Data Submitted (UTC 11): 10/28/2020 6:00:00 AM
First name: Shannon
Last name: Ansley
Organization:
Title:
Comments: Dear FS,

Attached below are my comments on the DEIS for Stibnite Gold Project.

Thank you,

Shannon Ansley

Specific citations: Section ES- 2.0, third paragraph, second sentence: The current representation of the SGP to the public is disingenuous and misleading. As advertised in public meetings, agency meetings, on the Midas Gold website, in press releases, and in other media outlets, Midas will [ldquo]restore the site[rdquo], a legacy mining area, and return fish passage and improve water quality in the East Fork of the South Fork of the Salmon River. This advertising stance is a gross exaggeration of what will actually happen according to the Midas Gold Water Quality Management Plan (WQMP). This reviewer suggests that Midas stop all misrepresentation of the SGP. Water quality in the EFSFSR will not change in any significant manner, as proven/shown by your geochemical modeling in the WQMP. Unless the water treatment system is enlarged and includes treatment of all water in the EFSFSR, then the inaccurate assertions should stop now.

In reference to Table 4.1-1, this document contains incomplete and missing information necessary for the public to determine and evaluate the full impacts of the Stibnite Gold Project on the area studied. Please prepare a Supplemental Draft EIS that does contain all information necessary for the public and agencies to determine full impacts. Midas Gold and the Forest Service have an obligation to the public and surrounding communities to provide full and complete disclosure of information necessary to fully evaluate impacts from the SGP.

Specific citations: ES 6.0, 6th bullet: This reviewer requests that during construction, operation, and long term monitoring of the mine and surrounding area, full public and tribal access to roads going into and out of the mine area should be allowed and maintained.

Ongoing public communication and accountability are not addressed in this DEIS. This reviewer requests that during the periods of construction, operation, and monitoring of the mine, ALL reports, communications, documents, evaluations, and notices shall be entered into a public-access website or database in a timely fashion so as to inform the public and surrounding communities of progress, issues, accidents, and managerial decisions relative to the construction, operation, and long term monitoring of the mine property and surrounding area.

Midas Gold should conduct a Habitat Equivalency Analysis of all of their properties in the Stibnite Mining District to determine the total value of habitat lost, including degraded resources such as surface water quality, groundwater quality, soil quality, vegetation, visual resources, Tribal Treaty Right resources, and wildlife (https://yosemite.epa.gov/Sab/Sabproduct.nsf/WebFiles/HEA/$File/HEA-03-09-09.pdf). The assessment of the full value of lost resources, including all of the above mentioned resources, must be repaid or mitigated to the American people, citizens of Idaho, and the three Tribes of Idaho whose ancestral lands the mine occupies. Mitigation could include, per this reviewer, breaching the 4 dams on the Lower Snake River in Washington (financial support, political support, and lobbying effort) that would help restore salmon into Idaho waters.

No section in this DEIS includes/addresses the effects of climate change on the ecosystem, the landscape, surface and groundwater volumes and contaminant levels. This must be an integral evaluation on all aspects of the mine and how Midas will adapt to climate change in the way they mine the resource, how and how much water volume will be treated, and how contaminant sources in the area but not included in the mine plan will be addressed/cleaned up. In addition, control measures, increased precipitation or increase in severe precipitation events, extended drought, and fire are climate change effects that must be discussed and evaluated and planned for in the MOD PRO (Alternative 2).

Table ES4-1: Table ES4-1 lists many significant impacts to the ecosystem from Alternative 2 for the Stibnite Gold Project that are unacceptable. In addition, this list is not exhaustive or fully accurate. Midas and the FS are obligated to fully and honestly disclose all impacts that will occur. Otherwise, this DEIS is incomplete and unacceptable.

