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Comments: To: USFS Attn - Linda Jackson, Payette Forest Supervisor

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From: Bill Strowd

RE: Midas Stibnite Gold Project -Draft EIS Comments

As a home owner located a few miles east of Cascade, Idaho along the Warm Lake Highway and with the 69KV transmission line corridor passing through the center of my two properties, my family have direct concerns relating to the proposed Midas Gold gold mining project at Stibnite. As a former principal mine geologist and lead exploration geologist at Stibnite with Pioneer Metals Corporation in the mid 1980's, I am familiar with its prior mining activity, the geology of the ore deposits and surroundings, and the environmental conditions at the site. As a former miner at Stibnite myself, I support mining in general, however some of my concerns and alternative preferences are listed below.

1. Mine Access Road

Why isn't Lick Creek Road out of Mc Call an option? It is much less distance to the mine site from Highway 55 than it is by Warm Lake Road route. If this not even considered as an alternative in the EIS, it stands as omission in the NEPA process and needs to be corrected in the final EIS. Are the recreational qualities and public safety that are negatively impacted on and about the Warm Lake (and Johnson Creek) roads from the larger traffic volume and large trucks worth the economic gain? Of the alternatives listed in the DEIS Alternative 4 has the least impact but the size of the operation as proposed in all the Alternatives (except 5) will have lasting impacts to the entire region.

My property is on Warm Lake Road and the increased traffic, especially the large trucks estimated to be over 50 per day, will totally destroy the rural peace and quiet now existent for use that chose to have our homes here.

The character of the region along the entire access road will be completely destroyed by this level of traffic. The size and scale of the proposed operation dictates a heavy footprint, not only at the mine site but far beyond.

Alternative 4, with access to the mine along Johnson Creek, is a better route than upgrading Burnt Log Road and creating a new road very close to a wilderness boundary and within roadless areas (as proposed in Alternative 2). The plan projects that up to 1,000 people may be working on the site. Why destroy so much natural undisturbed areas with that level of road construction and traffic when another access road already exist and is the one historically used to access this mine site? The Burnt Log Road access option seems excessively damaging to the environment and unnecessarily disruptive to wildlife.

With the width requirements and cut-and-fill needed to construct acceptable grades along steeper portions of the proposed new route, the impacts to watersheds need to be carefully evaluated. How much will wildlife be impacted from increased traffic with large trucks and equipment? Will sediment loads increase during road construction, at stream crossings, and from protracted erosion of a much larger road surface and cut and fill areas, potentially degrading salmon and other aquatic habitat? How will wildlife, especially such as the threatened Lynx, be protected from increased traffic. The recommended route also closely follows the Frank Church wilderness boundary, so would the view shed be protected from the road and its traffic?

2. Transmission Line Bypass

The Thunder Mountain Estates Bypass (2.4.7.2, page 2-116 and Fig. 2.4-12) as proposed in Alternative 2 is a much appreciated and acceptable option in regards to routing the much larger proposed transmission line. The modifications to lines, power poles, and especially the enormously increased power proposed (current 69-kv line to a 138-kv line) constitutes a substantial safety hazard, lost property values and visual impact to the residences and public at Thunder Mountain Estates should the new line follow the old existing right-of-way in the subdivision. The proposed enormous power increase to 50 megawatts is about half of Idaho Power's current peak power

usage for the entire west-central Idaho system (105 MW), including McCall, Donnelly, Cascade, Council, and other communities and adjacent regions. Particularly worrisome is property owner's adverse health effects that the much increased EMF field would generate. Past and recent studies show increased rate of leukemia, especially in children living within 600 meters (19,700 feet) of high voltage transmission lines. My house is within 12 meters (40 feet) of the existing line. Other homes are also very close, even practically under the existing lines. Recent controlled studies show a 69% increase in leukemia rates in children living within 200 meters (Vincent, Kroll, et al., BMJ 2005:330:1290 and Copes and Barnes, BC Medical Journal, Vol. 50, No.9). The potential is also high for adverse noise or hum generated from the powerline and induced electrical currents and interference within the homes at such close proximity. The required pole height, diameter, material change (from wood to steel), footprint size, and wire size will all be increased, thereby degrading property appearance and substantially reducing property values. Therefore, the bypass option in Alternative 2 as preferred and proposed by Midas Gold would prevent a substantial public health hazard and mitigate visual impacts and property values lost to residences.

