling the historic Stibnite Pit, the conical shaped-pit at the west end of the project area, with waste rock or tailings.”* (Submission 445);
- *“Develop an alternative in which the tailings and/or waste rock are relocated back into the main pits (or other geologically stable area). While rehandling this material would require additional expense, the Forest Service should compare this with the cost of dealing with a catastrophic dam failure, contamination, and effects of downstream public health and fisheries issues.”* (Submission 445);
- *“We are concerned that surface water will infiltrate the tailings and lead to increased groundwater flows of contaminants. The Forest Service should reassess the cap and consider using impermeable layers above the tailings and below Meadow Creek. The cap of the tailings facility should be designed so it is adapted to the expected tree growth, anticipated root depth and designed to withstand tip ups.”* (Submission 445);
- *“Consider concerns about temporary pooling at the lip of the tailings dam during highwater events that may occur post-closure. We recommend designing the lip of the tailings dam with a backup or secondary spillway that will prevent any pooling. In addition, should the designed water channel across the surface of the tailings facility meander or become rerouted, the flow could be redirected away from the spillway. To resolve this, we recommend designing the final surface of the tailings facility to accommodate meanders and to widen the spillway/incorporate secondary a spillway to capture and direct these flows.”* (Submission 445);
- *“The long-term stability of the Tailings Storage Facility is of tremendous concern and the Forest Service should include the lessons learned from the recent Mount Polley Mine tailings dam failure as outlined in the investigative panel's final report. The panel of experts recommended using best available technology to reduce the risk of failure. This included recommendations to; eliminate surface water from the impoundment; promote unsaturated conditions in the tailings with drainage provisions; and, achieve dilatant conditions (setting to a solid) throughout the tailings deposit by compaction. The EIS should incorporate a Failure Modes Effects Analysis in evaluating tailings disposal methods, and it should incorporate an independent tailings review panel in the earliest stages of planning, development and analysis. The tailings review should prioritize long-term stability and public safety, and analyze methods for dry tailings disposal.”*
(Submission 445);
- *“We would particularly like to emphasize the need for an independent tailings pond review panel to assess the final design and long-term management of the facility.”*
(Submission 445);

- *“While the likelihood of a catastrophic failure of the TSF may be relatively low, the environmental costs of a collapse would be extremely high and are not covered financially under any proposed scenario.”* (Submission 445);
- *“The Forest Service needs to complete an Emergency Action Plan in coordination with Valley County and the community of Yellow Pine for the tailings impoundment. This plan needs to include different emergency levels, the notification and communication list and section on expected actions but believe the EAP could still be improved.”* (Submission 445);
- *“Regarding liner material, the Forest Service should assess utilizing a Geosynthetic Clay Laminate Liner instead of a simple geosynthetic clay liner to see which is more protective of water quality. Redundant water monitoring, capture and treatment systems need to be established downgradient of the tailings to assist in the event of liner system leaks. This system, along with the water treatment system, will have to be monitored and maintained in perpetuity and the bonding should reflect these costs.”* (Submission 445);
- *“Idaho Rivers United objects to the proposed placement of Midas Gold’s tailings storage facility. The. The company must come up with an alternative placement.”* (Submission 487); and
- *“Propose new alternatives that do not involve dewatering or rerouting any streams or creeks in this basin. Rerouting streams is unsustainable and expensive; there are no guarantees that Midas Gold will reclaim these rerouted creeks, leaving the area more degraded than when this mining company arrived.”* (Submission 287)

The State of Idaho (Submission 468) would like to see the following items addressed in the EIS:

- *“Identification of where the new tailings will be deposited during excavation of the of the historic tailings, and details regarding the sequence of events and spatial relationships;*
- *Analysis on the proposed placement of the reconstructed Meadow Creek channel and any impacts it may have upon failure of the embankment as well as alternative design options;*
- *Identification of all tailings storage facilities state and federal requirements;*
- *Examination of the over liner collection system in the TSF;*
- *Detailed analysis of the potential risks associated with pushing the free water pond eastward against the constructed embankment and descriptions how this will be done safely;*
- *Modeling to determine if an impermeable layer is needed in the cover for water flux and contaminant transport through the reclaimed tailings;*

- *Determinations if geogrid or similar materials need to be used for at least half of the tailings impoundment.”*

2.6.14.3 Design Features

Commenters suggested design features that could be incorporated into the proposed action which included:

- *“Design the project in such a way that mining will not create permanent sources of pollution needing treatment in perpetuity.”* (Submission 23);
- *“Will backfilling the existing Yellow Pine Pit with waste rock be covered with an impermeable cap so as to prevent infiltration and leachate formation that could generate increased levels of ground water leachate? Although open-pit mine water is a current source of ground water contamination, the existing pond has the benefit of evaporation. Back-filled waste rock also will increase rock surface area and soluble contaminants in a permeable medium, thereby increasing potential for ground water leachate production, as well as preventing evaporative losses. Backfilling the pit is a good plan only if the design prevents surface water run-on, run-off is designed to prevent surface ponding and erosion, and an impermeable cover placed after backfilling to avoid infiltration of surface waters.”* (Submission 51);
- Several commenters requested that the Forest Service require Midas Gold to backfill all the pits; and
- Determine if there is *“sufficient volume of potentially acid neutralizing rock to not only fill the Yellow Pine pit, but to also blend with potentially acid generating (PAG) waste rock at the various development rock storage facilities. Perhaps not; hence the mention of the possible need for PAG storage cells (PRO p. 9-6). There is no further detail given in the PRO regarding the design of such cells, the anticipated volumes, or their effectiveness in isolating such material from the environment”.* (Submission 183)

The USACE (Submission 1539) made specific comments on the Project alternative as described in Appendices F and G of the Plan and stated:

- *“Impacts by facility listed in Table 3-1 of Appendix F of the PRO, appear to assume all WOUS within the facility boundaries will be impacted. The evaluation should include a review of what avoidance and minimization may occur within facilities to further reduce overall project impacts. For example, the Stibnite Lodge Facility lists a total of 1 acre of impacts. Are there alternative alignments or design changes such as additional levels to the complex that can further reduce or avoid a WOUS?*
- *Another example would be the Reclamation/Stockpile/Borrow area within Meadow Creek Drainage. Impacts are expected to include 12.3 acres of wetlands. Area there alterations to the layout and/or sequencing which could further reduce overall project impacts.*

- *Table 3-1, of Appendix F [of the PRO], Subheadings East Fork South Fork Salmon River and Midnight Creek each identify a 0.1 acre PEM impact from the construction of the West End Pit Haul Road to the primary crusher. Is this the same impact counted twice? If they are different impacts, we suggest changing the naming convention to reduce confusion.*
- *Table 11-2 of Appendix F [of the PRO], identified an impact in Rabbit Creek of P-29 and I-51. Discussion in Section 6.13 states the only impact to Rabbit Creek would be the installation of a single culvert associated with the construction of the access road. The stream cannot be both perennial and intermittent at the same location, and this needs to be clarified. In addition, clarification is needed for why this loss is not being mitigated”.*

2.6.14.4 Monitoring

Commenters requested that the Forest Service include it the EIS information regarding past, current, and planned monitoring at the site. Commenters asked that the Forest Service monitor: water quality, air quality, vegetation and wetland reclamation, wastewater treatment plant, and that monitoring plans be part of the EIS. Several commenters’ recommended third party monitoring and public access to monitoring results be made available. Water quality parameters suggested to be monitored include mercury, lead, antimony, arsenic, total dissolved solids, pH, temperature, phosphates, nitrates, and coliform. Commenters asked that the Forest Service clarify in the EIS the duration of monitoring, many stating that the 5 years proposed in the Plan is not long enough with commenters suggesting that that monitoring should be done in perpetuity. Other question asked during scoping that the Forest Service address included : identify who will pay for the monitoring and any repairs, who would pay for maintenance after the bond money is released, and who will set the goals/objectives/standards and what will happen in they are not achieved.

2.6.15 Mitigation Related

Commenters recommended that where adverse impacts are unavoidable, the EIS should include mitigation measures for each unavoidable impact and a discussion and analysis of the effectiveness of each proposed mitigation measure, including disclosing the failure rate of proposed mitigations. The Idaho Transportation Department commented that they are “*working with Midas Gold to clarify access points and needed traffic mitigation measures for several intersections on the State Highway System. Commenters asked that mitigations be required for impacts to: mercury, water quality impacts, and roadless areas.*” (Submission 206)

The Idaho Conservation League (ICL) (Submission 445) suggested that for every year of mine operations after the original 20-year mine life estimate, the mitigation portfolio be expanded, in essence, earning interest. The ICL also noted that the Forest Service has the authority and the responsibility to require additional mitigation measures when warranted. “*We believe that additional mitigation measures should be included to help offset increased sedimentation from transportation and mining activities. We note that FR 474/674 SFSR Road, FR 579 Warm Lake Highway, FR 412 EFSFSR (Yellow Pine to Stibnite) are all Functioning at Risk (Table 3-7 on EA*

p. 3-21). *The Forest Service should provide additional information on the revised TMDL sediment targets and successes to date. Mitigation measures could include closing, obliterating, signing and enforcing currently closed routes in the area that are contributing to sedimentation problems to area rivers. Mitigation measures need to factor in both the quantity (miles of stream) as well as the habitat quality. The mitigation ratio should allow for larger areas of medium-quality areas to be conserved if a small, higher quality area is being impacted.*" The ICL also noted that NEPA requires that documents: (1) "include appropriate mitigation measures not already included in the proposed action or alternatives," and (2) "include discussion of . . . Means to mitigate adverse environmental impacts (if not already covered under 1502.14(f))." 40 C.F.R. [sect] 1502.14(f); 40 C.F.R. [sect] 1502.16(h).

The Nez Perce Tribe (Submission 500) commented that in order to comply with NEPA, *"the Forest must identify and describe appropriate mitigation measures associated with the Project, specifying measures committed by the mine operator and/or required by the Forest or other federal, state, or local agency. The Forest must address how each measure would specifically mitigate the targeted impact, provide substantial detail on the means of implementing each mitigation measure, identify who would be responsible for implementing it (including long-term), indicate whether it is enforceable, and describe its anticipated effectiveness."* And, the EPA noted that there should be a "discussion of how CWA 404 (b)(1) Guideline Requirements would be met for direct and indirect impacts to jurisdictional waters, including and proposed mitigation." (Submission 472)

Commenters suggested the Forest Service consider the following mitigation measures for:

- Impacts to wildlife:
 - Designing fences to permit wildlife passage in suitable areas;
 - Using raptor-proof power transmission poles and raptor-safe power lines;
 - Reducing speeds to minimize mortality on roads and trails;
 - Instructing employees not to harass or disturb wildlife or damage native vegetation;
 - Establish protocols and restrictions to prevent exposure of migratory birds and other wildlife to toxic substances, spills, and mine-affected waters (including any open pit lakes);
 - Reduce traffic and roadway conflicts;
 - Prohibit snowmobiling and offset impacts to wildlife by closing off other high-elevation winter routes.
 - Mitigation plans should include measures to protect and minimize impacts to migratory bird nests located in the path of mining, road construction and maintenance, trail development, travel, and power transmission lines;
 - Authorized and permitted personnel should relocate nests to a suitable location within the species' territory after consultation with the Fish and Wildlife Service, Idaho Fish and Game, and the Tribe; and.

- Address management strategies to use when wildlife interferes with mining operations and reclamation.
- Impacts to residents of Warm Lake:
 - Require the use of trucks without air brakes, or restrict their use;
 - Limit the hours of traffic;
 - Reduce the number of car/truck trips that pass Warm Lake and go up the Warm Lake summit;
 - Build campgrounds on private property to accommodate workers and their families, since Warm Lake campgrounds and dispersed camping sites are already full, especially on weekends;
 - Require use of buses; and
 - Develop pull-outs on Warm Lake Road so trucks can let passenger vehicles pass.
- Impacts to snowmobilers:
 - Include overnight parking of the grooming vehicle in the Midas road maintenance facility proposed at Landmark. During the 3-5 year period of mine construction, overnight stays will give added flexibility to complete grooming activities without extended hours of operation for operators. And make this a clearly identified temporary mitigation measure that is tied to mine construction so as to avoid the interpretation it is an expansion of grooming operations and any associated analysis that comes with that interpretation; and
 - Mitigate the loss of snowmobiling opportunity and groomer access by accepting the financial cost associated with transporting the County groomer to Landmark approximately 5 to 6 times each season or provide funding for a contract groomer to do the trails south/east of Landmark. Parking facilities need to be designed and maintained as mitigation by the mining company. Once the mine is operational, the Cabin-Trout and Johnson Creek/Landmark route becomes functional; and Consider that infrequent, overnight or emergency warehousing for the groomer during the mine operation would be of tremendous value.
- Impacts to air quality:
 - Implement measures to reduce criteria and greenhouse gas emissions and offer the following for consideration as components of a construction air pollutant emissions control plan. Evaluate the use of the latest on-road and non-road diesel engines with ultra-low sulfur diesel:
 - Diesel engines that meet the latest EPA Tier 4 regulation as listed in 40 CFR 1 039 Retrofit non-compliant engines to achieve Tier 3/Tier 4 standards
 - Consider the use of alternative fuels. Establish idling limit (e.g., 5-10 minutes per hour) and install idle-reduction technologies (IRTs). Prohibit any tampering with engines and require continuing adherence to manufacturers' recommendations" (Submission 472).

- Impacts to water quality:
 - Consider of installation of an impermeable liner between the bulk backfill material and the channel lining substrate to create a hyporheic zone isolated from the adjacent groundwater offer further insurance against contamination?
- Impacts to the Frank Church-River of No Return Wilderness:
 - Create a "buffer" zone with strict controls on conflicted management priorities near the River of No Return.

The USACE (Submission 1539) made specific comments regarding compensatory mitigation on the proposed alternative as described in Appendices F and G of the Plan and stated:

- *“The Corps is aware and has been a part of the continued discussions regarding changes in the Mitigation Strategy as proposed in the PRO. The Corps expects the final mitigation plan to fully compensate for the loss of both open water, and wetland functions, as outlined in 33 CFR Parts 325 and 332, and to explain in those situations when no mitigation is being proposed to compensate for losses.*
- *Table 6-1 of Appendix F of the PRO describes proposed mitigation sites by feature. As proposed, the Tailings Storage Facility constitutes a large portion of created wetlands for compensatory mitigation, however given the need for operational and long term water management of this facility, how will these features be sustained to the extent described? This example can be carried to other proposed mitigation sites. The Corps expects the mitigation strategy, and subsequent plan, to address and include how the proposal will be accomplished in relation to spatial, operational, safety, and/or other regulatory requirements or restraints.*
- *Table 11-2 [of the PRO] indicates that no mitigation is being proposed for impacts to stream channel on Burntlog Creek; Riordan Creek and Sand Creek. Culvert installation on these streams total a loss of 2,955 linear feet of perennial channel and 4,615 linear feet of intermittent channel. The analysis needs to address the reason for not mitigating for this loss.”*

2.6.16 Bonding

Most comments on this topic mentioned the need for sufficient bonding to restore the site if Midas Gold is unable to do so. Many commenters asked that the EIS disclose and discuss bonding requirements, criteria for determining adequacy of bonding amount, calculation of bonding amount, bonding by third-parties, criteria for bond release, timeline for bond release, and the procedure for resolution of disputes over bond release. The ICL commented that the EIS *“should include the bond calculation for public review, and noted that without sufficient financial assurance for the reclamation and restoration components of the project, it's impossible to determine whether these measures will be completed as proposed. Failure to analyze this potentially significant impact violates NEPA's requirement for a full discussion of all mitigation measures and impacts.”* (Submission 445)

Some commenters had questions that they asked the Forest Service to address in the EIS that included: how will the bond be calculated, who would hold and control the bond, and what is the duration of the bond? Several commenters were concerned regarding Midas Gold's lack of a mining track record, and described past mining projects with inadequate bonds that required taxpayers to cover the cost of reclamation. Some recommended that the bond amount incorporate inflation and be reviewed periodically to reflect changes in costs and at the site. A few commenters recommended that the Forest Service consider the worst-case scenario, including long-term water treatment, and cover monitoring for generations.

One commenter noted that, *"The proposed project will require undoing over \$13 million of taxpayer-funded restoration work. If the site is eventually restored as envisioned by Midas Gold, the Forest Service needs to describe how these investments will be protected in the future and not simply undone by the next mining company."* (Submission 520)

The Nez Perce tribe requested that the Forest fully engage and consult with the Tribe regarding the bond estimate and calculations during the government-to-government consultation process as required by the NHPA and Presidential Executive Orders. The Tribe also commented that, *"the PRO states that the Project will only proceed "once Midas Gold raises the US\$1 billion capital required for the Stibnite Gold Project, and puts the necessary financial assurance for reclamation securely in place. The Forest should thus postpone preparation of the Draft EIS until Midas Gold proves that the \$1 billion in capital has been secured and all bonding has been completed. Otherwise, the Forest and the public may be forced to devote substantial time and money to preparing a Draft EIS for a project that may never materialize."* (Submission 520)

2.6.17 Reclamation

Comments on this topic included discussion of both the reclamation of past damage at the site and reclamation of damage that would be caused by the Plan or alternatives. Some commenters suggested that the Forest Service should conduct the reclamation of the site independently of the Project. Several commenters mentioned their concern regarding the risk of uncapping areas of prior contamination and asserted that the EPA previously has spent \$13 million to clean it up. Many commenters mentioned the poor record of past clean-ups in the mining industry. Many commenters noted that without the project, the legacy impacts at the site would not be addressed. Commenters noted that this Project is an "environmental opportunity" to clean up the mine site using the best modern day equipment and technology as part of carefully designed Plan, and not at the taxpayers' expense. One commenter noted, *"The old Stibnite mine site is in our backyard and it will likely never be cleaned up unless industry takes responsibility for those who came before them. Midas Gold plans to do just that."* (Submission 115) Many commenters stated that the project will have a net benefit on the environment. One comment noted that reclamation of the old operations at the site will benefit tourism and people with hobbies.

The need for more detailed reclamation plans was mentioned by many commenters. Numerous commenters asked that the EIS describe the effectiveness of the reclamation. One commenter recommended that after the Project is completed that the Forest Service withdraw the area from

future mining, or the Forest Service should describe how the restoration investment will be protected in the future and not undone by the next mining company. The Tribes requested that existing native plant communities in the Project area be restored after mining activity is completed. The ICL asked that the Forest Service provide additional information on the definition of concurrent reclamation and be more explicit that the timeline for reclamation should be as soon as practicable after mining activities area completed. The use of concurrent reclamation will reduce both surface disturbance and bonding costs. The Nez Perce Tribe expressed concern that the Plan repeatedly eludes to the fact that Midas Gold might not undertake closure and reclamation activities at the site. In fact, many commenters asked what would happen if Midas Gold went bankrupt or for some other reason was unable to complete the planned reclamation. Questions commenters had about reclamation included specific components of the reclamation, such as Blowout Creek, soils, and the tailings storage facilities that they wanted to see addressed in the EIS and included:

- Defining reclamation objectives;
- Explaining why the reclamation plan leaves two unfilled pits;
- Describe what will happen to the buildings post closure and if the buildings become vacant and rot, will Midas Gold be held responsible for properly disposing of any building materials both in Cascade and the Yellow Pine area;
- Identify which agencies will manage and sign-off on the reclamation;
- Detail how the mining company prevent the new "lake" formed by the open pit mine at Hangar Flats from becoming a toxic waste pit;
- Describe what the flood return interval of the TSF and Hanger Flats DRSF diversion channels been designed for;
- Determine if sediment production and transport downstream to the remaining Meadow Creek channel has been analyzed;
- Consider as one commenter noted that as far as reclamation of the TSF goes, it seems like 18 - 36" of waste rock as a cap would be insufficient depth to construct a channel having a design depth of 2 feet. Even assuming that such a channel had all the appropriate hydraulic design parameters (verify that this is the case) initially, subsequent bedload transport would create localized regions of scour that could penetrate the cap, exposing tailings. This becomes more likely if the design intentionally tries to replicate a riffle/pool structure and includes the placement of flow obstructions (e.g. root wads and boulders specified on p. 14-24) that result in turbulent flow concentrations. There are plenty examples of low-gradient C-type channels in similarly sized watersheds on the Forest Service that have pools exceeding 6 feet in depth. Although the cap rock may provide a resistant barrier to vertical scour, it would then force lateral instability; has the floodplain width design taken this into account;

- Describe if provisions would be made for at least a minimal hyporheic zone? What is the appropriate particle size distribution for this channel? What source material would be used to provide that distribution? What flood return interval have the channels been designed for? The cap rock could also limit vegetation rooting depth. Would this impair tree colonization? What degree of vegetative shading of the channel is predicted; have models been run? How long would it take to achieve this degree of shading?;
- Should there be a requirement for a less permeable cap material (e.g. compacted clay, geotextile liner, or hybrid product) between the rock cap and the tailings? Are there any regulatory standards for the hydraulic conductivity of tailings caps? A thorough analysis of all the relevant hydrologic and vegetative design factors and their interactions over time following mine closure should be undertaken and provisions made for long-term retention of sufficient bond money for reclamation maintenance which would invariably be required;
- Explain how the roads used for the project and planned for decommissioning will be decommissioned following cessation of mining, and if there would be full re-contour of slopes or simply gated slopes or a combination;
- Expand on the plan to remediate the mining pit once the mining operation ceases; and
- Discuss how discharge created by the excavation of the Yellow Pine pit will be handled during reclamation.

2.6.17.1 Streams

Several commenters expressed concern that the risk of accidents that would degrade habitat and water quality are too high, and that waterways could not be restored no matter how much restoration work is done, and that the damage would exist for generations. Watershed rehabilitation was mentioned by another commenter as being a major consideration in the mine closure and restoration plan. Other commenters expect that the Project would have a beneficial effect on streams, by restoring the natural flow of the EFSFSR, adding riparian habitat and improving water quality. One commenter noted that restoration of the salmon population would have a positive impact on recreation activities as well (Submission 204).

2.6.17.2 Wetlands

One commenter requested details of Midas Gold's plan for reclamation, asking several questions: *"do they align with the EPA's guidelines for restoring wetlands? Has there ever been a successful wetland restoration of a base and precious metal open pit mine storage site? Will this project restore some parts of the effected Stibnite area while destroying others? How can you measure which of these natural resources is more valuable than the other?"* (Submission 162) Another commenter noted that the *"mitigation ratios of harm done to areas restored ought to weigh heavily in favor of wetland and stream restoration, versus harm-done and then areas restored."* (Submission 487)

2.6.18 Other Proposed Alternatives

Several commenters mentioned the alternatives Midas Gold analyzed and discarded in the Plan. One commenter recommended that the Forest Service reevaluate several of these alternatives, including reduced or modified mining activities to lower the impacts. Midas Gold (Submission 446) remarked that *“Midas Gold used a vast database of information to evaluate alternatives from an environmental, social, technical and financial perspective, and screened through Midas Gold's Appendix G, and, we believe that the details presented in the Plan are the best alternatives. Many alternatives were weighed to maximize net benefits to the environment and reduce technical risk, including the location and design of the tailings storage facility and its related buttress that takes margins of safety well beyond regulatory requirements. Many years of thoughtful work, with diverse input and based on extensive data and information collected, has been completed to get to this Plan.”*

Many commenters mentioned specific Plan components for alternatives that should be considered by the Forest Service in the EIS and details that should be disclosed. The following are comments by component:

- Powerline Route
 - *“Extending the powerline to very near the town of Yellow Pine appears excessive. There is a lot less ground disturbance and clearing if the switching station/transformer was located just downstream of Ditch Creek and the mine powerline were to exit the Johnson Creek valley floor near the intersection with the Thunder Mountain road. This would also have an added advantage of having the access road and powerline corridor in close proximity to one another. It avoids all the clearing, road building and ground disturbance in the Horse Heaven area. Locating the powerline where it was for the WWII era simply because that is where it was last time is weak rationale;*
 - *“It is also confusing as to why the feed for the powerline comes from Lake Fork. The logic employed by Idaho Power in their Future Facilities Forecast seemed to be that there was great utility in feeding in a second 138kv line to Valley County from the High Valley area. If society is going to invest a lot of money into power for this project, it should be done with the greatest gain in mind. Not choosing the south feeder line because it will take too long is like saying we don't have time to do this right. I think we owe it to all the rate payers in Valley County to have the most reliable infrastructure set-up, even if it takes longer, and*
 - *“The investment and associated effects as a result of pioneering a new access to Stibnite along with the powerline/corridor for a mine life of 15 plus years will be improvement that deserves strong consideration to be treated differently than an automatic removal tag post mining. Returning the Thunder Mountain road to its present condition would be a step back and result in a whole new round of sediment. The value of a good standard road to the Thunder Mountain area needs to be given fair consideration. I urge you to look at this alternative. Perhaps the final resolution*

on the powerline and road would be best if left up to the management scenario and managers present in 2030-35-40.” (Submission 465).

