Data Submitted (UTC 11): 10/28/2020 6:00:00 AM
First name: Devon
Last name: Boyer
Organization: Shoshone Bannock Tribes
Title: FHBC Chairman
Comments: I am sending this at the request of the Chairman for the Fort Hall Business Council.

Thank you for allowing the Shoshone-Bannock Tribes an opportunity to submit comments on the Stibnite Mine DEIS. Our comments are in Attachment #A and look forward to continue working with the Payette and Boise National Forests on the Stibnite Mine. Other comments such as the Ethnographic Study will be forth corning.

If you have any questions or comments, please feel free to reach out to us.

1. The Shoshone-Bannock Tribes do not concur in nor accept the loss of Trust Resources the USFS identifies as Irreversible and Irretrievable Commitments of Public Resources from any permit issued or approval of the Stibnite Gold Project. The Tribes do not believe the USFS or other federal agencies may commit loss of trust resources on behalf of the Tribes. This commitment of losses to the Trust Resources does not align with the policies of federal mining and minerals policies; to lessen any adverse impact of mineral extraction and processing upon the physical environment that may result from mining or mineral activities. Some Mining and Minerals Policy Acts, identify liability for damages .... from mining activities and other mining laws and regulations call for the full reclamation of disturbed areas. Not for partial reclamation, not for partial loss of habitat and use of resources, but protection of environmental resources and full reclamation and restoration of the resources impacted by the specific project. The SOP does not plan to reclaim or restore the resources impacted, see specific comment 16 and 17.
2. Please provide a Table in the ES of this document that lists all resources that will be irretrievable and irreversible impacted.
3. Please provide a Table or a list of all regulations, rules, acts, etc. the mine currently does not comply with, what actions will be taken to ensure compliance and when this will occur.
4. Please provide information surrounding all fees paid to the Secretary of the Interior for claims at this site from the time Midas Gold began exploration of mining at this site including maintenance fees, claim fees, etc. If deferments or waivers have been granted please provide that information including specifics for the deferments, waivers or other mechanisms relieving Midas Gold from these payment requirements. Please provide information on fees paid to the Secretary of the Interior for a location fee, dates and amounts and when the information was filed with the Bureau of Land Management. This information should be made available for public review.
5. Please provide information in the ES surrounding the type of claim Midas gold has for the USFS properties; specifically, the acreages of patent and unpatented claims, the length of the mineral deposit, equivalent to the length along a vein or lode and how many feet on each side of the middle of the lode or deposit. Provide information on the end lines of each claims.
6. It appears this project will impact the Salmon Challis National Forest as well as the Payette National Forest and the Boise National Forest. Please amend the DEIS or supplement the DEIS to include all impacts to the Salmon Challis National Forest and include all assessments of impact to this National Forest separately from the Payette and Boise National Forests. Inclusion of the Salmon-Challis impacts with the other Forests does not fully disclose to the public all impacts to all public lands. Water Balance diagrams are provided throughout the document for each alternative however, without flows and projected volumes it is not a water balance but rather a projection of water movement. Provide projected water flow volumes for each input and output everywhere the Water Balance figure is located.
7. Specific citations: Section ES- 2.0, third paragraph, second sentence: As advertised in public meetings, agency meetings, on the Midas Gold website, in press releases, and in other media outlets, Midas will "restore the site", 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 is an exaggeration of what will actually happen according to the Midas Gold Water Quality Management Plan (WQMP). Water quality in the EFSFSR will not change in any significant manner, as shown by SOP 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 be corrected to reflect SBP WQMP.
8. 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 SOP.
9. Specific citations: ES 6.0, 6th bullet: Please amend so 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.
10. Ongoing public communication and accountability are not addressed in this DEIS. We request 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.
11. 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 abovementioned resources, should be characterized and indexed so the three Tribes of Idaho whose ancestral lands the mine occupies are aware of the identified impacts to their resources.
12. Table ES4- 1: Table ES4- I 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.
13. 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 not accurate in this DEIS. Please include discussion and detailed evaluations of the significance of the EFSFSR and its tributaries in a Supplemental DEIS for this mining project. Section 3.17.3. 1.3 is "The analysis area is still used by and of interest to these tribes (Battaglia 20 I 8; Forest Service 2003, 201 O; Walker 20 I 9)." This statement is not a full and comprehensive assessment.
14. 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.
15. Traditional Ecological Knowledge is not incorporated into this document anywhere. "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." https://www.fws.gov/NativeAmerican/pdf/tek-factsheet.pdf

16. Appendix A- Payette National Forest and Boise National Forest Land and Resource Management Plans (Forest Plans) Consistency Review and Amendments - The Shoshone-Bannock Tribes have great concern with the USFS 's Consistency Review and with the proposed Management Plan Project Specific Amendments. It appears the USFS is selectively applying the context of the Plan to fit into SGP use of the land even though it is clearly outside the Forest Plans intended use of the area. Please provide a list of Project Specific Amendments to the USFS Forest Plans and how these amendments will impact the tribal treaty rights and public rights to these public lands.

