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Organization:

Title:

Comments: Dear US National Forest Service Staff,

Thank you for the opportunity to comment during the Draft Environmental Impact Statement (EIS) public comment period for the Stibnite Gold Project.

I believe the project presents a plan to repair the environment and boost Idaho's economy - particularly under Alternative 2. Over the last 100 years un-regulated historic mining operations and natural processes have resulted in significant degradation of many elements of the environment in and around Stibnite. Loss of fish passage, potential water quality degradation from previous unregulated mining activity and excessive erosion are all of great concern to our communities and the environment. While the last round of mining and reclamation (80's and 90's) stabilized some of the legacy impacts and made some improvements in water quality as a result, they are a far cry from the restoration proposed by the Stibnite Gold Project.

In reviewing the Stibnite Gold Project Draft EIS it is clear to me that some additional alternatives need to be considered when preparing the final EIS. Access to backcountry recreational opportunities are critically important to myself and Idaho residents.

My first suggested alternative is related to the proposed OHV connector trail mentioned in the PRO (page 6-9) and discussed in the Draft EIS throughout Section 4.19. I propose that this connector OHV trail connect the end of road 1290 to the end of trail 233 thereby allowing a loop opportunity for OHV and lesser class vehicles. This would allow for some much-needed connectivity in OHV routes in the area and I believe discourage recreational OHV traffic from routing through the mine project and making an overall safer recreational route.

My second suggested alternative is related to Public winter access. The maps in Appendix N-2 through N-5 indicate the Warm Lake Road section from the existing snowmobile turn around up to the Johnson Creek bridge as being closed to public access during the winter. The maps indicated this closure is a "Mitigation measure to close to public use from Warm Lake to Landmark" (see attached image).

This mitigation measure is not described in appendix D and I am unsure how limiting public access along this stretch is a mitigation measure or what impacts are being mitigated. I would encourage the Forest Service and its contractor to analyze an alternative for the final EIS that allows winter access on all plowed public routes in the winter. This will allow a more dispersed recreational opportunity in the back country and supports some dispersed recreation around Warm Lake.

Lastly as an Idahoan for more than 28 years and an employee of Midas Gold for the past eight years with duties ranging from permitting support to environmental compliance and now to overall management of field operations, including occupational health, safety, and environmental, I want to point out that Midas Gold as a company and its staff as individuals go above and beyond to be a good neighbor to our local communities, be it Yellow Pine, Cascade, Donnelly or McCall. Our Safety Culture has been at the core of the work we do at Stibnite. This is especially showing in our fuel transport protocol. With a pilot vehicle out front, two emergency response vehicles traveling downstream of the transport vehicles and a chase vehicle in the rear we stay in constant contact with each other and the transport vehicles via VHF radios, with satellite vehicle tracking, a Sat-phone and a SPOT as backup. Our emergency response trailer has the appropriate equipment to offload an entire transports quantity of fuel and safely store it in temporary expandable tanks in the event of an incident. It also has the capability to boom and capture residue in the event of a spill into waterways. While Midas Gold hopes to never have to use any of the equipment identified above, through proper training and inspections, it does not stop us from being prepared to do so. This culture of safety and emergency preparedness doesn't stop with our onsite activities. Be it lending out our emergency response trailer to the McCall Fire Department to respond to a fuel oil spill in Payette Lake to shutting down operations to allow our onsite medic to assist with a broken arm in Yellow Pine to plowing open six miles of road to rescue two separate groups of archery hunters and their stock stranded by an early fall snow storm to assisting search and rescue with locating a lost hunter; Midas Gold has always and will continue to be a partner within our communities.

Our emergency preparedness will only increase as the project develops and we advance into construction and operations. Midas Gold is committed to have a dedicated emergency response team and medical personnel onsite at all times across all shifts during operations. Not only will these emergency response teams support the project site but they will cross train with local, county and city emergency response teams to facilitate safe and efficient communication in the event of a joint emergency response, much like how our existing staff participate in training events with the Yellow Pine Volunteer Fire Department. Many of the site emergency response and safety personnel will call Valley County home. Given the unique shift style work schedule at Stibnite this will allow individuals to volunteer their skills and training within the communities that they reside, should they so choose to, providing an overall higher level of emergency services than exists today.

ATTACHMENT: Screen Capture showing Warm Lake Road.