- Water Management

- *“The Forest Service needs to describe the post-closure plans for groundwater management under several scenarios. In the event that groundwater is contaminated, it may not be allowable to have them flow into the pits untreated and these wells may need to function in perpetuity.” (Submission 445);*
- *“We note that Midas Gold is anticipating withdrawing up to 5.63 cfs [cubic feet per second] over the present water right to maintain ore processing operations during a prolonged severe drought. This may result in adverse effects on fisheries. We recommend that the Forest Service establish a cap for water withdrawals to protect fisheries during drought conditions. During these times, Midas Gold may have to suspend or modify milling operations” (Submission 445);*
- *“The TMDL sediment load should be the basis for additional alternatives for project design and access routes.” (Submission 445);*
- *“The Project area contains a vast network of tunnels, adits, abandoned bore holes, and other underground workings from previous mining activities. The Forest Service needs to evaluate how these underground workings affect the geology, soil, groundwater hydrology, and other environmental conditions in the Project area, as this information is important for understanding the impacts of the Stibnite Gold Project. The Forest Service needs to describe how the defile and other underground workings will be reclaimed. Water quality within these workings is a concern for us. The Forest Service should examine the option of backfilling these workings with paste from tailings that has been appropriately buffered.” (Submission 445);*
- *“We recommend that the Forest Service and Midas Gold design all alternatives to minimize water contamination and hopefully obviate the need for a water treatment plant.” (Submission 445);*
- *Obviously a pit lake directly connected to an ESA-listed fish-bearing stream better have very high-confidence predictions as to water quality. This particular uncertainty may prove to be such a significant factor as to warrant a project alternative that omits mining of the Hanger Flats deposit or limits it to underground mining of the high grade ore zones.” (Submission 183)*
- *“EPA recommends that the NEPA analysis evaluate reasonable and practicable alternatives and mitigation measures to reduce or minimize adverse impacts to groundwater and surface water, with special attention to areas where they may be hydrologically connected, and minimize impacts to air.” (Submission 472);*
- *“In the proposal, the proponent [is] wanting to utilize a French drain, but the Tribes [Shoshone-Bannock] did not support the use of such technology because they are consistently failing in mine projects. In this case, the proposal fails to address water*

- quality assurance or water monitoring, both of which are necessary for French drains.” (Submission 429);*
- *“The Forest Service should evaluate the potential impacts from water treatment system failure, and provide alternatives that evaluate additional mitigation measures to ensure that contaminated water isn’t released in the event of a water treatment plant failure, and that financial assurance is in place to cover the full cost of these back-up systems, as well as the regular replacement of water treatment systems during post-closure.” (Submission 445); and*
 - *“The Forest Service should analyze how far-reaching and deleterious a spill of concentrated supernatant water were to occur relative to a spill of less-concentrated supernatant water. As a proactive safety measure, the Forest Service should analyze (1) the worst possible water quality expected for the supernatant water and (2) if this highly-polluted water were to spill from the TSF, what are the timing and magnitude of impacts.” (Submission 445).*
- **Economic**
 - For all alternatives, including the no-action alternative, the Forest Service should include a comparative costs analysis.
 - *“Midas Gold has set an arbitrary financial rate of return threshold of 20% to reject otherwise reasonable alternatives. The Forest Service may not accept Midas Gold’s self-selected and arbitrary monetary threshold for rejecting viable alternatives to the Plan. The Forest must assess all reasonable alternatives that reduce impacts to the site.” (Submission 500)*
 - *“An alternative proposal is to do the creation, engagement and restoration and leave the mining part out. The proposed \$1 billion investment in Idaho can come from revenue generated on other projects that are being done to establish a proven track record.” (Submission 323)*
 - **Roads**
 - *“There should be an option for those living in Yellow Pine to get to Stibnite for work rather than driving all the way to Landmark and catching a bus that would then take them to Stibnite.” (Submission 212);*
 - *“The State of Idaho would like to see a more thorough analysis of all the access routes identified and considered in the PRO using consistent metrics across all alternatives. In addition, the access analysis should include a thorough description of potential mitigation measures associated with route-related impacts. For example, consider and disclose the methods and benefits of making Johnson Creek a safe alternative for fish and water quality. Please consider mitigation measures which could alleviate potential effects of opening a new, year-round Burntlog route.” (Submission 468);*
 - *“We also note that the 20+ years that the road would be in use fits the Forest Service description of long-term (15+ years) and thus does not meet the definition of a*

- temporary road. The Forest Service should develop an alternative using the existing road network for comparison purposes. It may well be possible to reconfigure the geometry of the Yellow Pine pit to allow the current access to persist. We also note that the benches within open pits are designed to support ore trucks and should be able to accommodate normal vehicular traffic. While the potential impacts to aquatic systems will remain, the impacts to the Inventoried Roadless Areas, terrestrial wildlife and the Frank Church River of No Return Wilderness will be largely avoided. In fact, a new maintenance road is planned to be constructed on the southwest side of the Yellow Pine pit from Hennessey Creek to Fiddle Creek, so the engineering is not insurmountable. Significant safety measures would need to be incorporated, but are certainly possible. These two different ways to access the site have significant environmental impacts, one is to terrestrial systems and one is to aquatic systems. However, until both alternatives are developed, it will be impossible to know which one presents fewer overall risks. As such, the Forest Service needs to fully analyze both alternatives and perhaps develop a third one.” (Submission 445);*
- *“Due to the increased risk of traffic accidents in the winter and the difficulty in containing spills, the Forest Service should assess the pros and cons of clustering fuel trips in the summer months and stockpiling the fuel on site to further reduce winter fuel transportation needs. It is likely that some winter fuel hauling would still be needed.” (Submission 445);*
 - *“Split road travel three ways into Stibnite - Warren is an optional route.” (Submission 387);*
 - *“If this is a 20 year process, why not build a railroad spur into the area.” (Submission 387);*
 - *“Convoy the trucks, post the convoy hours so residents and visitors can plan their road use time.” (Submission 387);*
 - *“The proposed ATV/Jeep trail from Johnson Creek to Horse Heaven and on to Stibnite is an excellent plan, but does not allow for the use of family cars. It allows for more forest access which I firmly support. It does not make up for the loss of use of the present Stibnite road.” (Submission 392);*
 - *“Concerned about losing access to Thunder Mountain/Roosevelt Lake via Stibnite. As a business owner, losing this access will have a severe impact on my business. Access needs to be maintained from Yellow Pine to Stibnite and Thunder Mountain to support tourist access as well as allowing workers to visit the businesses in Yellow Pine. The current proposal to gate the East Fork road will have a double impact on the community by cutting off access to the Wilderness Area for tourists, as well as effectively eliminating access to the town by mine employees.” (Submission 221);*
 - *“To close the Stibnite Road with the accompanying obvious negative impacts to Recreation and the Village of Yellow Pine is the apparent lack of documented analysis. The OHV proposal does nothing significant to mitigate the impacts of the Stibnite Road closure. Very obvious and meaningful alternatives such as opening up*

- the Sugar Creek Road for light vehicular traffic to Stibnite and beyond do exist, but are not mentioned in the Proposal.” (Submission 291);*
- *“Building the road high going up the Burntlog Road and coming out at Landmark will keep all the heavy traffic off the Johnson Creek road and should not harm any fish. We are not in favor of closing the main road at Sugar Creek as it will make the trips to Cinnabar, Roosevelt Lake, The Dewey Mine, and the Sunnyside Mine a lot longer.” (Submission 221);*
 - *“Consider in a different alternative, dropping the proposed winter snow machine trail over the Cabin/Trail summit to the Johnson Creek road. This summer-access road already handles the existing powerline (proposed to be upgraded to 138kV), and the buried Midvale telephone line to Yellow Pine. This road has already had at least 2 slope failures immediately after the fires that burned through this saddle. The project proposes to maintain FH-22 and the FR-579 open all winter to Landmark. Consider a snow machine trailer parking area near the FR- 447 junction. Access will be available to the south (Lowman) and east (Stanley, ID through Bear Valley). The Landmark-to-Yellow Pine road will be still available for access to Yellow Pine.” (Submission 330);*
 - *“I would like to propose that a Yellow Pine accessible temporary road be built through the Roadless designated area for the duration of the project. Then, at the completion of the project or as appropriate, the existing road access from Yellow Pine, with county easement and right of way, should be permanently re-established through the mine site.” (Submission 265);*
 - *“Another route which would not include Highway 55 along the North Fork Payette River and the Warm Lake basin must be seriously considered.” (Submission 109);*
 - *“The Forest Service needs to develop a series of design features such as the use of pilot cars, flaggers, pull outs, and developing and posting transportation schedules for the public so they can minimize interactions with mine traffic.” (Submission 445);*
 - *“The Sugar Creek road should be re-opened. There is no reason for it to be closed. All other area roads should also be open. This is public land and the public should have access to it. Closing these roads substantially limits access to public lands and private lands.” (Submission 232);*
 - *“After extensive alternative analyses and drawing on local community and public input, the project appropriately identifies Burntlog Road as the best access road to prove safe transportation to site, avoiding travel adjacent to fish-bearing waterways. Midas Gold Idaho plans to close Stibnite Road from Yellow Pine. The company feels the road is too dangerous to safely transport employees and equipment; they've come up with an alternative route utilizing Burnt Log Road, which would ensure continued access to our public lands for all Idahoans. This route minimizes travel by waterways and takes advantage of existing infrastructure.” (Submission 167);*
 - *“Heavy mining traffic will take its toll on county maintained roads, especially during spring runoff. How will Midas Gold handle the impact and inability to haul during*

- spring runoff when the roads become impassible due to wet and soft conditions?”* (Submission 413) and;
- *“Midas Gold Idaho's plan to bus 90 percent of the workforce to site goes above and beyond to promote safe travel, limit noise and safety concerns, and reduce greenhouse gas emissions.”* (Submission 167)
 - Ore Processing
 - *“If the proposed project is constructed, I expect, at some time in the future, for the mine operators to propose converting from vat leaching to heap leaching. The EIS should consider and discuss this.”* (Submission 222).
 - Infrastructure
 - *“Construction of a staging area in Scott Valley. Again, the area is a beautiful, quiet valley where deer, elk, and osprey are frequently seen. With this proposal there will be trucks, construction equipment, and buildings. There will be vehicles coming and going likely at all hours of the day. This staging area should be built in Cascade if it has to be built at all.”* (Submission 218);
 - *“The ore processing facility, administration and warehouse buildings, truck shop, and the employee house facility will be connected to sanitary waste treatment plants connected to leach fields or NPDES permitted discharge points for the treated water; alternatively, sanitary waste can be pumped or hauled to a central water treatment facility”* (PRO, pg. 8-6). *IRU recommends that a thorough analysis to identify safe alternatives that minimize impacts to local water quality. A local waste water treatment plant, if found to be the most suited alternative, must be monitored for excess discharge, and have proper storage parameters.”* (Submission 487); and
 - *“Consider providing future options and flexibility, such as: Leave all and any new infrastructure built in place for future use and enjoyment of the general public, such as: hotel living quarters and support buildings for future public recreational use; Power Lines; development access roads - It seems crazy to abandon these costly structures that could be used in the future for the general public good. The new roads for instance would support potential future firefighting should it ever become necessary.”* (Submission 239);
 - Stream Restoration
 - *“Present an alternative of waiting to establish fish passage when all stream rehabilitation is complete and water quality is adequately improved throughout upper watershed.”* (Submission 237);
 - *“Moving a creek to then rebuild it later, if there are adequate funds to do so, is not a viable alternative. The EIS statement must include the detriment this alternative action will impose on the Meadow Creek valley.”* (Submission 487);
 - *“If Midas Gold is unable to build the tunnel, where would the EFSFSR be rerouted?”* (Submission 500);

- *“The proposal to relocate streams within the project area is unacceptable. Mine operations must be moved away from creeks known to contain spawning habitat for ESA-listed fish. Any mention of rerouting, diverting or manipulating any of the following creeks (or any others in the project area) must not be permitted: East Fork of Meadow Creek, Meadow Creek, Fiddle Creek, West End Creek, Hennessey Creek and Midnight Creek. Adverse effects of mining operations must not take place in or near Meadow Creek due to the presence of ESA-listed Chinook salmon. Meadow Creek, a tributary of the East Fork of the South Fork, is already productive spawning grounds and must not be disturbed.”* (Submission 487);
- *“With 1,000 people around what about restricting workers from leaving the premises so as to not allow the immediate area to get overrun.”* (Submission 521); and
- *“We would like to see a reduction in the timeline (isn't ten-years more than an adequate compromise?”* (Submission 491).

3 SUMMARY OF IDENTIFIED ISSUES

This section summarizes relevant issues for analysis that were identified during the scoping process for the Project. The purpose of the scoping process is to provide agencies, members of the public, and members of the Forest Service ID team with an opportunity to provide input on the scope of the Project and analysis of relevant issues (including alternatives) in the EIS. The comments received during the public scoping period, input received from the Forest Service ID team and AECOM supporting specialists, and input received from cooperating agencies form the raw material from which the issue statements of this report were developed.

The Council on Environmental Quality (CEQ) regulations have specific direction for issues in EISs. Agencies shall determine the scope and the significant issues to be analyzed in depth in the EIS (40 CFR 1501.8(a)(2)), and identify and eliminate from detailed study the issues that are not significant or that have been covered by prior environmental review (40 CFR 1506.3).

Issues can serve to highlight or question effects that may occur from the proposed action and alternatives, giving opportunities during the analysis to reduce adverse effects and compare trade-offs for the decision-maker and public to understand (alternatives). Issues help set the scope of the actions, alternatives, and effects to consider in the analysis of the EIS (Forest Service Handbook 1909.15.12.4). Comments from the tribes, public, and other agencies submitted during the scoping period were used to formulate issues concerning the proposed action and potential alternatives.

The ID team separated the comments into two groups: issue and non-substantive. Issues were defined as those that would be directly or indirectly caused by implementing the Project as described in the Plan prepared by Midas Gold or by alternatives. Non-substantive comments were identified as those which are:

- Outside the scope of the proposed action;
- Already decided by law, regulation, policy, the forest plan, or other higher level decisions;
- Not related to the decision to be made; or
- Conjectural and not supported by scientific or factual evidence.

The sections below summarize the issues relevant for alternatives development (Significant Issues) and detailed analysis (Analytical Issues) in the EIS. The detailed analysis contained in the EIS for each resource will focus on these specific issues/concerns and will allow for a comparison of impacts.

Scoping comments raised concerns about Tribal Treaty rights, access to public lands, the quantity and quality of surface and ground water, wetlands, TSF stability, wildlife habitat, socioeconomics, and other topics. The Summary of Identified Issues does not include every

comment available to the PNF during scoping. Section 3.1.1 presents a list of significant issues that emerged from the scoping process. Section 3.1.2 presents a list of analytical issues considered to guide the analysis during the EIS process. The analytical issues may be used to help develop resource analysis or to help develop mitigation strategies.

3.1.1 Significant Issues

The significant issues identified through the scoping process are listed below and categorized by the context of the concerns raised during the scoping process.

1. Loss or degradation of existing wetlands and or waters of the U.S.
2. Changes in surface and ground water quality, quantity, and temperature.
3. Effects on fish, wildlife, and plant species and their habitats, including current and proposed threatened, endangered, and candidate species.
4. Impacts to socioeconomics of surrounding communities.
5. Effects on public access and traffic safety.
6. Effects on aesthetic quality and special designations (e.g., Idaho Roadless Areas, RNAs), including noise, visual quality, and wilderness experiences.
7. Potential conflicts with Tribal Treaty and Trust Responsibilities and/or tribal values.

3.1.2 Analytical Issues

The analytical issues are related to the physical, biological, and social resources under consideration. Each of the analytical issues in the following sections includes a concern statement derived from scoping comments. The analytical issues included for the physical, biological, and social resources may also describe specific analyses and mitigation suggested in the scoping comments.

3.1.2.1 Physical Resources

Effects on physical resources would include short-term impacts during construction and operation, as well as long-term impacts during the reclamation and post-closure phases.

Issue 1: Project activities could contribute to climate change.

Concern: The project may cause adverse effects on the climate through the production of greenhouse gases.

Concern: Re-vegetation efforts to mitigate the project's contribution to climate change may not be enough to equal the amount of greenhouse gases produced.

Issue 2: The Project may affect air quality.

Concern: Construction, mining, and reclamation activities at the mine site and along transportation and utility corridors would increase dust, airborne chemicals, and transportation related emissions in the affected area.

Concern: Air quality may be affected by the release of particulate matter (fugitive dust) and other air emissions, including hazardous air pollutants (mercury).

Issue 3: Potential failure of the geotechnical stability of the tailings facility and other mine components.

Concern: A failure of any of the mine components during operations or after closure could result in environmental contamination at the mine site and adverse impacts to downstream life and property.

Concern: Contingency plans for failure of the tailings facilities; need to understand ultimate fate and transport of contaminants released.

Concern: Any weaknesses in tailings dam design or construction could lead to failure and environmental contamination.

Issue 4: Leaching of acid rock drainage from waste rock dumps, tailings impoundments, and abandoned mine pits.

Concern: Potential impacts on ground and surface water quality that could affect public health, fish and other aquatic life.

Concern: The physical and chemical characteristics of ore, waste rock and tailings could impact wastewater and solid waste management.

Concern: Need for long-term monitoring of acid drainage and/or metals mobilization. EIS should analyze plan for perpetual monitoring of surface and groundwater, including flooded mine pits, for lowered pH and/or metals mobilization.

Issue 5: Reclamation plans should include information regarding soils and how “growth media” would be created and stockpiled, including identification of quality criteria.

Concern: The area contains very little topsoil for reclamation purposes. The Forest Service should consider ways to help promote topsoil development over the course of the mine life so additional organic material will be available for reclamation.

Concern: QAPP and FSP should be used to determine that any potentially reclaimed, moved, imported soils do not contain contaminants of concern above regulatory standards.

Issue 6: Potential for release of hazardous materials associated with the project, including milling reagents and reaction products during handling and disposal or materials to be routinely used and transported to and from the mine site, could affect human health, wildlife, and vegetation.

Concern: Spills or leaks could cause impacts to human and wildlife health.

Concern: A fire, earthquake, or other catastrophic event could cause hazardous materials to be released.

Concern: Legacy tailings will be disturbed and may leach hazardous chemicals into the environment.

Concern: If contaminated sediment is released from the Yellow Pine pit lake, aquatic species downstream may be adversely affected.

Concern: Chemicals used at the mine site could cause adverse impacts on the environment if not handled and disposed of properly.

Concern: Chemicals transported to the mine site could spill into nearby streams or Warm Lake if protective transportation containment methods are not developed.

Concern: An accident during the offsite transport of antimony concentrate could cause a spill and contaminate aquatic systems or other resources.

Concern: Hazardous materials, fuel, lubricants, blasting agents, mercury-scrubbing materials, and cyanide to be transported over many miles of backcountry roads, under often dangerous weather and traffic conditions, could spill into nearby drainages that are home to ESA-listed fish.

Issue 7: Additional hazardous material will wash downstream through the fish passage tunnel and not be trapped behind the Yellow Pine pit dam.

Concern: The proposed fish passage tunnel may lead to adverse effects to Aquatic species downstream of the Yellow Pine Pit.

Issue 8: Impacts to surface water quality and quantity.

Concern: Impacts from downstream movement of heavy metals (mercury, lead, antimony, arsenic, etc.) contamination to South Fork headwaters (EFSF Salmon, Meadow Creek, etc.)

Concern: Potential impacts on water quality from “uncapping” or disturbing historic tailings or from historic contamination that still contaminates the river.

Concern: The potential for pit lake toxicity and effects on water quality.

Concern: Potential adverse physical and chemical impacts on all water resources, including potential failure of reclamation efforts with regards to protecting water quality/quantity.

Concern: Potential impacts of the Plan on stream channel protection.

Concern: Effects on the hydrology of all surface waters in all drainages, both quantity and timing of stream flows may be affected.

Concern: Impacts to surface waters from construction and use of new roads in the Project area. The South Fork lies primarily within the Idaho Batholith, a granitic lithology. As a result, the new roads developed could add the risk of fine sediments being released into surface waters in addition to risks of fuel and chemical spills.

Concern: Alteration of stream channels may cause an increase in water temperatures, adversely affecting salmon and other aquatic species.

Concern: The proposed use of sand for winter traction on the Warm Lake highway (FH-22) may add sediment into Trail Creek and Curtis Creek and the South Fork Salmon River (at the crossing).

Concern: Erosion and degradation of watershed quality could be caused by the extension of the Burntlog road includes crossing several very steep creek canyons, may lead to erosion and degradation of watershed quality.

Concern: Water quality could be further compromised by avalanches on the Burntlog Road.

Concern: The potential impacts to public safety and to wildlife from exposure to unsafe conditions or poor water quality post closure at the pit lakes.

Issue 9: Impacts to groundwater quality and quantity.

Concern: Potential impacts of the Plan on groundwater quality and quantity.

Concern: Potential for inflow of contaminated groundwater from fault zones that may be crossed by the EFSFSR diversion tunnel and potential for ungroutable entries?

Concern: Groundwater drawdown of aquifers [near the mine site] could adversely affect wetlands, seeps, springs, floodplains, and riparian areas.

Issue 10: Impacts to the water balance in the Project area.

Concern: Potential effects on groundwater-dependent ecosystem (GDE).

Concern: Potential need for treatment of the groundwater from pit dewatering

Concern: Potential for the dewatering wells around the Hanger Flats pit to dewater all the up-gradient alluvial aquifers in the Meadow Creek valley.

Issue 11: Sediment delivery to streams from the powerline construction.

Concern: Construction of a new powerline and upgrades to the existing powerline could contribute sediment loads to streams, particularly in areas that have recently burned.

3.1.2.2 Biological Resources

The Project would physically affect biological resources in the Project area. Effects on biological resources would include short-term impacts during construction and operation, as well as long-term impacts during the reclamation and post-closure phases.

Issue 1: Changes to vegetation communities (e.g., removal, revegetation) that result in an inability to achieve desired (restored) conditions.

Concern: The project may affect forest health, such as presence of insects or pathogens, through tree harvesting and replanting activities

Concern: The project may have effects on plant habitat and ecosystem functions and processes (erosion, hydrology, successional processes, community composition and diversity, etc.)

Concern: Climate change may also affect vegetation resources, resulting in cumulative effects.

Concern: Snags (including snag values as related to desired conditions for snags) may be affected by changes in access to roads.

Issue 2: Increased risk of human-caused wildfire.

Concern: The project may increase the risk of wildfires through increased human presence and use of equipment and vehicles, and new and increased usage of roads.

Concern: Change in vegetation communities may affect fire regimes.

Concern: Risk of loss or damage to mining developments and infrastructure due to natural and human caused wildfire.

Issue 3: Spread of noxious weeds and/or invasive plant species.

Concern: The project could increase the risk of the introduction and/or spread of exotic or invasive plant species, which could adversely affect native species.

Issue 4: Potential impacts to, or loss of, special status species or their habitats.

Concern: The project could adversely affect populations Region 4 designated sensitive plant species, including bent-flower milkvetch (species of conservation concern) and whitebark pine (candidate species for federal listing) present in the disturbance areas.

Concern: The Plan could adversely affect special status wildlife species, such as Canada lynx and wolverine, through habitat loss/fragmentation, collisions with vehicles, increased human presence (noise, light), etc.

Issue 5: Disturbance and/or loss of wetland, stream, and riparian resources and their functions, including through the spread of existing contamination.

Concern: Fens, or other high-value wetlands, could be adversely affected.

Concern: Changes in water quality or quantity at the mine site could affect Waters of the US, including wetlands.

Concern: The proposed road and powerline construction may affect Riparian Conservation Areas

Concern: there could be an increased risk of leeching cyanide, mercury, and arsenic from the existing site

Concern: Disturbing on-site wetlands could release contaminated sediment and water

Issue 6: Changes in surface and ground water quality, quantity, and temperature in the Project area could adversely affect aquatic species.

Concern: impacts on listed fish species, spotted frogs, aquatic environments downstream of the Project area.

Concern: hazardous material spills could enter waterways

Concern: existing contamination could spread into waterways when capped material is disturbed

Concern: Any increase in water temperature may adversely affect fish and other aquatic species.

Concern: Changes in groundwater availability may adversely affect fish and other aquatic species; groundwater is essential for the stream restoration.

Issue 7: Increased traffic on existing roads, road construction, and widening could adversely affect aquatic and terrestrial species.

Concern: Risk of degrading water quality in adjacent streams.

Concern: the potential increased traffic to Riordan Lake may affect bull trout

Concern: discharge of hazardous materials into waterways could adversely affect fish and other aquatic species.

Concern: spawning habitat in Johnson Creek could be affected by from dust, potential fuel spills and sediment.

Concern: construction and use of Burntlog Road could adversely affect aquatic species in Burntlog Creek.

Concerns: The new road segment and increased traffic on existing roads may cause habitat fragmentation

Concern: Potential for aquatic habitat contamination from sediment, risk of hazardous material spills, and increased risk of fires.

Concern: Wolverine may be at risk from the increased traffic.

Concern: The project would increase the risk of direct injury or mortality of wildlife from vehicle collisions

Issue 8: The proposed alteration of Project area streams could affect fish and other aquatic species.

Concern: Fish, including ESA-listed species and MIS, and other aquatic species could be adversely affected during stream restoration activities.

Concern: Loss of spawning habitat.

Concern: Impacts to bull trout critical habitat

Concern: Impacts to migratory patterns of anadromous fish

Concern: The connectivity of the EFSFSR above and below the mine site could affect the greater aquatic community with respect to productivity of populations, given potential increased movement of contaminated fish.

Issue 9: The planned re-establishment of fish access upstream of the Yellow Pine pit through a temporary bypass tunnel would affect existing fish populations.

Concern: Effects on fish could be both beneficial and adverse.

Concern: The adverse impacts of the change in habitat conditions could outweigh the benefits of re-established access.

Concern: The value of the newly accessible habitat may not be worth the impacts.

Concern: Fish may not use the proposed bypass tunnel.

Concern: It may not be possible to monitor the tunnel's "environment" for dissolved oxygen, nutrients and temperature.

Concern: The risk exists that if the mine fails financially, the stream could be forever be stuck in a tunnel.

Issue 10: The post-mining pit lakes may pose a risk to terrestrial and/or aquatic biota.

Concern: The pit lakes could attract wildlife (including birds) that could be adversely affected by potentially contaminated water or contaminated fish.

Issue 11: How would the direct and indirect alteration of wildlife habitat conditions (displacement, disturbance, community composition, diversity, etc.) affect wildlife?

Concern: Wildlife movement corridors may be affected.

Concern: The predicted loss of roadless areas may adversely affect big game security and wolverine habitat.

Concern: Wildlife may be affected by fugitive emissions, incidental releases of mercury, noise, and vibrations.

Concern: The project may cause direct and indirect changes in habitat connectivity and gene flow.

Concern: The project would increase the risk of the introduction of exotic or invasive wildlife species.

Concern: Wildlife may be affected by the use of explosives at the mine site.

Concern: Loss of habitat for may adversely affect birds, deer, elk, wolves, moose, bighorn sheep, and small mammals.

Concern: Migration or calving areas for deer or elk may be affected.

Concerns: Habitat fragmentation and displacement of individuals may affect wildlife in the project area and in adjacent areas.

Concern: The project may affect bird species protected under the Bald and Golden Eagle Protection Act and the Migratory Bird Treaty Act.

Concern: The project may cause impacts on Columbia spotted frogs in springs and seeps from arsenic contamination, and predators that prey on them, such as birds.

Concern: Wildlife may be affected by light and noise at the mine site

Concern: The project may affect northern goshawk nests.

Issue 12: Wildlife may be affected by the changes in access into the Project area (new roads, winter access, etc.).

Concern: Local predators may be affected by the increase in areas accessible to less snow-adapted competitors, such as coyotes and wolves, during the winter.

Concern: Wolverines may be affected by increased recreation resulting from expanded access associated with the project.

Concern: Wolverine may be affected by the construction of the Burntlog Road through occupied habitat.

Concern: Increased access to remote areas may affect species that require large areas of undisturbed habitat such as wolverine and lynx.

Concern: The Burntlog Route may adversely affect wildlife in the previously unroaded area.

Concern: New winter access on the Burntlog road may affect wildlife movement corridors.

Concern: Wildlife may be affected by increased hunting pressure and increased potential for illegal take of wildlife

Issue 13: Impacts to wildlife from the transmission line (upgrade and new segment).

Concern: Wildlife may be affected by the upgrade and new segment of transmission line.

Concern: Raptors or other birds may be at risk of collisions or electrocution from the new transmission line.

3.1.2.3 Social Resources

Construction and operation of the Project could have economic and “quality of life” social effects on the town of Yellow Pine, on surrounding Valley County communities and Tribes. Effects on socioeconomics would include short-term impacts during construction and operation, as well as long-term impacts during the reclamation and post-closure phases.

Issue 1: Effects on access to public lands during mine construction, operation, and closure.

Concern: Closing Forest Service roads near the mine site would limit access to public lands that offers recreation opportunities.

Concern: Closing the road from Yellow Pine to Stibnite would isolate the town and will make the trips to Cinnabar, Roosevelt Lake, the Dewey Mine, and the Sunnyside Mine longer.

Concern: Providing motorized access past Sugar Creek would reduce the adverse effects of the expected 20 plus year closing of Stibnite Mine Road.

Concern: Temporary roads and pilot cars could be used to provide access through the mine site.

Concern: The status of Stibnite and Sugar Creek roads as RS2477 or their eligibility as a FRTA Easement to Valley County needs to be disclosed in the EIS.

Concern: The county has a right-a-way through the mine to access to Thunder Mountain Area.

Concern: Limited access could affect tribal access to treaty use areas.

Issue 2: Public safety on the roads used by mine vehicles during construction, operation, and closure activities.

Concern: Include pullouts, passing lanes, runaway truck ramps, and limit the hours mine traffic use public roads during mine construction, operation, and closure.

Concern: Consider the risks to bicycles and recreationists that use roads.

Concern: The use of roads during the winter should be considered in the EIS.

Issue 3: Miles of roads and trails, the amount of use, and types of vehicles on each road or trail.

Concern: The road analysis must include inventory (miles) of existing roads and trails by class (full-size vehicle, ATV, motorcycle, non-motorized trails) and how each alternative would change that inventory.

Concern: The amount of traffic on roads would be reduced if the employees were required to be bussed to the mine site and by requiring truck convoys with posted hours.

Concern: The EIS should disclose the estimated travel time on Warm Lake Highway during mine construction, operation and closure.

Issue 4: The miles of roads and trails should be limited to the minimum transportation system necessary.

Concern: The project should use existing Johnson Creek / South Fork Salmon River / East Fork South Fork Salmon River roads.

Concern: The EIS should consider a railroad spur into the area.

Concern: The Forest Service should consider closing the Burnt Log road at end of mine or to keep it open.

Concern: The EIS should disclose in detail how roads will be decommissioned following cessation of mining.

Concern: Consider dropping the proposed winter snow machine trail over the Cabin/Trail summit to the Johnson Creek road.

Issue 5: Maintenance of transportation facilities.

Concern: The amount of use by mine traffic could increase road maintenance costs due to heavy truck traffic, increased wear of the road surface and vibration.

Concern: The EIS should disclose how repairs and road maintenance related to mine vehicle traffic would be funded?

Issue 6: Effects on cultural resources and traditional uses.

Concern: Tribal and cultural resources are not limited to the National Historic Preservation Act analyses. The tribes have also identified plants (particularly "plants of cultural significance") and visuals as Tribal rights.