1. Section E. 2.0, Page ES-12, Paragraph 2, Line 2-4: 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. We request the plan of operation be redesigned to leave no open pits or large-scale development rock or tailings disposal monoliths at all at the end of operation. Alternative 2 is not an acceptable option.
2. Section 2.3.3, Page 2-13, Paragraph 1, Line 4: (4) Closure and Reclamation (approximately 5 years at the mine site). This information is misleading to the public regardless if the following sentence states the environmental monitoring phase would continue for as long as needed to demonstrate that the site has been fully reclaimed. Closure and Reclamation will take upwards of 20 and 35 plus years. According to Figure 2.3-3, monitoring is planned for 35 plus years and closure activities 20 years. Revise the Closure and Reclamation section throughout the document (each Alternative) to disclose while the Closure of the mine site may take approximately 20 years, and likely longer and the Reclamation of the mine site will take a upwards of 35 plus years, as identified in Figure 2.3-3.
3. Table 2.2-3, Page 2-25: Provide information on how the pits will be accessed. Will these pits have benches and if so provide the width of each bench and the slope grade between the benches.
4. Section 2.3.4.4, Page 2-21, Paragraph 1, Line 5-7: Total closures of half-day to multiple-days could occur during construction work on Stibnite Road between Yellow Pine and the mine site, Part of Thunder Mountain Road, and Burnt Log Road. How does Midas Gold propose to provide alternative routes during these times for the public, with similar distances and road conditions to ensure the health and safety of the public that may need to travel on these roads? Please provide this information detailing distances and times for alternative routes. Loss of public road routes is a public health and safety issue.
5. Section 2.3.5.6, Page 2-31, Paragraph 3, Page 8-10: It is assumed that the concentrate, when sold, would be shipped to facilities outside the U.S. for smelting and refining because there are currently no smelters in the U.S. with capacity for refining the antimony concentrate. Provide specific information where this byproduct will be going. This is a large volume of material that must be processed. Logistic impediments may result in large volumes of hazardous materials being subject to storage on site or at an off-site location. Subjective information regarding the fate, transport and possible location of this material for processing is not acceptable.
6. Section 2.3.5.7, Page 2-33, Paragraph 5: Tailings Storage Facility- A Root Cause Analysis and Failure Engineering Analysis information should be provided in this section or a reference to where it can be found must be provided here. Section 3.2.3.9 references Recent Tailings Dam Failures but this is incomplete information. Information on possible causes of failures to this structure must be fully detailed. Should a catastrophic event occur, due to earthquake, failure of the structure the full impacts to ecological and human health should be assessed and information provided in order for the public to understand complete potential impacts from the project.
7. Section 3.3.3.2, Page 3.3-15: Hazardous Air Pollutants (HAP) - the SOP can be expected to emit HAPs but this information appears to be missing. The indexing of what Air Quality rules, regulations and affected environments listed does not provide information on projected air impacts for each category. Provide a summary of projected emissions from each of the categories listed in Section 3.3 Air Quality in addition to the reference of Table and Figures so the public is provided with an estimated emission for each.
8. Section 3.17, Page 13-71: Cultural Resources. This section describes regulations that are utilized in determining cultural resources such as eligibility, cultural landscapes and traditional cultural properties. The

National Historic Preservation Act (NHPA) Section 106 and its implementing regulations were developed without a tribal perspective. It is only through consultation and participating in the development of eligibility of sites (pre-contact sites) can they be truly be effective for protection and preservation of our ancestor's footprints on the land. Sometimes the process utilized for determining eligibility is lost without the Tribes input. And our existence is lost to the process.

9. Section 3.7.3.1, Page 3.7-7, Paragraph 4: Cultural Context. There is projected to be close to 100,000 gallons of fuels, oils, etc. stored at the mine site in AST and other tanks. Provide a Failure Engineering Analysis and risk information should a catastrophic event occur and these products were to leak or flow from their containment. Provide a summary of ecological and human health impacts.

10. Section 3.17.3.2, Page 3.17-7: Cultural Resources Investigations. Specific to the archaeological investigations pertaining to pre-contact sites, one site was noted and determined eligible to the NRHP by Dr. Sylvester Lahren who previously worked as an archeologist for Midas-Gold. He made recommendations for the site to be avoided with a 500-foot site protection buffer around the site. A power line alignment was a proposed development at that time with rerouting and/or spacing of the power poles can also be changed to avoid the site.

