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Organization:

Title:

Comments: Payette National Forest Supervisor et. al.,

I am submitting comments/questions regarding the Stibnite Gold Project EIS # 50516.

Firstly, I want to thank you and your entire staff for the MASSIVE amount of work that has been devoted to the draft environmental impact statement process, and the continued work going forward. Though I have been actively involved in this process, ultimately, I will rely on your expertise to make the right decisions on behalf of not just Valley County residents, but all United States citizens. You have a tremendous responsibility, and we are counting on you.

I am a 20-year McCall resident. I have owned, operated, and sold multiple businesses in Valley County, and I remain active in the community as a volunteer with Central Idaho Trail Riders Alliance, Payette Avalanche Center, and Valley County Search and Rescue. I am a Forest Service supporter (despite some critiques I have), and I am an ardent public lands advocate and user. I just spent 5 days camping on Pueblo Summit. Driving through defunct, or barely functioning mining claims on the way there offered a clarity of vision on what mining operations big and small have left us.

FISH:

The DEIS has preliminarily determined that bull trout (pg. 4.12-87), chinook salmon (pg. 4.12-69), and steelhead (pg. 4.12-75) and their critical habitat will be adversely affected by Midas Golds proposed operations. Increased water temperatures, sediments, and chemicals downstream of the project are expected.

Activities as simple (certainly not un-important) as routine trail maintenance Forest wide are subject to strict compliance to EIS protocols. Pheobe Meadows on the Krassel Ranger District is in critical need of a trail re-route around the primary wetland. Yet these efforts are nearly paralyzed by the EIS process I am commenting on today. This trail re-route I referenced cannot be improved for essentially free with volunteers, due to EIS constraints. Will you hold Midas Gold to the same strict standards in defense of endangered animals etc. that make it nearly impossible for routine maneuvers such as short trail re-routes? If the answer is "yes", then I see a difficult path forward for you in green lighting this project, and avoiding the optics of hypocrisy. Over half of the proposed mine operation is on undisturbed public land. We need to protect the best and restore the rest.

BIRDS:

Does Midas Golds plan uphold the August 2020 court ruling striking down the allowance of "incidental" takes of migratory birds? The answer is not offered in this DEIS.

OTHER WILDLIFE

Will Midas Gold be beholden to the strict protection standards for wolverines (Chapter 4.13.2.1.3.2) and grey wolves (Chapter 4.13.2.2.4.1)? This is difficult, maybe impossible to do with an operation of the proposed scope. How do I know this? As a 20-year Valley County resident I have had the benefit of education from Payette National Forest ecologists and biologists of the extreme sensitive nature specifically of wolverine habitat. I have also been affected by the ensuing recreation policies.

AIR QUALITY IMPACTS:

Why does the DEIS fail to consider the impacts of dust from blasting, loading and transportation of ore? Which includes dust laden with antimony, arsenic and selenium from proposed mining operations. Impacts that will send these pollutants into the Salmon River drainage.

HAZARDOUS WASTE:

Does Midas Gold intend to burden Valley Counties waste management system (Lake Shore) with their industrial, and high-volume community trash production? Has this been discussed with Valley County officials? Will Midas Gold be required to include emissions from hauling trash in the plan?

Why does the DEIS not address the inherent risks of the exponential increase of hauling of hazardous materials

and chemicals on Highway 55 or Highway 95? Why does the DEIS not include a plan to contain and clean up potential hazardous chemical emergencies on these State highways or through the communities in which they pass?

HUMAN CASUED CLIMATE CHANGE:

Why does the DEIS fail to consider, much less address, the negative impacts to human caused climate change that this project will have? The DEIS does discuss climate change i.e. decreased precipitation, more intense and frequent wildfires, increased stream temperatures. Yet, there is no connection to Midas Golds proposed actions and the effects their actions will unequivocally have. No environmental impact statement can ignore what 97% of scientists worldwide agree on: Human activity is changing the climate, and not for the better. Midas Gold must be required to analyze their impact on climate. Human caused climate change is a global catastrophe, but the effects are felt right here and to no small degree.

WATER QUALITY:

The DEIS discusses surface water treatment "in perpetuity". Even If one were to operate in a vacuum free from observation that considers historical legacy of mining companies leaving a mess for future generations to clean up, despite best intentions or ultimately empty promises, the idea of relying on Midas Gold to treat surface water "in perpetuity" is troubling in the most clear sense. What guarantees do taxpayers have that Midas Gold will, or can fund surface water treatment for, FOREVER if needed? Why does the DEIS assume, with no evidence, that surface water contamination will decrease to a level below requirements, when they are projecting 100+ years into the future? How does Midas Gold know what the water regulations will be 100 years from now?

RECREATION:

The DEIS notes that recreation plays a major role in Valley County, including close to the proposed site. However, the DEIS does not give a full analysis of the impact to this recreation economy it will have. (Section 3.4.3.3.17) Tourism is now Valley Counties major economy, and the natural character and quality in the area is clearly the primary draw. Why does the DEIS fail to use more current statistical analysis when considering impacts to recreation in Valley County? If current data is not available, why has Midas Gold not commissioned a study on this?

SOCIO-ECONOMIC IMPACTS:

Tied with our outdoor recreation economy is the general socio-economic impact the project will have on the community (a community reliant on outdoor/national forest-based recreation).

Why does the DEIS lack a coherent plan to mitigate the affects their operation will have on a housing market already in a crisis state? (4.21-11) Why does the DEIS fail to address the potential wage inflation and staff shortage that likely will occur with this operation?

PURPOSE AND NEED

Gold is not listed by the United States government as a "critical or strategic mineral." Obviously, it has an economic value. Midas Gold has made much ado about antimony. Midas' pre-feasibility study revealed that 5% of the total projected value of the project "might" be produced by the sale of antimony, which is listed as a "critical and or strategic mineral". However, the supporting USGS report also mentions, "(e)nhanced recovery of antimony from precious-metal deposits may represent the most readily available source of antimony if demand were to increase rapidly.". These are antimony supplies that can be accessed from already existing gold and silver mines throughout the United States. Furthermore, if Midas Gold were to extract the approximately 68 million pounds of antimony from the proposed Stibnite Gold project, currently it would need to be shipped to Asia to be refined. This pokes holes in any argument ringing the alarm bells about the "critical and strategic" nature of Stibnite's antimony supply.

I appreciate your time, and your considerations of my comments and questions.