Section 3.4.3.3.18: The inclusion and discussion of the Shoshone-Bannock, Nez Perce, and Shoshone-Paiute use of and ancestral connection to the land at and around the Stibnite Gold Project, and particularly the traditional and cultural significance of ancestral and current fisheries is downplayed in this DEIS. This is unacceptable. Please include discussion and detailed evaluations of the significance of the EFSFSR and its tributaries in a Supplemental DEIS for this mining project. All that you suggest, Section 3.17.3.1.3 is [ldquo]The analysis area is still used by and of interest to these tribes (Battaglia 2018; Forest Service 2003, 2010; Walker 2019).[rdquo] This statement is not a full and comprehensive assessment by any means. And, Midas will please consider supporting and advocating for removal of the 4 dams on the Lower Snake River in Washington as part of mitigation activities for this mining project which would help restore salmon into Idaho waters.

What grade is the antimony that you will be harvesting as a byproduct of gold processing? Forest Service 2015 says that (Section 3.17.3.1.3) antimony deposits after wartime mining were low-grade due to a played out deposit. If your antimony harvest is low-grade then how will it be profitable other than being used as a ruse to slide onto the critical infrastructure list to support Trump administration and his wealthy cronies? Please explain.

Because of the recent Covid-19 pandemic and the expected continuation of Covid-19 transmission in perpetuity, Midas Gold must now include and address Covid-testing, vaccination, social distancing, living quarters of mine workers, large population concentrated in a small area, access to health care and emergency services, and community transmission within the mine area and to neighboring communities. Section 3.18.1 Public Health and Safety Scope of Analysis must be expanded to include Covid-19 issues.

Traditional Ecological Knowledge is not incorporated into this document anywhere. This is an astounding data gap in the DEIS and must be rectified. [ldquo]Working Definition of Traditional Ecological Knowledge: Traditional Ecological Knowledge, also called by other names including Indigenous Knowledge or Native Science, (hereafter, TEK) refers to the evolving knowledge acquired by indigenous and local peoples over hundreds or thousands of years through direct contact with the environment. This knowledge is specific to a location and includes the relationships between plants, animals, natural phenomena, landscapes and timing of events that are used for lifeways, including but not limited to hunting, fishing, trapping, agriculture, and forestry. TEK is an accumulating body of knowledge, practice, and belief, evolving by adaptive processes and handed down through generations by cultural transmission, about the relationship of living beings (human and non-human) with one another and with the environment. It encompasses the world view of indigenous people which includes ecology, spirituality, human and animal relationships, and more.[rdquo] https://www.fws.gov/NativeAmerican/pdf/tek-fact-sheet.pdf

SPECIFIC COMMENTS

Alternative 2 leaves 3 open pits, placement of tailings in a TSF in upper Meadow Creek valley, and placement of

development rock in 3 DRSFs. This much remaining on land surface disturbance is unacceptable in this area of Idaho. Redesign your plan of operation to leave no open pits or large scale development rock or tailings disposal monoliths at all at the end of operation. Midas Gold can spend more of their profit to move dirt at the end of the project. Alternative 2 is not a legitimate or acceptable option.

In the groundwater modeling effort, there is no long term fate analysis and prediction of water chemistry and movement through the hydrologic system from open pits remaining into the EFSFSR after mining is completed. This is a significant data gap that needs to be addressed. Suggest more modeling and supply data in a Supplemental DEIS.

The 2020 Brown and Caldwell Ground Water Quality Management Plan (GWQMP) significantly informs the public regarding the results and actual impacts to EFSFSR water quality improvements offered by the water treatment plant. In reality, modeling shows that the improvement to overall EFSFSR is insignificant, even though the outflows from the water treatment plant will meet regulatory standards. The public needs to be made aware of and have access to this information, which is not included in this DEIS. Please disclose this information in a Supplemental DEIS.

There is an obvious lack of adequate identified growth media and uncontaminated cover rock for reclamation activities. Please explain how you will obtain and from where you will obtain the necessary quantity needed for reclamation.