11. Section 3.17.3.2, Page 3.17-7: Cultural Resources Investigations. Why was another investigation for the site in 2018-20 I 9 for a re-evaluation for the pre-contact site? l11is is the only pre-contact site within the APE. There was testing clone on th is site to determine boundaries. Consultation should have occurred previous to the testing of this pre-contact site. The Tribes certainly would have objected to this activity. We did not receive a copy of the final report until the summer of2020 after we requested for the report. If this site is going to be adversely affected by the project activities, we request additional consultation to be ongoing.

12. Section 3.17.3.2, Page 3.17-7: Cultural Resources Investigations. The Tribes sense this area was used before the mining activities occurred and the tribal sites were adversely affected and destroyed with the advent of mining. The Bumtlog as most of all the roads within the mountainous areas of the area, were a trail system that was used by the people who lived and associated with the area. The Middle Fork is an important and significant area that the Shoshone and Bannock people utilized. The tributaries associated with the East Fork of the South Fork Salmon river, were used by our people from the Weiser Band, to the Lemhi people. ll1ey communicated with each other as they utilized this area.

13. Section 3.17.3.1, Page 3.17-11: The reference to Nez Perce and Shoshone-Paiute Tribes already have provided cultural context to the DEIS through ethnographic reports does not proceed the extent of work the Shoshone-Bannock Tribes have provided within the project activities through anadromous related projects and activities as well as cultural resource consultation within the Payette NF and the Boise NF. The Shoshone-Bannock Tribes have been active in their off reservation reserved rights to continue to enable their subsistence pursuits within their ancestral lands.

14. Section 3.17.3.2, Page 3.17-17: The Tribes HeTO would like to see the permit to excavate for the Stibnite Lithic Scatter pre-contact Site (I0VY 1488/PY-I 964 Testing methods (2018). This is the only pre-contact site within the APE and the Tribes were not consulted for the testing at the site. Was this to determine boundaries? The Tribes need to be consulted when determinations of eligibility occur and consult with potential mitigations measures. The pre-contact site must be avoided and all project activities relocated to avoid this sensitive and non-renewable historic resource significant to the Tribes. The Forest Service has a duty to consult with Tribes. That consultation did not occur in regards to the testing of the precontact site.

15. Section 3.17.3.2.1, Page 3.17-18: Under Pre-contact Site (I0VYl488) - this site is eligible for the NRHP, because it is important information potential for understanding central Idaho's prehistory. The tribal perspective needs to be included regarding this site. It is one of the only precontact sites within the project area. It would lead to believe there were more sites within the project area that were destroyed with the mining impacts.

16. Section 3.17.3.2.1, Page 3.17-18: Under Item Old Thunder Mountain Road (FR440) ( I 0VY3 I 2) describes this as linear resource utilized by Native Americans as a travel route and later a historic wagon road that extended from Emmett, Idaho via Cascade to Roosevelt, Idaho to access the Thunder Mountain mines. There were trails throughout the area that were used later by settlers moving into the area from living to prospecting.

17. Section 3.17.3.2.1, Page 3.17-18: Idaho Power Company Line 328 (IHSI 85-18148) built in 1943 should have archaeological surveys if they were not completed due to the early build of the lines. Any new lines associated with the SGP must have surveys completed before the ground work construction begins