Concern: The area is sacred to Shoshone-Bannock Tribe and cultural resources encompasses plants, air, water, soil, fish (e.g., salmon), wildlife, and humans, and the relationship existing between them contribute to the Shoshone and Bannock unique cultural heritage.

Concern: The EIS should explain how the proposed Landmark Maintenance Facility meets the objective of "Maintain the National Register status of Landmark Guard Station and other eligible properties" from both a visual and a sound-generation perspective and how this meets the need to "protect its historic character."

Issue 7: The Forest Service has a trust responsibility to ensure that its actions are consistent with Tribal Treaty and Trust Responsibilities.

Concern: The Forest Service has a trust responsibility to ensure that its actions, including implementation of the Project, are fully consistent with the treaties,

executive orders, departmental regulations, and other federal laws implicating the US' unique relationship with the Tribes.

Concern: The Tribe's treaty-reserved right to take terrestrial and aquatic resources on open and unclaimed land presumes the continued existence of those resources. Harm to habitat for treaty-reserved resources directly harms the Tribe and its members.

Issue 8: Impacts on human health.

Concern: The amount of pollution and Particulate Matter 2.5 emissions from the truck traffic and the mining operations should be considered.

Concern: There need to be safeguards and response plans established for potential spillage of fuel and mine related chemicals into roadside streams.

Concern: The EIS should analyze how risks to human health would be mitigated by potential consumption of contaminated fish from an accidental discharge.

Concern: The potential public health risks from EMF fields that could be emitted by the powerlines needs to be considered in the EIS.

Issue 9: Changes to the recreation experience, setting, or opportunity.

Concern: The amount of vehicle traffic will adversely affect the recreation experience, setting, and opportunities due to the amount of traffic and associated noise.

Concern: The proposed changes to existing roads and trails could affect recreation opportunities and other resources.

Concern: The EIS should disclose potential effects on the Frank Church River of No Return Wilderness, Eligible Wild and Scenic Rivers, and other special designations such as Research Natural Areas, and recommended wilderness.

Concern: Increased recreation in the area could affect the recreation experience and opportunities.

Issue 10: Effects on aesthetic quality, including noise, visual, and wilderness experiences.

Concern: The noise of heavy vehicle traffic may affect local residents, recreation, and wildlife.

Concern: To reduce noise consider eliminating or restricting the use of air brakes

Concern: The new powerline may generate noise that could adversely affect local residents.

Concern: Blasting at the mine site will be heard as far as Warm Lake.

Concern: The potential effect of the Project on dark skies should be evaluated in the EIS.

Concern: Facilities proposed to support construction, maintenance, and use of the Burntlog route (e.g., communication and mineral material borrow sites) may negatively impact visual and other social resources.

Issue 11: Impacts to the socioeconomics of surrounding communities.

Concern: The changes to access in the Stibnite and Thunder Mountain areas could alter the availability of services provided by Yellow Pine to recreationists such as lodging, eating and drink establishments, fuel, groceries, RV parks and general camping supplies.

Concern: Changes to access could affect the 32-million-dollar snowmobiling industry in Valley County.

Concern: The EIS should examine the boom and bust cycle and any need for studies of impact on Valley County and communities of Cascade, Yellow Pine commerce.

Concern: The EIS should analyze the potential benefits and changes to local tourism and recreation dependent businesses.

Concern: The employment opportunities, location of the powerline, road closures and increased traffic could affect property values in the local communities and the region.

Concern: The EIS should include projected tax revenues and distribution of those tax revenues (e.g., local, state, etc.).

Issue 12: Potential effects on infrastructure and services.

Concern: The project could affect the cost or availability of emergency and medical services, law enforcement, social services, fish and game regulation enforcement, schools, housing, sanitation, and wastewater treatment for communities in Valley County.

Concern: Higher than average wage earners could increase education and economic benefits and demands in the region.

Issue 13: Use of water rights could affect the quantity of water.

Concern: New or changed water rights to divert and use surface water or ground water may affect the local public interest.

Concern: Water rights required by this project may cause potential water availability issues for other resources.

Issue 14: Long-term reclamation and bonding success.

Concern: This project will disturb previously reclaimed areas and what assurance would the public have that the reclamation proposed by Midas would not be disturbed by another mining company?

Concern: How will the Forest Service ensure that reclamation would be successful in a reasonable time frame?

Concern: The cost of reclamation could exceed the funds available.

Concern: Reclamation of the area could not be accomplished without funds from private companies such as Midas.

Concern: Mining companies in the western United States have a record of not completing reclamation efforts.

Issue 15: Effects on wilderness characteristics from construction and operation of the mine site.

Concern: The roads, mine traffic, and powerlines could result in a long-term reduction in wilderness characteristics and experiences in the Frank Church River of No Return Wilderness and the Inventoried Roadless Areas.

Concern: The EIS should analyze how the proposed Project could affect wilderness characteristics in the Frank Church River of No Return Wilderness, the Inventoried Roadless Areas, and recommended wilderness.

Concern: Mining operations or related activities could negatively impact roadless characteristics and potential wilderness attributes in Idaho Roadless Areas.

Issue 16: Impacts to the value of the special designations areas, such as eligible Wild and Scenic Rivers, and Research Natural Areas (RNAs).

Concern: The EIS should analyze how impacts to special designation areas impact the value of these areas and what effect that may have on the recreation industry in the region.

Concern: The EIS should clarify whether the proposed new construction or reconstruction of the "Burntlog Road" is in the Chilcoot Peak RNA.

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**Appendix A:
Scoping Period Information**

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Stibnite Gold Notice of Intent Published in Federal Register

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Responsible Officials for the MNF LRMP Amendment and the GWNF LRMP Amendment, respectively. However, since the Regional Foresters for the Eastern and Southern Region will be the Responsible Officials for the decision to authorize the construction and operation of ACP, in the interest of administrative efficiencies as well as to simplify the administrative review process for the public, the Responsible Officials for the LRMP Amendments will now be the Regional Forester Eastern Region for the MNF LRMP Amendment and the Regional Forester Southern Region for the GWNF LRMP Amendment.

Dated: May 10, 2017.

Robert M. Harper,

Acting Associate Deputy Chief, National Forest System.

[FR Doc. 2017-11484 Filed 6-2-17; 8:45 am]

BILLING CODE 3411-15-P

DEPARTMENT OF AGRICULTURE

Forest Service

Payette and Boise National Forests; Valley County, Idaho; Stibnite Gold Project Environmental Impact Statement

AGENCY: Forest Service, USDA.

ACTION: Notice of intent to prepare an environmental impact statement.

SUMMARY: The Payette National Forest (PNF) is preparing an Environmental Impact Statement (EIS) to evaluate and disclose the potential environmental effects from: (1) Approval of the "Stibnite Gold Project Plan of Restoration and Operations" (Plan) submitted by Midas Gold Idaho, Inc. (Midas Gold) in September 2016, to occupy and use National Forest System (NFS) lands for operations associated with open-pit mining and ore processing; and (2) related amendments to the Payette National Forest Land and Resource Management Plan (Payette Forest Plan, 2003) and/or the Boise National Forest Land and Resource Management Plan (Boise Forest Plan, as amended in 2010).

The United States Army Corps of Engineers (USACE) will cooperate on the preparation of the EIS and evaluate its content to ensure that the EIS can be adopted by the USACE to support an eventual decision to either issue, issue with conditions, or deny a Department of the Army Permit under Section 404 of the Clean Water Act (CWA) for the Plan. The United States Environmental Protection Agency (EPA) will cooperate on the preparation of the EIS and

evaluate its content to ensure that the EIS can be adopted in support of the decision-making process for issuance of a National Pollutant Discharge Elimination System (NPDES) Permit under Section 402 of the CWA.

DATES: Comments concerning the scope of the analysis must be received by July 20, 2017.

ADDRESSES: Webform submission of comments is encouraged. Comments can be submitted via the project Web page at <http://www.fs.usda.gov/goto/payette/StibniteGold> by selecting the "Comment on Project" link on the right side of the page. Written comments may also be sent to Payette National Forest, ATTN: Forest Supervisor Keith Lannom—Stibnite Gold EIS, 500 N. Mission St., McCall, Idaho 83638. Comments may also be sent via email with a subject line reading "Stibnite Gold EIS Scoping Comment" to comments-intermtn-payette@fs.fed.us or via facsimile (FAX) to 1-208-634-0744. Additional information regarding submittal of comments is provided below in the Scoping Process section. Written comments may also be submitted during public scoping meetings that will be held by the U.S. Forest Service (Forest Service), as follows:

1. June 27, 2017, 5:00–7:00 p.m., Ashley Inn, Cascade, Idaho
2. June 28, 2017, 5:00–7:00 p.m., Payette Forest Supervisor's Office, McCall, Idaho
3. June 29, 2017, 1:00–3:00 and 5:00–7:00 p.m., Holiday Inn Express and Suites (Airport), Boise, Idaho

FOR FURTHER INFORMATION CONTACT: Brian Harris, Public Affairs Officer, at 1-208-634-0784 or bdharris@fs.fed.us.

Individuals who use telecommunication devices for the deaf (TDD) may call the Federal Information Relay Service (FIRS) at 1-800-877-8339 between 8 a.m. and 8 p.m., Eastern Time, Monday through Friday.

SUPPLEMENTARY INFORMATION: The Stibnite Gold Project (Project) is located in both the PNF and BNF. The PNF will be the lead unit for processing and administering the Plan on NFS lands.

Purpose and Need for Action

The purpose of the Forest Service's action is to provide for approval of the Plan, which would govern occupancy and use of NFS lands for operations that are reasonably incident to mining. To provide for such approval, the Responsible Official needs to determine whether reasonable changes or additions to the Plan are necessary in order to meet the requirements of regulations set forth in 36 CFR 228 Subpart A and other applicable laws,

or policies, prior to approval.

Midas Gold submitted a plan of operations for mining on NFS lands, titled "Stibnite Gold Plan of Restoration and Operations" (Plan) to the Forest Service in September 2016, in accordance with Forest Service regulations for locatable minerals set forth at 36 Code of Federal Regulations (CFR) 228 Subpart A. In order to comply with its statutory and regulatory obligations to respond to the Plan submitted by Midas Gold Idaho, Inc. (Midas Gold), the Forest Service must: (1) Evaluate the Plan; (2) consider requirements set forth at 36 CFR 228.8, including those to minimize adverse effects to the extent feasible, comply with applicable laws, regulations, and standards for environmental protection, and provide for reclamation; and (3) respond to the Plan as set forth at 36 CFR 228.5(a). The Responsible Official determined the Plan to be administratively complete in December 2016. Approval of the Plan and issuance of permits under the CWA would be major federal actions subject to the National Environmental Policy Act (NEPA). Accordingly, the federal land management and regulatory agencies must also prepare an EIS to consider and publicly disclose the potential environmental effects of the proposed action.

Proposed Action

The Responsible Official proposes to approve the Plan submitted by Midas Gold, with any modifications determined necessary through the analysis to comply with applicable laws and regulations. USACE would review the Plan and EIS for purposes of evaluating Midas Gold's application for a Department of the Army Permit under Section 404 of the CWA. EPA would review the Plan and EIS for purposes of evaluating Midas Gold's application for a related NPDES Permit under Section 402 of the CWA. As described in the Plan, the Project would affect federal, state, and private lands. The proposed action by the Forest Service would only authorize approval of mining-related operations on NFS lands, because the Forest Service does not have jurisdiction to regulate mining operations that occur on private or state land. However, the EIS will consider and disclose environmental effects of mining-related operations that would occur on private and state lands. Connected actions related to the Plan, including but not necessarily limited to CWA permitting by USACE and EPA and related amendments of the Payette and Boise Forest Plans, will be

considered. Impacts of past, present, ongoing, and reasonably foreseeable future actions in the Project area will be considered in combination with the impacts of the Project to estimate the potential cumulative impacts of Project implementation.

Project Location

The Project area is located in the upper East Fork of the South Fork of the Salmon River (EFSFSR) drainage, approximately 44 air miles northeast of the City of Cascade and three miles east of the Frank Church-River of No Return Wilderness in Valley County, Idaho. Operations would impact approximately 500 acres of patented mining claims owned or controlled by Midas Gold and approximately 1,500 acres of federal public lands comprised of adjacent NFS lands administered by the PNF and two supporting-infrastructure corridors located primarily in the BNF. Parts of the Project area, such as the Stibnite mine site, have been impacted by historic mining and ore processing operations. Some of these impacts have been remediated, but legacy mining impacts remain.

Project Description

Midas Gold's stated objective is to economically develop and operate a modern mine, while providing environmental restoration of impacts related to historic mining activities at the site and socioeconomic benefits in surrounding areas. Midas Gold's Plan includes descriptions of the following operations and activities to be conducted on a mixture of NFS, State, and private lands:

- **Redevelopment and Construction** (2 to 3 years): Developing supporting infrastructure, including upgraded and reconstructed powerline, communication sites, upgraded and/or new roads (including a long-term, temporary mine access and public bypass route), maintenance facility, and onsite housing, oxygen plant, and water management infrastructure; relocation and reuse of spent ore and construction of a lined tailings storage facility; modifying stream channel to reduce sedimentation and restore wetland function and fish passage (including temporarily rerouting the East Fork of the South Fork of the Salmon River [EFSFSR] through a fish-passable tunnel); planting burned areas; initial mining of one open pit (which will require closure of the Stibnite road through the mine site); and constructing development rock storage and temporary ore stockpile facilities, crusher, and ore processing facilities.

- **Mining and Ore Processing** (12 to 15 years): Resuming mining from two historical and one new open pit at a rate of approximately 40,000 to 100,000 tons of material per day; processing up to 25,000 tons per day of ore to recover gold/silver doré and antimony concentrate; historical tailings reprocessing and clean-up; placing neutralized new and reprocessed tailings in the tailings storage facility; placing development rock in four engineered facilities, backfilling Yellow Pine pit; and concurrent reconstruction of stream channels, riparian areas, wetlands, and upland habitat, including restoring the EFSFSR to its approximate original gradient across the backfilled Yellow Pine pit.

- **Initial Closure and Reclamation** (2 to 3 years): Removing structures and facilities; decommissioning temporary roads; recontouring and drainage; additional wetland mitigations; reconstructing the Stibnite Road and various stream channels in the project area; and growth media placement and revegetation.

- **Post-Closure and Monitoring** (5 to 7 years): Establishing a wetland on top of the tailings storage facility; reclaiming rock storage facilities; monitoring reclamation and remediation projects. The Plan includes operational standards and practices to minimize, mitigate or eliminate the potential for negative impacts and environmental monitoring to document compliance and to facilitate adaptive management through the redevelopment, mining, reclamation, and post-closure periods.

An initial review of the consistency of the Plan with both the Payette and Boise Forest Plans indicates that approval of the Plan as submitted would result in conditions that are inconsistent with the forest plans. Amendments to the forest plans may be required to address inconsistencies with Forest Plan standards including standards for recreation, roadless areas, vegetation, visual quality, and wildlife.

Possible Alternatives

The EIS will disclose the effects of the no-action alternative, which, while not within the Responsible Official's discretion, would provide a baseline against which action alternatives can be compared, and the proposed action, approval of Midas Gold's Plan. Additional alternatives and Project design features may be evaluated in the EIS. Alternatives and design features determined reasonable and necessary to meet Forest Service regulations for locatable minerals set forth at 36 CFR 228 Subpart A may require changes and/or additions to the Plan. Further

information regarding the nature of the decision(s) to be made is presented in the following section.

Lead and Cooperating Agencies

The Forest Service will be the lead agency preparing the EIS. Currently, five Cooperating agencies have been identified, they are:

- U.S. Environmental Protection Agency (EPA)
- U.S. Army Corps of Engineers (USACE)
- Idaho Department of Lands
- Idaho Department of Environmental Quality
- Governor's Office of Energy and Mineral Resources

Other agencies or governmental entities may join as cooperators during the process.

Responsible Official

The Forest Supervisor of the PNF has been delegated authority for decisions related to the Plan on the BNF and will be the Responsible Official who prepares the record of decision (ROD) necessary to approve the portions of the Plan on NFS lands. USACE and EPA will prepare final decisions for their respective permitting action(s).

Nature of Decision To Be Made

The Responsible Official will consider the beneficial and adverse impacts of each alternative. With respect to the portions of the Plan on NFS lands, the Forest Service Responsible Official has discretion to determine whether changes in, or additions to, the Plan will be required prior to approval. However, the Responsible Official cannot categorically prohibit operations that are reasonably incident to mining of locatable minerals on NFS lands in the area of the proposed Plan.

Using the analysis in the EIS and supporting documentation, the Forest Service Responsible Official will make the following decisions regarding the Plan:

1. Decide whether to approve the Plan as submitted by Midas Gold, or to require changes or additions to the Plan to meet the requirements for environmental protection and reclamation set forth at 36 CFR 228 Subpart A before approving a final Plan. The Forest Service decision may be to approve a plan of operations composed of elements from one or more of the alternatives considered. The alternative that is selected for approval in the final Plan must minimize adverse impacts on NFS surface resources to the extent feasible.

2. Decide whether to approve amendments to the forest plans, if

required in order to approve the final Plan.

3. Decide whether and/or how to mitigate the effects of the proposed mining operation to existing public motorized access.

Final EIS and Record of Decision

The Forest Service would release a draft ROD in conjunction with the final EIS. The draft ROD would address approval of the Plan, and any related project-specific Forest Plan or Travel Plan amendments that may be required. The draft decision would be subject to 36 CFR 218, "Project-Level Pre-decisional Administrative Review Process." Depending on the nature of the forest plan amendments required, the draft decisions may also be subject to 36 CFR 219 Subpart B, "Pre-decisional Administrative Review Process."

Following resolution of objections to the draft ROD, a final ROD would be issued. As the operator, Midas Gold would have an opportunity to appeal the decision as set forth at 36 CFR 214, "Postdecisional Administrative Review Process for Occupancy and Use of National Forest System Lands and Resources."

Prior to approval of the Plan, Midas Gold may be required to modify the September 2016 Plan to comply with the description of the selected alternative in the final ROD. In addition, the PNF Forest Supervisor would require Midas Gold to submit a reclamation bond or provide proof of other acceptable financial assurance to ensure that NFS lands and resources involved with the mining operation are reclaimed in accordance with the approved Plan and Forest Service requirements for environmental protection (36 CFR 228.8 and 228.13). After the Forest Service has determined that the Plan conforms to the ROD as well as other regulatory requirements, including acceptance of financial assurance for reclamation, it would approve the Plan. Implementation of mining operations that affect NFS lands and resources may not commence until the reclamation bond or other financial assurance is in place and a plan of operations is approved.

Preliminary Issues

Issues to be analyzed in the EIS will be developed during this scoping process. Preliminary issues expected to be analyzed include potential impacts to: Access and transportation; aesthetics and visual resources; botanical resources, including wetlands and threatened, endangered, proposed, and sensitive species; climate and air

quality; cultural and heritage resources; environmental justice; federal land management and environmental protection; fire and fuels management; fisheries and wildlife, including threatened, endangered, proposed, and sensitive species; geochemistry; geology; hazardous materials; land use; long-term, post-closure site management; noise; public health and safety; recreation; roadless and wilderness resources; socioeconomic; soils and reclamation cover materials; timber resources; water resources (groundwater and surface water); and water rights.

Permits or Licenses Required

Aspects of the Plan will also require other permitting, including by the Idaho Departments of Lands, Environmental Quality, and Water Resources.

Scoping Process

This notice of intent initiates the scoping (public involvement) process, which guides the development of the EIS. Public comments may be submitted to the PNF in a variety of ways, including: via email, via the project Web site, by mail, and via FAX. In addition, the PNF will conduct scoping meetings, during which members of the public can learn about the Forest Service proposed action and the NEPA process and submit written comments. Comments sought by the PNF include comments specific to the proposed action, information that could be pertinent to analysis of environmental effects, identification of significant issues, and identification of potential alternatives.

Written comments may be sent to: Payette National Forest, ATTN: Forest Supervisor Keith Lannom—Stibnite Gold EIS, 500 N. Mission St., McCall, ID 83638. Comments may also be sent via email with a Subject Line reading "Stibnite Gold EIS Scoping Comment" to *comments-intermtn-payette@fs.fed.us*, submitted via Web site at <http://www.fs.usda.gov/goto/payette/StibniteGold>, or sent via FAX to 1-208-634-0744.

It is important that reviewers provide their comments at such times and in such manner that they are useful to preparation of the EIS. Therefore, to be most useful, comments should be provided prior to the close of the scoping comment period and should clearly articulate the reviewer's concerns and contentions.

Comments submitted anonymously will be accepted and considered; however, without an associated name and address, receiving further correspondences concerning the proposed action will not be possible and

those individuals will not have standing for objection.

Dated: May 12, 2017.

Robert M. Harper,
Acting Associate Deputy Chief, National Forest System.

[FR Doc. 2017-11483 Filed 6-2-17; 8:45 am]

BILLING CODE 3411-15-P

DEPARTMENT OF AGRICULTURE

Forest Service

Notice of Updated Information Concerning the Mountain Valley Pipeline Project and Equitrans Expansion Project and the Associated Forest Service Land and Resource Management Plan Amendments

AGENCY: Forest Service, USDA.

ACTION: Notice; updating information.

SUMMARY: The USDA Forest Service (Forest Service) is participating as a cooperating agency with the Federal Energy Regulatory Commission (FERC) and the Bureau of Land Management (BLM) in the preparation of the Mountain Valley Pipeline Project (MVP) and Equitrans Expansion Project (EEP) Environmental Impact Statement (EIS). On October 14, 2016, the Forest Service published in the **Federal Register** (81 FR 71041) a Notice of Availability of the Mountain Valley Pipeline Project and Equitrans Expansion Project Draft Environmental Impact Statement and the Draft of Amendments to the Jefferson National Forest's Land and Resource Management Plan (LRMP) to allow for the MVP to cross through the Jefferson National Forest. Since that publication, the Forest Service determined there is a need to disclose the following: New information relating to the proposed LRMP amendments and the substantive provisions in the 2012 Planning Rule that are likely to be directly related to the proposed amendments. In addition, a proposed change to one of the LRMP amendments will result in a change to the administrative review procedures as outlined in the October 14, 2016 **Federal Register** Notice.

FOR FURTHER INFORMATION CONTACT: Information about the MVP Project is available from the FERC's Office of External Affairs at 866-208-FERC (3372), or on the FERC Web site (www.ferc.gov). On the FERC's Web site, go to "Documents & Filings," click on the "eLibrary" link, click on "General Search" and enter the docket number CP16-10. Be sure you have selected an appropriate date range. For assistance, please contact FERC Online Support at

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Legal Notice for Stibnite Gold Scoping in Idaho Statesman

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Press Release - Public Scoping Meetings Rescheduled

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NEWS

Payette National Forest

United States
Department of
Agriculture

500 North Mission Street
McCall, ID 83638
208-634-0700



Date: May 30, 2017

Contact: Brian Harris, Forest Service (208) 634-0784 cell: (208) 634-6945

FOR IMMEDIATE RELEASE

Public Meetings Rescheduled for Stibnite Gold Project - Notice of Intent to be Published

McCall, ID – The Payette National Forest has rescheduled the public meetings for the Stibnite Gold project. The public meetings will be conducted as follows:

- Cascade – Tuesday, June 27 from 5:00 to 7:00p.m at the Ashley Inn, 500 North Main Street, Cascade.
- McCall – Wednesday, June 28 from 5:00 to 7:00p.m at the Payette National Forest Supervisor’s Office, 500 North Mission Street, McCall.
- Boise – Thursday, June 29 from 1:00 to 3:00p.m., and from 5:00 to 7:00p.m, at the Holiday Inn Express & Suites (Airport), 3050 South Shoshone Street, Boise.

The Notice of Intent (NOI) to prepare an Environmental Impact Statement (EIS) for the Stibnite Gold project under the National Environmental Policy Act (NEPA) is expected to be published in the Federal Register on Friday, June 2. A 45 day public scoping period will begin once the NOI is published.

The EIS will evaluate and disclose the potential environmental effects from the approval of the “Stibnite Gold Project Plan of Restoration and Operations” (the Plan) submitted by Midas Gold Idaho, Inc. (Midas Gold) to occupy and use National Forest System (NFS) lands for operations associated with open-pit mining and ore processing in the Stibnite Mining District, and related amendments to the Payette National Forest Land and Resource Management Plan (2003), and/or the Boise National Forest Land and Resource Management Plan (as amended 2010).

During the scoping period, the public is encouraged to provide comments specific to the proposed action, information that could be pertinent to analysis of environmental effects, identification of significant issues, and identification of potential alternatives.

Written comments may be submitted via Web site at <https://www.fs.usda.gov/goto/StibniteGold> , sent to: Payette National Forest, ATTN: Forest Supervisor Keith Lannom - Stibnite Gold EIS, 500 N. Mission St., McCall, ID 83638. Comments may also be sent via email with a Subject Line reading “Stibnite Gold EIS Scoping Comment” to comments-intermtn-payette@fs.fed.us, or sent via FAX to 1-208-634-0744.

For more information, please call the Payette National Forest Public Affairs Office at (208) 634-0784.

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Stibnite Gold Idaho Statesman Legal Notice Correction

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LEGAL PROOF OF PUBLICATION

Account #	Ad Number	Identification	PO	Amount	Cols	Lines
588480	0003111572	LEGAL NOTICE DRAFT LEGAL NOTICE CORF	Stibnite Gold 2nd	\$140.12	2	77

Attention: JANET GUINN PETERSON

AECOM
10525 S HIGHWAY 165
PARADISE, UT 84328

LEGAL NOTICE

DRAFT LEGAL NOTICE CORRECTION to the Legal Notice of Opportunity to Provide Scoping Comments on Stibnite Gold Project

The Payette National Forest (PNF) is preparing an Environmental Impact Statement (EIS) to evaluate and disclose the potential environmental effects from: (1) Approval of the "Stibnite Gold Project Plan of Restoration and Operations" (Plan) submitted by Midas Gold Idaho, Inc. (Midas Gold) in September 2016, to occupy and use National Forest System (NFS) lands for operations associated with open-pit mining and ore processing; and (2) related amendments to the Payette National Forest Land and Resource Management Plan (Payette Forest Plan, 2003) and/or the Boise National Forest Land and Resource Management Plan (Boise Forest Plan, as amended in 2010).

A legal notice was published in this newspaper on June 1, 2017, which provided project details, information about upcoming public meetings, and methods for providing public comment. The notice erroneously stated that the project area was located three miles east of the Frank Church-River of No Return Wilderness in Valley County, Idaho.

The project area is located in the upper East Fork South Fork Salmon River (EFSFSR) drainage approximately 44 air miles northeast of the city of Cascade and three miles west of the Frank Church-River of No Return Wilderness in Valley County, Idaho.

Comments submitted via webform are preferred and can be submitted from the project website at <http://www.fs.usda.gov/goto/payette/StibniteGold>. Written comments may be sent to: Payette National Forest, ATTN: Forest Supervisor Keith Lannom - Stibnite Gold EIS, 500 N. Mission St., McCall, ID 83638, sent via email with a subject line reading "Stibnite Gold EIS Scoping Comment" to comment-intermtn-payette@fs.fed.us, via facsimile (FAX) to 1-208-634-0744. . . The office business hours for those submitting hand-delivered comments are 8:00 AM-4:30 PM Monday through Friday, excluding federal holidays.

Scoping comments are requested by July 20, 2017. Comments received in response to this solicitation, including names and addresses of those who comment, will be part of the public record for this proposed action. Comments submitted anonymously will be accepted and considered; however to be eligible to submit an objection, individuals and entities must have provided the following during the comment period: 1) name and postal address (email address is recommended but not required); 2) title of the proposed project or activity; 3) specific written comments as defined in §218.2 regarding the proposed project or activity, along with supporting reasons, and 4) signature or other verification of identity upon request and identification of the individual or entity who authored the comments. For comments listing multiple entities or multiple individuals, a signature or other means of verification must be provided for the individual authorized to represent each entity and for each individual in the case of multiple names. A scanned signature or other means of verifying the identity of the individual or entity representative may be used for electronically submitted comments. Individual members of an entity must submit their own comments to establish personal identity; comments received on behalf of an entity are considered as those of the entity only.

