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Organization: Swiftwater Safety Institute

Title:

Comments: My name is Eric Riley. I was born and raised as a third generation Idahoan, received my undergraduate education from the University of Idaho, and currently own and operate a large swiftwater training company - Swiftwater Safety Institute LLC. My lifeline and the lifeline of my 40 employees rests largely on the shoulders of a bustling and healthy recreational and commercial population of avid river users. I am extremely concerned about the short-sighted notion of any long-term positive outcomes of the Stibnite Gold Project in the state of Idaho. I am interested in the long-term sustainability of a healthy ecosystem. I am a public land owner and I am mad as hell about the potential negative impacts a project like this can easily unleash.

The General Mining Act of 1872 is an antiquated practice that comes with a heavy environmental price. This proposed project will likely become a taxpayer liability down the road. I implore you to exercise your authority to help keep the Stibnite Gold Project from becoming another Superfund Site on the National Priorities List.

I'm concerned about a number of items with the DEIS that I will outline below, but I am most immediately concerned about the following for the protection of the health and economic sustainability of our citizens:

[bull] Polluted drinking water

[bull] Loss of fish and wildlife

[bull] Contaminated soils

[bull] Various associated health risks

[bull] Reclamation costs handed to the public after Midas Gold leaves

The beauty of Idaho's intact wilderness and the healthy ecosystems managed by the US Forest Service are what make Idaho special. Unparalleled scenery and wild, free-flowing, largely pristine rivers are also the foundation of Idaho's most sustainable economy: recreational tourism. The South Fork of the Salmon (SFS) is not explicitly a popular recreational destination and is of lesser economic importance to the recreational tourism economy of Idaho. However, the SFS is a large and important tributary to the (Main) Salmon River and the health of the Salmon River, its fisheries, and its pristine and scenic qualities that drive an enormous recreational tourism economy is dependent on the continued protection and conservation management of the SFS.

I am worried about the continued health of the river and forest ecosystems in the headwaters of the South Fork of the Salmon River. I believe there may be some additional components to evaluate, and I would like to ask the following:

1) to ask the Forest Service to create a Supplemental Draft Environmental Impact Statement for the relative agencies and public to review and have the opportunity to comment on in order to address all of the missing and incomplete information of the current DEIS a small sample of which is discussed below. This is the most CRUCIAL piece in transparency.

2) to support Alternative 5, the No Action Alternative, outlined in the existing Stibnite Gold Project's Draft Environmental Impact Statement.

In its current state, the DEIS seems incomplete with a lack of important information. This clearly impedes the public's ability, and the USFS's ability, to properly evaluate the significant adverse impacts of the Stibnite Gold Project. It is simply missing important information. Additional information that MUST be included in the DEIS:

[bull] A mitigation plan for transporting cyanide into and along the SF Salmon River, and Burntlog and Johnson Creeks

[bull] Adequate information on the adequacy of the leak detection layer (for Alt. 2) / the functionality of the

MicroDrain liner/leak configuration

[bull] Information on whether or not the public have access to this area and regional recreation / hunting access during mining operations

[bull] The DEIS clearly states that all of the alternatives presented, apart from Alternative 5, would adversely affect federally listed endangered fish species, their habitat, and the watershed's water quality and quantity. This further negatively impacts economic vitality related to tourism and recreation of surrounding communities and those in Idaho who depend upon the integrated watershed of Salmon River systems and the hundreds of thousands of visitors each year to our National Forests. This number and economic benefits are growing immensely annually, with a recorded record number of visitors and related economic benefits in summer 2020. Information regarding future monitoring reports (which are already public documents). Will these be delivered honestly, and reliably and posted on a website for real time public access?

[bull] Information on accountability for Midas's mining practices

[bull] Information on accountability and future funding for restoration / mitigation projects when the mine becomes inactive

Secondly, after reviewing the DEIS I fully support Alternative No. 5[mdash]the No Action

Alternative[mdash]because I strongly believe that the negative environmental and social impacts (largely omitted in the DEIS) strongly outweigh any positive economic or job-bolstering effects of Midas's proposed Stibnite Mine Project. The following is a brief list highlighting some of the most important reasons that I support the No Action Alternative:

[bull] Cyanide leach mining is a practice banned completely in the state of Montana (1998), Wisconsin (2001), 5 Colorado Counties (2004), and many other countries around the world related to a high affinity for failure and environmental destruction

