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Organization:
Title:
Comments: My name is Melissa Coriell and I am writing to provide comment on the proposed Stibnite Gold Project.

I am a resident of McCall, Idaho; I have been teaching in the McCall Donnelly School District for 12 years, and I've been accessing the South Fork of the Salmon River since my first experience with it, in July, 2003. In fact, I knew about and had experienced the river, before I'd even heard about the town of McCall. As a daughter of an Air Force pilot, I've lived in Virginia, Kansas, Washington, California, Arizona, Germany, England, and Japan. And never in my life have I experienced a more unique and beautiful place than the South Fork of the Salmon river drainage.

My name is Fred Coriell and I incorporate by reference all comments submitted by Save the South Fork Salmon including all attached references, reports, and other documents to those comments herein. The South Fork Salmon watershed is a unique and special landscape in central Idaho. It is a place that makes my heart feel whole.

Thank you for reading the following comments:

1. Impacts to user groups that utilize SFSR river corridor

The Forest Service acknowledges a particular user group that regularly utilizes the river corridor by requiring float boaters to have a permit when floating the South Fork of the Salmon River: Biological Assessment for the Issuance of Permits on Big Creek and the South Fork Salmon River To Snake River Spring/Summer Chinook, Snake River Steelhead, Columbia River Bull Trout, Northern Idaho Ground Squirrel, & Canada Lynx in the South Fork Salmon River and Middle Fork Salmon River Tributaries Section 7 Watersheds On the Krassel and McCall Ranger Districts, Payette National Forest 2020.1 1

The study states that "the number of permits issued and users on the SFSR has increased in recent years."2 Between 2010 and 2019 the number of permits on the SFSR appear to have increased by 6 times, from 50 to over 300.3 However, the DEIS offers no analysis of the impacts the SGP will have on whitewater recreation. First, these impacts include increased traffic on the various routes that float boaters use to access not only South Fork Salmon, but also the East Fork South Fork Salmon, and Johnson Creek. Midas Gold will use the Johnson Creek/Stibnite Road during the three-year construction of its project. DEIS at 2-5. Indeed, it is possible that Midas Gold will use this transportation route for the life of the mine. DEIS Alternative 4. Even if Midas Gold builds the Burnt Log route there will continue to be overlap with heavy truck mine traffic carrying hazardous materials and individuals and groups travelling into the South Fork Salmon watershed for float boating opportunities. No analysis of how the increasing float boating use in the river corridor will be impacted from mining traffic was even considered in the DEIS.

Second, there is no analysis of the impacts that degraded water quality and the effects of mercury and other metals concentrated into the river system because of mine related activities will have on float boaters. Of any user group float boaters are at the highest risk of exposure to this type of pollution. Typically the highest concentration of float boaters occurs during the spring run off period when the rivers are near, or at, the seasonal hydrological peak. A USGS study notes that the highest concentrations of metals such as mercury occur during this runoff,4 precisely the time that float boaters are most prevalent on the East Fork South Fork Salmon and South Fork Salmon River. One of the model uncertainties noted in the DEIS is the fact that "[f]irst-flush chemistry for contact water coming off the DRSFs was not considered relevant to surface water quality predictions." DEIS

at 4.9-144. "First-flush releases from the development rock material could cause short term increases in downstream concentrations above and beyond what is currently predicted by the model." Id. This is concerning because under all scenarios the DEIS notes that absent in perpetuity active water treatment mercury concentration in surface water will increase significantly. DEIS at ES-26. Furthermore, the DEIS notes that "mercury inputs from the atmospheric deposition caused by the SGP have not been considered in the model. These additional loads could cause incremental increases in downstream concentrations of mercury and other constituents." DEIS at 4.9-144. "Additionally, if the growth media cover erodes in places and runoff contacts the underlying development rock, constituent concentrations in downgradient streams receiving the runoff could prove to be higher during the post closure period." Id. The DEIS does not mention the potential impacts (particularly from a human health standpoint) on

2. The DEIS is lacking a comprehensive analysis on social and economic impacts to Valley County.

a. Tax Revenue for Valley County

According to Section 4.21-26 , on page 1252 of the DEIS, the following is stated:

As a result, operations under Alternative 1 are expected to result in a relatively limited tax revenue increase for the local area's economy. Local property taxes may be used to fund local schools, local governments, local law enforcement, fire protection, local roads, and other public services. The extent that the SGP-related increase in local tax revenues would result in a net benefit to Valley County's public services would depend on the extent that they offset increases in costs to provide public services.

