Data Submitted (UTC 11): 10/27/2020 6:00:00 AM
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Comments: The dictionary defines the word "risk" as a "chance of injury, hazard or loss" and further as "the degree of probability of loss." Practically all of our daily activities involve a certain amount of risk like driving a car during rush hour traffic. However, Midas/Barrick's proposal calls for a number of risks that carry a high probability of catastrophic impact on the environment and people's lives for many years if things go wrong.

On a proposal as large and complicated as the Stibnite Gold Mine project, it is to be expected that there will be a great many risks. These vary considerably as to their likelihood for unfavorable impact to the environment and our concern. Now for a list of risks that we who have worked with this proposal from its start in the fall of 2014 have identified as items of concern:

#1 The Threat of Acid Mine Drainage (AMO) and Toxic Metals, The majority of the gold bearing mineralization that Midas/Barrick is planning to mine is primarily sulfide in nature. (This is in contrast to the recent cyanide heap leach mining operations that were after ores that are oxide in nature.}} Sulfide mining can lead to acid mine drainage (AMO}}, a condition that is toxic to fish. AMO has historically been a big concern for the mining industry as far back as Roman times and is well documented on the Internet. (Type: acid mine drainage in the search box at Google}}.

#2 The Threat to Fish, There is a real risk that this mine will pollute the Salmon River with mine wastes and kill fish. In addition to chemical pollution, there is a high risk of sediment pollution from open pits and mine roads. Sediment from mining in the 1980's was evident clear to Mackay Bar. The lower South Fork Salmon River is a major rearing area for wild salmon and steelhead and bull trout, all species listed under the Endangered Species Act. Salmon and steel head are in record low abundance. The loss of even a few salmon and steel head might jeopardize the species.

#3 The Threat of the Tailing Disposal Dam, Midas/Barrick has plans for a tailings disposal dam of compacted crushed rock and overburden material that is 420 feet high to retain a lake of waters that has been contaminated by mining. This structure would be taller than any building in Idaho. (The building at 8th and Main Streets in Boise is 323 feet tall including the spire.}} The tailing dam is high on our list of Stibnite risks and concerns because dams built in this manner have a history of failure. Google: Mt Polley in BC, Canada, the Teton Dam in eastern Idaho, and the recent Edenville Dam failure in Michigan. A dam in Meadow Creek near the current proposal failed in 1964-65 destroying roads downstream to Yellow Pine.

#4 The Threat Posed by the Tunnel, Midas/Barrick has conducted an extensive core drilling program in the Stibnite area. This program has established that the most valuable gold mineralization is in the northern part of the Stibnite area near the "Glory Hole" and beneath and immediately adjacent to the bed of the East Fork of the South Fork of the Salmon River {{EFSFSR). It will be necessary to reroute the stream in order to dewater and mine this area. Midas/Barrick proposes to do this by means of an .8-mile tunnel through the steep slope on the west side of the stream.

Now tunneling was done before by the Bradley Mining Company that mined for antimony and tungsten during WWII as part of the war effort. The company constructed a tunnel through the mountain on the east side of the stream which was largely trouble free for mining purposes for the many years they were in operation. However, no thought was given to fish passage, and the anadromous fish habitat in the upper reaches of the EFSFSR and along Meadow Creek were inaccessible to fish.

Midas/Barrick is making a big point that they will correct this situation by restoring fish access to former spawning

grounds by making their tunnel a virtual .8-mile-long fish ladder equipped with electric lighting to make it attractive to fish.

We have researched the matter of fish passage around dams and other obstacles and have never found a case where a tunnel has successfully been used for fish passage. A much shorter fish ladder in the East Fork just downstream from Stibnite proved dysfunctional because of channel scour and bedload movement into the ladder. We view this proposal by Midas/Barrick as an effort to counter the bad reputation that mining has for impact on the fishery resource and as a proposal that has a high risk of failure.

#5 Threats Posed by Snow Avalanches and Landslides, Stibnite is located well within Idaho's backcountry. This general area is all mountainous with V bottom canyons with steep side slopes and is subject to extreme weather conditions. The annual snowfall is quite heavy with snow on the ground for roughly six months each year. These factors combined with the steep terrain create ideal conditions for snow avalanches and landslides. These are risks that past mining operations at Stibnite have dealt with with varying degrees of success. In Canadian Superior days, a huge landslide within the Westend pit due to over steepening the mined area closed down mining for a long period while the company constructed a section of new haul road. The headwall of the Garnet Creek pit initiated a landslide there. Landslides along the EFSFSR have regularly cut off road access to the town of Yellow Pine and the Stibnite area. These are risks that are hard to predict as to time and place, but Midas/Barrick will have to be prepared to deal with them.

#6 The Threat Posed by Road Traffic, Hauling hazardous materials on low-standard roads yearround presents a safety risk. Also the everyday traffic on poor roads associated with a work force of approximately 500 people on site for the 20 year life of the mine including post mining reclamation is another safety factor to consider. Several petroleum spills have occurred on these routes in the past.