3. Water Quality

Routine water quality monitoring including potential contaminants in surface water, springs, and ground water are required to establish baseline data prior to and during mining operations, at both up- and down-gradient locations from the project. Surface and ground water monitoring should continue after mine reclamation, including downstream along the EFSF Salmon and down hydraulic gradient of the mine claims to insure detection and mitigation of contaminants that may impact aquatic life, wildlife, and the community of Yellow Pine. Monitoring should include mercury, antimony and arsenic as well as other metals that could be mobilized during operations and of course other required drinking water constituents should Stibnite serve as a public drinking water system. The closure and post closure care period needs to be established and maintained after mining closure and reclamation, including surface and ground water monitoring, to insure offsite migration of contaminants have stabilized.

Backfilling the existing Yellow Pine Pit with waste rock should be covered with an impermeable cap or capillary break so as to minimize surface water infiltration and decreased leachate formation within ground water.

Although open-pit mine water is likely a current source of ground water contamination in the Yellowpine Pit, the existing pond at least affords some benefit of evaporation. Back-filled waste rock will remove current evaporative losses and with the increased rock surface area and soluble contaminants in the permeable backfill, there is increased potential for ground water leachate production. Backfilling the pit is a good plan only if the design prevents surface water run-on, run-off is designed to prevent surface ponding and erosion, and infiltration of surface waters is minimized or eliminated to reduce mine leachate.

Wildlife protection, including aquatic birds, must be addressed in long-term care and safety from exposure and ingestion of toxic waters within open pits that will accumulate pooled water or in the tailings storage facility.

4. Dam safety

The proposed project shows a mine tailings dam about 450 feet high that will ultimately impound 98 million tons of tailings. This is a major dam, the largest dam category according to State of Idaho Code governing dam regulations. Presumably the failure of a dam of this size would have a direct and profound impact to the downstream community of Yellow Pine and lasting damage to the EFSF Salmon River (if not further). If so, this places the proposed dam in the high risk category according to Idaho dam regulations. The dam as proposed must meet Idaho and Federal dam safety regulations in its siting, foundation analysis, structural design, materials and construction quality control and testing, and possibility of a public warning system to downstream residences and businesses? Since it is in a seismically active zone (Intermountain Seismic Belt), will the dam's design withstand, by an appropriate factor of safety, the ground accelerations of the maximum credible earthquake? The final EIS must address this important issue. Considering Stibnite has already experienced a previous mine dam failure at almost the very same location as the proposed larger dam (Blowout Creek), which to this day still causes sediment problems, how will water and tailings management and erosion be maintained long after closure and virtually into perpetuity behind the impoundment during high snow years and large storm events in an area with high precipitation? For how long will a post reclamation bond be afforded to insure these long term protections from contaminant leakage, dam failure, and/or tailings and impoundment erosion and sediment control downstream in the EFSF Salmon River?

5. Mine Impacts and Benefits

Lastly, I have many other concerns about a mine operation of this magnitude at this location, but Stibnite has been mined for a long time and problems persist which a new operation can help solve. Midas Gold proposes to mitigate some of these mine legacy problems in the course of its operation. I'm not opposed to renewed mining at Stibnite, the economic benefits and new jobs are a very positive benefit to the region. The commodities generated support our modern society. Yet, the scale of the project as proposed should give one pause for extra consideration for the lasting consequences and their extent it may have on the environment, on the lifestyle of many of its residences and recreationists alike. If scaled back to appropriately fit in with the needs of this remote and beautiful area, especially avoiding unnecessary environmental damage as proposed in constructing a new road and widening the Burnt Log Road, it seems to me to be perfectly suited for another mining venture.

6. Conclusion

I support Alternative 4 so long as monitoring and meeting surface and ground water quality standards are part of the design and plan of operations, and so long as the Thunder Mountain Estates Transmission Line Bypass is constructed, and so long as the tailings dam is designed and built to have a safety factor insuring permanent stability from failure in an active seismic zone. Water quality, wildlife protection, and reclamation should be imperative at this remote and beautiful place, so close to a designated wilderness area. Should these provisions and practices not be required nor maintained, then I feel the costs are too high and the Midas Gold Project not be approved with the No Action Alternative taken.

Thank you for the opportunity to express my concerns and hope they will be addressed in the final EIS and operating plan.

Bill Strowd