Question: Will property tax payers such as ourselves be picking up the tab for the increased public services not covered by the "relatively limited tax revenue" generated by this project? Please provide a more comprehensive analysis and prediction of how this potentially major tax burden might play out.

b. Impacts to Schools

According to Section 4.21-15 , pg. 1241-42, it is stated that McCall and Donnelly schools "currently don't have capacity for additional students (Idaho Department of Education 2019) and that even a 6% increase in student enrollment would be difficult to the schools to accommodate, and there could be an adverse impact on the schools." I am a teacher at McCall Donnelly High School and I can speak to the limited capacity we have to enroll an influx of students in a short period of time. Currently all classrooms at the high school are occupied. And, a computer lab just this year was turned into a classroom. According to the superintendent, more room could be made available at the high school if teachers were to move to other classrooms to teach or to a common office space to prep but "none of those solutions are ideal." Finally, Donnelly Elementary has one set of restrooms for 160 kids and the gym is nearly 100 years old with capacity for 165 students. Referencing the Idaho Department of Education does not reflect comprehensive analysis of this area. The DEIS is lacking a comprehensive analysis on impacts to schools and local infrastructure.

Comments/Questions: School administration should be involved in conversations when trying to do an analysis of impacts to schools, as well as looking at case studies. If the district had to build new buildings, new classrooms, new bathrooms, etc, who would pay for those infrastructure costs? Property tax payers such as ourselves? How will schools be reimbursed for the school district's total cost each year for each new student entering the system as a result of the development of the proposed gold mine and ancillary businesses? Will the district be reimbursed for the total cost each year for reopening and operating the Yellow Pine School if that becomes necessary? Will the district be reimbursed for all costs if Yellow Pine students are transported and boarded, if that becomes necessary.

c. Public Utilities

Public utilities and the McCall-Donnelly school system have the most potential to be impacted by population increase. DEIS 4.21-15. Substantial adverse impacts could be expected to the McCall-Donnelly School system and the water and sewer system capacities depending on where new workers reside. The DEIS offers no mitigation for these adverse impacts.

d. Valley County Public Agencies

The DEIS offers no mitigation measures. FurtherAccording to section 4.21-16 , pg. 1242, Valley County public agencies and service sectors could experience adverse impacts from wage inflation and/or understaffing. Government agencies have limited flexibility to adjust wages or increase funding to pay contractors. Labor cost increases affect the capacity of government agencies to continue providing services like school bus drivers , plow operators, garbage haulers and road maintenance. Contraction could also occur for private businesses relying on lower wage workers. This all could result in loss of local businesses and reduced public services. The DEIS offers no mitigation for this potential crisis.

e. Traffic

The DEIS offers no analysis of the impact of congestion from commuting workers or trucks hauling mine supplies on highway 55 or highway 95, both of which are crucial corridors for the recreation and tourist traffic that is essential to this area. Even though they say 29% of employment is through the tourist industry their operations could cause a drop in visitors because of increased congestion and danger on the access roads to this area. DEIS 4.21.2.1.1.6. Further, analysis outside of the mine site transportation corridor is not addressed in the DEIS. Spill/Accident risks are not considered for the three major transportation routes that access the Warm Lake Road, Highway 95 from Lewiston along the Clearwater and Salmon Rivers, Highway 95 from Weiser along the Snake and Weiser Rivers, and Highway 55 from Boise along the North Fork Payette River. Even an increase of one death related to increased traffic attributable to the mining operations is unacceptable. This risk is not disclosed for any of these transportation corridors and must be included in the analysis.

