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Organization:

Title:

Comments: To Whom It May Concern:

My name is Regan Byrd. I was born and raised in Idaho, have a family cabin in the South Salmon River drainage, am a Registered Nurse by profession, a whitewater kayaker and avid outdoor recreationalist by good fortune, and take pride in the wild places, wildlife, and the whitewater found in Idaho and all across the United States. Because of the great pride and love for Idaho Rivers, my husband and I founded a world famous whitewater kayaking event on one of Idaho's Rivers, called the North Fork Championship, which has brought attention to the great state of Idaho for its recreational attributes in whitewater as well as its wildness.

The Stibnite Gold Project is deeply concerning on many levels. There are species of fish that based on my understanding of the Endangered Species Act, should be protected, species of plants that are crucial to the survival of other sentient beings and assist with avalanche control and groundwater, concerns with water quality over time and no real plan by Midas aside from statements like 'into perpetuity' that do not outline a full restoration plan, a break of Treaty with the Nez Perce Tribe and blatant disregard for their wishes, the trucking of heavy loads carrying toxic chemicals and fuel many times per hour in and out of the mine site, and concerns related to the recreation and economics of the local communities. None of the aforementioned environmental effects are more impactful than the others as they all have extremely dire consequences, of which I will outline my concerns below.

#### FISH

The fish that call these streams and rivers home are under siege. These fish already face toxic waterways starting in the Lower Columbia River Basin, a demand too great with commercial fishing, dam choked rivers which slow water flow, confuse fish, undermine salmon spawning grounds, and contribute to extreme rising stream temperatures with stagnant water, and finally the increased stream temperature effects occurring from climate change. The DEIS explicitly states with reference directly to Bull Trout:

DEIS p. 4.12-83 and 4.12-87, "Total habitat availability for bull trout decreases along the timeline of the SGP. Post-closure, and a net decrease in quality and quantity of bull trout habitat would occur. Decrease in stream flow, increase in modelled stream temperatures by up to 4 degrees C, access to bull trout critical habitat in upper Meadow Creek would be blocked, Critical Habitat Will Decrease By 28-70%."

The main environmental factor limiting the distribution of Bull Trout is stream temperature. They are typically found in the coldest headwater tributaries. In the East Fork South Fork record sized Bull Trout are being caught yearly, making obvious the fact that this stream is home to an already thriving habitat. Bull Trout are listed as Threatened on the Endangered Species Act, yet all 4 Alternatives outlined by Stibnite conclude a degradation in water quality and an increase in stream temperatures, how can any of these current plans go forward with these known impacts?

The DEIS states a similar notion regarding Chinook Salmon:

DEIS p. 4.12-69. "?" Following closure and reclamation, the overall net effect would be a loss of both quantity and quality of habitat for Chinook salmon."

Chinook is another species of fish listed as Threatened under the Endangered Species Act. How can this project, in good faith, be approved when we know for sure in a best-case-scenario, that habitat and water quality will be degraded simply by the day to day operations of this mine? Furthermore, according to a statement by the

U.S. Forest Service, "The South Fork Salmon River contains the most important remaining habitat for summer chinook salmon in the Columbia River basin. The fish were once the largest, most valuable segment of the world's largest runs of Chinook Salmon... The National Marine Fisheries Service has designated critical habitat for chinook salmon. It includes all tributaries of the Salmon River presently or historically accessible to chinook salmon. This includes essentially the entire South Fork system. Within critical habitat, an agency must avoid actions that destroy or adversely modify that critical habitat. The Fisheries Service has recently proposed that steelhead trout be added to the threatened and endangered species list" USFS, (2017). I need clarification as to why we find ourselves considering a project that will directly undermine this statement. Please respond to this in a personal email or in a supplemental DEIS.

Chinook Salmon and Steelhead, as anadromous fish, are truly a gift from the ocean because as we know, they bring nutrients from the marine environment back to the river and surrounding ecosystem. These are nutrients that could not be delivered in any other way other than with the life cycle of these incredible species in this known critical habitat. Diminishing their habitat will create problems for our species in the future.

A way I see we could potentially mitigate some of these dire effects to fish is to consider a more calculated approach to the size of the mine, what about something on a smaller scale than what is proposed? What about a mine that is not in service for the full 12-20 years as proposed? What about dry mining or underground mining? I request to see these options considered in a supplemental DEIS.

