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Organization:

Title:

Comments: I am a semi-retired physician working and living in McCall, Idaho for the past 6 years. After 35 years as a primary care physician in Boise, Idaho with an emphasis on preventive medicine, I now consult for patients with chronic health problems. I have a special focus on environmental toxicity, autoimmune disease, cancer and genetic variations that make people more susceptible to these problems. There is considerable evidence that heavy metal exposures contribute to chronic illness even in amounts that are not acutely toxic.

My interests in the project and project area:

I am concerned about health effects for the people of the nearby towns and counties due to the Midas Gold Stibnite Project. This includes effects on water, soil, air and fish during the project and in perpetuity. This includes risks of environmental accidents that could cause unexpected contamination of water, air, soil and fish. I am concerned about the short and long term financial risks to our community and the State of Idaho should the project proceed. I am concerned about the quality of life issues for our local communities.

Concerns: and Questions:

1.

Inaccuracy about claims that the mining of antimony makes the mine strategically important to national security. Midas Gold Pre-feasibility Study (page 19-1).

1.

There are no current or planned antimony processing plants in the United States. Any antimony concentrate produced at Stibnite would be shipped to Asia for processing. Antimony is common in many precious metal mines in the United States and any of these mines could provide antimony if domestic processing becomes available.

2.

Overall need for the project in general: The DEIS clearly states that the SGP will result in further degradation to the water and fish of the East Fork of the South Fork of the Salmon River. The open pit mine proposed will negate the money and time already invested by USFS and EPA to mitigate the toxins already present and will require water treatment in perpetuity. Option 5 in the DEIS is the only option to not disturb the site at all and I find this to clearly be the best option. It would be ideal to allow further clean up without the risk of disturbing the environment further.

QUESTION: Can the Stibnite site be designated a Superfund site?

1. I do not see any analysis in the DEIS of air, water and soil contamination of the surrounding communities. This should be addressed for each phase of the proposed project. The Recreational risk-based screening levels (RBSLs) in EIS Appendix M for future site specific exposure assumes 16 days exposure per year. This is not relevant to an analysis of the risks for people, fish and animals living in the nearby environment for 365 days per year. It also only analyzes soil contamination in a very local area and does not look at air or water.

QUESTION: Are there methods available to estimate levels of heavy metal contamination for air, soil and water within a radius of 50 miles of the site? Why does the DEIS not include such analysis? This would include nearby wilderness areas where people might not know they are being exposed to toxins, soil in home and commercial gardens where people grow food, year round air quality during the project and year round water quality from drinking sources such as lakes and reservoirs.

1.

I do not see any methodology or analysis in the DEIS to address the costs of water treatment in perpetuity. Alternative 2 (Table D-2 in Appendix D) states that Midas Gold can designate a contractor to [ldquo]perform long-term maintenance as necessary, including maintaining and monitoring the Mitigation Area (including streams and wetlands) in perpetuity once the final performance standards are met or until such responsibility is relinquished to an appropriate third party (Forest Service, etc) as approved by USACE). We want to avoid the situation of the Summitville Mine in Colorado where the State of Colorado is managing a similar situation at the cost of \$2 million of state funds in perpetuity. Reference: <https://www.denverpost.com/2018/07/10/colorado-summitville-mine-cleanup/>.

Midas Gold CEO does state in Star News Aug 20, 2020 [ldquo]We will set aside funds necessary for reclamation before any mining activity begins[rdquo].

QUESTION: Why does the DEIS not have an analysis of methods to cover costs of water treatment in perpetuity? Will Midas be required to post a cash bond to cover the restoration costs for USFS land as specified in the executive summary? Will the State of Idaho require Midas to post a cash bond to cover the estimated costs before beginning mining per the executive summary? When will the amount for the cash bond be determined and how can the public be involved in this process? How will the amount of such a bond be adjusted if information changes over the course of the project? What studies exist to document that water quality can successfully be treated [ldquo]in perpetuity[rdquo]?

1.

Human Health concerns include both acute and chronic effects of heavy metal exposure and treatment of heavy metal toxicity. Testing for and treatment of these problems is generally not covered by insurance. Treatments are lengthy, expensive and often have side effects. At present, there are no physicians in our area with this expertise. Reference: Heavy Metal Toxicity. Medscape. Updated. Aug 24, 2018. Adefris Adal, MD, MS; chief Editor: Sage W wiener, MD.

The 2011 [ndash] 2017 baseline Idaho DEQ Interim Report on the EFSFSR (Reference 2) showed marked increases of dissolved arsenic, antimony and mercury from upstream to downstream. The dissolved metal levels were highest during low-flow months suggesting groundwater contamination. The Nez Perce Tribe lawsuit also has documentation of multiple heavy metals above the Clean Water Act criteria for acceptable water quality. (Reference 33 U.S.C 1311(a)). (Reference: Case 1:19-cv-00307-BLW Document 1 Filed 8/08/19 Nez Perce Complaint.

Pollutant sources include: the Glory Hole, Bradley Tailings Pile and Keyway Dam, Hangar Flats Tailings Pile, Bailey Tunnel DMEA Adit and DMEA Waste Rock Dump, Bonanza Adit, Cinnabar Tunnel, and Meadow Creek. Estimates by USGS in 2015 of heavy metals coming from the Glory Hole drained into the EFSFSR included an average of 2,150 pounds of arsenic, 1,010 pounds of antimony, and 617 pounds of dissolved manganese annually, from 2012-2014. Although Midas has had control of these areas for at least 5 years, they have not remediated nor stopped discharges of pollutants. As polluted water from upstream and from seeps in its walls collect in the Glory Hole, they settle into the sediments in its bottom and are thence discharged downstream at higher concentrations than upstream. The various tailings piles similarly leach pollutants into the watershed. For example, the Hangar Flats Tailings Pile, which is not capped, contains high concentrations of arsenic, antimony, aluminum, iron, manganese, and mercury, which are leached out into the EFSFSR during rain and snow melt.

Reference: US Dept of Interior. USGS. Scientific Investigation Report 2019-5072. Arsenic, antimony, Mercury and Water Temperature in Streams near Stibnite Mining Area in Central Idaho 2011 [ndash] 2017.

QUESTIONS: How will screening and treatment of acute and chronic heavy metal exposures be available to the surrounding communities and onsite workers? How will tests and treatments be paid for? How will physicians be available to evaluate and treat these problems? What information will be available to the public regarding these possible health hazards? Since current levels of As, Sb and Hg all exceed human and/or aquatic life criteria downstream from the mine site in the EFSFSR indicating groundwater contamination, will Midas Gold be required to monitor and treat these levels downstream? Should Midas Gold be required to pay for medical care for persons with illness due to downstream contamination by heavy metals?

1. The communities closest to the Midas Gold Stibnite project and many others both north and south of McCall all rely on the quality of life in this area for our own recreation. Many businesses are completely based on access to a healthy and safe environment. There is no way to put a price on the presence of the wilderness that surrounds us. Because this is so important I am requesting additional time to work on this response. The DEIS was very difficult to work with and actively discouraged comments that are researched due to its very poor organization and presentation. There are many more concerns that could be addressed. The NEPA regulations (Reference Section 1502.14) states that the agency [ldquo]must rigorously explore and objectively evaluate all reasonable alternatives[rdquo] and [ldquo]devote substantial treatment to each alternative[rdquo]. It requires [ldquo]appropriate mitigation measures[rdquo] be included. Alternatives 3 and 4 did not have these requirements applied.

QUESTION: Can the DEIS be issued in a more user friendly format? Can 3-6 additional months be allowed for review and comments?