Additional information regarding this action can be obtained from: <http://www.fs.usda.gov/goto/payette/StibniteGold>, or by contacting Brian Harris, Public Affairs Officer, at 1-208-634-0784 or bdharris@fs.fed.us. Individuals who use telecommunication devices for the deaf (TDD) may call the Federal Information Relay Service (FIRS) at 1-800-877-8339 between 8 a.m. and 8 p.m., Eastern Time, Monday through Friday.

Pub. June 8, 2017


0003111572-01

JANICE HILDRETH, being duly sworn, deposes and says: That she is the Principal Clerk of The Idaho Statesman, a daily newspaper printed and published at Boise, Ada County, State of Idaho, and having a general circulation therein, and which said newspaper has been continuously and uninterruptedly published in said County during a period of twelve consecutive months prior to the first publication of the notice, a copy of which is attached hereto: that said notice was published in The Idaho Statesman, in conformity with Section 60-108, Idaho Code, as amended, for:

1 Insertions

Beginning issue of: 06/08/2017

Ending issue of: 06/08/2017


(Legals Clerk)

STATE OF IDAHO)

.SS

COUNTY OF ADA)

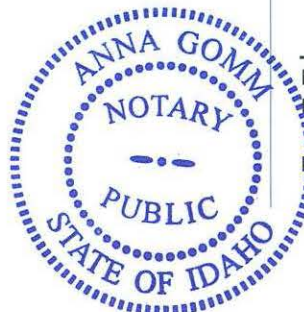
On this 9th day of June in the year of 2017 before me, a Notary Public, personally appeared before me Janice Hildreth known or identified to me to be the person whose name subscribed to the within instrument, and being by first duly sworn, declared that the statements therein are true, and acknowledged to me that she executed the same.



Notary Public FOR Idaho

Residing at: Boise, Idaho

My Commission expires: 08/17/2022



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**Appendix B:
Scoping Meeting Materials**

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June 2017 Stibnite Gold Public Scoping Meeting Presentation

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United States
Department of Agriculture



Payette National Forest
Boise National Forest

Stibnite Gold Project



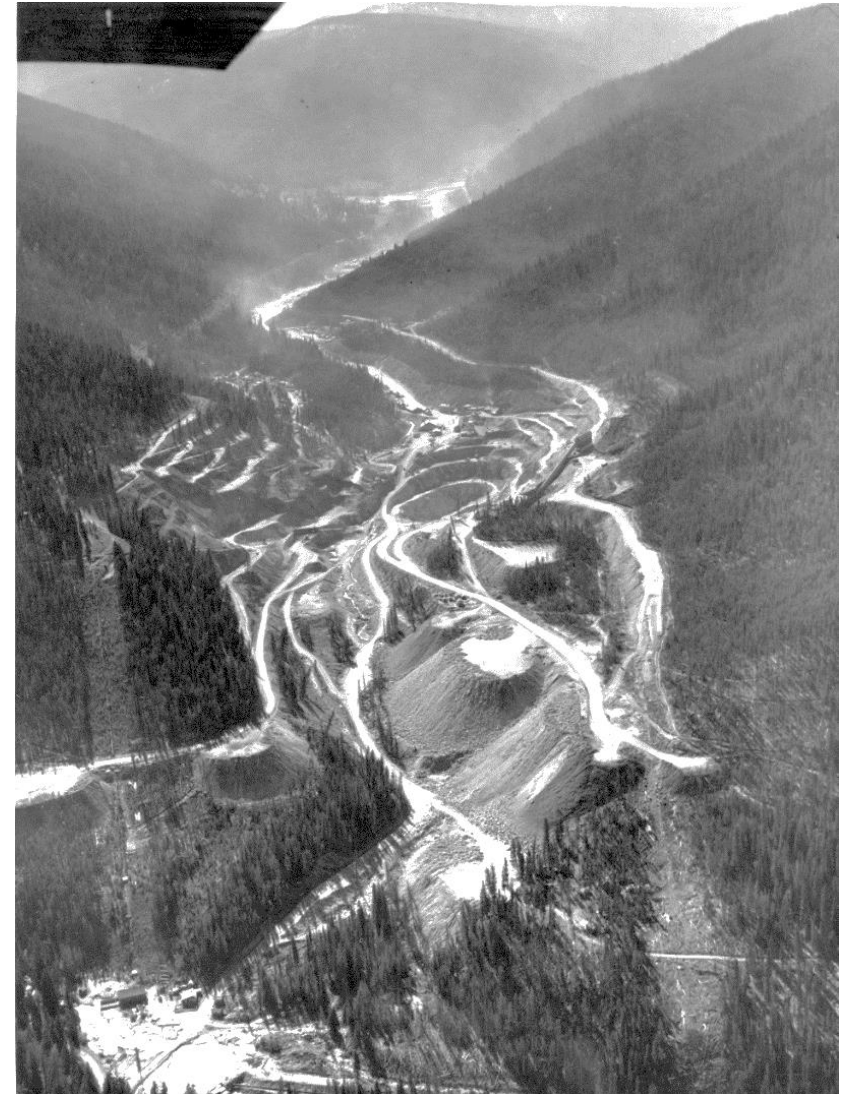
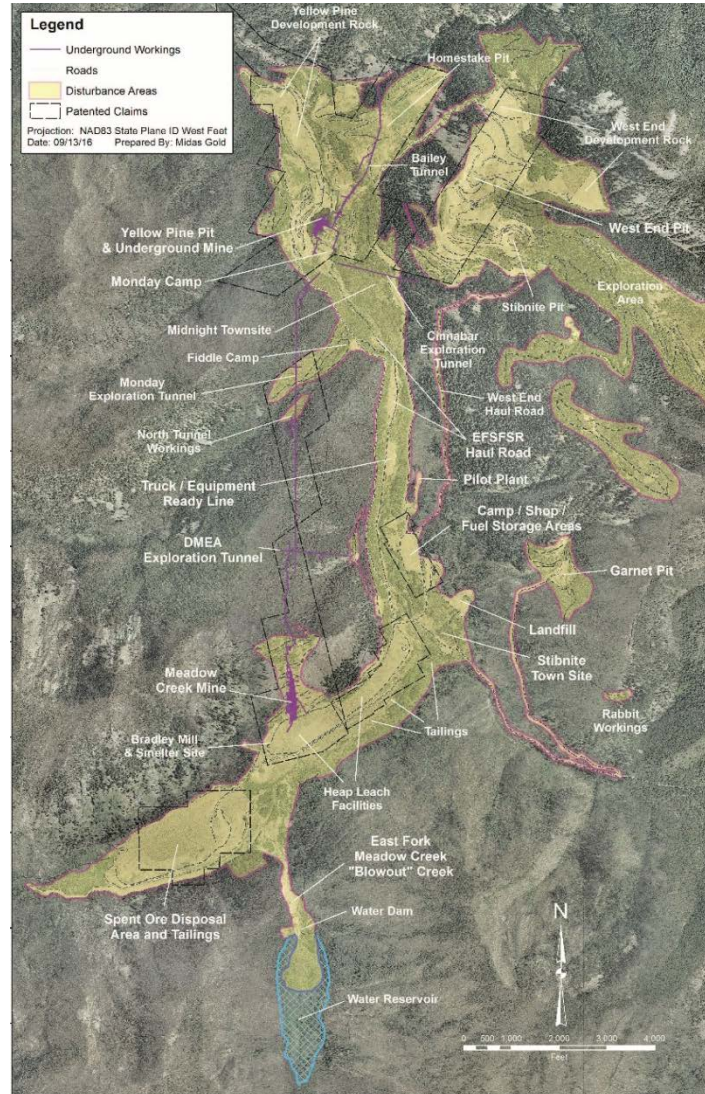
Stibnite Gold Project

Environmental Impact Statement (EIS)





Mining History





Mining Laws and Regulations on National Forest System lands

Federal Mining Laws

- **1872 Mining Law:** established the statutory right to search for, develop and extract mineral deposits on public domain lands open to mineral entry. The project is within the Stibnite Mining District where mineral entry is allowed.
- **Mining & Minerals Policy Act of 1970:** declared it in the national interest to foster and encourage private enterprise in the development of domestic mineral resources and reclamation of mined land.

Forest Service Regulations

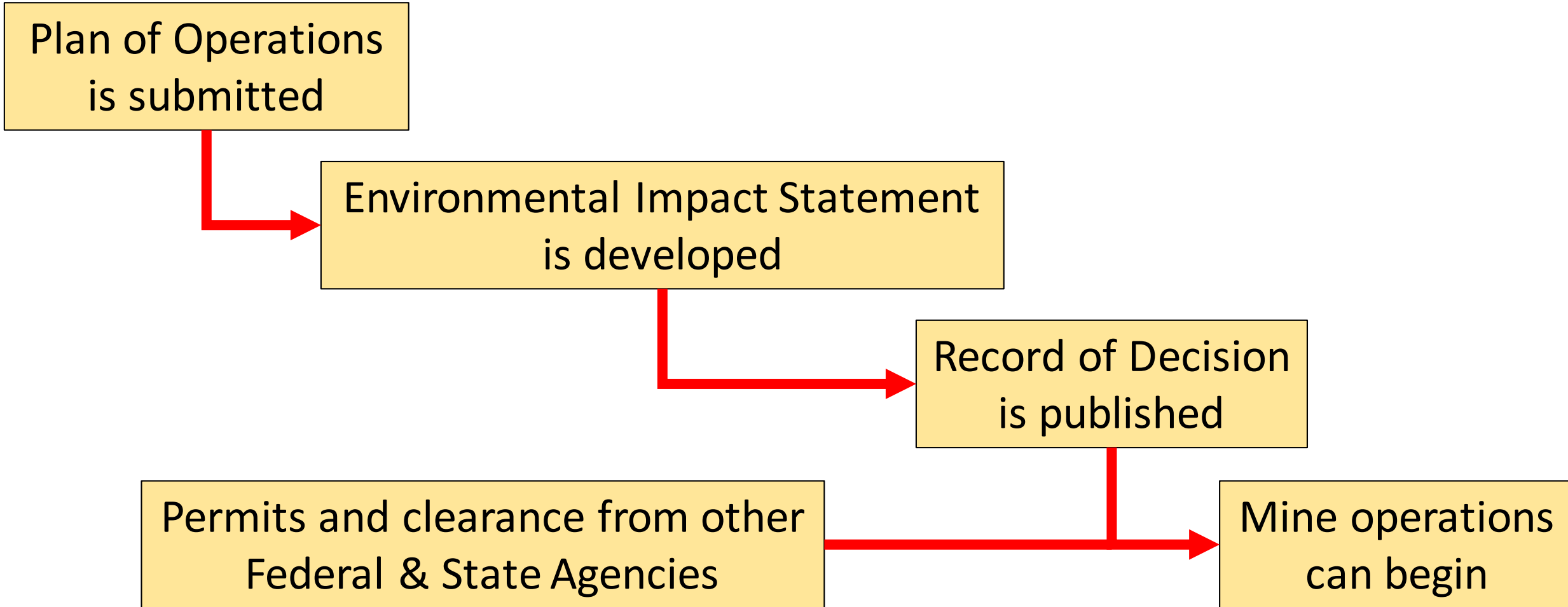
Locatable Minerals - **36 Code of Federal Regulations (CFR) 228, Subpart A:** requires the Forest Service to:

- Respond to a mining Plan
- Evaluate that Plan
- Consider requirements to minimize adverse effects to the extent feasible
- Comply with applicable laws, regulations and standards for environmental protection
- Provide for Reclamation
- Further respond by following National Environmental Policy Act (NEPA) process.





Forest Service Project Steps





Cooperating Agencies

Government agencies having jurisdiction by law or special expertise on issues to be addressed, and that intend to Cooperate on the EIS include:

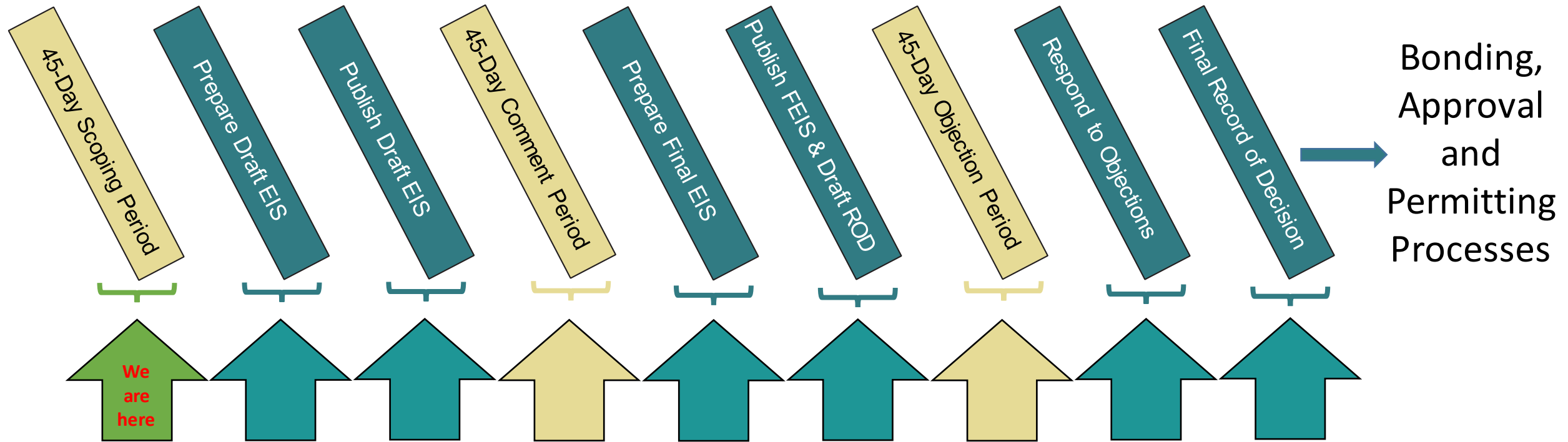
- The U.S. Environmental Protection Agency (EPA)
- The U.S. Army Corps of Engineers (USACE)
- Idaho Department of Lands (IDL)
- Idaho Department of Environmental Quality (IDEQ)
- Idaho Governor's Office Energy & Mineral Resources (OEMR)
- Valley County

Required permits include, but are not limited to, a Clean Water Act (CWA) section 404 permit to fill waters of the United States (issued by the USACE); and a National Pollutant Discharge Elimination System (NPDES) CWA section 402 permit (issued by the EPA or IDEQ).

The Forest Service is also Consulting and/or coordinating with other regulatory agencies and Tribes.



NEPA Process & EIS Timeline



During the Scoping Period, the public provides input regarding project and resource concerns. This input is used to identify issues to be addressed through alternatives developed or EIS analysis.



Purpose & Need

The purpose of the project is to provide for approval of a Plan, which would govern occupancy and use of NFS lands for operations that are reasonably incident to mining.

To provide for such approval, the Responsible Official needs to determine whether reasonable changes or additions to the Plan are necessary in order to meet the requirements of regulations set forth in 36 CFR 228 Subpart A and other applicable laws, regulations, or policies, prior to approval.



Proposed Action

- The Forest Service Responsible Official proposes to approve the Plan submitted by Midas Gold, with any modifications determined necessary through the analysis to comply with applicable laws and regulations.
- The Army Corps of Engineers would review the proposed plan and EIS for purposes of evaluating Midas Gold's application for a Clean Water Act (CWA) section 404 permit.
- The EPA would review the proposed plan and EIS for purposes of evaluating Midas Gold's application for a related NPDES (CWA section 402) permit. However, EPA is in the process of reviewing the State of Idaho's application to implement the NPDES program in Idaho. EPA's role in issuing any final permit will depend on timing of program authorization and the NEPA process.
- As described in the Plan, the Stibnite Gold Project would affect federal, state, and private lands. The proposed action by the Forest Service would only authorize approval of mining-related operations on NFS lands, because the Forest Service does not have jurisdiction to regulate mining operations that occur on private or state land. However, the EIS will consider and disclose environmental effects of mining-related operations that would occur on private and state lands.
- Connected actions related to the Plan, including but not necessarily limited to CWA permitting and potential amendments of the Payette and Boise Forest Plans, will be considered. Impacts of past, present, ongoing, and reasonably foreseeable future actions in the project area will be considered in combination with the impacts of the project to estimate the potential cumulative impacts of project implementation.



Project Description

The Plan, as submitted by Midas Gold, proposes redevelopment of the Stibnite site over the course of approximately 20 years as follows:

- Initial Redevelopment and Construction (2 to 3 years)
- Mining and Ore Processing (12 to 15 years)
- Closure and Reclamation (2 to 3 years)
- Final Closure and Monitoring (5* years)



Economics

Midas Gold has projected their proposed operations would produce:

- 4+ million ounces of gold
- 2+ million ounces of silver
- Antimony concentrates, containing approximately 100 million pounds of elemental antimony
- Professional and technical jobs, as well as indirect employment
- State, local, and federal tax revenues



Preliminary Issues and/or Resources to be Addressed

- access and transportation
- aesthetics and visual resources
- botanical resources, including wetlands and threatened, endangered, proposed, and sensitive species
- climate and air quality
- cultural and heritage resources, including Tribal rights
- environmental justice
- federal land management and environmental protection
- fire and fuels management
- fisheries and wildlife, including threatened, endangered, proposed, and sensitive species
- geochemistry
- geology and mineral resources
- hazardous materials
- land use
- long-term, post-closure site management
- noise
- public health and safety
- recreation
- research natural areas
- roadless and wilderness resources
- socioeconomics
- soils and reclamation cover materials
- timber resources
- water resources (groundwater and surface water)
- water rights



Reclamation and Bonding

Per 36 CFR 228, Subpart A: Prior to approval of a Plan of Operations for mining on NFS lands, the authorized officer may require a bond to ensure performance of reclamation.

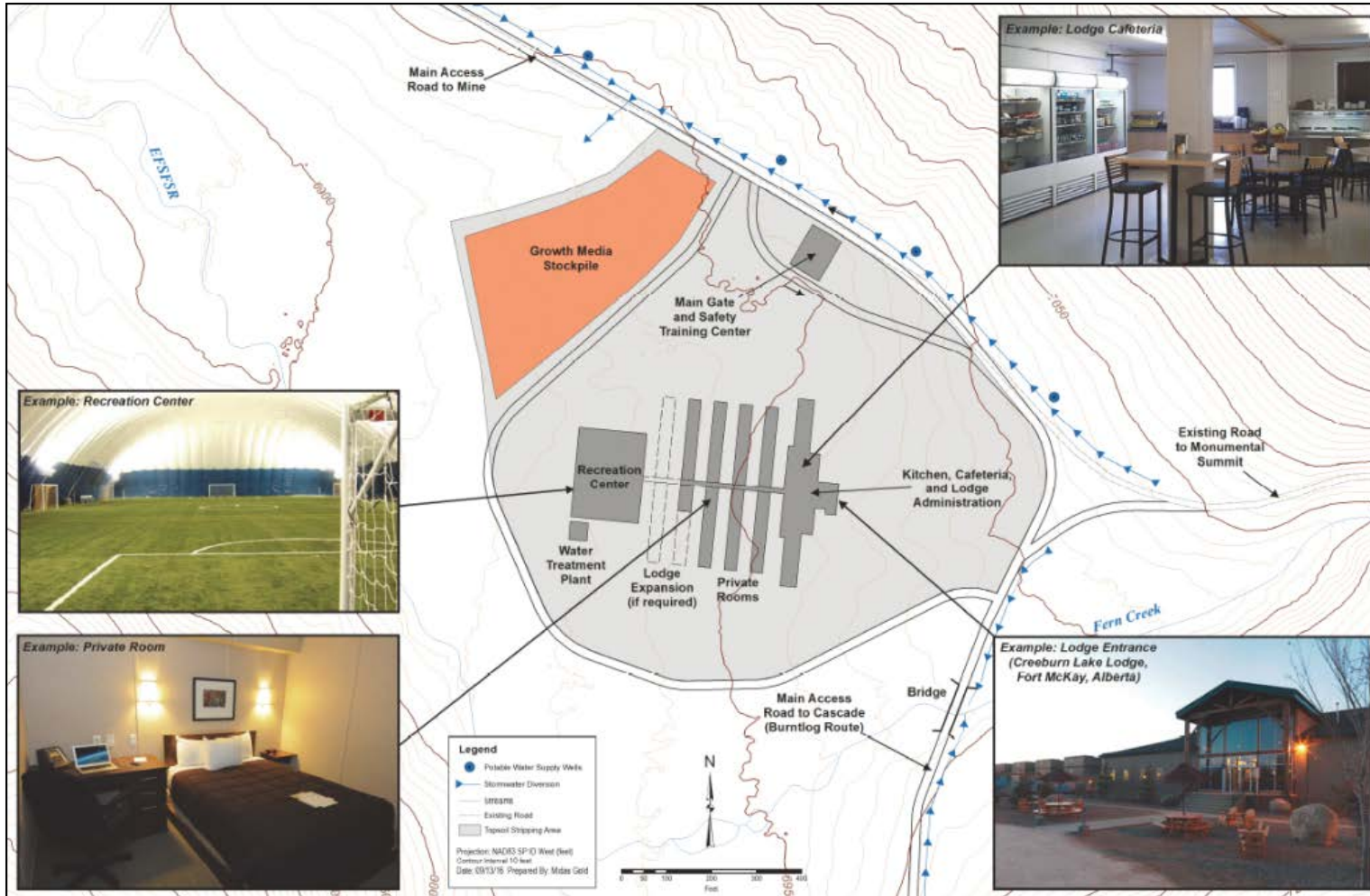
Reclamation: Requirements for reclamation of areas disturbed by mineral operations must be included in contracts and permits. Reclamation must be timely, complete and conducted concurrently with mining operations. Bonds shall not be released until reclamation has been certified by the Forest Service as complete.

Midas Gold's Plan includes reclamation measures such as: reshaping topography, drainage systems, segregation of spoil materials, waste disposal, revegetation, soil treatments, motorized access, backfilling the Yellow Pine Pit, and restoring the EFSFSR channel to approximate pre-mining conditions, which would provide natural fish passage.

Reclamation measures may be refined through the EIS process. Reclamation cost estimating procedures and the types of financial instruments that may be accepted to assure reclamation will be disclosed in the EIS.



Infrastructure at the Project Site



Onsite Housing

- Two-week on/off work cycle
- Bus/van service minimizes commute time to mine
- Decreases road traffic & dust, lower accident risk & lower greenhouse gas emissions
- Accommodation for ~500 people Hotel style accommodation

Meal service, laundry, housekeeping, first aid, Wi-Fi, health services, recreation facilities, 24 hour food





Road Maintenance Facility at, or adjacent to, Landmark

Road maintenance & snow removal

- Sanding/snowplowing trucks, snow blowers, road graders, and support equipment

Additional features:

- Double-contained fuel storage area to support maintenance equipment
- Covered stockpiles of coarse sand & gravel for winter sanding
- Housing for road maintenance crews
- Communications equipment & towers as needed

Located on previously disturbed land

- Minimizes new disturbances and repurposes a legacy gravel pit





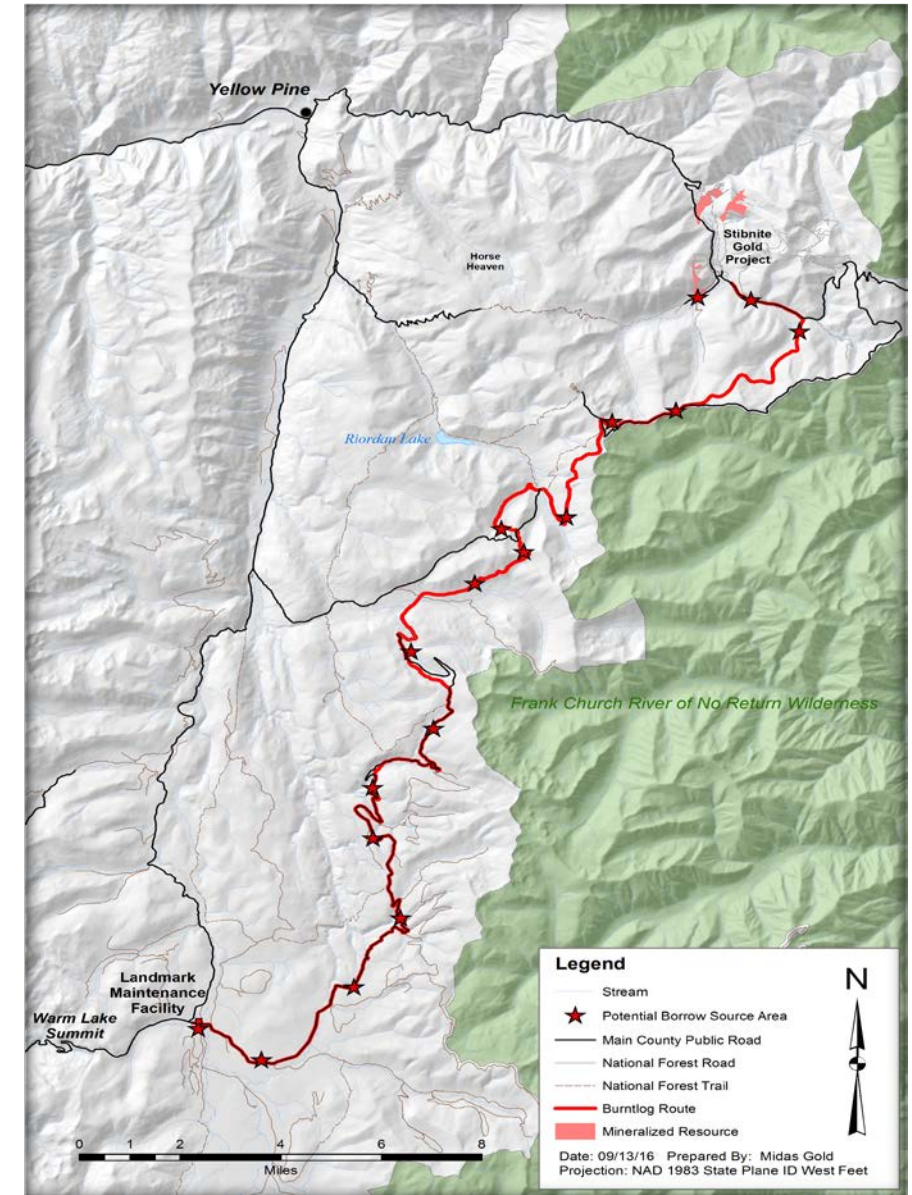
Access to the Site

Current Route: East Fork South Fork Salmon River

Travel adjacent to tributaries of the Salmon River, including Johnson Creek, then up the East Fork of the South of the Salmon River from Yellow Pine.