#### FISH TUNNEL

Much of the success of reopening fish habitat is dependent upon the success of a Fish Tunnel that Midas has had engineered. While I appreciate the creativity, the DEIS clearly states that the tunnel's efficacy is in question.

DEIS Apx J3, p. 6. "Even after close collaboration with NMFS, meeting passage criteria, and executing all adaptive management measures, there exists a reasonable probability that the project will not be able to volitionally pass fish safely, timely, or effectively."

Although Midas cites references to support this tunnel, they don't represent the fish species or the habitat present at Stibnite. The three references cited for the rationale of success of this tunnel are also out of date (Wollenbaek et al. 2011, Rogers and Cane 1979, Gowans et al. 2003). In addition, the construction of the tunnel has the very high likelihood to contribute to large amounts of fish mortality as stated in the DEIS p. 4.12-17, about 100,000 fish could be potentially affected by injury or death for 1.6 km of channel changes in the EF South Fork Salmon River during construction of the tunnel. To reference the USFS again, the "agency must avoid actions that destroy or adversely modify that critical habitat" USFS, (2017). Again, I need clarification as to how the action by Midas and the statement by the Forest Service can work synergistically within this proposal because it remains unclear with the current DEIS.

#### WHITEBARK PINE

The Whitebark Pine tree is found within the project proposal, and is considered threatened within the Endangered Species Act. Over 2,000 acres of mature Whitebark pine habitat are within the Midas analysis area, and up to 250 acres of tree removal are included within the proposal which equates to over 1,000 trees (some of which are cone bearing). Information retrieved by the DEIS, Table ES4-1 "Summary and Comparison of the Potential Environmental Impacts Associated with the Significant Issues by Alternative" & Table 2.9-1 "Summary and Comparison of the Potential Environmental Impacts Associated with the Significant Issues by Alternative". Whitebark Pine are a sensitive species that take over 50 years to sexually mature and bear cones, making these cone bearing trees integral to the survival of this species. "On a landscape scale, the species appears to be in danger of extinction, potentially within as few as two to three generations. The generation time of Whitebark Pine is approximately 60 years" according to the U.S. Fish and Wildlife press release in 2017. Whitebark Pine trees are considered a keystone species within our ecosystem, and are already facing hardship for survival across its native distribution zones. Keystone Species, as defined by National Geographic

Encyclopedic Resource Library, "Every ecosystem has certain species that are critical to the survival of the other species in the system. The keystone species could be a huge predator or an unassuming plant, but without them the ecosystem may not survive" NatGeo., (n.d.). "Whitebark Pine is ecologically very significant" U.S. Fish & Wildlife, (2017), they "maintain snow pack and regulate runoff?, reduce soil erosion? by initiating succession after fire or other disturbance events, and provide ?seeds that are a high-energy food source for many species of wildlife?" including individuals within the Salmon River Mountains such as Black Bears and Wolverines. As a ?keystone? species that is facing immense hardship as it is, without removal or disturbance as planned by Midas Gold, this is a great topic of concern. A supplemental DEIS must be created to mitigate destruction of this species of tree, what about a smaller area of mining, or small claims throughout the forest that would not disturb an entire population as noted in the DEIS. Mitigation measures include replanting seedlings and 2 year old trees during the reclamation process, but who will ensure the success of the replantation? There is also an effort to collect pine cones for propagation, however this is directly removing an important component of the resident wildlife diet without a replacement. How does Midas plan to mitigate the dietary insufficiencies related to the removal of Whitebark pine cones and removal of trees? I would like to hear in a supplemental DEIS what Midas plan is here.

#### AVALANCHE MITIGATION MEASURES

There is a complete lack of analysis for handling avalanches in the proposed mining area. The use of explosives to build a road could contribute to increased avalanche activity and this should be considered in a supplemental DEIS. Stibnite Road is susceptible to avalanches, and there is no mitigation plan in place for that route prior to the creation of the Burnt Log Route. Appendix C of the DEIS outlines the Midas did a study based on vegetation patterns, but then the resource cited (which is very out of date, 1992) directly concludes that "vegetation patterns are not always the best indicator". This needs addressed in a supplemental DEIS.

