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Comments: As a retired Forest Service employee with over 25 years of service on the Payette National Forest, I am concerned about the mining proposal at Stibnite. While Midas Gold has spent many years developing a thorough proposal to cover almost every aspect of environmental disturbance at the site, I remain skeptical of their ability to follow through on every detail. Still, the current law gives them the right to propose and implement a mining operation, so the Forest Service is responsible for implementing environmental protections and monitoring all operations. Given the high turnover rate of federal personnel, I am not optimistic about this outcome! This project will take years of professional administration and monitoring.

Issues that concern me include the following:

1. What are the effects on threatened and endangered species, specifically from the new road construction, road improvements, and heavy year-round traffic on the Thunder Mountain/Burntlog access route? I like the idea of shifting road access off the East Fork South Fork, Johnson Creek, and South Fork Salmon Rivers, as that will have a tremendous benefit to fish. But I'm concerned how the new access route will impact high elevation wildlife species such as wolverine and lynx. Winter traffic especially in these area would negatively impact these struggling species via noise disturbance, increased hunting, increased snowmobiling, and likely increased trapping due to easy access. I would like to see the Forest implement strong mitigation for this road system, such as prohibiting snowmobiling altogether and offsetting impacts by closing off other high-elevation winter routes.

2. How will the mining company prevent the new "lake" formed by the open pit mine at Hangar Flats from becoming a toxic waste pit? It seems by building this pit in such close proximity to the old toxic waste sites that are currently capped (and ironically called "Legacy" areas by Midas Gold, as if they are something to aspire to), the lake that will likely form when mining is complete is highly likely to contain toxic leachates. I think some serious environmental engineering is required here. At a minimum, the Forest Service must have a professional mining chemist review this proposal and develop some assurances to prevent another toxic lake legacy like the one in Butte, Montana.

3. Reclamation bonding is an important issue. The Federal government has a lousy track record of estimating and collecting enough bonding to cover the true costs of reclaiming such a large area of disturbance in case the company defaults. And based on industry track record, most mining companies default when either the price of gold drops or there is some sort of weather-induced mining disaster. Midas Gold is almost certain to sell their lands and investments as this project commences. The bond they post is the only assurance the public has that everything promised in the Plan of Operations will be done. The Forest Service must be diligent in collecting an adequate amount of money to fully reclaim and mitigate the environmental impacts of this operation. Don't let the well-prepared Plan of Operarions fool you - this company is out to make money from investors who believe they will make millions from extracting minerals from a heavily mined area! Once they sell, the new owners will be blamed for any environmental disasters, and the U.S. taxpayers will be on the hook for any cleanup cost overruns. Just look at how many times this has happened at Stibnite and its toxic cousin Cinnabar.

4. What are the effects of this project on Cimate Change? Yes, the proponent has devised some clever and useful ways to offset some of their carbon footprint. Rebuilding the power line will certainly save some generator diesel fuel usage (but probably not prevent more fuel incidents like the accidental pumping of fuel into a monitoring well by a previous worker who thought it was a buried fuel tank), and installing solar panels is always a good idea. Planting trees, recycling, busing workers in - yes, all good practices for the planet. But those energy savings will be dwarfed by the fuel usage and carbon emissions produced by the heavy machinery used in this mining proposal. At some point, humans must choose between expending fossil fuels for the profit of a few gold seekers vs. working seriously to stop global changes due to atmospheric carbon. The Forest Service has a responsibility to disclose what additional impact this project will have on our rapidly changing climate.

Thank you for considering my comments and working to improve the outcomes of this project proposal.