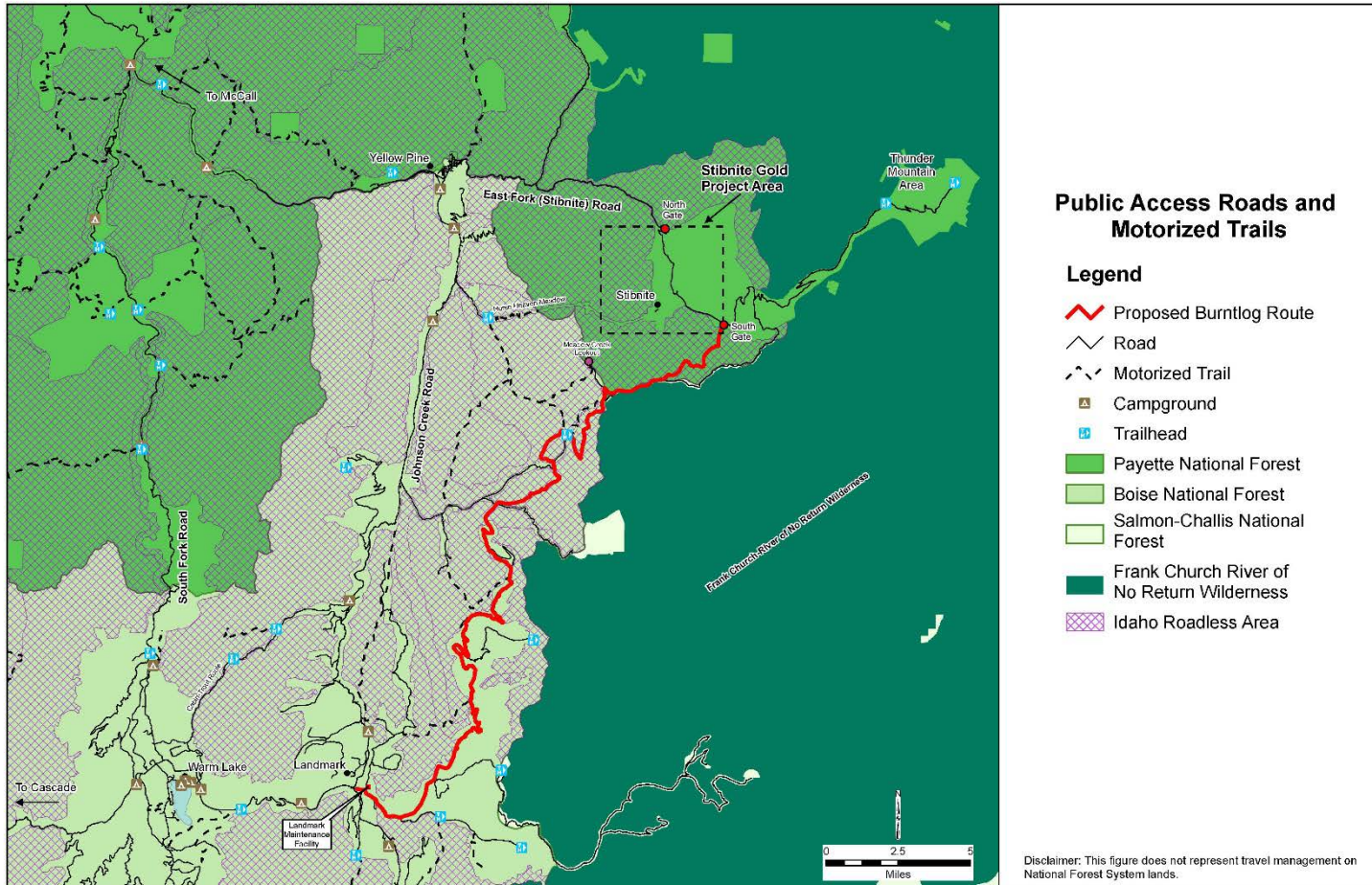
Proposed Burntlog Route (bypasses Yellow Pine)

- Intent is to avoid travel along waterways
- Burntlog Road extension would entail a combination of upgrading existing forest roads, and new road construction
- Inventoried Roadless Areas
- At time of mine closure, this route would be returned to pre-project configuration





Public Access Proposed in the Plan



- Access to Thunder Mountain via Warm Lake Road to Burntlog to Thunder Mountain Connector
- Close Stibnite Road at the north gate just past Sugar Creek
- Connect Horse Heaven/powerline road to Meadow Creek Lookout as a motorized trail

Winter Access

- Plow Warm Lake Road to Landmark, provide parking for visitors at Landmark
- Work with Valley County Parks & Recreation to support continued winter recreation access
- Groomed over-snow access to Landmark via Cabin Creek/Trout Creek trail



Logistics Center at Cascade

The “Scott Valley” Administrative and Transportation Facility (Warm Lake Road, east of Cascade, ID) **would accommodate:**

- Accounting & Human Resources
- Purchasing & Accounting
- Administration & Management
- Warehousing & Storage
- Laboratory

It is also intended to minimize traffic to and from site:

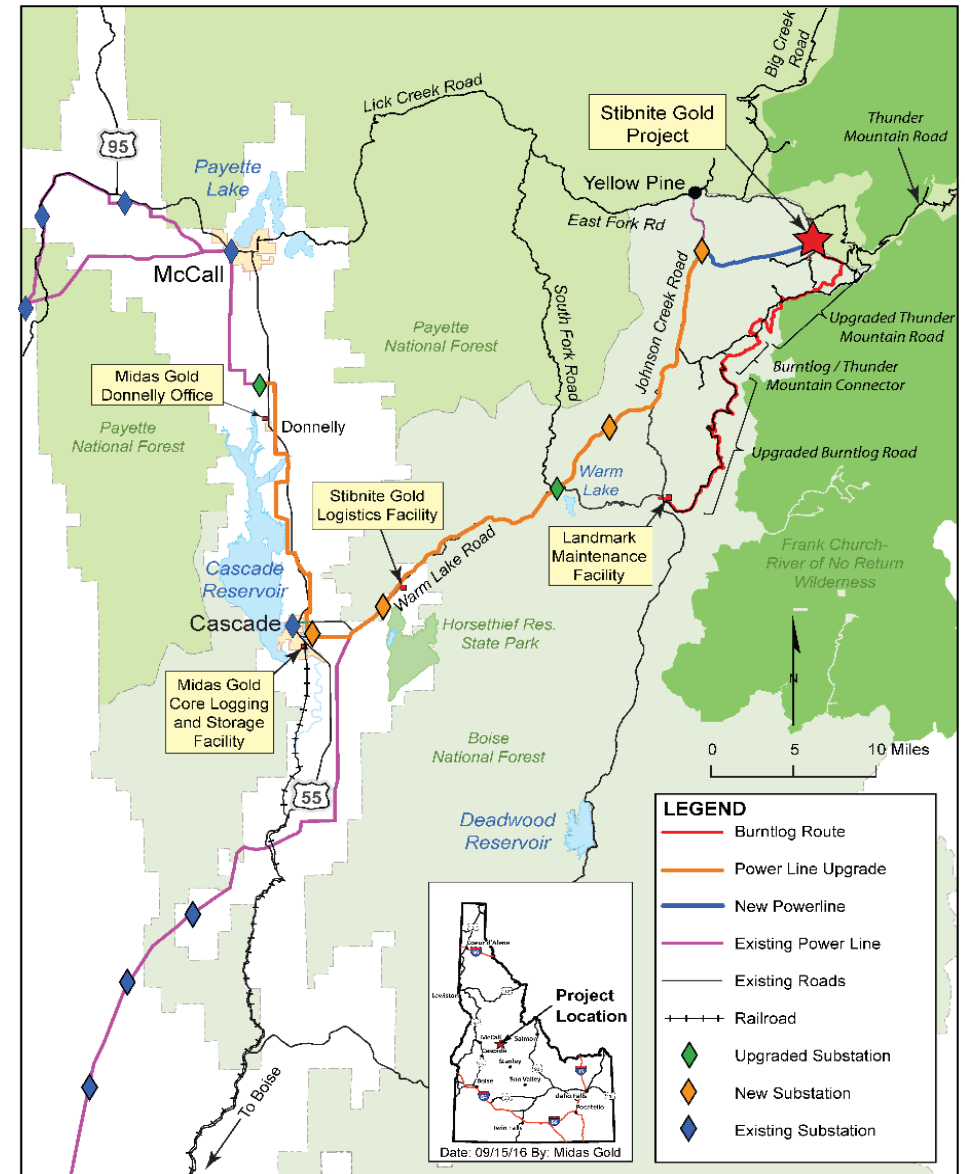
- Consolidate staff transport to the mine site
- Consolidate loads to be hauled up to site
- Reduce dust & sediment generated by vehicles
- Reduce risk of accidents along route
- Reduce greenhouse gas emissions from vehicles



Powerline

The old powerline to the mine site has been removed, but a corridor was retained for future use. This, in addition to construction of a new piece of the corridor, is proposed. This would require:

- Upgrading existing line from Lake Fork substation to a new substation near Johnson Creek airstrip
- Rebuilding line from new substation to Stibnite
- Rebuilt line follows existing and new route
- Rights of way and easements on public and private land may be required





Mining Sequence



1. Process legacy tailing & drain/open Yellow Pine Pit mine



2. Open
Hanger Flats as
an open pit
mine



Proposed general sequencing of mining is based on:

- Prioritizing fish passage to spawning grounds
- Restoring river using development rock from West End
- Balancing the different grade & ore types
- Maintaining a stable workforce & equipment requirements
- Economics of extraction and processing

3. Open
West End as
an open pit
mine



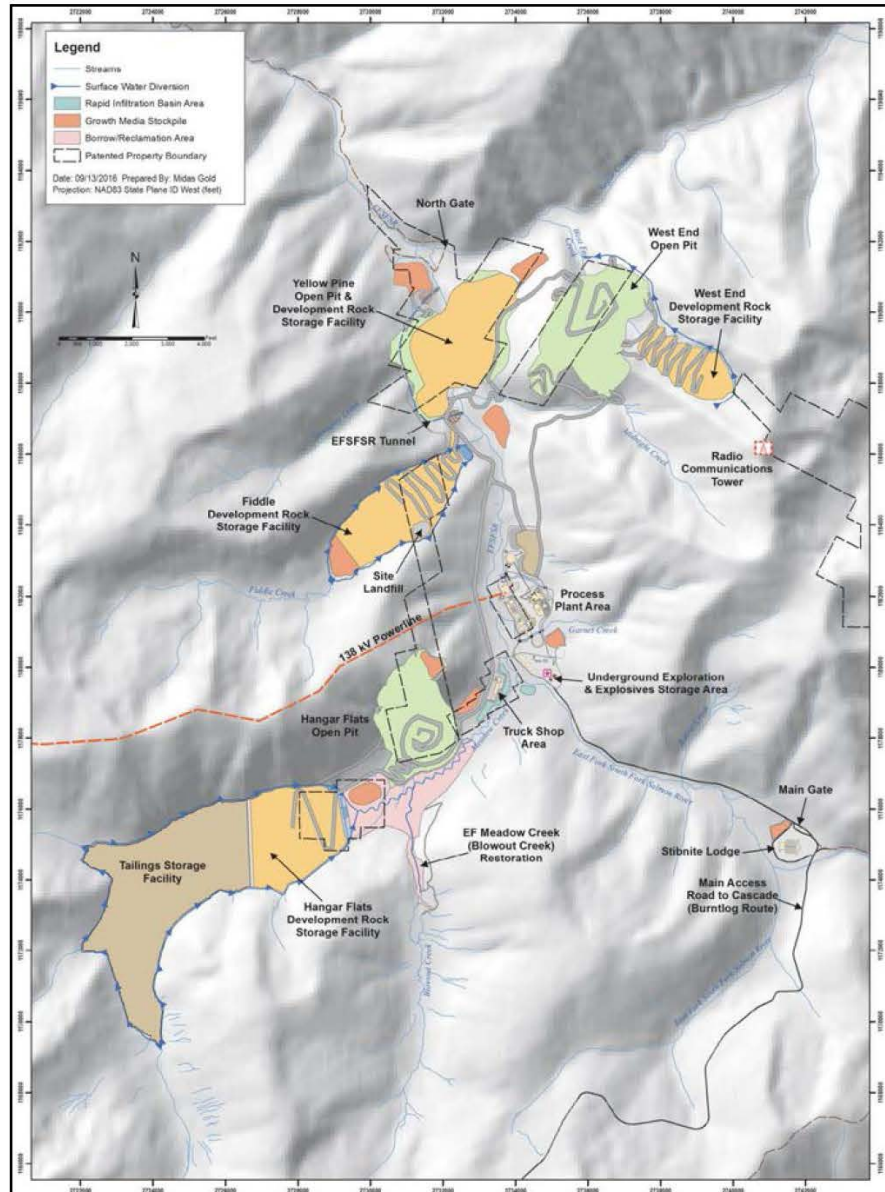


United States
Department of Agriculture



Payette National Forest
Boise National Forest

Stibnite Gold Project





Timeline for Public Scoping

45 Day Public Scoping Period that ends on **July 20, 2017** – **written comments are requested by this date.**

Additional public comment will be received following the publishing of the Draft Environmental Analysis

How to submit comments:

- By Website Comment link at <http://www.fs.usda.gov/goto/payette/StibniteGold>
- By Fax ATTN: Forest Supervisor Keith Lannom- Stibnite Gold EIS at 208-634-0744
- By Email: Email to comments-intermtn-payette@fs.fed.us Include subject line: “Stibnite Gold EIS Scoping Comment”
- At this meeting: Comment forms are available to fill out and leave with the Forest Service tonight or mail via USPS.
- U.S. Postal Service (USPS): Mail a completed/stamped comment form or letter to: Forest Supervisor Keith Lannom- Stibnite Gold EIS Payette National Forest 500 N. Mission St., Bldg 2, McCall, ID 83638

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Public Scoping Notice for the Stibnite Gold Project - 05-31-17

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PUBLIC SCOPING NOTICE FOR THE STIBNITE GOLD PROJECT

DISTRICT: Payette National Forest, Krassel Ranger District and
Boise National Forest, Cascade Ranger District

PROJECT NAME: Stibnite Gold Project Environmental Impact Statement

RESPONSIBLE OFFICIAL: Keith Lannom, Payette National Forest Supervisor

PROJECT CONTACT: Brian Harris, Public Affairs Officer, 1-208-634-0784 or
bdharris@fs.fed.us

SCOPING PERIOD: Comments requested by July 17, 2017

SUBMIT COMMENTS: Preferred via webform on the project webpage

PROJECT WEBSITE: <http://www.fs.usda.gov/goto/payette/StibniteGold>

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Frequently Asked Questions	Pages 24 through 30

NOTICE OF INTENT TO PREPARE AN ENVIRONMENTAL IMPACT STATEMENT

The following information is derived from the Notice of Intent to Prepare an Environmental Impact Statement, which is anticipated to be published in the federal register notice on June 2, 2017.

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Preliminary Issues.....	8
Permits or Licenses Required	8
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SUMMARY:

The Payette National Forest (PNF) is preparing an Environmental Impact Statement (EIS) to evaluate and disclose the potential environmental effects from: (1) Approval of the “Stibnite Gold Project Plan of Restoration and Operations” (Plan) submitted by Midas Gold Idaho, Inc. (Midas Gold) in September 2016, to occupy and use National Forest System (NFS) lands for operations associated with open-pit mining and ore processing; and (2) related amendments to the Payette National Forest Land and Resource Management Plan (Payette Forest Plan, 2003) and/or the Boise National Forest Land and Resource Management Plan (Boise Forest Plan, as amended in 2010).

The United States Army Corps of Engineers (USACE) will cooperate on the preparation of the EIS and evaluate its content to ensure that the EIS can be adopted by the USACE to support an eventual decision to either issue, issue with conditions, or deny a Department of the Army Permit

under Section 404 of the Clean Water Act (CWA) for the Plan. The United States Environmental Protection Agency (EPA) will cooperate on the preparation of the EIS and evaluate its content to ensure that the EIS can be adopted in support of the decision-making process for issuance of a National Pollutant Discharge Elimination System (NPDES) Permit under Section 402 of the CWA.

DATES: Comments concerning the scope of the analysis must be received within 45 days from date of publication in the Federal Register.

ADDRESSES: Webform submission of comments is encouraged. Comments can be submitted via the project webpage at <http://www.fs.usda.gov/goto/payette/StibniteGold> by selecting the ‘Comment on Project’ link on the right side of the page. Written comments may also be sent to Payette National Forest, ATTN: Forest Supervisor Keith Lannom – Stibnite Gold EIS, 500 N. Mission St., Bldg 2, McCall, Idaho 83638. Comments may also be sent via email with a subject line reading “Stibnite Gold EIS Scoping Comment” to comments-intermtn-payette@fs.fed.us or via facsimile (FAX) to 1-208-634-0744. Additional information regarding submittal of comments is provided below in the Scoping Process section. Written comments may also be submitted during public scoping meetings that will be held by the U.S. Forest Service (Forest Service), as follows:

- June 27, 2017, 5:00 – 7:00 p.m., Ashley Inn, Cascade, Idaho
- June 28, 2017, 5:00 – 7:00 p.m., Payette Forest Supervisor’s Office, McCall, Idaho
- June 29, 2017, 1:00 – 3:00 and 5:00 – 7:00 PM, Holiday Inn Express and Suites (Airport), Boise, Idaho

FOR FURTHER INFORMATION CONTACT: Brian Harris, Public Affairs Officer, at 1-208-634-0784 or bdharris@fs.fed.us.

Individuals who use telecommunication devices for the deaf (TDD) may call the Federal Information Relay Service (FIRS) at 1-800-877-8339 between 8 a.m. and 8 p.m., Eastern Time, Monday through Friday.

SUPPLEMENTARY INFORMATION:

The Stibnite Gold Project (Project) is located in both the PNF and BNF. The PNF will be the lead unit for processing and administering the Plan on NFS lands.

Purpose and Need for Action

The purpose of the Forest Service’s action is to provide for approval of the Plan, which would govern occupancy and use of NFS lands for operations that are reasonably incident to mining. To provide for such approval, the Responsible Official needs to determine whether

reasonable changes or additions to the Plan are necessary in order to meet the requirements of regulations set forth in 36 CFR 228 Subpart A and other applicable laws, regulations, or policies, prior to approval.

Midas Gold submitted a plan of operations for mining on NFS lands, titled “Stibnite Gold Plan of Restoration and Operations” (Plan) to the Forest Service in September 2016, in accordance with Forest Service regulations for locatable minerals set forth at 36 Code of Federal Regulations (CFR) 228 Subpart A. In order to comply with its statutory and regulatory obligations to respond to the Plan submitted by Midas Gold, the Forest Service must: (1) evaluate the Plan; (2) consider requirements set forth at 36 CFR 228.8, including those to minimize adverse effects to the extent feasible, comply with applicable laws, regulations, and standards for environmental protection, and provide for reclamation; and (3) respond to the Plan as set forth at 36 CFR 228.5(a). The Responsible Official determined the Plan to be administratively complete in December 2016. Approval of the Plan and issuance of permits under the CWA would be major federal actions subject to the National Environmental Policy Act (NEPA). Accordingly, the federal land management and regulatory agencies must also prepare an EIS to consider and publicly disclose the potential environmental effects of the proposed action.

Proposed Action

The Responsible Official proposes to approve the Plan submitted by Midas Gold, with any modifications determined necessary through the analysis to comply with applicable laws and regulations. USACE would review the Plan and EIS for purposes of evaluating Midas Gold’s application for a Department of the Army Permit under Section 404 of the CWA. EPA would review the Plan and EIS for purposes of evaluating Midas Gold’s application for a related NPDES Permit under Section 402 of the CWA. As described in the Plan, the Project would affect federal, state, and private lands. The proposed action by the Forest Service would only authorize approval of mining-related operations on NFS lands, because the Forest Service does not have jurisdiction to regulate mining operations that occur on private or state land. However, the EIS will consider and disclose environmental effects of mining-related operations that would occur on private and state lands. Connected actions related to the Plan, including but not necessarily limited to CWA permitting by USACE and EPA and related amendments of the Payette and Boise Forest Plans, will be considered. Impacts of past, present, ongoing, and reasonably foreseeable future actions in the Project area will be considered in combination with the impacts of the Project to estimate the potential cumulative impacts of Project implementation.

Project Location

The Project area is located in the upper East Fork of the South Fork of the Salmon River (EFSFSR) drainage, approximately 44 air miles northeast of the City of Cascade and three miles east of the Frank Church-River of No Return Wilderness in Valley County, Idaho. Operations would impact approximately 500 acres of patented mining claims owned or controlled by Midas

Gold and approximately 1,500 acres of federal public lands comprised of adjacent NFS lands administered by the PNF and two supporting-infrastructure corridors located primarily in the BNF. Parts of the Project area, such as the Stibnite mine site, have been impacted by historic mining and ore processing operations. Some of these impacts have been remediated, but legacy mining impacts remain.

Project Description

Midas Gold's stated objective is to economically develop and operate a modern mine, while providing environmental restoration of impacts related to historic mining activities at the site and socioeconomic benefits in surrounding areas. Midas Gold's Plan includes descriptions of the following operations and activities to be conducted on a mixture of NFS, State, and private lands:

- **Redevelopment and Construction (2 to 3 years):** Developing supporting infrastructure, including upgraded and reconstructed powerline, communication sites, upgraded and/or new roads (including a long-term, temporary mine access and public by-pass route), maintenance facility, and onsite housing, oxygen plant, and water management infrastructure; relocation and reuse of spent ore and construction of a lined tailings storage facility; modifying stream channels to reduce sedimentation and restore wetland function and fish passage (including temporarily rerouting the East Fork of the South Fork of the Salmon River [EFSFSR] through a fish-passable tunnel); planting burned areas; initial mining of one open pit (which will require closure of the Stibnite road through the mine site); and constructing development rock storage and temporary ore stockpile facilities, crusher, and ore processing facilities.
- **Mining and Ore Processing (12 to 15 years):** Resuming mining from two historical and one new open pit at a rate of approximately 40,000 to 100,000 tons of material per day; processing up to 25,000 tons per day of ore to recover gold/silver doré and antimony concentrate; historical tailings reprocessing and clean-up; placing neutralized new and reprocessed tailings in the tailings storage facility; placing development rock in four engineered facilities, backfilling Yellow Pine pit; and concurrent reconstruction of stream channels, riparian areas, wetlands, and upland habitat, including restoring the EFSFSR to its approximate original gradient across the backfilled Yellow Pine pit.
- **Initial Closure and Reclamation (2 to 3 years):** Removing structures and facilities; decommissioning temporary roads; recontouring and drainage; additional wetland mitigations; reconstructing various stream channels in the project area and reopening the Stibnite Road through the mine site; and growth media placement and revegetation.
- **Post-Closure and Monitoring (5 to 7 years):** Establishing a wetland on top of the tailings storage facility; reclaiming rock storage facilities; monitoring reclamation and remediation projects.

The Plan includes operational standards and practices to minimize, mitigate or eliminate the potential for negative impacts and environmental monitoring to document compliance and to facilitate adaptive management through the redevelopment, mining, reclamation, and post-closure periods.

An initial review of the consistency of the Plan with both the Payette and Boise Forest Plans indicates that approval of the Plan as submitted would result in conditions that are inconsistent with the forest plans. Amendments to the forest plans may be required to address inconsistencies with Forest Plan standards including standards for recreation, roadless areas, vegetation, visual quality, and wildlife.

Possible Alternatives

The EIS will disclose the effects of the no-action alternative, which, while not within the Responsible Official's discretion, would provide a baseline against which action alternatives can be compared, and the proposed action, approval of Midas Gold's Plan. Additional alternatives and Project design features may be evaluated in the EIS. Alternatives and design features determined reasonable and necessary to meet Forest Service regulations for locatable minerals set forth at 36 CFR 228 Subpart A may require changes and/or additions to the Plan. Further information regarding the nature of the decision(s) to be made is presented in the following section.

Lead and Cooperating Agencies

The Forest Service will be the lead agency preparing the EIS. Currently, five Cooperating agencies have been identified, they are:

- U.S. Environmental Protection Agency (EPA)
- U.S. Army Corps of Engineers (USACE)
- Idaho Department of Lands
- Idaho Department of Environmental Quality
- Governor's Office of Energy and Mineral Resources

Responsible Official

The Forest Supervisor of the PNF has been delegated authority for decisions related to the Plan on the BNF and will be the Responsible Official who prepares the record of decision (ROD) necessary to approve the portions of the Plan on NFS lands. USACE and EPA will prepare final decisions for their respective permitting action(s).

Nature of Decision To Be Made

The Responsible Official will consider the beneficial and adverse impacts of each alternative. With respect to the portions of the Plan on NFS lands, the Forest Service Responsible Official has discretion to determine whether changes in, or additions to, the Plan will be required prior to approval. However, the Responsible Official cannot categorically prohibit operations that are reasonably incident to mining of locatable minerals on NFS lands in the area of the proposed Plan.

Using the analysis in the EIS and supporting documentation, the Forest Service Responsible Official will make the following decisions regarding the Plan:

1. Decide whether to approve the Plan as submitted by Midas Gold, or to require changes or additions to the Plan to meet the requirements for environmental protection and reclamation set forth at 36 CFR 228 Subpart A before approving a final Plan. The Forest Service decision may be to approve a plan of operations composed of elements from one or more of the alternatives considered. The alternative that is selected for approval in the final Plan must minimize adverse impacts on NFS surface resources to the extent feasible.
2. Decide whether to approve amendments to the forest plans, if required in order to approve the final Plan.
3. Decide whether and/or how to mitigate the effects of the proposed mining operation to existing public motorized access.

FINAL EIS AND RECORD OF DECISION

The Forest Service would release a draft ROD in conjunction with the final EIS. The draft ROD would address approval of the Plan, and any related project-specific Forest Plan or Travel Plan amendments that may be required. The draft decision would be subject to 36 CFR 218, "Project-Level Pre-decisional Administrative Review Process." Depending on the nature of the forest plan amendments required, the draft decisions may also be subject to 36 CFR 219 Subpart B, "Pre-decisional Administrative Review Process."

Following resolution of objections to the draft ROD, a final ROD would be issued. As the operator, Midas Gold would have an opportunity to appeal the decision as set forth at 36 CFR 214, "Postdecisional Administrative Review Process for Occupancy and Use of National Forest System Lands and Resources."

Prior to approval of the Plan, Midas Gold may be required to modify the September 2016 Plan to comply with the description of the selected alternative in the final ROD. In addition, the PNF Forest Supervisor would require Midas Gold to submit a reclamation bond or provide proof of

other acceptable financial assurance to ensure that NFS lands and resources involved with the mining operation are reclaimed in accordance with the approved Plan and Forest Service requirements for environmental protection (36 CFR 228.8 and 228.13). After the Forest Service has determined that the Plan conforms to the ROD as well as other regulatory requirements, including acceptance of financial assurance for reclamation, it would approve the Plan. Implementation of mining operations that affect NFS lands and resources may not commence until the reclamation bond or other financial assurance is in place and a plan of operations is approved.

PRELIMINARY ISSUES

Issues to be analyzed in the EIS will be developed during this scoping process. Preliminary issues expected to be analyzed include potential impacts to: access and transportation; aesthetics and visual resources; botanical resources, including wetlands and threatened, endangered, proposed, and sensitive species; climate and air quality; cultural and heritage resources (including Tribal treaty and trust responsibilities); environmental justice; federal land management and environmental protection; fire and fuels management; fisheries and wildlife, including threatened, endangered, proposed, and sensitive species; geochemistry; geology; hazardous materials; land use; long-term, post-closure site management; noise; public health and safety; recreation; roadless and wilderness resources; socioeconomics; soils and reclamation cover materials; timber resources; water resources (groundwater and surface water); and water rights.

PERMITS OR LICENSES REQUIRED

Aspects of the Plan will also require other permitting, including by the Idaho Departments of Lands, Environmental Quality, and Water Resources.

SCOPING PROCESS

This notice of intent initiates the scoping (public involvement) process, which guides the development of the EIS. Public comments may be submitted to the PNF in a variety of ways, including: via the project Website, via email, by mail, and via FAX. In addition, the PNF will conduct scoping meetings, during which members of the public can learn about the Forest Service proposed action and the NEPA process and submit written comments. Comments sought by the PNF include comments specific to the proposed action, information that could be pertinent to analysis of environmental effects, identification of significant issues, and identification of potential alternatives.

Written comments may be sent to: Payette National Forest, ATTN: Forest Supervisor Keith Lannom - Stibnite Gold EIS, 500 N. Mission St., Bldg 2, McCall, ID 83638. Comments may also be sent via email with a Subject Line reading "Stibnite Gold EIS Scoping Comment" to

comments-intermtn-payette@fs.fed.us, submitted via Web site at <http://www.fs.usda.gov/goto/payette/StibniteGold>, or sent via FAX to 1-208-634-0744.

It is important that reviewers provide their comments at such times and in such manner that they are useful to preparation of the EIS. Therefore, to be most useful, comments should be provided prior to the close of the scoping comment period and should clearly articulate the reviewer's concerns and contentions.

Comments submitted anonymously will be accepted and considered; however, without an associated name and address, receiving further correspondences concerning the proposed action will not be possible and those individuals will not have standing for objection.

SCOPING MEETING DISPLAY BOARDS

The following pages present the 13 display boards that will be presented at the public scoping meetings.

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Forest Service Proposed Action and Purpose and Need.....	12
Agency Roles and Responsibilities.....	13
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Stibnite Gold Project



Welcome!

Welcome to the public scoping meeting for the **Stibnite Gold Project Environmental Impact Statement (EIS)**.

While you are here, please take time to learn about the proposed project, ask questions, and discuss your concerns with the Forest Service project manager and resource specialists involved with this project.

Written comments are requested by **July 17, 2017**.