18. Section 3.17.3.2, Page 3.17-17: Another observation regarding the precontact site is the renaming of the site to a precontact "lithic scatter" from "Stibnite Lithics". Calling it a lithic scatter is a qualitatively different site type that MINIMIZES its importance. The following is a definition of a lithic scatter: lithic scatter is a surface scatter of cultural artifacts and debris that consists entirely of lithic (i.e., stone) tools and chipped stone debris. This is a common prehistoric site type that is contrasted to a cultural material scatter, which contains other or additional artifact types such as pottery or bone artifacts, to a camp which contains habitation features, such as hearths, storage features or occupation features, or to other site types that contain different artifacts or features (http://mojavedesert.net/glossary/lithic-scatter.html). It makes the point of being on the surface and not "containing temporally functional or diagnostic artifacts." Please correct that name change if it hasn't been corrected already.
19. Section 3.17.3.2.1, Page 3.17-24: Old Thunder Mountain Road (FR 440) State Site Number I OVY 312 further describes this NA trail that eventually was utilized as a historic road. Again, need to state that this would not be the only road that began as a trail. There were many trails utilized by our people. The Shoshone and Bannock people living in the Weiser and Payette areas utilized these trails. The Lemhi and mixed band of Shoshone and Bannock utilized these trails. The Sheepeater people who lived in the mountainous region had ties to the people from the Weiser and Payette areas and to the west with the Lemhi and Middle Fork areas.
20. Section 3.24.3.4, Page 3.24-13, Paragraph 4-5: These paragraphs are absent discussion of the Shoshone-Bannock Tribes even though the USFS is aware the SBT have expended millions of dollars to restore salmon runs in the EFSF and its' tributaries through their hatchery supplementation, fishery research and watershed restoration. Please add the Shoshone-Bannock Tribal efforts to this section.
21. Section 4.12.2.3.3, Page 4.12-50, Paragraph 3: Summary of Chemical Contaminant Impacts to Fish- Despite activities that would improve water quality for fish from the removal and reclamation of legacy mine wastes, exceedances of the NMFS and USFWS and other applicable criteria for antimony, arsenic, copper, and mercury are anticipated to extend indefinitely post-closure. SGP and Midas Gold will forever alter the groundwater chemistry, surface water chemistry causing harm and possible extinction of all fish in entire area. This is not what mining and mineral regulations, policies and acts anticipated and this perpetual exceedance of the toxic metals and the uncertainty in the change in concentrations of these and other metals that may alter fish tissue concentrations in unacceptable. Provide novel reclamation and remediation practices that will remedy the concentration of contamination in the groundwater and surface waters, beyond a mere improvement, but a permanent solution. In the absence of this, mining in this area should not take place.
22. Section 4.24.7, Page 4.24-10, Paragraph 1-4: Summary- All action alternatives would cause disturbances that may harm tribal resources and that would adversely affect tribal rights and interests. Tribal access to certain areas would be restricted during the SGPs construction, operations and closure and reclamation phases, preventing tribal members from exercising their off-reservation rights to hunt, fish, gather, and pasture in usual and accustomed areas, for a period of 20 years. The SGP would impact endangered salmon and other aquatic species and essential fish habitat. Harm to fish, wildlife, and habitat would in turn impact availability and harvestability of these resources by tribes at their usual and accustomed fishing, hunting, and gathering areas. The Shoshone-Bannock Tribes do not concur in the approval of the SGP knowing this mine will permanently harm the Tribes for decades and possible perpetually.
23. Section 4.5: In the groundwater modeling effort, there is no long-term fate anarysis 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.
24. Section 4.4.2.1.3: 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.
25. Section 4.4.2.1.4.3: 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.
26. Section 4.8 and 4.9: Please explain how 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. Where and to whom will Midas be shipping this material? Is it out of the country? The public deserves to know where the resources from their state and Tribal homelands will be going, and in particular if this material is leaving the United States. Please provide this information in a Supplemental DEIS.
27. Section 4.4.2.2.1: Please provide information surrounding sources of soil for reclamation cover including volume and quality. There are n nearby sources, without scouring/destroying more land, for providing enough growth medium. Consequently, diminished soil quality could hinder reclamation efforts involving revegetation o.f disturbed areas in the SGP area.
28. Section 4.8: How is Midas "restoring the site" 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.
29. Section 4.5: 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.
30. Section 4.5: "Lower streamflow's, 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." 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.
31. Section 4.1.4 and App. D: "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 20 I 9)." "alteration of natural soil characteristics that results in immediate or prolonged loss of soil productivity and soilhydrologic 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 ofRCM". 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. This information must be presented each time Midas claims this is a " restoration" project. The true timeframe and means of restoration are not being communicated to the public.
32. Section Appendix D: 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 I 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 I 8-year delay;". The above information, while provided in this DEIS, is largely buried in the 5,000 pages of text, figures, tables and appendices.
33. Section 4.5, Paragraph D-27: Instead of harvesting wood for[middot] milling, use all harvested wood into compost material and store for the next I 8-20 years to provide material for soil amendments and cover material. Please provide this use in a Supplemental DEIS for the public to evaluate.
34. Section Appendix D: 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.
35. Section 4 Environmental Consequences 4.5 Soils and Reclamation Cover Materials, Page 4.5-18: Please expand this section and create novel solutions for reclamation, visual, soil, and contaminant impacts.
36. Section 4.2.2.1.2.1: There should be considerations for staff in the event of an inescapable fire event .....

fireproof building materials, escape/shelter structures, fire shelters, supplied oxygen, etc.
37. Section Appendix B: The impacts to soil resources from the SGP are unacceptable. "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."
38. Section 4.2.2.1.3.3, Paragraph 4.2-4: Stability and failure analysis of all tailing's dams: In the GEOTECHNJCAL 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 darn 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.
39. Section Appendix D: 404(b )( l) 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 l section but applies to Alternative 2.
40. Section Appendix D, Paragraph 4.2-8: Reduction of high walls 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 I section but applies to Alternative 2.
41. Section Appendix D, Paragraph D-20: Midas must update the mitigation plan to be applicable to Alternative 2 and re-present it to reviewers for comment.
42. 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. Please re-evaluate the disposal of tailings into the Meadow Creek drainage.