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Comments: Please find the attached comments from the State of Idaho.

The State of Idaho submits the following scoping comments which were developed through a coordinated effort between the Idaho Governor's Office of Energy and Mineral Resources (OEMR), the Idaho Department of Lands (IDL), the Idaho Department of Fish and Game (IDFG), the Idaho Department of Water Resources (IDWR), and the Idaho Department of Parks and Recreation (IDPR). The State of Idaho appreciates the opportunity to provide scoping comments on the Stibnite Gold Project Plan of Restoration and Operations (PRO) Environmental Impact Statement (EIS).

Introduction

The Payette National Forest is preparing an Environmental Impact Statement in consultation with cooperating agencies and in accordance with the National Environmental Policy Act of 1969. The EIS will evaluate and disclose the potential environmental effects of approving the Stibnite Gold Project PRO and any related National Forest Land Amendments. Midas Gold Idaho, Inc. submitted the PRO in September 2016.

Comments Related to Water Resources

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

An examination of the potential impacts that failure of dams and mine tailings impoundment structures, both existing and proposed, could have on downstream life and property;

- [bull] An evaluation of the stream channel alteration proposals in the Plan for their potential impacts on fish and wildlife habitat, aquatic life, recreation, aesthetic beauty, and water quality;

- [bull] A review of 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.

- [bull] A summarization of the need for new or changed water rights to divert and use surface water or ground water to accomplish the Plan;

- [bull] 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;

- [bull] 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.

Comments related to Mining Operations

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

- [bull] Examination on salvaging of topsoil for reclamation uses;

- [bull] Addressing the NPDES/IPDES and 404 permits in significant detail;

- [bull] Identifying the discharge standards that need to be met to adequately satisfy the proposed wetlands mitigations;

- [bull] Identifying any measures needed to prevent wildlife from accessing on-site waste;

- [bull] Identification of any emergency evacuation plans for wildfire or extreme weather;

- [bull] Identification of all IDAP A rules pertaining to the project;

- [bull] Identification of all measures that will require bonding;

- [bull] Discussion of how the Spent Ore and other cover materials will be segregated from the old tailings during excavation;

- [bull] Identification of the type of construction that will be done with the spent heap leach ore disposal area (SODA) material;

- [bull] Identification of where SODA material will be stored if it is going to be excavated during construction then used during final reclamation;
- [bull] Identification of potential snow dump areas used for winter snow plowing;
- [bull] Discussion of how the site landfill will be used on the ridge south of Fiddle Creek;
- [bull] Analysis of how Blowout Creek channel will be constructed with a gradient of 2%;
- [bull] How the excavated material from access roads to Blowout Creek will be utilized;
- [bull] Identify if the EFSFSR bypass tunnel will pass through any material that will leach out contaminants.

Comments Related to Waste Rock

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

- [bull] Examination on salvaging of topsoil for reclamation uses;
- [bull] Addressing the NPDES/IPDES and 404 permits in significant detail;
- [bull] Identifying the discharge standards that need to be met to adequately satisfy the proposed wetlands mitigations;
- [bull] Identifying any measures needed to prevent wildlife from accessing on-site waste;
- [bull] Identification of any emergency evacuation plans for wildfire or extreme weather;
- [bull] Identification of all IDAP A rules pertaining to the project;
- [bull] Identification of all measures that will require bonding;
- [bull] Discussion of how the Spent Ore and other cover materials will be segregated from the old tailings during excavation;
- [bull] Identification of the type of construction that will be done with the spent heap leach ore disposal area (SODA) material;
- [bull] Identification of where SODA material will be stored if it is going to be excavated during construction then used during final reclamation;
- [bull] Identification of potential snow dump areas used for winter snow plowing;
- [bull] Discussion of how the site landfill will be used on the ridge south of Fiddle Creek;
- [bull] Analysis of how Blowout Creek channel will be constructed with a gradient of 2%;
- [bull] How the excavated material from access roads to Blowout Creek will be utilized;
- [bull] Identify if the EFSFSR bypass tunnel will pass through any material that will leach out contaminants.

Comments Related to Waste Rock

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

Consistency regarding the use of tenns, such and waste rock and development rock;

nalysis of any testing procedures that may be needed to screen and classify spent ore and existing waste rock prior to use as construction materials;

- [bull] 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;
- [bull] An analysis of the measures taken to segregate waste rock and the steps taken to reduce water infiltration;
- [bull] Identify the measures taken to construct waste rock dumps;
- [bull] Identify the specific construction measures taken for the clean water diversions near waste rock dumps;
- [bull] The measures taken to capture and route the springs and the seeps near the SODA;
- [bull] Geochemically characterize any potential mixing of waste rock to assess potential leaching of materials if it is mixed with IDL regulated waste rock.

Comments Related to Tailings Facilities

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

- [bull] 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;
- [bull] 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;
- [bull] Identification of all tailings storage facilities state and federal requirements;
- [bull] Examination of the over liner collection system in the TSF;
- [bull] 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;
- [bull] Modeling to determine if an impermeable layer is needed in the cover for water flux and contaminant transport through the reclaimed tailings;
- [bull] Determinations if geogrid or similar materials need to be used for at least half of the tailings impoundment.

Comments Related to Pit Areas

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

- [bull] Analysis on whether the "rapid infiltration basins" identified in the PRO will need IDWR permitting as injection wells;
- [bull] A summary of the water quality monitoring of the Hanger Flats and West End pit lakes;
- [bull] Discussion of how discharge created by the excavation of the Yellow Pine pit will be handled during reclamation.

Comments Related to Fish and Game

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

- [bull] 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;
- [bull] 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;
- [bull] 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;
- [bull] A detailed description of where the potential closure on the East Fork South Fork Salmon River (EFSFSR) road between Yellow Pine and Stibnite will occur as this will affect hunter access to the area;
- [bull] An assessment of the effects of the fish passable tunnel on upstream and downstream fish populations,

both pre- and post-construction;

[bull] A detailed analysis of how the proposed action might affect the persistent contamination of fish in the EFSFSR;

[bull] 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;

[bull] An analysis of restoration work including removal of tailings and channel stabilization in Sugar Creek as part of the mitigation plan, and we offer collaboration on analysis and design;

[bull] A clarification of what data was used to develop estimates of fish production included in the PRO, and detailed descriptions of channel design and application of these to develop projections of fish production;

[bull] Disclosure of the potential increased traffic to Riordan Lake, and associated effects to bull trout;

[bull] A thorough analysis of potential effects to wolverine populations and their habitats, as well as any potential mitigations;

[bull] An assessment of the potential impacts to wolverines from increased recreation resulting from expanded access associated with the proposed project, and quantification of recreation data in a systematic way over several years once access routes are established;

[bull] Disclosure of the predicted loss of roadless areas and effects of this loss to big game security and wolverine habitat;

[bull] 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;

[bull] 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?

Comments related to Motor Vehicles and Recreational Activities

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

[bull] 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;

[bull] 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;

[bull] 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;

[bull] An examination of the upgrades necessary to the Cabin Creek Road to provide for a groomed snowmobile trail.

The State of Idaho appreciates the opportunity to submit these scoping comments on the Stibnite Gold Plan of Operations EIS. Please feel free to contact me with any questions or clarifications related to these comments.