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Organization:

Title:

Comments: As a recreationist, I have enjoyed kayaking, hiking and camping in the area impacted for over 40 years. This area is too beautiful and pristine to limit access to for 20 years or more. It is too valuable to destroy and pollute, just for a questionable promise to clean up some day.

As a worker, I am familiar with differences between marketing promises and the reality on the ground. While working for a mining company previously, I saw their advertising brag about low "Lost Time Injury Rate" from accidents. However, in reality, if someone was injured they were offered their regular wage plus their worker compensation if they would return to the jobsite. The company would pick up the injured worker in an accessibility van at their home as soon as they were released from the hospital, bringing them into the timeclock area in a wheelchair, and then into the lunchroom to wait out the day. In one case, the worker had burns over the majority of his body and he was wheeled in wrapped in bandages from head to toe, looking like a mummy. When asked why he would endure the extra misery, he said because of the extra money the mining company was willing to pay him to minimize their "Lost Time Injury Rate".

Their mining smelter was required to control sulphuric acid released into the atmosphere and had a facility to filter out and bottle the acid emissions. However, when the facility exceeded its capacity, almost pure sulphuric acid fumes were ventilated directly out the side of the building. One day an exhaust fan came on as a group of workers was passing by, and all of the workers fell to their knees, coughing and gagging from the sulphuric acid fumes. Since this was a random activity, there was no practical way for the government inspectors to trace this violation.

In another factory, I heard the plant manager bragging about all of the ways that he had figured out to sneak product past the government inspector when it was sub-standard. Where there is a will there is a way, and all current indications indicate that Midas Gold has the will and the way.

There is every reason to believe that Midas Gold will do everything within their power to cheat on their environmental obligations, releasing toxins whenever they think they can get away with it, making sure to time these infractions away from government inspection and oversight. The news below indicates that they are already using their money and political power to cheat the system.

As reported in the Associated Press news, documents show that Midas Gold heavily lobbied the Trump administration. The company's initial request to take part in the (biological) assessment was refused by the Forest Service in February 2018, but the lobbying continued, and they were said to be leading the evaluation and writing a draft by October 2018.

The Forest Service must submit a supplemental EIS to address lack of critical analysis. I urge you to support Alternative 5: the No Action Alternative.