f. Antimony

It is estimated that Midas Gold will recover 100 to 200 million pounds of antimony. DEIS 2-11. Antimony would be carried off the mine site, 1 to 2 ton super sacks and "transported on flatbed trailers from the mine site for off-site smelting and refining." An estimated one to two truckloads of antimony concentrate, containing up to 20 supersacks per truckload, would be hauled off the site each day. It would be transported via Burnt Log Route to State Hwy 55, and then to a commercial brage of truck loading facility depending on the refinery location. "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." DEIS 2-31.

Comments/Questions: How will antimony, a "critical mineral,"support national security, especially, with such relatively small amounts expected to be recovered? Secondly, once the antimony is shipped outside the U.S. for smelting and refining, who will become the owner of that antimony? What happens if there is an avalanche on the Burntlog Route, while in the midst of transporting antimony? This leads me to my next comment:

g. Road/Avalanche Hazard

There is a lack of analysis of an avalanche program for mine site access and workers' safety, the impacts of using explosives along the Burnt Log route and in areas around the mine site in general. There is no analysis about how Midas plans to mitigate avalanche hazard (stated 5 year recurrence interval in Appendix C) along the Stibnite road during the construction phase of the mine before the Burntlog road is even built.

According to Appendix C, it basically says that Midas did a desktop study (Google Earth) to analyze avalanche paths and that they didn't find them along the Burntlog Route; they used vegetation patterns as their indicator. Then, they cite a reference (Mears 1992 Snow Avalanche Analysis for Land-Use Planning and Engineering) that says vegetation patterns are not always the best indicator: "Many slopes with potential avalanche terrain lack a long history and show no sign of previous avalanche activity through study of vegetative indicators or aerial photos" (Mears, 23). The cited study contradicts the findings stated in the DEIS report, appendix E.

h. Spill Risk Haul of highly toxic reagents and fossil fuels at the mine site and on the haul route could result in spills with significant impact to fish (Chapter 4.12.2.3.2.1 and 4.7.2). Nearly the entire length of streams adjacent to both access routes (Burntlog and Yellow Pine) is within designated critical habitat for Chinook salmon, steelhead, bull trout, and westslope cutthroat trout (Chapter 4.12.2). The spill risk modelling, spill probabilities, and # of potential spills in the DEIS (Chapter 4.12.2.3.2.1) is 2 orders of magnitude less than that calculated by statistician Lubetkin pers comm 9/2/20. The assumption that 91 meters from access routes contain all important fish habitat potentially impacted by spills is arbitrary and capricious.

3. The DEIS does not analyze a reasonable range of alternatives-

The Stibnite Mining District is listed as a proposed site for the National Priorities Lists.5 Thus, it seems unreasonable for the Forest Service to not include, or modify, an alternative that meets the agency's responsibilities under CERCLA. As with any junior mining company endeavouring to strike it rich it is reasonably foreseeable, due to external circumstances beyond that company's control, that the mine proposal will not come to fruition. These external circumstances include fluctuations in gold prices, lack of investment, corporate mismanagement, and rigorous environmental permitting, costly mitigation measures, improper estimation of the mineral deposit, etc. As such, the No Action Alternative, or baseline condition to which the mining proposal should be analyzed under, must be a full site remediation project that addresses legacy contamination without mining. Currently, the only options that are available for a decisionmaker to reference are some variation on a large scale mining proposal. This includes long term consequences, such as active water treatment (dismally outlined in DEIS at 4.9) and a bigger, deeper pit lake left on the landscape forever (DEIS at ), which by any reasonable evaluation would be there anyways if the only action taken was remediation of legacy contamination with no mining. It makes little sense not to consider a remediation plan without mining for Stibnite as the No Action Alternative. Doing so would give the decisionmaker a much more objective analysis in choosing which components of the project to advance forward in the Record of Decision.