#7 The Threat of Earthquakes This area of central Idaho is prone to earthquakes. Although the actual time, place, and size of an earthquake cannot be predicted, the possibility of an actual quake is such that Midas/Barrack should have contingency plans in place.

#8 The Threat to Recreation Travel Travel by the recreating public in the vicinity of Horsethief Reservoir and Warm Lake is expected to fall off as tourists dislike sharing the roadways with heavy mining traffic. Thus an increase in the number of visitors in the McCall area can be expected.

#9 The Threat of a Biased Biological Assessment, (BA). The biological assessment is an important part of the preparation process for an EIS. This is the document that looks into all possible impacts of the project to a long list of natural resources. In the case of the Stibnite Gold mine, we who have been involved with the project since its inception have identified the potential impact to the anadromous fish resource of salmon and steelhead as our most important concern. These fish are on the verge of extinction and don't need another obstacle to their survival. The record of gold mining and the fishery resource has been one of incompatibility -the two just don't mix.

The usual procedure is for the Forest Service's interdisciplinary team of scientists specializing in various fields to write the BA or, at least, closely monitor the BA while it is being prepared by an outside firm. Midas/Barrick has petitioned and been granted permission from the Forest Service to write the BA. This is not a completely uncommon way to produce a BA but it has us wondering if the product will truly be unbiased. To us it is a real risk that comes across as a classic case of hiring the fox to guard the hen-house.

#10 The Threat of the Need for Long Term Water Treatment, This is one of the oldest risks that has been recognized as being applicable to the Stibnite Gold Mine project. This statement, and I will quote this verbatim, is on page 28 of the PFS under the subject of "Project Specific Risks". "Water management and chemistry, which could affect diversion and closure designs and/or the need for long term water treatment". Since the gold bearing

mineralization that Midas is planning to mine is primarily sulfide, there is a probability that this will lead to an AMD situation that, once started, is very difficult to stop even after closure of mining operations. This creates the need for long-term water treatment that elsewhere has proven to be very expensive. This likelihood needs to be recognized in the EIS and in the calculation of the performance bond for the Project. (Type: Summitville Mine, long term water treatment in the search box at Google.)

#11 The Threat of an inadequate Financial Assurance, Midas's Public Relations people have always emphasized that the company is committed to restoring the site and leaving the area in better shape than they found it. That is a big promise and will require a big reclamation bond. Our risk is that the company will mine until the ore is exhausted, then declare bankruptcy, move back to Canada, and leave a big mess for the American taxpayers. Indeed, this very thing happened with a Canadian mining company in Colorado. (Again, In the search box at Google, type: 'Summitville Mine, Colorado.) Let's be sure that the reclamation bond is of sufficient size to discourage such actions.

The Nez Perce Tribe has probably been adversely impacted by mining more than any other group in Idaho. The tribe has produced an excellent short film in opposition to the Stibnite Gold mine Project titled: "Dig for the Truth" that does a great job of telling their side of the issue. Type the title in the search box at Google.

Conclusion By law projects as large and complex as the proposed Stibnite Gold mine are required to prepare an Environmental Impact Statement (EIS) in keeping with the provisions of the National Environmental Policy Act (NEPA). For almost 50 years, NEPA has been the "Bill of Rights" for the environment. It is one of the nation's most important laws protecting public health and the environment. In the case of Stibnite, we are well along with the preparation of an EIS and are awaiting release of the Draft EIS that the Forest Service and the mining company have indicated will be in August 2020. The public will then have a specified time - usually 45 days - to make written comment on the document. This is the last opportunity that the public has to comment on a proposal that has the potential to change life styles for many of us for years into the future. The changes brought on by the above risks would affect not only Valley County Idaho but also a large part of the Pacific Northwest that is downstream from Stibnite. People will have to live with the consequences of this mine for a long time and should weigh in as to whether or not they view this project as a good idea while in the planning stage Please make written comment to the Draft EIS when it is released. You can use the above list of risks as a check list for a starter.

ATTACHMENT: Acid Mine Drainage From From Crossing the Next Meridian: Land, Water, and the Future of the West, by Charles F.Wilkinson. Copyright @ 1992 by the author

ATTACHMENT: Scoping Comments From July 13, 2017.

ATTACHMENT: Sulfide Mining - The Case for the No Action Alternative

ATTACHMENT: Acid Rock Draining Prediction: A critical review

ATTACHMENT: Item #2: July 9, 2019: Four Things that you should know about the Stibnite Gold Mine

ATTACHMENT: Long-Term Water Treatment

ATTACHMENT: Acid Rock draining predication: A critical review

ATTACHMENT: EPA Tells Colorado to take over the Summitville Mine Cleanup

ATTACHMENT: Irregularities with the Stibnite Gold NEPA Process