Stibnite Gold Project



Forest Service Proposed Action and Purpose and Need

In September 2016, Midas Gold submitted to the U. S. Forest Service (Forest Service) a Plan of Restoration and Operations (Plan) to occupy and use National Forest System (NFS) lands in both the Payette National Forest (PNF) and the Boise National Forest (BNF) for operations associated with open-pit mining and ore processing. In order to comply with its statutory and regulatory obligations, the Forest Service must evaluate and respond to the Plan with consideration of applicable laws, regulations, and standards for environmental protection and reclamation.

Forest Service Proposed Action: The PNF proposes to approve the Plan, with any modifications determined necessary through the analysis to comply with applicable laws and regulations. The Proposed Action by the Forest Service would only authorize approval of mining-related operations on NFS lands, because the Forest Service does not have jurisdiction to regulate mining operations that occur on private or state land.

Forest Service Purpose and Need: The **purpose** is to provide for approval of a Plan, which would govern occupancy and use of NFS lands for operations that are reasonably incident to mining. To provide for such approval, the Forest Service **needs** to determine whether reasonable changes or additions to the Plan are necessary in order to meet the requirements of regulations set forth in 36 Code of Federal Regulations (CFR) 228 Subpart A and other applicable laws, regulations, or policies, prior to approval.



Stibnite Gold Project



Agency Roles and Responsibilities

The Forest Service will evaluate and disclose the potential environmental impacts of Midas Gold's Plan in an Environmental Impact Statement (EIS). The **PNF is the Lead Agency** with responsibility for preparing the EIS.

Lead Agency responsibilities and decisions include the following:

- Conformance determination of the Plan (and alternatives) with the Payette and Boise National Forest's Land and Resource Management Plans;
- Adequacy of the EIS to reach an informed decision regarding the Plan and alternatives;
- Approval of the Plan, a different alternative, or a combination of alternatives;
- Conditions of Approval that may be attached to the Record of Decision (ROD); and
- Any related permitting (e.g. special uses).

Cooperating Agencies are government agencies with jurisdiction by law or special expertise on issues addressed in the EIS. The U.S. Environmental Protection Agency (EPA), U.S. Army Corps of Engineers (USACE), Governor's Office of Energy and Mineral Resources, Idaho Department of Lands (IDL), and Idaho Department of Environmental Quality (IDEQ) will be cooperating agencies on the EIS. Each agency has special expertise and/or jurisdiction over permits that will be required for operation of the project. Other agencies or governmental entities may join as cooperators during the NEPA process. Federal permits required include a Clean Water Act (CWA) section 404 permit to fill waters of the United States (issued by the USACE); and a National Pollutant Discharge Elimination System (NPDES) CWA section 402 permit (issued by the EPA).



Stibnite Gold Project



NEPA Process

Forest Service actions

The **Draft EIS** will:
 1) identify different alternatives that meet the purpose and need while addressing resource conflicts;
 2) disclose the effects of each alternative on the natural and human environment; and
 3) identify mitigation that may be applied to reduce impacts.

The **Final EIS** will include all public comments and Forest Service's responses to the comments, and will disclose the Agency-preferred Alternative. The **Draft ROD** will disclose the proposed decision on which alternative analyzed in the EIS may be implemented, as well as any Conditions of Approval.

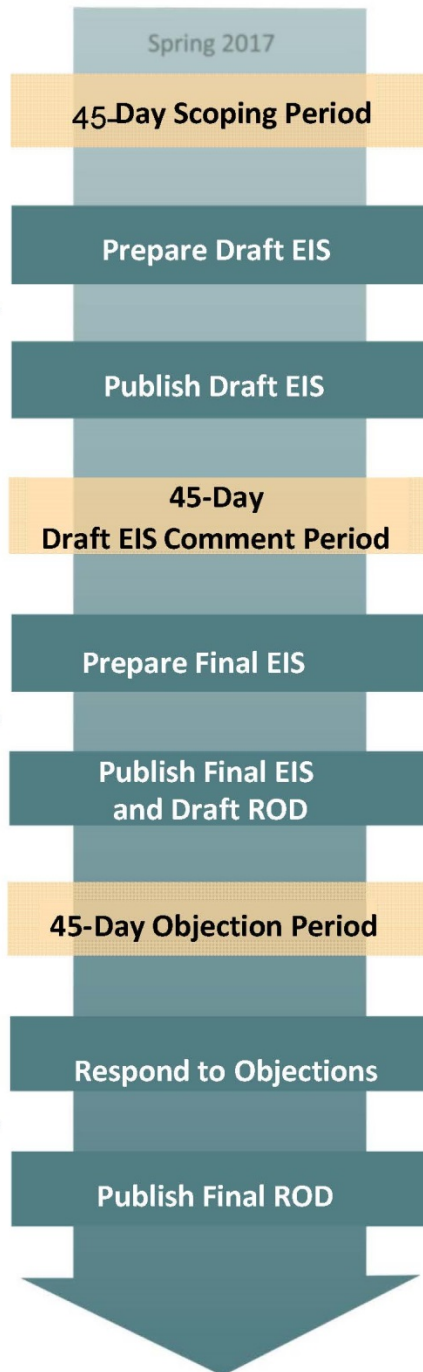
The Forest Service will release the **Final ROD** after responding to all objections.

Public Outreach opportunities

During **Public Scoping**, the public provides input regarding project and resource concerns. This input is used to identify issues to be addressed through alternatives development or EIS analysis.

The Draft EIS public comment period will allow for public comment on the proposed action and alternatives and the analysis contained in the EIS document.

The Objection period provides an opportunity for all interested and affected parties who provided written comment during scoping or the Draft EIS comment period to provide comments regarding the proposed decision.





Stibnite Gold Project



Project Description

Midas Gold's Plan of Restoration and Operations (Plan) to redevelop and mine the historically impacted Stibnite, Idaho, mine site includes descriptions of the following operations and activities to be implemented on a mixture of NFS, State, and private lands:

- Redevelopment and Construction (2 to 3 years):** Developing supporting infrastructure (including powerline, communication sites, roads, maintenance facility, and onsite housing, oxygen plant, and water management infrastructure); relocation and reuse of spent ore and construction of a lined tailings storage facility; modifying stream channels to reduce sedimentation and restore wetland function/fish passage (including temporarily rerouting the East Fork of the South Fork of the Salmon River [EFSFSR] through a fish-passable tunnel); planting burned areas; initial mining of one open pit (which will require closure of the Stibnite road through the mine site); and developing rock storage facilities, temporary ore stockpile facilities, crusher, and ore processing facilities.
- Mining and Ore Processing (12 to 15 years):** Resuming mining from two historical and one new open pit at a rate of approximately 40,000 to 100,000 tons of material per day; processing up to 25,000 tons per day of ore to recover gold/, silver dorè and antimony concentrate; historical tailings reprocessing and clean-up; placing neutralized new and reprocessed tailings in the tailings storage facility; placing development rock in four engineered facilities, backfilling Yellow Pine pit; and concurrent reconstruction of stream channels, riparian areas, wetlands and upland habitat, including restoring the EFSFSR to its approximate original gradient across the backfilled Yellow Pine pit.
- Initial Closure and Reclamation (2 to 3 years):** Removing structures and facilities; decommissioning temporary roads; recontouring and drainage; additional wetland mitigations; reconstructing the Stibnite Road and various stream channels in the project area; and growth media placement and revegetation.
- Post-Closure and Monitoring (5 to 7 years):** Establishing a wetland on top of the tailings storage facility; reclaiming rock storage facilities; monitoring reclamation and remediation projects.

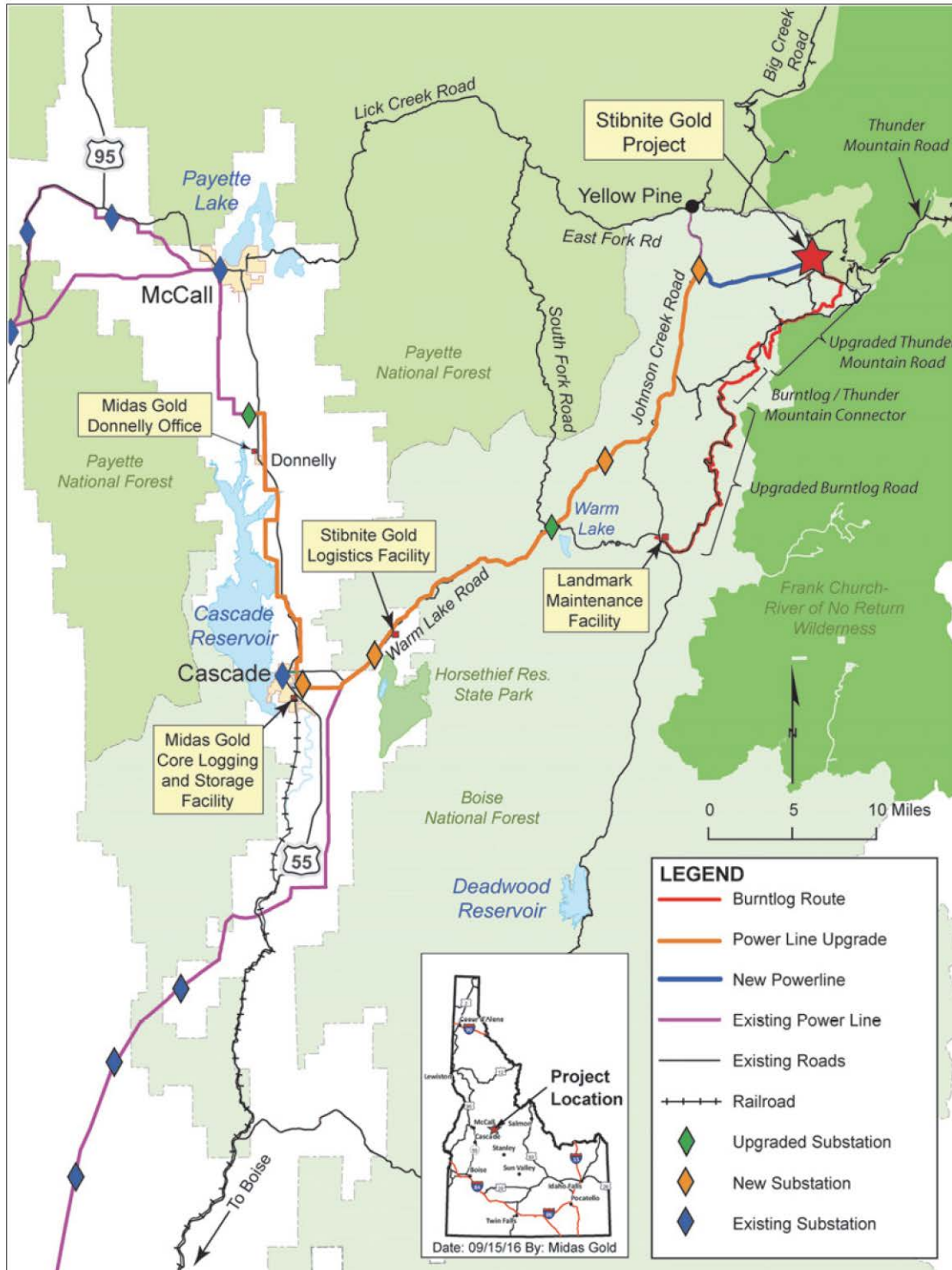
The Plan includes operational standards and practices to minimize, mitigate or eliminate the potential for negative impacts and environmental monitoring to document compliance and facilitate adaptive management through the redevelopment, mining, reclamation, and post-closure periods.



Stibnite Gold Project



Project Area Overview

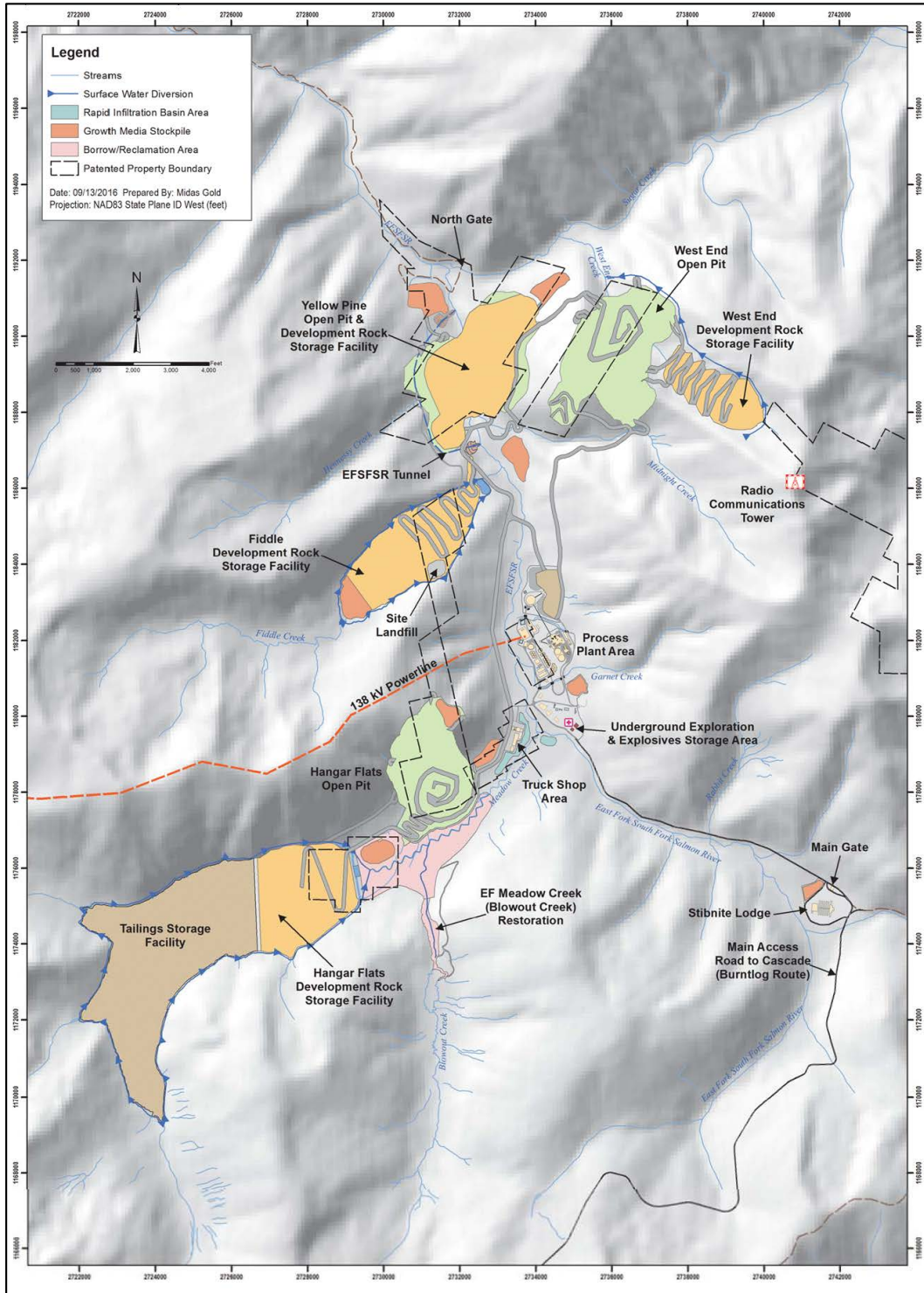




Stibnite Gold Project



Mine Site Plan





Stibnite Gold Project



Water Resources

The project area includes eight named perennial tributaries of the East Fork of the South Fork of the Salmon River (EFSFSR): Meadow Creek, East Fork Meadow Creek (also known as Blowout Creek), Fiddle Creek, Garnet Creek, Midnight Creek, Lower Sugar Creek (also known as Hennessy Creek), Rabbit Creek, and West End Creek. Baseline studies have identified 323 acres of wetlands within the project area.

Groundwater occurs primarily in alluvial sediments in the Meadow Creek and EFSFSR valley floors. Artesian conditions have been encountered in fault zones in the Yellow Pine and West End pit areas.

Midas Gold holds both established and temporary water rights in the project area and plans to secure additional groundwater water rights to support ore processing and potable water supply during the life of the Project and plans to mitigate wetland impacts. Midas Gold also plans to obtain a National Pollutant Discharge Elimination System (NPDES) permit for three different discharges to waters of the U.S. and a Department of Army 404 permit (to fill waters of the US).

EIS Analysis Considerations

- Examine variations in groundwater pumping to dewater the mine pits by alternative
- Evaluate groundwater drawdown and water management effects to groundwater, surface waters, and aquatic habitat based on groundwater modeling results
- Assess potential impacts to groundwater and surface water quality
- Evaluate water use in relation to established and proposed water rights



Stibnite Gold Project



Wildlife and Aquatic Resources

Wildlife

There is suitable habitat in the project area for the federally-listed Canada lynx, and 19 Forest Service-sensitive species (white-headed woodpecker, American three-toed woodpecker, boreal owl, fisher, flammulated owl, great gray owl, northern goshawk, pileated woodpecker, mountain quail, wolverine [candidate species for ESA listing], gray wolf, mule deer, Rocky Mountain bighorn sheep, Rocky Mountain elk, spotted bat, Townsend's big-eared bat, bald eagle, Columbian spotted frog and harlequin duck). Field investigations recorded evidence of three individual wolverines, but found no evidence of Canada lynx or fisher.

EIS Analysis Considerations

The Forest Service will prepare a Biological Assessment (BA)/ Biological Evaluation (BE) for listed or sensitive species. Issues to be addressed in the EIS and BA/BE:

- What effects would habitat loss, habitat fragmentation, and noise have on wildlife and aquatic resources, including migratory birds and special status species?
- Would the post-mining pit lakes pose a risk to terrestrial and/or aquatic biota?
- How effective would the applicant-committed environmental protection measures (such as reclamation) be in minimizing impacts? Would additional mitigation measures be needed?

Aquatic Resources

There are three federally listed fish species in the project area, the Columbia River bull trout, Snake River spring/summer Chinook salmon, and Snake River Basin steelhead, and one Forest Service-sensitive species (Westslope cutthroat trout). Several streams in the project area are Essential Fish Habitat for anadromous species and designated Critical Habitat for Chinook salmon, steelhead, and bull trout. Other fish species present include mountain whitefish, sculpin, longnose dace, largescale sucker, and brook trout.



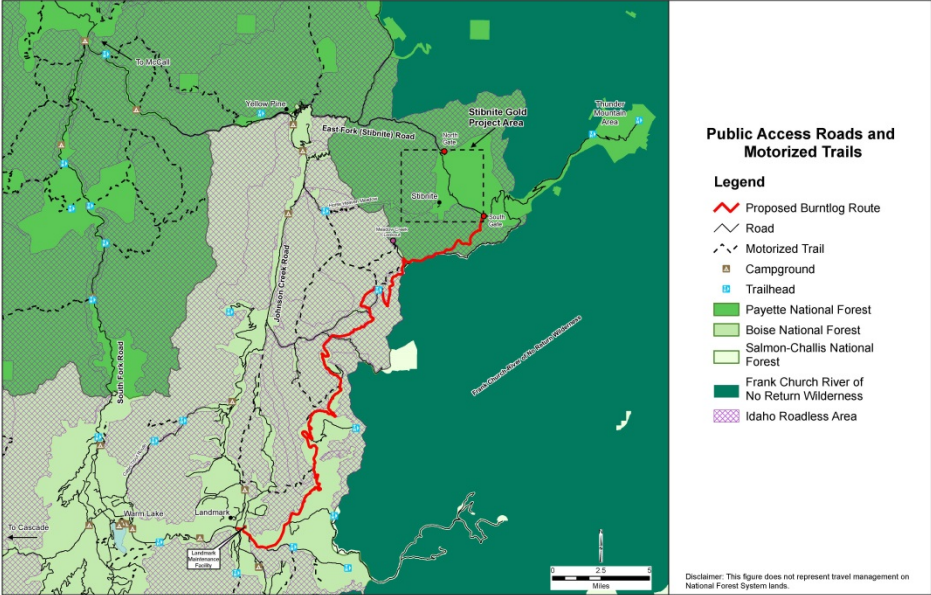
Stibnite Gold Project



Transportation and Public Access

The project site is currently accessible through Yellow Pine via Johnson Creek or the South Fork and East Fork South Fork and Stibnite Roads. Midas Gold’s Plan includes the following changes to transportation routes and public access:

- Upgrading and extending the Burntlog road to the mine site.
- Closing Stibnite Road just above Sugar Creek at the north end of the project area during active operations
- Connecting Horse Heaven/powerline road to Meadow Creek lookout as a motorized trail
- Plowing Warm Lake Road to Landmark and the Burntlog route to the project site
- Grooming Cabin Creek/Trout Creek trail to provide public winter access to Landmark



- Reclaiming/decommissioning the Burntlog route and re-opening public access from Yellow Pine on the Stibnite Road through the reclaimed mine site.

EIS Analysis Considerations

How would the project affect public access in and near the project area? How would the project affect traffic, road integrity, and access in and around the project area? What actions can be incorporated to reduce traffic-related impacts such as dust, sediment and greenhouse gases generated by vehicles, and minimize the risk of accidents along the route?



Stibnite Gold Project



Recreation and Visual Resources, Roadless Areas and Wilderness

Recreation Resources: The project area supports low to moderate dispersed recreation, including hunting, hiking, fishing, camping, all-terrain vehicle (ATV) use, snowmobiling, horseback riding, and sightseeing (interpretive signage at Stibnite describing mining history). Many users, including permitted outfitters and their clients, drive through the area to use the adjacent Frank Church River of No Return Wilderness Area, especially during big-game hunting seasons. Most trails in the area are open to some form of motorized recreation.

Visual Resources: Most of the area is managed with a visual quality objective (VQO) of “retention” and “partial retention” (“retention” refers to landscapes where the valued landscape character “appears” intact; “partial retention” refers to landscapes where the valued landscape characters “appear slightly altered”).

EIS Analysis Considerations

The EIS will examine impacts to access, seasonal and year-round recreation opportunities, visual resources, and wilderness characteristics. It will also analyze and disclose any project-level Forest and/or Travel Plan amendments that may be required to approve Midas Gold’s Plan. Forest Service may consider alternatives or design features that would require changes or additions to the Plan in order to comply with applicable law, regulation and/or policy.

Inventoried Roadless Areas and Designated Wilderness: An **inventoried roadless area (IRA)** is specifically defined as an area that meets the minimum criteria for wilderness as defined by the Wilderness Act of 1964 and Forest Service guidelines. Areas designated as **Wilderness** have management objectives for preserving their wilderness attributes, which include natural integrity, apparent naturalness, opportunities for solitude and primitive recreation, special features or values, and wilderness manageability and boundaries.

There are eight IRAs located in and adjacent to the project area; additional IRAs are located along or near the proposed power transmission corridor. The Frank Church River of No Return Wilderness is located three (3) miles to the east of the project area. The Burntlog route is adjacent to the Wilderness Area.



Stibnite Gold Project



Other Resource Issues

Other key resource issues to be examined in the EIS include:

Air Quality and Climate: How would the project impact air quality in the project vicinity and region? What would be the contribution to mercury emissions and deposition and emission of other hazardous air pollutants? How would the project contribute to greenhouse gas emissions and climate change?

Cultural and Heritage Resources: What is the potential for impacts to historic or ancestral Native American objects, artifacts, or sites? How would the project affect the Stibnite National Historic District, which is included in the National Register of Historic Places for its historic context?

Socioeconomics and Environmental Justice: How would the project contribute to direct and indirect social and

economic impacts and benefits, including those to special use permit holders? Would the project disproportionately affect minority or low income populations?

Hazardous Materials, Human Health and Safety and Noise: How would public health and safety issues resulting from increased ore transportation, potential chemical spills or fires, increased access in the project area or reclamation of previously contaminated areas be minimized? How would noise from new construction and expanded operations be minimized?

Soils, Botanical Resources, Vegetation and Timber: How will the project minimize impacts to riparian, wetland and upland vegetation communities and sensitive species? How will the project control the spread of invasive species? How will the project development and restoration affect timber resources?

EIS Analysis Considerations

The EIS will identify and take into consideration the applicant-committed environmental protection measures designed to minimize impacts to these resources. Additional mitigation measures may be identified based on the results of the impact analysis.



Stibnite Gold Project



How to Comment

You may submit written scoping comments by any of the following methods:

By Website

Comment link at

<http://www.fs.usda.gov/goto/payette/StibniteGold>

By Fax

ATTN: Forest Supervisor Keith Lannom- Stibnite Gold EIS at
1-208-634-0744

By Email

Email to comments-intermtn-payette@fs.fed.us

Include Subject Line: "Stibnite Gold EIS Scoping Comment"

Effective Public Commenting: The most helpful comments are those that are timely, specific, and actionable in regard to the **content of the EIS**. Examples include: 1) new data or information regarding the affected environment or analysis methodologies; 2) a specific resource concern that should be analyzed in the EIS; 3) an alternative element that meets the purpose and need statement and should be considered in the range of alternatives; or 4) mitigation or other suggestions to reduce impacts.

WRITTEN COMMENTS ARE REQUESTED BY July 17, 2017.

Comments received in response to this solicitation, including names and addresses of those who comment, will be part of the public record for this proposed action. Comments submitted anonymously will be accepted and considered, however.

At This Meeting

Comment forms are available to fill out and leave with the Forest Service tonight or mail via USPS.

U.S. Postal Service (USPS) Mail

Mail a completed/stamped comment form or letter to:

Forest Supervisor Keith Lannom- Stibnite Gold EIS
Payette National Forest
500 N. Mission St., Bldg 2
McCall, ID 83638

FREQUENTLY ASKED QUESTIONS

The following pages contain the information in a Frequently Asked Questions document that will be distributed at the public scoping meetings.

What is the Stibnite Gold Project?	24
What is the role of the Forest Service and other agencies in this project?	25
What is NEPA?	27
What is Public Scoping and how can I best participate?.....	28
What is the Objection Process?.....	29
Where should I submit my scoping comments?	30
After Scoping, when is the next opportunity for public involvement?	31

WHAT IS THE STIBNITE GOLD PROJECT?

Midas Gold submitted a plan of operations for mining on National Forest System (NFS) lands, titled “Stibnite Gold Plan of Restoration and Operations” (Plan) to the Forest Service in September 2016, in accordance with Forest Service regulations for locatable minerals set forth at 36 Code of Federal Regulations (CFR) 228 Subpart A. Midas Gold’s stated objective is to economically develop and operate a modern mine, while providing environmental restoration of impacts related to historic mining activities at the site and socioeconomic benefits in surrounding areas. Midas Gold’s Plan includes descriptions of the following operations and activities to be implemented on a mixture of NFS, State, and private lands:

- **Redevelopment and Construction (2 to 3 years):** Developing supporting infrastructure, including upgraded and reconstructed powerline, communication sites, upgraded and new roads (including a long-term, temporary mine access and public bypass route), maintenance facility, and onsite housing, oxygen plant, and water management infrastructure; relocation and reuse of spent ore and construction of a lined tailings storage facility; modifying stream channels to reduce sedimentation and restore wetland function and fish passage (including temporarily rerouting the East Fork of the South Fork of the Salmon River [EFSFSR] through a fish-passable tunnel); planting burned areas; initial mining of one open pit (which will require closure of the Stibnite

road through the mine site); and developing rock storage and temporary ore stockpile facilities, crusher, and ore processing facilities.

- **Mining and Ore Processing (12 to 15 years):** Resuming mining from two historical and one new open pit at a rate of approximately 40,000 to 100,000 tons of material per day; processing up to 25,000 tons per day of ore to recover gold/silver dorè and antimony concentrate; historical tailings reprocessing and clean-up; placing neutralized new and reprocessed tailings in the tailings storage facility; placing development rock in four engineered facilities, backfilling Yellow Pine pit; and concurrent reconstruction of stream channels, riparian areas, wetlands, and upland habitat, including restoring the EFSFSR to its approximate original gradient across the backfilled Yellow Pine pit.
- **Initial Closure and Reclamation (2 to 3 years):** Removing structures and facilities; decommissioning temporary roads; recontouring and drainage; additional wetland mitigations; reconstructing various stream channels in the project area and reopening the Stibnite Road through the mine site; and growth media placement and revegetation.
- **Post-Closure and Monitoring (5 to 7 years):** Establishing a wetland on top of the tailings storage facility; reclaiming rock storage facilities; monitoring reclamation and remediation projects.