The EPA's National Priorities List website states that as of June 26, 2002 a remediation investigation has been commenced. Further, Idaho Department of Environmental Quality has produced a 650 page report titled Stibnite Area Risk Evaluation Report (2000)6. This has clearly been a known problem for quite some time and the Forest Service seems to have overlooked developing an alternative for the Stibnite Gold Project that follows through on these plans. It is likely that a no mining alternative to address legacy contamination and fish passage issues will consist of some components (such as water treatment, fish barrier removals) that would be required if Midas Gold is through with its project. However, there is no way to know if things such as elevated stream temperatures lethal to fish, or obtuse engineering work arounds to keep stream flows at adequate levels, or metals mobilization from blasting, crushing, excavating, smelting mercury laden marble, or trucking hundreds of thousands of pounds of hazardous materials, or burning 10 million gallons of diesel fuel in the Idaho backcountry, or exposing humans who interact with the landscape and water in the South Fork Salmon watershed to elevated levels of mercury and other metals are reasonable consequences of the proposed action at Stibnite without first evaluating them against a project of significantly smaller scale and scope that only address remediating legacy contamination.

The Forest Service must issue a Supplemental EIS that includes a No Action Alternative based solely on a hypothetical site remediation project that includes no mining. Doing otherwise creates an unreasonably narrow range of alternatives from which to take a hard look at the environmental consequences of the proposed Stibnite

Gold Project. NEPA requires full disclosure and this type of alternative would better inform the actual consequences of the proposed action. Conclusion

In closing we ask that the Forest Service disclose in a supplemental EIS CEQ's reasoning for listing the Stibnite Gold Project on FAST-41. If it qualifies simply because Midas Gold is offering to upgrade a utility corridor in Valley County, that would appear to be an abuse of the intent to elevate this project to that list. If it is concerning antimony as a critical mineral, it seems that sending the concentrate to "Asia," as indicated in Midas Gold's most recent version of the Pre-feasibility Study (PFS 2019) is dispositive of the issue.7 Midas Gold lists the reason for doing so as no processor that can handle the volume of antimony ore produced at Stibnite will exist within "at least the next 5-7 years" (PFS 2019 at 19-1).

1 Ferguson et al., Biological Assessment for the Issuance of Permits on Big Creek and the South Fork Salmon River To Snake River Spring/Summer Chinook, Snake River Steelhead, Columbia River Bull Trout, Northern Idaho Ground Squirrel, & Canada Lynx in the South Fork Salmon River and Middle Fork Salmon River Tributaries Section 7 Watersheds On the Krassel and McCall Ranger Districts, Payette National Forest 2020 (March 11, 2020).

2 Id. at 7.

3 Id.

4 Baldwin, A.K., and Etheridge, A.B., 2019, Arsenic, antimony, mercury, and water temperature in streams near Stibnite mining area, central Idaho, 2011-17: U.S. Geological Survey Scientific Investigations Report 2019-5072, 20 p., plus appendix, https://doi.org/10.3133/sir20195072. this user group whatsoever. Please provide an analysis that examines the impacts that degraded water quality will have on the health and well-being of this increasing recreational user group.

5 https://cumulis.epa.gov/supercpad/SiteProfiles/index.cfm?fuseaction=second.schedule&id=1000236

6https://www.deq.idaho.gov/media/571930-_newinternet_waste_data_reports_mining_waste_stibnite_risk_eval_rpt_0800.pdf

7 https://www.midasgoldcorp.com/site/assets/files/2119/amended_techreport.pdf at 19-1.

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underlying development rock, constituent concentrations in downgradient streams receiving the runoff could prove to be higher during the post closure period." Id. The DEIS does not mention the potential impacts (particularly from a human health standpoint) on this user group whatsoever. Please provide an analysis that examines the impacts that degraded water quality will have on the health and well-being of this increasing recreational user group.

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