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Organization:
Title:
Comments: To whom it may concern,

I am very concerned for mining in this region and don't think this should be allowed/permitted based on past poor practice and ongoing mining issues related to water pollution, habitat destruction and sensitive ecological systems that will be negatively impacted for miles away from this project.

Manipulative rhetoric - Midas presents new mining as an opportunity for "environmental restoration," despite acknowledging that the need for restoration is due to the previous history of mining. Mining is not the solution to mining.
Antimony is a particularly harmful metal to mine - known to enter into the soil and groundwater, leaching into tributaries, and causing death to small sized mammal animal populations.
There is a lack of detail as to how the proposed fish tunnel will impact the surrounding landscape and vegetation.
The executive summary does not specifically name any tribes (in particular land stolen in the land grab treaty of 1863) and the need to maintain the hunting and fishing lands of the Nez Perce tribe.
While Midas claims to incorporate a mitigation plan in accordance with the Presidential Memorandum: Mitigating Impacts on Natural Resources from Development and Encouraging Related Private Investment (November 2015)- they do not provide detailed clarity on what that would look like, as far as what "modern" mining techniques they are using that would produce different outcomes from the past mines in the region, or ways that they would "avoid or minimize harm" - and minimize relative to what? This is a very large proposed mine and while Midas can say that they are working with guidance from the Presidential Memorandum, the memorandum itself is very vague and leaves room for a great deal of environmental destruction.
The "Socioeconomic & Workforce" plan leaves plenty of wiggle room for hiring and contracting outside of the local region.
The 216 page plan document has ZERO mechanisms for specific inclusion of tribal governments, or a measure of impacts specific to Native American people or tribes who utilize this region for fishing and hunting. This proposal would disproportionately impact local tribes, and there is no mechanism to balance out that disproportionality. (The prefix trib as in tribe or tribal is used twice in the document, with no specific tribes named).
The plan describes wildlife habitat restoration, and certain protections for unnamed wildlife, fish, and birds, but neglects to specifically mention small mammal species who are at greatest risk for death/adverse health impacts from antimony runoff.
The plan includes a "wildlife mortality reporting tool" - thus acknowledging that this will kill wildlife...The goal would be NOT to kill wildlife, rather than have a tool to report the death of the wildlife.
A plan this long and dense serves as a deterrent to allow the public to actually meaningfully engage in the comment process. Further, the document lacks many of the technical details necessary in the actual operationalization of the mining activity to determine the level of risk to the surrounding region.
Noise is predominantly discussed from the perspective of local residents (human) the closest of which are ten miles away, however there is not sufficient detail to explain how animal habitat would be protected by increased noise. This would destroy the surrounding habitat for several species.
The number of miles of new road is not stated- while there is some explanation of roads that will be maintained during initial construction and then connected, it is not clear how much roadless area will be permanently changed. This is a pristine wilderness area and any new roads dramatically alter wildlife habitat and the pristine nature of the wilderness.
It is mentioned that Midas may "install a sewage treatment facility"- this creates an entirely new set of hazards and is a huge undertaking not sufficiently described. Where would this treatment facility be? How large could it

be?

What will be the impacts to the down stream in this drainage basin? For fish and aquatic ecosystems? For recreational use? For groundwater aquifers?  How does the economic impact to ecotourism compare to the overall economic impact of the mine? Is the mine sustainable like the recreational uses are?

Thank you,

John Sunich