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Title:
Comments: After attending the public meeting at Yellowpine on the Stibnite-Midas Gold project proposal I would like to submit the following comments, changes, and modifications.

I find the plan of operation acceptable with the following exceptions:

The paramount issue was that of access. Many of the objectives of the project were not met because no access was provided in the plan from or to the community of Yellow Pine. This road closure was difficult to find and was not mentioned in the Executive Summary. Most people reviewing the project would not even know the closure was proposed and would not comment on this important issue. Because of the lack of transparency, omission in the executive summary and document design, results of your public scoping are skewed. The plan did not recognize, value, or accommodate historic visitor use that has accessed hundreds of thousands of acres of public lands through the existing arterial road system. The plan proposes to close this road access. Most, if not all of the attendees to the meeting found this unacceptable and unreasonable. The current road was proposed to be closed at Sugar Creek. No access through the project site was proposed because the mine operation would create an open pit in the area of the existing road and through the existing county road right of way or easement. In the planning process, a permanent bypass road was not possible due to the adjacent land having a Roadless designation that does not allow for a permanent road. However, the proposed Burnt Log access route also crosses Roadless designated lands, but due to the temporary nature of the road, it was allowed.

It is not reasonable to close access from the Yellow Pine direction. I would like to propose that a Yellow Pine accessible temporary road be built through the Roadless designated area for the duration of the project. Then, at the completion of the project or as appropriate, the existing road access from Yellow Pine, with county easement and right of way, should be permanently re-established through the mine site. The temporary and re-established road should have the capacity for vehicles that the existing current road has. It may also be appropriate to consider changing the Roadless designation through a modification of the Forest Plan. The current designation seems to be a significant impact in excessively limiting public access.

In addition, Natural Resource Mitigation measures, especially fish specific, seem to be extreme, excessive, and lack any economic or resource benefit analysis. There appears to be no limit to what needs to be spent to get consensus and approval for this type of activity. Fish have not used this area for passage in many decades. Requiring nearly a mile of lighted tunnel to be temporarily built for fish passage until the steam channel can be reestablished does not seem reasonable. What is the urgency? What is the cost? How many fish will be affected? Is the proposed action scientifically sound? Does your Fish Biologist concur with this action? Where are the fish that would use this passage? As the approving agency, the Forest Service should provide guidance and direction to control extreme and excessive mitigation measures seemingly required to conduct operations such as this.