#### TRANSPORTATION / RECREATION

There is nothing in the DEIS that discusses an analysis of spill risk along the two very busy highway corridors in Idaho, Highway 55 and Highway 95. This is a large area of concern, because it is generally not a question of if, but when. The amount of fuel, oil, and toxic materials that will be trucked up and down the highways, along with recreational traffic and along major waterways requires a clear spill risk model. This needs further addressed in a supplemental DEIS.

The routes needed to access this area are also integral and very important to the tourism and recreation of this area. It is noted in the DEIS that the local communities rely heavily on tourism to support their economies" and that "the analysis area is a popular area for a variety of recreation activities on both private and public lands," yet there is no report, information, or analysis on how the Stibnite proposal will affect tourism, recreation, or the related economic benefits to local communities. A supplemental report and information are needed accordingly. The sources utilized are out of date (2003 and 2010) in the context of Idaho experiencing a population boom, and its residents holding high value in recreation opportunities, this needs addressed in a Supplemental DEIS.

#### MINING / RECLAMATION

Current Plan for Mining Practice could affect up to 3,500 acres, only 880 of which are owned mining claims (by Midas) the rest is on public land. The proposal is for Cyanide Vat Leach mining - a practice banned completely in the state of Montana (1998), Wisconsin (2001), 5 Colorado Counties (2004), and many other countries around the world related to a high affinity for failure and impressive negative environmental impacts. Fiddle creek, a currently unaffected waterway (also viable spawning habitat) will become non-existent as it fills up with waste rock from mining ore. Meadow Creek, a main tributary with EFSF above the Yellowpine pit which is experiencing water quality improvements from previous mining sites where arsenic and antimony still leach from old mining reclamation attempts, is actually considered restored by the USFS and the EPA. Fish have returned to spawn in Meadow Creek currently and though the waterway has been rerouted along the edge of the waste rock site from old mining operations and water quality still needs improvement, all 4 Alternatives outlined by Midas include plans to build 460 foot tall tailings retention dam reservoir, effectively drowning Meadow Creek into perpetuity.

They are also for open pit mining, which by nature, is destructive. This does not fall in line with a 'reclamation theme' as Midas continues to state. Midas states that the "environmental monitoring and maintenance phase will continue for as long as needed", but this is not a measurable plan. If Midas claims to be an environmental mining company, they need to include a timeline for their reclamation plans in a supplemental DEIS.

As a resident of the Lower Columbia River Basin, it is a daily reminder of how sick our rivers are. The Columbia River is reaching summer temperatures too great for fish survival, and has become a toxic wastewater dump to the point that it is unsafe to consume large amounts of resident fish because of known cancer risk increase. The damages done at the headwaters of the South Salmon will flow downstream and into the Columbia River eventually, contributing to an already massive environmental disaster. It is imperative we take a 10,000 foot view and recognize this is not just 3,500 acres in the middle of Idaho, this will have a ripple effect clear to the Pacific Ocean, across many species, and beyond.

Thank you for taking the time to review my comments. Please provide information accordingly in a supplemental DEIS for public review. It is clear, based on the research I was able to conduct, that the current DEIS is incomplete with a lot of missing information. Furthermore, with its current lack of content I am advocating for Alternative 5, no action.

Regards,  
Regan Byrd

#### References

International Cyanide Code. <https://www.cyanidecode.org/>

MEIC, (n.d.). Ban on Cyanide Mining in Montana with initiative 137. <https://meic.org/issues/mining-in-montana/hardrock-and-cyanide-mining-in-montana/ban-on-cyanide-mining-in-montana-with-initiative-137/>

National Geographic. (n.d.). Keystone species; Resource library encyclopedic entry.

<https://www.nationalgeographic.org/encyclopedia/keystone-species/>

USFS, (2017). South Fork Salmon River Information.

<https://www.fs.usda.gov/detail/payette/home?cid=STELPRDB5160141#:~:text=The%20South%20Fork%20Salmon%20River,largest%20runs%20of%20chinook%20salmon>

U.S. Fish & Wildlife. (2017, January 17). Whitebark pine (*Pinus albicaulis*). <https://www.fws.gov/mountain-prairie/es/whitebarkPinee.php>