

Data Submitted (UTC 11): 10/28/2020 6:00:00 AM

First name: Dale

Last name: Allen

Organization:

Title:

Comments: Please accept the following comments about the SGP, DEIS. I have spent a considerable amount of time in the country around the SGP impact area. I first visited the Stibnite area in 1994 while working for the SW Region of IDFG. From 2001 to 2018 I was the Regional Fishery Manager for IDFG stationed in McCall. I was responsible for the fishery management program in the South Fork Salmon drainage and have worked in the area hundreds of days. I am very familiar with Midas Gold's plans and was involved in many tours and meetings about the project before the DEIS process began. My thoughts about the SGP have been formed over several years and much research.

I believe it is in the best public interest to adopt Alternative 5; not allowing the SGP to proceed on US Forest Service public lands. The DEIS identifies many short and long lasting environmental issues with the mine development. There is an overall risk to the anadromous fish populations in the SF Salmon River that are already depressed. Mining run-off and chemical accidents are likely to affect water quality in the mine footprint and downstream. There is not a good choice of access routes into the project; they both have long term consequences. The project will affect fish and wildlife of the State and lower the overall productivity of the environment. The social and economic impacts to Valley County are not all positive, despite ten years of Midas Gold's PR lies. Midas Gold is not a mining company; the SGP will be completed by another entity, the development and operation of the mine might be quite different than proposed.

My opinion is worth about as much as the cost of paper to print it, but I offer some specific concerns with the DEIS below.

Road Access

Do not use Johnson Creek Road and Yellow Pine as the mine access. The amount of diesel and toxic materials moving into the mine could be spilled at any time. Chemical spills here could easily directly kill several year classes of listed fish and resident fish species. Increased sedimentation from gravel roads will impact spawning and rearing capacity of the streams.

The Burntlog route is only slightly better. This route should be closed to motorized public traffic for the life of the project, allow only necessary travel. The public should be allowed to use the existing route above Yellow Pine to access public lands beyond the SGP. Open use of the new sections of the Burntlog road will destroy wilderness values, impact numerous wildlife species and likely force IDFG to severely curtail big game hunting opportunities. Even though plans call for removing the road after mine closure, if the public has been using this road for years there will be lots of pressure for the road to remain open.

Fish

Do not construct a fish-way in the East Fork diversion tunnel. There will be direct mortality of listed species with its use, even if it passes some fish. The anadromous fish stocks in the SF Salmon are not habitat limited. The populations are in a decline currently and any migration into the mine industrial zone could likely be a subtraction to the overall population. The waters in the mine area could well become a population sink. Fish in the mine area of Meadow creek will be subject to reduced water volume, increased water temperatures, increased sediment, changes in water quality from numerous sources. The temperature modeling depicts the best estimate of just under lethal water temperatures through most of the mine period. If temperatures are just slightly higher than modeled mortalities will increase for all species.

Place a physical barrier above Sugar Creek to prevent fish access till the East Fork channel is constructed in the Yellow Pine pit. By this time a majority of the artificial channels should be complete.

Do not trap and haul fish above the yellow pine pit.

Do not connect the Hanger Flat pit to Meadow Creek. Make the decision to connect the stream after the pit is filled.

Blowout Creek rehab should include a step pool channel if the meadow valley channel will support fish.

Much effort was used to estimate chinook spawning in the project area and data collected showing chinook presence. These chinook were from excess adults collected and transported from the IDFG trap on the SF Salmon River. This summer chinook program is in cooperation with the Nez Perce and Shoban Tribes and funded by the USFWS. Transport of excess chinook adults will never happen again from this program because of tribal concerns about the mine operation.

In my professional opinion the fish-way and fish programs proposed by Midas Gold are a net negative to the SF Salmon River and are just more of Midas gold's PR campaign. If the river channel is put back to a grade usable by native species there can be a net positive gain for the fish populations after the mine closure.

Water Quality

There are currently water quality issues from arsenic, mercury and other heavy metals. A long-term water quality facility is needed from the start of operation and well past mine closure. Who will run this and how would it be funded?

Economics

It was pleasing to see some objective look at the labor force and how it might affect the local towns. The housing shortage discussion should be updated to the year 2020, several factors have made the availability of housing even worse from the 2017 data used.