The Plan includes operational standards and practices to minimize, mitigate or eliminate the potential for negative impacts and also includes environmental monitoring to document compliance and facilitate adaptive management through the redevelopment, mining, reclamation, and post-closure periods.

The project area is located in the upper East Fork South Fork Salmon River (EFSFSR) drainage approximately 44 air miles northeast of the city of Cascade and three miles east of the Frank Church-River of No Return Wilderness in Valley County, Idaho. Operations would impact approximately 500 acres of patented mining claims owned or controlled by Midas Gold and approximately 1,500 acres of Federal public lands comprised of adjacent NFS lands administered by the Payette National Forest (PNF) in the historic Stibnite Mining District and two supporting-infrastructure corridors located primarily in the Boise National Forest (BNF).

WHAT IS THE ROLE OF THE FOREST SERVICE AND OTHER AGENCIES IN THIS PROJECT?

In order to comply with its statutory and regulatory obligations to respond to a mining Plan submitted by Midas Gold, the Forest Service must: (1) Evaluate the Plan; (2) consider requirements set forth at 36 CFR 228.8, including those to minimize adverse effects to the extent feasible, comply with applicable laws, regulations, and standards for environmental protection,

and provide for reclamation; and (3) respond to the Plan as set forth at 36 CFR 228.5(a). The Forest Service fulfills these obligations by analyzing and disclosing the potential environmental impacts of the proposed project under the National Environmental Policy Act (NEPA).

The PNF, acting as the **Lead Agency**, is preparing an **Environmental Impact Statement (EIS)** to evaluate and disclose the potential environmental effects from: (1) Approval of the Plan submitted by Midas Gold in September 2016, to occupy and use (NFS) lands for operations associated with open-pit mining and ore processing; and (2) related amendments to the Payette National Forest Land and Resource Management Plan (Payette Forest Plan, 2003) and/or the Boise National Forest Land and Resource Management Plan (Boise Forest Plan, as amended in 2010).

The United States Army Corps of Engineers (USACE) will cooperate on the preparation of the EIS and evaluate its content to ensure that the EIS can be adopted by the USACE to support an eventual decision to either issue, issue with conditions, or deny a Department of the Army Permit under Section 404 of the Clean Water Act (CWA) for the Plan. The United States Environmental Protection Agency (EPA) will cooperate on the preparation of the EIS and evaluate its content to ensure that the EIS can be adopted in support of the decision-making process for issuance of a National Pollutant Discharge Elimination System (NPDES) Permit under Section 402 of the CWA. The PNF will evaluate Midas Gold's Plan and decide whether to approve the Plan, as submitted or as reasonably modified to meet regulatory requirements for environmental protection, based on the analysis of the Proposed Action and alternatives in the EIS. The Forest Supervisor of the PNF has been delegated authority for decisions related to the Plan on the BNF and will be the Responsible Official who prepares the Record of Decision (ROD) necessary to approve the portions of the Plan on NFS lands.

A "**Cooperating agency**" is an agency that has jurisdiction by law or special expertise with respect to any environmental impact involved in a proposal (or a reasonable alternative). A cooperating agency typically will have some responsibilities for the EIS analysis related to its jurisdiction or special expertise, and will use that analysis to inform relevant permitting decisions, as applicable. These responsibilities are defined in a memorandum of understanding with the Forest Service. To date, five cooperating agencies have been identified:

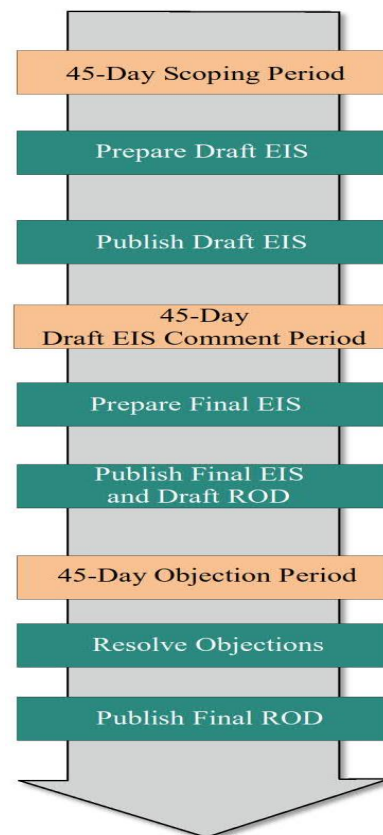
- **U.S. Environmental Protection Agency (EPA):** has special expertise regarding NEPA compliance. Decisions to be made include whether, and under what conditions, to issue a CWA NPDES Permit, approve the Stormwater Pollution Prevention Plan and Spill Prevention Control and Countermeasure Plan.
- **U.S. Army Corps of Engineers (USACE):** has jurisdiction over waters of the United States (WUS), including wetlands. The USACE's decision to be made will be whether, and under what conditions, to issue a CWA Section 404 permit for discharge of dredged or fill material into WUS.

- **Governor’s Office of Energy and Mineral Resources:** coordinates and cooperates with federal and state agencies, departments and divisions on issues concerning the State’s mineral supply and management.
- **Idaho Department of Lands (IDL):** regulates and has special expertise in surface mining and reclamation on all lands in the State of Idaho, and provides approval of the Mining Operation Plan, Reclamation Plan and Reclamation Financial assurance.
- **Idaho Department of Environmental Quality (IDEQ):** has special expertise in surface and ground water quality, cyanidation operations, hazardous and solid waste management, and air quality and has jurisdiction over the following permits: Air Quality Permit to Construct, Air Quality Operating Permit, Cyanidation Permit, Wastewater Treatment Permit, Groundwater Rule Permit, Drinking Water Permit, Water Treatment permits, and Solid Waste permits.

A **third-party contractor**, AECOM, has been selected to assist the PNF help carry out the Forest Service’s NEPA responsibilities, including public outreach and preparation of the EIS and other associated environmental documents.

WHAT IS NEPA?

National Environmental Policy Act of 1969, as amended (NEPA), is a procedural Act aimed at ensuring that environmental information is available to the public and to public officials before decisions are made and actions taken. The implementation of this Act is commonly referred to as “the NEPA process” or “the environmental impact assessment process.” The NEPA process must be completed **before** an agency makes a final decision on a proposed action. The level of impact assessment that is required varies by project type and scope; a federal agency must prepare an EIS if it is proposing a major federal action significantly affecting the quality of the human environment. The accompanying graphic outlines the key phases associated with the Stibnite Gold Project EIS Process.



NEPA is...

- A formal structured process prior to federal decision-making
- Provides for public involvement in federal decisions
- Requires development and analysis of alternatives to a proposed federal action
- Requires federal agency to analyze and disclose effects in an environmental document

NEPA is not...

- A voting process or other measure of relative support or opposition to a proposed action
- Does not provide a federal agency with decision-making authority
- Does not overrule other federal laws

Additional resources on NEPA can be found here:

- <https://www.whitehouse.gov/ceq/nepa>
- <http://www.fs.fed.us/emc/nepa/>
- https://ceq.doe.gov/docs/get-involved/Citizens_Guide_Dec07.pdf

WHAT IS PUBLIC SCOPING AND HOW CAN I BEST PARTICIPATE?

Scoping is the initial phase of NEPA process, during which agencies and the public “scope” issues related to the proposed project. This input regarding project and resource concerns is used to identify “issues” to be addressed through alternatives development or EIS analysis. An **issue** is a point of uncertainty, disagreement or dispute about an effect that would be caused by the Project. The best way to participate in scoping is to

- Read about the project online at <http://www.fs.usda.gov/goto/payette/StibniteGold> or provide written comments at a public scoping meeting
- Ask questions and express your concerns freely and openly
- Provide written comments to help the Forest Service develop a comprehensive EIS

The most helpful comments you can provide are those that are specific and actionable in regard to the content of the EIS. Examples include: 1) new data or information regarding the affected environment or analysis methodologies; 2) a specific resource concern that should be analyzed in

the EIS; 3) an alternative element that meets the purpose and need statement and should be considered in the range of alternatives; or 4) mitigation or other suggestions to reduce impacts.

Example: “The EIS should consider the potential for acid rock drainage to leak into underground aquifers and to contaminate springs and other water sources downstream.”

Comments are *least* helpful when they simply express a personal opinion, address issues that are beyond the scope of this project or the beyond the legal authority of the Forest Service to influence or change.

Example: “Mining is terribly destructive. Mining should not be allowed on any Forest lands.”

While these types of comments are noted and recorded, they do not help the Forest Service with development of the EIS.

WHAT IS THE OBJECTION PROCESS?

The draft decision for the project and activities are subject to the pre-decisional objection process pursuant to 36 CFR 218, Subparts A and B, “Project-Level Pre-decisional Administrative Review Process”. The regulation provides that “all interested and affected parties who provided written comment as defined in §218.2 during scoping or the comment period will be eligible to participate in the objections process.” Depending on the nature of the forest plan amendments required, the draft decisions may also be subject to 36 CFR 219 Subpart B, “Pre-decisional Administrative Review Process.”

The Forest Service's objection process provides an opportunity for members of the public who have participated in the planning process to have any unresolved concerns reviewed by the Forest Service prior to a final decision by the Responsible Official. An objection typically includes a statement of the issues and/or parts of the plan, plan amendment, or plan revision to which the objection applies; an explanation of the objections and suggestions as to how the draft plan decision may be improved (or an explanation of why the plan, plan amendment, or plan revision is inconsistent with law, regulation, or policy), and a statement that demonstrates the link between the objector's prior substantive formal comments and the content of the objection, unless the objection concerns an issue that arose after the opportunities for formal comment.

Only those who provided **substantive formal comments** during previous opportunities for public comment during the planning process are eligible to file an objection. Comments are considered substantive when they are within the scope of the proposal, are specific to the proposal, have a direct relationship to the proposal, and include supporting reasons for the responsible official to consider.

To be eligible to submit an objection, individuals and entities must also have provided the following during the comment period: 1) name and postal address (email address is recommended but not required); 2) title of the proposed project or activity; 3) specific written comments as defined in §218.2 regarding the proposed project or activity, along with supporting reasons, and 4) signature or other verification of identity upon request and identification of the individual or entity who authored the comments. For comments listed multiple entities or multiple individuals, a signature or other means of verification must be provided for the individual authorized to represent each entry and for each individual in the case of multiple names. A scanned signature or other means of verifying the identity of the individual or entity representative may be used for electronically submitted comments. Individual members of an entity must submit their own comments to establish personal identity; comments received on behalf of an entity are considered as those of the entity only.

WHERE SHOULD I SUBMIT MY SCOPING COMMENTS?

Comments can be submitted via the project webpage at <http://www.fs.usda.gov/goto/payette/StibniteGold> by selecting the ‘Comment on Project’ link on the right side of the page.

While Webform submission of comments is encouraged, you may also submit written scoping comments by any of the following methods:

- Submit a comment form or letter at a public scoping meeting
- By email: comments-intermtn-payette@fs.fed.us, with a subject line reading “Stibnite Gold EIS Scoping Comment”
- By Fax: ATTN: Forest Supervisor Keith Lannom- Stibnite Gold EIS at 1-208-634-0744
- U.S. Postal Service (USPS) Mail: Mail a completed/stamped comment form or letter to:

Forest Supervisor Keith Lannom- Stibnite Gold EIS
500 N. Mission St., Bldg 2, McCall, ID 83638

Scoping comments are requested by **July 17, 2017**. Comments received in response to this solicitation, including names and addresses of those who comment, will be part of the public record for this proposed action. Comments submitted anonymously will be accepted and considered; however as noted above, 36 CFR 218 requires comments to contain certain identifiers in order to be eligible to file an objection (see Objection Process, above, or a description of requirements).

AFTER SCOPING, WHEN IS THE NEXT OPPORTUNITY FOR PUBLIC INVOLVEMENT?

After conclusion of the scoping period, the Forest Service will develop the Draft EIS. The Draft EIS will identify different alternatives that meet the Forest Service purpose and need and address issues identified during the scoping process; disclose the effects of each alternative on the natural and human environment; and identify mitigation that may be applied to reduce impacts. The Draft EIS is expected to be released in 2018. Following publication of the Draft EIS, the Forest Service will hold a 45-day **Draft EIS public comment period** to allow the public to review the Draft EIS and provide comments on the proposed action and alternatives, and the analysis contained in the EIS document. The Forest Service will hold public meetings during this time to allow the public to discuss the EIS with Forest Service resource specialists.

For more information, contact Brian Harris, Public Affairs Officer, at 1-208-634-0784 or bdharris@fs.fed.us, or visit the project website at <http://www.fs.usda.gov/goto/payette/StibniteGold>.

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Stibnite Gold Project Comment Form

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United States Department of Agriculture



Payette National Forest

Midas Gold Stibnite Mine Project



SCOPING COMMENT FORM

We want your comments! If you have any issues, concerns, or questions you would like addressed in the Midas Gold Stibnite Mine Project Environmental Impact Statement (EIS), please complete and submit this comment sheet to ensure your input is considered. Please write your comments on the space provided below. Use reverse side or attach additional pages if necessary. Please submit your comments within the timeframes announced. This helps the agencies include all concerns in the Draft EIS document. **All public comments are due by July 20, 2017.**

If you have no comments or questions, but would like to be on our mailing list, please complete the contact information below. Please write clearly and legibly so that we can accurately record your comments and contact information.

Crafting Effective Comments

The most helpful scoping comments are those that focus on resource issues and identify information such as: 1) specific resource concerns; 2) data that should be included in the analysis; 3) project design elements that meet the purpose and need statement and should be considered in the range of alternatives; and 4) best management practices, standard operating procedures, or mitigation that would help reduce impacts.

To mail this comment form, fold comment sheet on the lines with the return address showing, tape it closed, affix a stamp, and mail. You may also submit this form to Forest Service staff during scoping meetings, or e-mail comments to comments-intermtn-payette@fs.fed.us (include Subject Line: "Stibnite Gold EIS Scoping Comment"). All public comments are due by **July 20, 2017**. This helps the agencies include all concerns in the Draft EIS document.

Name _____

Address _____

City, State, ZIP _____

Email _____

I represent (circle one): Myself Agency Tribe Business Non-governmental organization Other (explain)

Please provide Entity name that you represent here: _____

Fold 2 (outside fold)

Affix stamp

Forest Supervisor Keith Lannom- Stibnite Gold EIS
500 N. Mission St.
McCall, ID 83638

Fold 1 (inside fold)

Comment continuation 2

**Appendix C:
Comment Codes and Submission Index**

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Comment Index

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APPENDIX C: COMMENT INDEX

1.1 COMMENT CODE INDEX

To identify how each submission was coded, a submission and comment Index (Section 2.0) was created. To aid viewers, Table 1a through 1d represents a list of all comment codes. Table 2 is an index of each individual unique submission (alphabetical by last name), the submission ID and all comment codes that the content of those submissions were assigned. For example, a submission from The Wilderness Society was given Submission ID #201 and contained nine comment codes.

Appendix C Table 1a: NEPA Process Comment Codes

Code	Code Name
1	NEPA Process
1.1	Purpose & Need
1.2	Connected Actions
1.3	Public Involvement
1.3.1	Public Open House and Meeting
1.3.2	Adequacy of Comment Period
1.4	Tribal Consultation
1.5	Interagency Coordination/Cooperating Agencies
1.6	Relationship to other Planning and Permitting Processes
1.7	Relationship to Applicable Laws, Regulations, and Policy
1.7.1	ESA Consultation
1.7.2	404 Permitting
1.7.3	NPDES Permit
1.7.4	Forest Service Management Consideration
1.8	Relationship to other potential projects
1.9	Use of Science/Best Available Science
1.10	Cumulative impacts

Appendix C Table 1b: Alternatives Comment Codes

Code	Code Name
2	Alternatives
2.1	Alternative Development
2.2	No Action Alternative
2.3	Midas Gold Proposed Action
2.3.1	Ore Processing (i.e. non-cyanide)
2.3.2	Tailings Storage Facility
2.3.3	Design Features
2.3.4	Monitoring
2.4	Mitigation Related
2.5	Bonding
2.6	Reclamation
2.6.1	Streams
2.6.2	Wetlands
2.7	Other Proposed Alternatives

Appendix C Table 1c: Resources Comment Codes

Code	Code Name
3	Resources
3.1	Water Rights
3.1.1	Water Rights Inventory/Data/Analysis
3.2	Geology
3.2.1	Geology Inventory/Data/Analysis
3.3	Soils
3.3.1	Soils Inventory/Data/Analysis
3.4	Water Resources
3.4.1	Groundwater (quantity and quality)
3.4.1.1	Groundwater Inventory/Data/Analysis
3.4.2	Surfacewater (quantity and quality)
3.4.2.1	Surfacewater Inventory/Data/Analysis
3.4.3	Geochemistry
3.4.3.1	Geochemistry Inventory/Data/Analysis
3.5	Air Quality
3.5.1	Air Quality Inventory/Data/Analysis
3.5.2	Climate change
3.6	Noise

Code	Code Name
3.6.1	Noise Inventory/Data/Analysis
3.7	Hazardous Materials
3.7.1	Inventory/Data/Analysis
3.7.2	Fuel spills risk
3.8	Botanical Resources
3.8.1	Botanical Resources Inventory/Data/Analysis
3.8.2	Fire/Fuels
3.8.3	Timber
3.8.4	Threatened, endangered, sensitive species
3.9	Wetlands
3.9.1	Wetlands Inventory/Data/Analysis
3.9.2	Mitigation
3.10	Fish
3.10.1	Fish Inventory/Data/Analysis
3.10.2	Threatened, endangered, sensitive species
3.10.3	Fish Habitat
3.11	Wildlife
3.11.1	Wildlife Inventory/Data/Analysis
3.11.2	Threatened, endangered, sensitive species
3.11.3	Wildlife Habitat
3.12	Land Use and Federal Land Management
3.12.1	Inventory/Data/Analysis
3.12.2	Inventoried Roadless Areas
3.12.3	Wilderness
3.13	Social
3.13.1	Social Inventory/Data/Analysis
3.13.2	Socio-economic
3.13.3	Powerline Upgrade
3.13.4	Environmental justice
3.14	Cultural Resources
3.14.1	Inventory/Data/Analysis
3.15	Public Health and Safety
3.15.1	Inventory/Data/Analysis
3.15.2	Traffic Increase
3.16	Access and Transportation
3.16.1	Access and Transportation Inventory/Data/Analysis

Code	Code Name
3.16.2	Forest Roads
3.16.3	County Roads
3.16.4	Safety
3.16.5	Improvements
3.16.6	Maintenance
3.16.7	Temporary Access Roads
3.16.8	Powerline and Communication Tower Access Roads
3.17	Recreation
3.17.1	Recreation Inventory/Data/Analysis
3.17.2	Experience, Setting, Opportunity
3.17.3	Dispersed Camping
3.17.4	Hiking
3.17.5	Mountain Bikes
3.17.6	Rafting/Kayaking
3.17.7	Fishing
3.17.8	Hunting/Trapping
3.17.9	Snowmobiling
3.17.10	Motorized Recreation
3.17.11	Recreational Mineral Collection
3.17.12	Special Use Permits
3.18	Aesthetics
3.18.1	Aesthetics Inventory/Data/Analysis
3.18.2	Powerline Upgrade
3.19	Special Designations
3.19.1	Inventory/Data/Analysis
3.19.2	Inventoried Roadless Areas
3.19.3	Wilderness
3.19.4	Wild & Scenic Rivers

Appendix C Table 1d: Non-Substantive Comment Codes

Code	Code Name
4	Non-Substantive Comment

1.2 COMMENT INDEXES

1.2.1 Comment Index for Unique Submissions

Unique submissions were received during the public comment scoping period and include an entire letter or email. The content of submissions was broken down by comment, and then assigned a comment code. Table 2 below is an index of each individual unique submission (alphabetical by last name) and all comment codes that the content of those submissions were assigned.

Appendix C Table 2: Comment Index by Individual

Commenter	Submission ID	Comments
Absher, Jonathan	133	(3.11), (2.6), (3.4), (3.15), (3.19.4)
Ackerman, Dennis	490	(3.13.2), (3.13.3)
Adolphsen, Andrew	499	(3.15.2), (3.17)
Alan, Reynolds	27	(2.5)
Alderson, George & Frances	13	(2.4), (2.5), (2.6), (2.7)
Allen, Sherian	504	(3), (3.15.2)
Allred, Keith	451	(1), (1.3), (2.6), (3.13.2)
Amos, Scott	2, 63, 252, 388	(1.3), (3.8), (2.7), (3.11.3), (3.13.2), (3.16), (4)
Anderson, James and Mona	431	(3.13.2)
Anderson, Tanya	70	(2.7), (3.4), (3.10.3), (3.11.3), (3.13.2), (2.3.3)
Anderst, Robert; Idaho House of Representatives	297	(4)
Andrews, Scott	149	(3.10.2)
Anonymous, Clint	389	(4)
Anonymous, Leon Jones	202	(4)
Apperson, Kimberly	237	(2.1), (2.5), (3.9.1), (1.7.4), (2.6), (2.7), (3.13.1), (3.13.2), (3.16.1), (3.12.2)
Armacost, Bret	251	(3.11), (3.13.2)
Armacost, Bret and Doris	87	(3.11), (3.13.2)
Arnold, Ron	501	(3.15.2)
Arnold, Ron and Dorothy	117	(1.3), (2.6), (3.6), (3.13.2), (3.15.2), (3.18)
Arnold, Shauna	213	(2.6)
Artis, Alexis	525	(2.4), (2.7), (3.15.2)
Artis, Deborah	387	(2.7), (3.16)
Atwood, April	93, 195	(3), (3.10), (3.13.2)
Bacon, Thomas	36	(4)
Bair, Steve; Idaho State Senate	430	(3.13.2)

Commenter	Submission ID	Comments
Balch, Drs. Karen & Olin	492, 493	(2.4), (2.5), (3), (3.4.1.1), (3.10.2), (3.11.2), (3.19.3), (3.12.2), (4)
Barker, Diane; Crescent Capital, LLC	77	(3.4), (3.6), (3.13.2), (3.16.5), (3.17), (3.13.3)
Barker, Richard	109	(3.12), (2.7), (3.6), (3.13.2), (3.15.2), (3.17), (3.19.3)
Barker-Hicks, Devon	164	(4)
Bartholomew, Virginia	373	(2.7)
Bass, Adam	352	(1.10)
Bate, Steve Bob Bate Ford	141	(4)
Baugh, Sara	494	(3)
Baughman, Owen	198	(1.3), (2.3.1), (2.6), (3.17.2)
Bayer, Cliff; Idaho State Senate	400	(4)
Bean, Jim	418	(4)
Bean, Kristina	417	(2.5), (3.13), (3.6), (3.13.2), (3.18)
Beattie, Jane	82	(4)
Bechdel, Laura	113	(2.6)
Bechdel, Susan	118	(2.7), (3.13.2)
Bedke, Scott; Idaho House of Representatives	275	(3.13.2)
Bent, Julia	120	(2.4), (2.6), (3.7), (3.10.2)
Bentz, Rusty	534	(3.13.2)
Betcher, Steven; Amerigas Propane	329, 331	(3.13.2)
Beyeler, Merrill	273	(4)
Bibb, Marth	49	(2.6), (2.7), (3.4.1), (3.13.2)
Bierle, Kristin	91	(3.19.3)
Birak, Donald	433	(4)
Birkbeck, Scott	289	(4)
Blanksma, Megan; Idaho House of Representatives	432	(3.13.2)
Bliss, Richard	511	(3), (3.14), (3.7.2), (3.10.3), (3.16), (3.13.3)
Bloomberg, Susan	166	(3.13.2), (3.15)
Bockino, Alida	107	(3.10), (2.6), (2.7), (2.3.3)
Bonilla, Juan; Donnelly Rual Fire Protection District	126	(2.7), (3.15.2)
Boyle, Judy; Idaho House of Representatives	401	(3.13.2)
Bracht, David	427	(2.7)

Commenter	Submission ID	Comments
Bracht, Kacie; ROSE Advocates	122	(3), (2.6), (3.13.2)
Brackebusch, Andrew	165	(3.3)
Brackebusch, Fred	5	(4)
Brackett, Bert	295	(4)
Brewer, Vernon	137	(3.8), (2.6), (3.10.3), (3.13.2), (3.15.2), (3.16)
Briley, Shawn; Idaho Chapter, United Women Entrepreneurs	67	(3.13.2)
Brown, Anna	378	(1.3.2), (2.7), (3.13.2), (3.15.2), (2.3.4)
Brown, Dave	379	(2.7), (3.5), (3.6), (3.7), (3.15.2)
Brudenell, Ingrid	241	(2.5), (3), (2.7), (3.4.3.1), (3.13.2), (2.3.3)
Bruett, Rick and Bette	169	(2.7)
Brugger, Linda	456	(2.3), (2.5), (3.13.2)
Bruhn, Lois	380	(4)
Brunk, Kenneth A.	204	(2.2), (3.2), (2.6), (2.6.1)
Bryant, Diana; Wapiti Meadow Ranch	440	(2.5), (3), (3.10), (3.11), (2.7), (3.13.2), (3.19.3)
Bunch, Denise	364	(2.7)
Burgess, Ray	477	(4)
Burns, Bill	99	(3)
Burt, Stan	92, 442	(2.3), (3.11), (3.5), (3.6), (3.7.2), (3.16), (3.16.2)
Burton, Merritt	145	(3.10.3), (3.18)
Butz, Paul	4	(3.13.2)
Cadwallader, Kara	274	(3), (2.7), (3.13.2)
Campbell, Ryan	35	(2.5), (2.6), (2.3.4)
Carlson, Richard	193, 250	(4)
Carpenter, Ann	444	(2.6)
Carr, Shaun	327	(3.13.2)
The Cascade Store Employees and Owners	424	(3.13.2), (3.17)
Casey, Claire	443	(3.4), (3.7)
Caswell, Joan	410	(2.4), (3.19.3)
Cavins, Marjorie	384	(4)
Chapman, Lee; Formation Capital Team	333	(2.2), (2.5), (3), (3.2), (2.6), (3.13.2)
Chase, Michael	86	(2.6), (3.13.2)
Chatburn, John; Idaho Office of Energy and Mineral Resources	513	(2.3), (3), (2.3.2), (2.6), (3.4), (3.4.3), (3.16.1)
Choate, Larry	260	(4)
Christensen, Sandy	14	(2.6), (3.4)

Commenter	Submission ID	Comments
Christoffersen, Brandon	188	(4)
Chumbley, Stewart	197	(3.17)
Clements, Steve	179, 426	(2.6), (2.6.1), (3.13.2), (3.16.5)
Cline, Marcus	371	(4)
Coffman, Tom	532	(3.2), (3.3), (3.6), (3.7.2), (3.15.2), (3.16.6)
Cohen, Rajal	53	(3.10), (3.10.3), (2.3.3)
Collord, Jim	486	(3.2), (2.7), (3.4.1.1)
Conitz, Margo	450	(3.8.4)
Cooke, Kerry	76	(2.3), (3.4), (3.10.3), (2.3.3)
Cools, Teri	314	(3), (3.11), (3.6)
Coppola, Barbara; Women's Mining Coalition	140	(2.2), (3.2), (1.5), (2.3.2), (3.13.2)
Coski, David	455	(3.13.2)
Coski, Kay	535	(3.13.2)
Couch, Ken; Idaho Transportation Department District 3	206	(2.4), (3.16)
Coughlin, Bill	298	(2.4), (3.3), (3.4), (3.7.2)
Coyle, Nathan; McCall City Council	376	(2.6)
Crane, Brent J.; Idaho House of Representatives	247	(3.2)
Crosby, Michele	231	(2.7), (3.17.2)
Crosby, Scott	229	(2.7), (3.17.2)
Cruikshank, Gordon; Valley County Board of County Commissioners	413	(2.3), (2.7), (3.16.6)
Curtis, Cheryl	383	(3.5), (3.13.2), (3.15.2), (3.17.2)
Curtis, Lauren	538	(3), (3.4), (3.13.2), (3.17), (3.17.2)
Cuvelier, Dave	449	(2.6), (3.13.2)
Cwiklinski, Thomas	514	(4)
Dalgleish, Alex	130	(2.6), (3.17.6), (3.18)
Daly, Susan	533	(4)
Davenport, Benjamin J.; Idaho Mining Association	64	(3.10), (2.6), (3.13.2)
Davenport, Beverly; The McCall Store LLC	420	(3.13.2)
Davenport, Scotty	422	(3.13.2), (3.17)
Davenport, Scotty; The Cascade Chamber of Commerce	423	(3.13.2)
Davenport, Scotty; The McCall Candy Company LLC	421	(3.13.2)

