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Organization:

Title:

Comments:

Reference: Midas Gold DEIS

I am a former Payette USDA. employee of 28 years. I worked for 18 years working on environmental clean-ups at abandoned mine sites in Region 4. I worked specifically on the Stibnite Mine cleanup from 1992 to 2010. I am opposed to permitting the operation of Midas Gold. Based on the DEIS (Draft Environmental Statement). I don't understand how their claims to minimize the environmental impacts can hold water. They would be increasing disturbed areas (pits, repositories, transportation infrastructure and more). So, I am writing you about some specific issues that I think need to be explored further before any approval of the DEIS is determined.

Primarily, the risk of hauling hazardous materials to and from Stibnite over private and public roads creates a substantial hazard. I did some risk assessment work on hauling hazardous materials to Stibnite in 1990s. We found the greatest risk was the hauling of fuels. Petroleum products typically are the most difficult to control and the most expensive to clean-up. Furthermore, any release into streams and rivers will cause considerable damage to the aquatic wildlife and human health and local economy. The length of the road, terrain and weather conditions, make it very difficult to respond to any release in a timely matter. Overall, the risk factor of hauling fuel and hazardous substances does not warrant the operation.

Secondly, the integrity of the liner system is questionable. In my experience, every liner fails at one time or another. The key to the failures can be found in the original installation and differing site conditions (unstable ground). The work must be controlled in specifications and inspected often for compliance during installation. Continued monitoring is a must. I have seen liners fail due to operator/equipment errors during installation and operation (caterpillar blades cutting through liners). We need to look at what will be in place if and when the redundant or backup liner system fails. (There already has been recent earthquakes in the vicinity, which could hasten the liner failure.)

Further, I am concerned about the surface water temperatures. In order to actualize ideal aquatic habitat, water temperatures require vegetation and a good cover canopy. During the life of the current proposed project, I didn't see many places where ongoing vegetation is being considered. The corrective stream, that I coordinated, had 10,000 willow plants planted in a half-mile section. (If you compared the water temperatures in the channel adjacent to the SODA (Spent or Deposit Area) and the temperatures constructed below Blowout Creek, you will see what I am referring to.) Re-vegetation of a cover crop to shade the water for aquatic habitat needs to be ongoing throughout the project (not just at the end during the final reclamation phase).

As a former employee, I know what a difficult decision this is to make. Please consider the impacts of a gold operation of this magnitude to the environment and human health and welfare. The potential risks are significant and can be irreversible. In respect to the continued cleanup of the environment, I believe this project should be denied. This site can still be cleaned up using the existing Clean Water Act and Superfund Reauthorizing and Response Act (1980). The mechanisms and current laws allow for other state and federal agencies to clean up this area. Wild life and outdoor enthusiasts, indigenous people and future generations should be able to enjoy this area. During my time spent cleaning up this site, a lot of the areas were starting to stabilize naturally. For example, the gradation of falls on the East Fork is flattening out, allowing passage for the salmon and other species. The brief period for economic gain in temporary jobs and such will be a snapshot in the history of this system with so very much to lose for posterity. Make your decisions carefully, with care to the balance of material gain and loss of a stable environment downstream and in the immediate area.

Yours truly,

Pat Trainor
USDA-FS retired