Data Submitted (UTC 11): 9/7/2020 5:09:02 PM

First name: Doug Last name: Shepherd

Organization:

Title:

Comments: Dear Payette National Forest Supervisor,

As retired wildlife/fish biologists, my wife and I have followed with interest the proposed mining project and Midas' plan to restore fish passage. After studying the DEIS we've identified the following concerns and have the following recommendations:

FISH

*The estimated fish linear densities and salvage numbers are confusing; the numbers in the parentheses appears to contain estimates of fish species that would be affected by the dewatering and salvage. However, there must be an error in the estimates of the number of Chinook Salmon. It doesn't seem possible that there could be 44,716 Chinook in any stream at the mine site - even with transplantation. The estimates for the other species seem too high as well.

*Section 4.12 is confusing and some of the information isn't consistent with the tech memos in the fish appendices.

*It appears that all the alternatives would have similar effects on fish - except Alternative 4 which would exclude fish from the mine site during the life of the mine. WE RECOMMEND THIS ALTERNATIVE BECAUSE IT WOULD BE MOST PROTECTIVE OF FISH. The habitat at the mine site during mining would be dangerous to fish due to low flows, high temperatures, diversions, and poor water quality. It would be best to keep fish out completely until the streams are fully restored.

WILDLIFE

*The construction and operation of the Burntlog Road extension would adversely affect numerous wildlife species, especially wolverine, because it opens up access to previously undisturbed areas, especially during winter. These effects may persist if the road isn't closed at the end of the mining. For this reason WE RECOMMEND ALTERNATIVE 4 SINCE IT USES JOHNSON CREEK ROAD AS THE PRIMARY ACCESS ROUTE. We understand that this would increase the risk to fish in the adjacent streams, but there would be mitigations in place and impacts may never happen. But the impacts to wildlife from the Burntlog Road are certain to happen.

WETLANDS

*We understand that the U.S. Army Corps of Engineers can only permit the LEDPA - which appears to be Alternative 4 since it avoids wetland impacts associated with the Burntlog Road extension. WE RECOMMEND ALTERNATIVE 4 BECAUSE IT HAS LESS ACRES OF WETLAND IMPACTS.

I urge you to take these factors into consideration and appreciate the opportunity to comment

Sincerely,

Doug Shepherd