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Organization:

Title:

Comments: As a full-time Valley County resident, I am writing to voice my concerns about the DEIS for the Stibnite Mining Project.

[bull] Midas is seeking approval for Alternative 2. However, there has not been a detailed, revised plan for this alternative submitted to the Payette National Forest. It is impossible to complete a thorough review on this alternative without the plan. (Page ES-13)

[bull] Water is a priceless resource. Midas is going to need water for the operations of the Stibnite Mining Project, and although Midas Gold has four water rights, additional water is needed for Alternatives 1, 2, 3 and 4. Midas does not state if water rights have been obtained. (Page ES-24) Midas does not have the water rights proposed for potable use, they have not applied for these rights from IDWR. (Page 2-53).

[bull] It is stated that tribal access to the area will be restricted. (Page ES-36). These Native American Nations have treaties with the United States that MUST be observed.

[bull] The number of deliveries for fuel alone is going to increase the traffic to the mine. Diesel fuel, gasoline, Ammonium Nitrate and Lime will have several deliveries per year. (Table 2.3-6). These materials could create a hazard if an accident occurred. (Page 2-60). The Spill Prevention Plan has not been developed. (Page 2-58).

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[bull] The standards for Closure and Reclamation need to be set at a level that is more stringent than the current levels of toxins. The site has been degraded by previous mining activities that have not properly restored the site. Midas needs to pay a type of bond to ensure that there will be funds for proper Closure and Reclamation.

[bull] Tourism is vital to Valley County's economy. If this project is approved, there will be several impacts to tourism:

Loss of access to some public lands (Page ES-33)

Stibnite Gold Project would violate the Valley County lighting ordinance (night sky). Nighttime lighting would be substantially increased at the mine site, maintenance facilities and on the roads. (Page ES-35, Page 4.20-7, Page 4.20-52) Per the Valley County lighting ordinance, 6-2-3, exterior lighting on property used for commercial purposes must be in conformance of the ordinance.

Impacts to the water quality for the tributaries flowing into the East Fork of the South Fork Salmon River could be quite damaging (Page ES-26). This river is a tributary to the Salmon River, a designated Wild and Scenic River. People from all over come to enjoy this special river. Polluted water would impact the recreation use of the Salmon River waterways.

The water quality for critical fish habitat will be disturbed by increasing the water temperatures, changing the water flow and possible pollutants entering the streams. (Pages ES 29-31). The fish that are salmonids in this area have special status as endangered or needing special management. The fish populations in the area of the Stibnite Mine would be severely compromised. Many anglers come to this area for their fishing enjoyment.

The proximity of the mine to the Frank Church River of No Return Wilderness is a concern. The effects of the proposed new roads and the traffic on the roads, power lines, having year round human activity, and increased noise on the surrounding wildlife and their habitat would be harmful. (Page 4.13-2). How threatened and endangered species would react to these changes in their range is unknown (Chapter 4.13). Many hunters from all over the United States come to Idaho for big game hunting. The movement of game may cause these hunters to go elsewhere, effecting the guide industry and the communities in Valley County. There would be a visual impact from Stibnite on the Frank Church Wilderness (Page 4.20-40)

[ldquo]There are several ways that SGP activities at the mine site and related infrastructure could potentially affect recreation use[rldquo]. (Page 4.21-19).

[bull] Mining is a boom or bust industry that can harm small communities like those in Valley and Adams counties:

Midas has stated that most of the jobs will be held by employees that will be working 2 week shifts. Some families may choose to stay at their present locations, but some may choose to move closer to the mine. Affordable housing is already an issue in Valley County. As of October 26, 2020, there were 106 listings for residential real estate in McCall. Of those listings 31 were active and 75 were pending. There were 13 listings for residential real estate in Cascade, with five active listings. The proposed salaries to be paid to Stibnite Mining Project employees may not be adequate to buy many of the houses in this area. (Page 4.21-6)

If the employees choose to stay at their present location, there would be no benefit to local economies as the spending of these families would not be buying from local businesses and the taxes paid would not go to Valley County. (Page 4.21-23)

McCall-Donnelly Schools are at or above capacity. (Page 4.21-16). It was stated that the McCall-Donnelly School District would be able to accommodate more students if a bond is passed. Passing a bond is not a sure venture.

[bull] Idaho has a history of seismic activity. There have been several earthquakes in the area of the Stibnite Mining Project. (Page 3.2.-17). Midas does not have a detailed plan on how the mine would protect the surrounding area from harm from a major earthquake as the ones experienced near Mackey and Stanley. The only statement states results from a model. (Page 3.2-20).

[bull] Midas Gold is a Canadian company. No royalties from the mining activities would be paid to the United States (1872 Mining Law of hard rock mining). My biggest concern is that Valley County takes the brunt of the environmental damage due to the Stibnite Mining Project, but will receive very little in return.

The Stibnite Gold Project proposed by Midas Gold is a huge project that will impact so many areas of Valley County. It is such monumental task to review the DEIS for the public and for the Forest Service staff. My hope is that the concerns of the Valley County and the Idaho Community will be heard. Thank you for your time.

Pam Wissenbach