It is disingenuous to claim that the production of byproduct antimony from the SGP processes qualifies to include the SGP as a critical infrastructure project. Midas will be shipping out antimony froth/slurry for processing. Midas has no buyer, no processor, and no indication of whether transportation costs will override profit from production. Production of antimony is expected to be low compared to antimony production around the world.

The cartoon image of a [ldquo]reclaimed and restored Yellow Pine Pit[rdquo] is misleading to the public. This reviewer has serious concern about reclamation and rock material called soil that will not provide adequate substrate to plant and sustain growth. There are no nearby sources, without scouring/destroying more land, for providing enough growth medium. Consequently, diminished soil quality could hinder reclamation efforts involving revegetation of disturbed areas in the SGP area.

How is Midas [ldquo]restoring the site[rdquo] when the SGP project will actually create and increase contaminant sources that will need to be monitored, maintained, in perpetuity (such as the tsfs, drsfs, new tailings piles, etc.)? Please provide a comparison for the reader that defines current contaminant sources (per the Nez Perce Clean Water Act lawsuit) versus the contaminant sources and monitoring points that will be created during the SGP.

GHG emissions, winter weather, low wind movement etc will cause significant reduction in air quality for mine staff, particularly those who are housed at the mine. Please explain how air quality will be monitored during construction and operation phases of the mine and how mine staff be protected.

[ldquo]Lower streamflows, increased water temperatures, and decreased water quality would adversely impact aquatic species and habitat. Process and design modifications, such as rerouting Hennessy Creek, Lining the Meadow Creek diversion channel, piping low flows, and continued use of rapid infiltration basins would help to minimize these impacts.[rdquo] This is an unacceptable environmental consequence of the SGP. Proposed mine operation methods such as large-scale stream rerouting, lining and infilling large areas of drainage basins, and direct injection (rapid infiltration through rock material that will not provide any COC treatment or reduction in concentration) are unacceptable and commit large scale and irreversible damage to the environment.

[ldquo]Available RCM may not be of sufficient quantity or quality to achieve reclamation objectives of returning disturbed areas to productive conditions that sustain long-term wildlife, fisheries, land, and water resources, as

defined in the Reclamation and Closure Plan (RCP) (Tetra Tech 2019).[rdquo] [ldquo]alteration of natural soil characteristics that results in immediate or prolonged loss of soil productivity and soil-hydrologic conditions. site-specific challenges for reclamation that are associated with low organic matter, high rock content, and background metals concentrations of the soils, as well as challenges with long-term stockpiling of RCM[rdquo]. The above environmental consequences of the SGP are unacceptable. Inadequate soils or growth media coupled with highly fractured rock areas will commit unacceptable and large scale and irreversible damage to the environment.

[ldquo]For most of the areas to be reclaimed, there would be a long delay (18 to 20 years) between the time when the site is initially disturbed and when it undergoes final reclamation (refer to Figures 1 and 2 of Appendix G-2). This would substantially reduce the number of years remaining to successfully recover soil productivity prior to the 50-year threshold associated with TSRC. For example, there would be a 20- to 22-year delay from initial disturbance to final reclamation of the TSF, and DRSFs would range from an 8- to 18-year delay;[rdquo]. The above information, while provided in this DEIS, is largely buried in the 5,000 pages of text, figures, tables and appendices. Please stop advertising the SGP project as a [ldquo]restore the site[rdquo] project.

Instead of harvesting wood for milling, use all harvested wood into compost the material and store for the next 18-20 years to provide material for soil amendments and cover material. That would be a much better use for harvested wood.

What other smallish measures could Midas take to reduce inputs of contaminated seeps etc while up there mining. Such as eliminating COC input into Sugar Creek or taking care of /eliminating input from other sources identified in the Nez Perce lawsuit. Make the effort. Midas has the money.