[bull] Midas's claims that this is a reclamation project but the re-mining is a very small portion of the project; ultimately this is a proposal for a cyanide leach dam double the current size or more

[bull] There is no reclamation or mitigation plan: "no definitive plan in place" and this needs clarification in a supplemental DEIS

[bull] Midas continues to claim safe environmental practices but I cannot find an example / proof. Therefore the DEIS must include requirements for accountability for Midas in the form of binding legal documents

[bull] Even in the DEIS, there is not compelling evidence to refute concern that this mine will have a negative and permanent impact on the health of the downstream ecosystems (fishing, hunting etc.) and recreational landscape of the river corridors

[bull] There is a long history of mining companies going bankrupt and/or leaving sites in environmental distress / destruction requiring the use of federal funds (ie: Superfund Sites). This proposal must include binding legal documents that hold Midas[mdash]and any future entity charged with mining operations[mdash]accountable for future environmental cleanup.

In summary, based on the long history of mining practices, specifically regarding open-pit mining and cyanide leach mining, there is ample evidence to support the conclusions that:

1) there is a high probability that despite Midas's best intentions and promises there will be enduring and unalterable negative and permanent environmental impacts associated with the proposed project.

2) If an accident or incident occurs that causes environmental destruction or degradation, especially if Midas or future mine operators are not directly negligent (i.e. earthquake / storm or flood of unprecedented intensity), no person, corporation or entity will be held financially accountable for remediation or cleanup; explicitly, it is a irrefutable fact that the potential and magnitude of environmental destruction or degradation of the SF Salmon and the downstream resources is much, much greater if the 4 proposed alternatives are endorsed by the USFS versus the No Action Alternative.

3) in light of the aforementioned conclusions 1 and 2 above, the potential economic benefits touted by Midas to bolster support for their preferred alternative(s) would not be long term or sustainable economic benefits for

Valley County or Idaho, and do not outweigh the risks associated with the proposed project moving forward within the scope of any of the 4 proposed alternatives.

Thank you for taking the time to consider my comments, and the numerous comments of other extremely concerned citizens. We need to get this right.

I am concerned about the continued health of the river and forest ecosystems in the headwaters of the South Fork of the Salmon River and therefore I am writing to request for extension of the comment period for the Draft EIS for the Stibnite Mine Project to 120 days. Many who are concerned have not had time to comment during the excessively short comment period. It's not due to lack of concern, but life has been very complicated for a number of people during this pandemic and historical election year/process. It seems as though there are so many things to be concerned with that it would stand to reason that an extension to the full 120 days would be in the public's best interest. The very public that owns 2620 acres of the potentially affected 3500 acres.

Therefore, and for the additional reasons that follow, I'm requesting that the comment period be extended to the full 120 days:

1) The DEIS for the Stibnite Gold Project contains an enormous amount of information, much of which has not been readily available to the public. It is unreasonable to assume that 45 days plus the given partial mini-extension (to 10/28/2020) is enough time to thoroughly examine and comment on a document thousands of pages long. The full extension of 120 days is needed as a minimum to review the document in a way for citizens to be able to submit substantive comments.

2) Similar mining proposals, such as the Pebble Mine DEIS 2019 (120 days), Rosemont Copper Mine DEIS 2011 (90 days), Idaho Cobalt Project 2007 (originally 60 days but was extended to 90 days in response to requests for additional review time), Thompson Creek Mine MMPO DEIS 2014 (modified mine plan of operations 90 days), have had comment periods at least twice as long.

3) Further, the given comment period does not account for input from citizens who may have had their time/bandwidth further limited due to life events (such as births and deaths) and/or the extensive amount of natural events (wildfires and hurricanes) that have impacted citizens during the limited given comment period. In order to hear public input, you must account for the true limitations and lack of inclusivity for citizens of different circumstances in the given number of provided days.

4) In the given comment period, there is a lack of acknowledgement that this comment period also falls immediately before the national election, and citizens have limited bandwidth due to personal obligations to engage in political processes. More time is needed to comprehensively review this project during this time of a national election.

Thank you very much for your hard work and for reading this comment, and the comments of so many other concerned citizens. I urge you to strongly consider extending the comment period for the Draft EIS for the Stibnite Gold Project to 120 days. We need to get this right.

If you would please confirm receipt of this message, it would be greatly appreciated.