Commenter	Submission ID	Comments
Davis, Dan	78	(2.6), (3.13.2)
Dawson, Paul	220	(3.17)
de Laloe, Megan	97	(3.10), (2.6), (3.13.2)
Deger, Cindy	95	(3)
DeYoung, Rita	267	(4)
Dixon, Sage; Idaho House of Representatives	467	(2.3), (3.13.2)
Dodds, Earl	199, 210, 1540	(1.3), (3.13), (1.9), (3.4.3), (3.4.3.1)
Donohue, Stacey	15	(4)
Dorris, George & Susan	347	(1.3), (2.2)
Drake, Karen	131	(2.5), (3.10.3), (3.13.2), (3.15.2)
Drake, Kathryn	491	(2.5), (2.7), (3.7.2), (3.18)
Driskell, Melissa	344	(3)
Dudley, Mary	16	(2.6)
Dwyer, Allison	508	(2.6), (3.4), (3.10.3)
Earl, Cindy	360	(3.11.1), (2.7), (3.15)
Earl, James	361	(2.7)
Earl, Ronald	359, 386	(3.10), (3.11.1), (2.7), (3.15)
Earnest, Fred	320	(2.6), (3.13.2)
Eberhardt, Ila; Granite Excavation, Inc.	524	(4)
Eberle, Noah	52	(3.4), (3.13.2)
Eder, Renee	30	(4)
Eiguren, Terry & Trudy	84	(4)
Eld, Frank	160	(2.6)
Elliott, Robert	460	(4)
Ellsworth, Matthew; American Exploration & Mining Association	461, 523	(3.2), (2.6), (3.13.2)
Fairchild, Stephanie	136, 174	(2.7), (3.6), (3.10.2), (3.16.6)
Farnsworth, David	294	(2.4), (2.5), (1.6), (1.9), (3.10.3)
Farrar, Bradrick	8	(4)
Farrell, Timothy	425	(2.6), (3.13.2)
Felton, Scott; Press in the Pines	474	(3.13.2)
Field, Dan	396	(4)
Field, Sue	394	(4)
Fields, Ed	59	(3.13.2)
Fields, Joel	238, 287	(2.7), (3.13.2), (3.19.2)
Fields, Marjie and Joel	144	(3.13.2)

Commenter	Submission ID	Comments
Filler, Deb	12	(3.17.2)
Fisher, Mark	519	(3.15.2), (3.16.6)
Fleisher, Marc	17	(4)
Flores, Victor	300	(2.3), (3), (3.13.2)
Follett, Andrew	484	(2.6), (2.7), (3.10.2)
Ford, Happy	18	(2.6), (3.4), (3.10.3)
Forster, Ann	313	(2.7)
Forster, Jeff; Yellow Pine Fire Protection District	303, 304	(2.7), (3.13.2), (3.15), (3.15.2), (3.16.5)
Fortin, Cary	178	(2.6)
Foster, Brenda	278	(4)
Fostvedt, Matthias	163	(2.5), (3.10), (3.13.2)
Fowle, Allison	481	(4)
Freeman, Scott	471	(3.7.2), (3.13.2)
French, Elaine	105	(3.4.1)
Frishman, Andrew	54	(2.6), (3.10.3), (3.13.2)
Funkhouser, Kourtne	205	(4)
Gaffney, JD	154	(2.6), (3.17)
Gehrke, Craig; The Wilderness Society	201	(2.0), (3.12), (1.7), (1.7.4), (3.10.3), (3.11.3), (3.16.2), (3.19.2), (3.19.4)
Gerhard, Clyde	224	(3.6), (3.17)
Gerhard, June	223	(3.16)
Gibbs, Marc	296	(3.13.2)
Gibson, Michael; Trout Unlimited	512	(3.4), (3.10.2), (3.12.2)
Gilbert, Travis	263	(4)
Ginkel, Tonia	55	(3.13.2)
Goldberg, Jennie	316	(2.7), (3.4.3.1), (3.13.2)
Goode, Jon D.	170	(4)
Gordon, Brian	138	(3.6), (3.15.2), (3.16)
Gordon, Jasmine	217	(2.6), (3.6)
Gordon, Sherry	68, 528	(2.5), (2.7), (3.2), (3.10), (3.11.3), (3.13.2), (3.16), (3.18)
Greenwall, Ephraim; 8th Street Marketplace	11, 191	(4)
Greenway, Billie	40	(4)
Greenwood, Josie	155	(2.4)
Griffith, Christen Marve US Army Corps of Engineers, Walla Walla District	1539	(3.4), (2.3.3), (2.4)
Grover, Quinn	81	(3.19.3)

Commenter	Submission ID	Comments
Gryder, Teresa	175	(2.4), (2.6), (2.7)
Guizzetti, Sheila	235	(3.10.2)
Guthrie, Jim; Idaho State Senate	414	(3.13.2)
Hagedorn, Marv; Idaho State Senate	312	(3.13.2)
Hansen, Kirk	66	(3.13.2)
Harnar, Carmen	317	(2.7), (3.13.2)
Harper, George R.	253	(4)
Harris, Melissa	539	(3)
Harris, Tom; Western States Equipment Company	123	(2.6), (3.13.2)
Harshfield, Steven	515	(3.13), (2.6), (2.7), (3.13.2), (3.16), (4)
Hawkins, Sharon; Idaho Association of Commerce & Industry	159	(2.6), (3.13.2)
Hawley, Daniel	19	(2.6), (3.10.3)
Haynes, Chris	181	(2.6), (3.13.2), (3.16.5), (3.13.3)
Hecker, Wayne	20	(2.5), (3.11), (2.6), (3.3), (3.4)
Hedges, Cami; City of Donnelly	464	(2.2), (3.13.2)
Henning, Blake; Rocky Mountain Elk Foundation	353	(3.10), (3.11)
Henrichs, Kirk	234	(2.7)
Hensley, David; Office of Governor C.L. "Butch" Otter	290	(3), (3.13.2)
Hermann, Randall	83	(3), (3.4)
Herrick, Cynda	398	(4)
Higdem, Jann	480	(1.5), (2.1), (2.2), (3.10.1), (3.4.2), (3.13.2)
Hill, Brent	372	(2.6), (3.13.2)
Hill, Bryan; Mile High Power Sports	310	(2.6), (3.17)
Himes, Vernon & Roxie	212	(2.3), (2.7), (3.13.2), (3.15.2), (3.17.9)
Hindman, Charles	488	(3.4.2), (3.7.2)
Hines, Brian	345, 346	(2.6), (3.11.3)
HInson, Jim; Rocky Mountain Signs	452	(2.6), (3.13.2)
Hodge, Nicholas	280	(2.2), (3), (3.13.2), (2.3.3)
Holloway, Steve and Susan	156	(3.13.2)
Honsaker, Amberlee; Representative Malek	334	(3.13.2)

Commenter	Submission ID	Comments
Hoover, Johnathan	485	(4)
Hower, Charles	363	(3.4.3)
Hower, Jonne	458	(2.3), (2.5), (1.7), (2.6), (2.7), (3.13.2), (3.15.2)
Huber, Matt	497	(2.7), (3.17.9)
Hull, Kathy	505	(3.13.2), (3.16), (3.17.9)
Hull, Katrina	262	(4)
Hull, Steven; West Mountain Snowmobile Club	502	(2.4), (2.7)
Hunchak, Bob	187	(4)
Huss, Phil	88	(3), (3.10.3), (3.17.7)
Imel, Lynn	392	(2.1), (2.7), (3.13.2)
Irwin, Shellie K.	249	(1.3.2), (2.7), (3.13.2)
Isaacson, Ava; Idaho Rivers United	487	(2.5), (3), (3.9), (3.9.1), (3.10), (3.10.1), (3.11), (1.7), (2.3), (2.3.2), (2.6), (2.6.2), (2.7), (3.4.1), (3.4.3.1), (3.7), (3.8.2), (3.10.2), (3.13.1), (3.13.2), (3.17), (3.17.2), (3.17.6), (3.17.7), (3.19.4), (2.3.4), (3.3)
Ivy, Conway; Ivy Minerals, Inc	139	(1), (2.6), (3.13.2)
Jackson, Sacha	323	(2.7)
Jacobsen, Glenn	419	(2.5), (3.11)
Jacobsen, Lora	75	(2.5), (3.4.3), (3.10.3), (3.17.2)
Jayne, Jerry	507	(2.4), (3.10), (3.4.3.1), (3.19.3)
Jensen, Braden	257	(3.13.2)
Jensen, Lorraine	393	(2.7)
Jensen, Leslie	489	(2.7)
Jividen, Dwight	21	(3.2), (3.13.2)
Johnson, Mark	232	(2.7)
Johnson, Paul	196	(2.7), (3.13.2), (3.15), (3.15.2)
Jones, Diane	90	(3.10)
Jones, Eric	57	(3), (3.13.2)
Jones, Steve	147	(2.6), (3.13.2), (3.17), (3.17.6)
Josey, William	436	(2.6), (3.13.2)
Julian, Ronn	465	(2.7), (3.3)
Kalmbach, Kevin	268	(4)
Kaplan, Eliza	332	(2.4)
Kaplan, Harley	527	(2.4), (2.7), (3.17)
Kaplan, Sybil	326	(2.4), (2.5), (2.6), (3.5), (3.13.2)
Kauffman, Clark; Idaho House of Representatives	434	(3.17)
Kazmaier, Renay	74	(2.5)

Commenter	Submission ID	Comments
Keaveny, Amanda	365	(4)
Keithley, Scott	370	(2.7), (3.17)
Kennedy, Clinton	158	(2.6), (3.10.3), (3.13.2), (3.17)
Kenyon, Jim and Krista	292	(3), (3.13.2)
Kerby, Ryan; Idaho House of Representatives	256	(3.13.2)
Kesler, Kristi	341	(3.17.9)
Keys, John	56	(2.5)
Kidwell, Stan	459	(4)
Kildee, Janet	397	(4)
Kim, Marcelo	62	(3), (2.6), (3.16)
Kniefel, Bruce; Kniefel Insurance	375	(2.5), (3.7.2), (3.15.2)
Knoblock, Jack & Sandy	190	(4)
Kolkman, Dawn	377	(3.13.2)
Koskella, Kathleen	215	(2.6)
Kovalicky, Tom	41	(4)
Kozlowski, Mike	483	(2.7)
Kubo, Teresa; Environmental Review and Sediment Management US EPA Oregon Operations	472	(1.1), (1.4), (1.5), (2.1), (2.4), (2.5), (3.2), (3.10), (3.14), (1.7.2), (1.7.4), (1.9), (1.10), (3.2.1), (3.4), (3.4.2), (3.4.3), (3.4.3.1), (3.5), (3.7), (3.10.2), (2.3.4)
Kunath, Nickolas	124	(2.6), (3.13.2), (3.17), (3.17.6), (3.18)
Kuntz, Laurie	135	(2.3.1), (3), (2.6), (3.10.3), (3.11.3), (3.13.2), (3.17.2)
Laey, Scott	520	(2.5), (2.6), (3.4.3), (2.3.3)
LaFay, Brent	540	(3.17)
Lange, Rebecca	80	(2.6), (3.13.2)
Larabee, Brett	354	(2.3.2), (2.6), (2.7)
Lauer, Micah	355	(3), (3.10), (3.7.2), (3.17)
Laxson, Larry	309	(2.6), (3.17.9)
Leavitt, Reese; Leavitt & Associates Engineers, Inc.	374	(4)
Lee, Abby; Idaho State Senate	302	(3.13.2), (2.3.3)
Leonardson, Michelle; Warm Lake Users Association	495	(4)
Lewinski, John	112	(2.3.1), (2.5), (2.6), (3.4.3.1), (3.10.3), (3.13.2), (3.17), (3.12.2)
Lilly, James	161	(3.13.2)
Lodge, Patti Anne; Idaho State Senate	531	(4)

Commenter	Submission ID	Comments
Lyman, Adam	245	(4)
Lyons, Robert; Idaho Junior Steelheads	441	(3.3), (3.13.2)
Mackey, Tulley	362	(3.10.2)
Madden, Sean	510	(4)
Manthos, Nancy	391	(2.7)
Maresca, Tom	22	(3)
Marguet, Dennis	45	(4)
Marks, Melinda	151	(3.13.2)
Masterson, Jay; May Security	157	(4)
Matthews, Patricia	79	(3.10), (3.4.1)
Maupin, Sherry; Idaho First Bank	305	(3.13.2)
McCallister, Sean	469	(3.13.2)
McCarter, Kathleen	315	(2.5), (2.6), (2.7), (3.13.2), (2.3.4)
McCullough, Peter	42	(2.6)
McLean, Michael	343	(4)
McLean, Mike; Academy Mortgage	342	(4)
McMaster, Tracy	322	(3.13.2)
McRae, Robin	127	(2.6), (3.13.2)
Meckel, Janet	522	(3.13.2)
Mehen, Rory	506	(4)
Mentzer, Andrew	6	(2.6), (3.13.2)
Meredith, Larry	399	(4)
Meuleman, Bobbi-Jo; Idaho Department of Commerce	454	(3.13.2)
Meyer, Jacquelyn	134	(3.15.2), (3.16), (3.16.5), (3.17.2), (3.17.9), (3.13.3)
Meyers, Paul; Cascade Medical Center	358	(3.15)
Miles, Mary Jane; Nez Perce Tribe	500	(1.1), (1.2), (1.3), (1.4), (1.5), (2.1), (2.2), (2.3), (2.4), (2.5), (3), (3.1), (3.8), (3.9), (3.10), (3.11), (3.14), (1.6), (1.7), (1.7.3), (1.10), (2.3.2), (2.6), (2.7), (3.2.1), (3.3), (3.4), (3.4.1), (3.4.1.1), (3.4.2), (3.4.3), (3.4.3.1), (3.5), (3.5.2), (3.7), (3.9.2), (3.10.2), (3.11.3), (3.13.4), (2.3.4)
Miller, Allison	526	(3.11), (2.3), (2.6), (3.5), (3.13.2)
Miller, Jeremy	457	(4)
Miller, Joshua	521	(2.5), (3.11), (2.3.2), (2.7), (3.4), (3.6), (3.7), (3.15), (4)
Minder, Rickey	128	(3), (2.6), (3.13.2), (3.17)

Commenter	Submission ID	Comments
Mink, Mary	283	(3)
Mink, Roy; Mink GeoHydro, Inc.	293	(2.3), (3)
Mitchell, Sandra; Idaho Recreation Council	288	(3.13.2), (3.17)
Moen, David	339	(4)
Moon, Dorothy	311	(3.2), (3.13.2)
Moore, Laura	23	(2.7), (2.3.3)
Mooseman, Sandy	328	(3.13.2)
Morford, Carol & Mel	110	(3.6)
Morgan, Scott	153	(2.5)
Moses, Rich	10, 106	(2.2), (2.6), (3.13.2)
Moyle, Mike; Idaho House of Representatives	453	(3.13.2), (3.17.9)
Munn, Lorinne	381	(2.7)
Nelson, Lyle	72	(3.13.2)
Newberry, Donald D.	330	(2.3), (3), (3.12), (3.14), (1.9), (2.7), (3.3), (3.4.2), (3.7), (3.13.2), (3.16), (3.19.2), (3.19.4)
Niebrand, Chris	219, 226	(2.7)
Nonini, Robert; Idaho State Senate	308	(3.13.2)
Norell, Teri; Norell Ranch	529	(3.11), (3.3), (3.15.2), (3.16), (3.17)
Norton, Elizabeth	162	(2.6.2)
Nourish, Bruce	58	(3.10.3)
Oberbillig, Ron; JJO LLC	476	(2.2), (2.7)
Olden, John & Anne	509	(4)
Olson, Marilyn	415	(3.8.1), (2.7), (3.7), (3.10.2)
Ongaro, Frank; Mining Minnesota	167	(2.3), (2.5), (2.6), (3.13.2)
Osburn, Scott	269	(3.13.2)
Ostis, Nate	325	(2.6), (3.4), (3.17)
Otter, Butch; State of Idaho	227	(3.13.2)
Palmer, Joe; Idaho House of Representatives	276	(3.13.2)
Pape, Catherine	150	(3.16)
Papenberg, Edward	132	(3.11), (3.16)
Parrish, Eugenie	172	(3.8), (3.5), (3.6), (3.15), (3.15.2)
Pearse, Devon	129	(3), (3.13.2), (3.17)
Petersen, Sue	24	(4)

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Pierce, Dylan	173	(2.5), (2.6), (2.7), (2.3.4)
Pisel, Terry	3, 337	(2.6), (3.13.2)
Platt, Ron	233	(3.17.9)
Podgorski, Natalie	462	(2.2), (3.13.2)
Pressley, Peter	25	(4)
Preston, Francis	356	(3.17.2)
Public, Jean	1	(3.15)
Rathmann, Patricia	26	(4)
Rau, Henry	102	(3.13.2), (3.16)
Ray, Charles	222, 301	(1), (1.2), (2.1), (2.3.1), (2.4), (2.5), (2.7), (3), (1.7.4), (2.6), (3.4), (3.4.1.1), (3.4.2), (3.4.3), (3.4.3.1), (3.5.2), (3.7), (3.7.2), (3.11.3), (3.13.2), (3.16), (3.18.2), (2.3.4), (3.13.3)
Raymondi, Ann Marie	517	(3), (2.6), (3.19.3)
Redell, Yvon	261	(3.13.2)
Reed, Rich	9, 239	(2.7), (3.13.2), (3.17)
Reis, Janet	61, 184	(3), (2.6), (3.13.2), (4)
Renner, Rebecca	209	(2.5)
Rice, Dennis	225	(3.17.7)
Richins, Rick	48	(3.2), (2.6)
Roark, Craig	255	(2.5), (3), (3.13.2)
Robbins, Heather	230	(2.7)
Roberts, George; Jerry's Auto Parts	271	(3.13.2)
Robinson, Robert	119	(2.5), (1), (2.6), (2.6.1), (3.13.2)
Robison, John; Idaho Conservation League	445	(1), (1.3), (1.5), (1.6), (2.1), (2.3) (2.3.3), (2.4), (2.5), (3), (3.11), (3.11.1), (3.12), (3.14), (1.7.3), (1.10), (2.3.2), (2.6), (2.7), (3.2.1), (3.3), (3.4), (3.4.1), (3.4.1.1), (3.4.3), (3.4.3.1), (3.5), (3.5.2), (3.7), (3.7.2), (3.10.2), (3.10.3), (3.11.3), (3.15), (3.17), (3.18), (3.19.2), (3.19.4), (2.3.4)
Rogers, Tim	496	(2.7), (3.16)
Rohlman, Erin	146	(2.4), (2.5), (2.6), (2.7), (3.5.2), (3.11.2)
Roper, Daniel	28	(2.7)
Rosenbaum, Robert & Darlene	412	(2.7), (3.4.3)
Ruprecht, Judy & Jeff	29	(4)
Rusnak, Richard	43	(2.6), (2.7), (3.4.3.1)
Russ, John; Idaho Department of Labor	279	(3), (3.13.2)
Russell, Luke; Hecla Mining Company	282, 438	(2.5), (3.13.2), (3.16)
Rutherford-Felton, Kelly Jo; Press in the Pines	482	(3.13.2)

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Ryan, Buck	46	(2.7)
Ryan, Sylvia	7	(4)
Rygh, John	183, 211	(2.4), (2.5), (1.7.2), (1.7.3), (2.3.3), (2.3.4), (2.6), (2.7), (3.4.1), (3.4.1.1), (3.4.3.1), (3.5.2),
Sabin, Mark	244	(4)
Saleen, Merrill	265	(3.10), (2.7), (3.16)
Saleen, Nikki	264	(2.7), (3.16)
Sandmeyer, Greg	242	(3.13.2)
Sartori, Pal; Cascade School District #422	65	(3.13.2)
Saxton, David	367, 368	(2.7)
Sayer, Laurel; Midas Gold	177, 446	(2.1), (2.3), (2.3.1), (2.4), (2.5), (3.10), (2.6), (2.7), (3.3), (3.4.1), (3.13.2)
Scaraglino, Kristy	516	(3.16)
Schappacher, Gunter	416	(2.7)
Schappacher, Paula	435	(2.5), (3.12), (2.7), (3.6), (3.15.2), (3.17)
Schill, MaKayla	479	(4)
Schott, John	143	(2.6), (2.3.3)
Schwarzhoff, Chris	216, 291	(2.7), (3.13.2), (3.16.1), (3.17.8)
Shay, Robert	366	(4)
Sheriff, William; Golden Predator	96	(3.2), (3.10), (3.13.2)
Shreiner, Cndy	236	(3.13.2), (3.16)
Silvernell, Kerri	448	(4)
Sivertsen, Dave	351	(4)
Skinner, Kathryn	218	(2.7), (3.15.2)
Sledzieski, Walt	31, 100	(2.5), (2.6.1), (3.13.2), (3.17)
Small, Nathan; Fort Hall Business Council Shoshone-Bannock Tribes	429	(1.4), (2.3), (3.12), (3.14), (2.6), (3.4), (3.10.3), (3.14.1), (3.18.1)
Snell, Rebecka	382	(1.9), (3), (3.2), (3.13.2)
Snyder, Walter	285	(3.13.2)
Soelberg, Heather; City of Cascade	103	(3.13.2)
Solomon, Wayne	272	(3.13.2)
Spackman, Gary; State of Idaho Department of Water Resources	248	(2.3.2), (2.4), (3.1.1), (3.4), (3.4.1.1), (3.4.2)
Speer, Jason	466	(4)
Stafford, Michael	50, 240	(4)
Stafford, Michael and Maria	121	(2.6)
Steneck, Denise	194	(3.13.3)

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Stiff, David (Dan)	536	(2.7), (3.10.2), (3.13.2), (3.16), (3.16.2)
Stillwell, Bruce	228	(3.17.10)
Stilwell, Dale	470	(3.15.2), (3.16.6)
Stinnett, Erwin	200	(3)
Stout, Ted	32	(2.6), (2.3.3)
Stringer, Patricia	208	(2.7)
Strowd, Bill	51, 104	(1.3), (2.5), (3.11), (2.3.2), (2.7), (3.6), (3.10.3), (3.11.2), (3.13.2), (3.15), (3.15.2), (3.16.5), (3.19.3), (2.3.3), (2.3.4), (3.13.3)
Suda, Cathy; Teck America Incorporated	411	(2.6), (3.13.2)
Sullivan, Candace	395	(2.7)
Sullivan, Willie	390	(2.7)
Summerhays, Chris	171, 349	(4)
Surabian, Roby	259	(3), (3.4), (3.10.3), (3.13.2)
Swanson, Don and Karen	69	(4)
Swisher, Carlton	348	(4)
Taghon, Kathryn	101	(3.4.1), (3.17.6)
Tate, Charles	73	(3)
Taylor, Andrew	447	(2.6), (3.10.3)
Taylor, Sarah; Artis Family Cabin	142	(2.4)
Terry, Margaret	182	(4)
Terry, Rob; City of Cascade	115	(2.3), (2.3.1), (2.6), (3.10.3), (3.13.2)
Thea, Kaz	89	(3.10), (2.6.1), (3.10.3), (3.19.3)
Thompson, Gary	369	(2.6), (3.13.2)
Thurrow, Russ	340	(2.5), (2.7), (3.13), (3.10.2)
Tippett, Shannon	266	(2.7)
Todd, Nathan	148	(3.13.2)
Trees, Alan	246	(4)
Troyer, Brett	152	(4)
Trujillo, Janet; Idaho House of Representatives	299	(3.13.2)
Tyler, Gene & Cecilia	439	(2.6), (3.13.2)
Underwood, JR, Charles; IDAK Consulting, Inc	60	(2.6), (3.13.2)
Uptmor, Debbie; AmeriBen	176, 185	(1.1), (2.4), (3.13), (3.6), (3.16.6), (4)
Valasek, Daniel	478	(2.7)
Valdez, Donna	221	(2.7)
VanArsdel, Mary Lou	125	(3.6), (3.15.2), (3.16), (3.17), (3.18)

Commenter	Submission ID	Comments
Vander Woude, John; Idaho House of Representatives	463	(2.7), (3.4.2)
Vogt, Niki	543	(3), (3.12), (3.17.2)
Walters, Randi	34	(2.5)
Ward, Brian	518	(4)
Ward, Matt; The Lilypad, LLC	47	(2.6), (2.7), (2.3.4)
Waterman, Zack; Idaho Chapter Sierra Club	475	(3), (3.10), (2.7)
Watters, Ron	214	(2.6)
White, John	71	(2.6)
Whitney, April	284	(3), (3.13.2)
Whitson, Marilyn	114	(3.13.2)
Wiggs, Matt; Idaho Governor's Office of Energy and Mineral Resources	468	(2.3), (2.5), (3.1.1), (3.10), (3.11), (1.7), (1.7.2), (2.3.2), (2.6), (2.7), (3.4.2), (3.4.3), (3.10.3), (3.16), (3.17.8), (2.3.4)
Wilder, Stewart	277	(1.3), (3.15.2)
Williams, Dedra; J.R. Simplot Company	306	(3.2), (3.11.3), (3.13.2)
Williams, Eric	503	(4)
Winder, Chuck; Idaho State Senate	286	(3)
Wise, Ron and Sally	116	(2.6), (3.13.2)
Wissenbach, Michael; Bureau of Reclamation, USDOJ	350	(1.6), (3.17), (3.18.2), (3.13.3)
Wood, Fred; Idaho House of Representatives	428	(3.13.2)
Wood, Mark; McCall Area Snowmobile Club	108, 111, 186	(2.5), (2.6), (2.6.1), (3.10.3), (3.13.2), (3.16), (3.16.6), (3.17.9), (3.17.10)
Wyble, Jonathan	498	(4)
Yoder, Chris	44	(2.5), (2.7), (3.4)
Youngblood, Rick; Idaho House of Representatives	437	(3.13.2)
Zamzow, Doug and Sheelagh	168	(3.13.2), (3.17)
Zatzke, Seth	307	(4)
Ziegler, Amber	530	(3.15), (3.17.2)

1.2.2 Comment Index for Form Letter Submissions

During the public scoping period, the Forest Service received six form letters. These were treated as one submission with multiple signatories. Table 3a through 3f below is an index of each form letter, listing all signatories, and the comment codes that the content of those letters were assigned.

Appendix C Table 3a: List of Signers of Form Letter 4 – Comments (2.2), (2.6), (3.2), (3.13.2)

Signers
Boleneus, David
Calmpitt, Duane F.
Greenwall, Ephraim 8 th Street Marketplace
Hall, Trevor
Hardy, Brent
Hosington, Charles A.
Howell, David
Prickett, Molly
Shively, Josh
Smith, Tom
Zieg, Jerry
Zatzke, Becky

Appendix C Table 3b: List of Signers of Form Letter 5 – Comment (4)

Signers
Davis, Josh Granite Excavation, Inc.
Hibbard, Dusty Granite Excavation, Inc.
Kent, Quinn
Landa, Taylor Granite Excavation, Inc.

Appendix C Table 3c: List of Signers of Form Letter 6 – Comments (2.5), (2.7), (2.3.3)

Signers
Carney, Molly
Davis, Todd
Fryberger, Jeremy
Thode, Walter

Appendix C Table 3d: List of Signers of Form Letter 7 – Comments (1.3), (2.5), (3.6), (3.7), (3.15.2), (3.16), (3.16.1), (3.16.5)

Signers
Barrett, Robert
Barrett, Rob

Appendix C Table 3e: List of Signers of Form Letter 8 – Comments (2.5), (3.13.2) (3.17.2)

Signers
Fowlds, Jeff
Fowlds, Misty
Kellam, Janet

Appendix C Table 3f: List of Signers of Form Letter 9 – Comments (3.4), (3.13.2), (3.17), (3.17.2)

Signers
Atwood, April
Gallaher, Nicole
Larson, Erin
Marumoto, Kerry
Rutherford, Robert
Summerhays, Chris
Witschard, Moe

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