[ldquo]The magnitude of impacts to soil resources within the PNF activity area includes excavation, grading, or filling of 1,616 acres (approximately 120 acres of which are already disturbed to some degree from historical mining activities or other TSRC), and a net increase of TSRC in the PNF activity area of approximately 1,357 acres (from an existing 259 acres to 1,616 acres).[rdquo] The impacts to soil resources from the SGP are unacceptable and the SGP should not be approved.

6 inches of GM is inadequate for plant growth and stability in the vicinity of the Stibnite Mining District and the SGP. Please increase GM for reclamation areas to at least 1.5 feet.

You have gone this distance so far, so go the rest of the way to creating novel solutions for reclamation, visual, soil, and contaminant impacts.

There should be considerations for staff in the event of an inescapable fire event[hellip][hellip]fireproof building materials, escape/shelter structures, fire shelters, supplied O2, etc.

The impacts to soil resources from the SGP are unacceptable and the SGP should not be approved. [ldquo]The short target timeframe for achievable reclamation measures (e.g., 5 to 10 years) would not be sufficient to establish trends in soil resources and productivity that may take decades to develop within the conditions that pertain to the activity area, especially with respect to the short growing season and harsh winters. The loss of productivity of GM stored in long-term stockpiles and the long delay between the time when the site is initially disturbed and when it undergoes final reclamation would affect GM quality and would substantially reduce the number of years remaining to successfully recover soil productivity prior to the 50-year threshold associated with TSRC.[rdquo]

Stability and failure analysis of all tailings dams: In the GEOTECHNICAL STABILITY OF PROPOSED MINE SITE STRUCTURES section 4.2.2.1.2.1 TSF Dam and Hangar Flats DRSF, it does not appear that liquefaction effects during a seismic event on saturated or partially saturated tailings/development rock was accounted for or

modeled. Considering the large volumes of material impounded behind the TSF dam and the potential breaching of this dam during a liquefaction event, the subsequent impact to the mine area and the EFSFSR and downstream reaches would suffer unrecoverable damage and degradation. Please redo failure analyses to include the potential for liquefaction of all DRSFs and the TSF (including all DRSFs existing and to be created during mining). Tailings impoundments at Blackbird Mine have done such analyses and they included an increased safety factor for liquefaction potential. Midas SGP can do this as well. The TSF that is proposed to fill the Meadow Creek drainage will be particularly vulnerable. The reference to this comment is in the Alternative 1 section but applies to Alternative 2.

404(b)(1) Analysis Framework section contains incomplete information. Please include a completed permit application into a Supplemental DEIS for the SGP. The reference to this comment is in the Alternative 1 section but applies to Alternative 2.

Reduction of highwalls created during mining: While pit slope design during mining appears to be adequately addressed, leaving these pit slopes exposed after mining ceases is a concern. Slope and high-wall reduction after mining needs to be addressed in this section and other applicable sections. The reference to this comment is in the Alternative 1 section but applies to Alternative 2.

Midas indicates that their current mitigation plan is outdated yet they still present it in this DEIS. They state that it applies to Alternative 1 only. Midas must update the mitigation plan to be applicable to Alternative 2 and re-present it to reviewers for comment. This reviewer suggests inclusion of this information in a Supplemental DEIS.

Per drawings and written information, the Meadow Creek drainage, after the TSF and associated dam are constructed, will completely remove the Meadow Creek system from fish passage and result in permanent loss of salmon habitat. This is unacceptable. Please re-evaluate the disposal of tailings into the Meadow Creek drainage.

Please re-evaluate the need for leaving open mine pits at the end of mining. Backfilling mine pits is a preferred alternative to filling in valleys (Meadow Creek) and creating additional DRSFs that will need capping and monitoring in perpetuity. All pits should be backfilled with waste rock and spent tailings and capped with impermeable covers that can then be revegetated. That would be restoration of the site, not what is currently proposed. Please evaluate this as an additional alternative in a Supplemental DEIS.