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Comments: I agree with the letter below written by Eric Winfred

Dear Linda Jackson,

Thank you for taking my comments on the DEIS for the Stibnite Gold Project. This project should not be allowed to move forward as planned, and additional investigation into alternatives that improve the resources at stake should be done. Ultimately, the cost of the project exceed the benefits. The risks to the resources, the people, and the economy of Idaho are too great. This should be a restoration activity, and not a mining activity. While some mineral recovery and economic gain is expected, the ultimate goal should be the achievement of standards and improvement of habitat for species of concern. Unfortunately, none of the alternatives achieve this goal. My first concern with this project is that there was not sufficient opportunity for the public to become aware of the project, to understand it, and to comment on it. The project is sufficiently complex and has some tremendous consequences to the resources at stake that more effort should have been made to engage the public. Yes, Covid-19 derailed all our plans this year and limited public gatherings. However, it did not curtail opportunities for online presentations, webinars, and other forms of outreach which could have met the requirements of public engagement as required by the law. The virtual public meeting room, while perhaps appropriate for smaller projects with less impacts, does not provide the level of engagement necessary.

Additionally, there are numerous faults with the assumed risks throughout the entire project plan. These are too numerous to list but can be as specific as the lack of hydrologic modeling that incorporates expected changes of temperature and precipitation during the project lifespan which could drastically change the estimate peak streamflow - the failure to assess that particular risk could mean a disastrous leak, collapse, spill or breach of many of the proposed mining features. Proposed mitigation measures are not sufficient.

Specific concerns are to the proposed amendments to Forest Land and Resource Management Plans discussed in Appendix A. My objections to the specific plan amendments are as follows:

(1) Total Soil Resource Commitment, in PNF: Standard SWST03, is to be amended to "suspend the requirement that management activities shall leave the area in a condition of 5 percent or less TSRC following completion of the activities."

Removal of that standard is neither justified nor appropriate. The current TSRC is estimated as 3% and conservative estimates place the end-of-project TSRC at 20%!! This is an unreasonable level of disturbance for what could be 50-100 years or more. The reason for the amendment appears to rest on the inability of the SGP Reclamation and Closure Plan to define productive conditions. Instead, the RCP and the plan amendment propose that the site be in a "stable" condition. This is a drastic lowering of standards and should not be allowed. Stable and productive are not synonymous.

The Forest Service should demand the definition of productive conditions be the same as or better as it's own definition, and that is to sustain plant growth. The very purpose of the Forest Service is to ensure that activities do not produce substantial and permanent impairment of the productivity of the land. The soils should achieve a greater than 40% recovery of natural background soil productivity within 50 years. The concern that this is difficult or challenging (as stated in the EIS, section 4.5.2.1.1.1) is not sufficient reason to make this change.

That restoration to productive soil conditions will cost money and time is no reason not to pursue it. The Midas Gold Prefeasibility Study Technical Report describes they are making 19% return on their investment, in excess of \$1 billion (using a very inappropriate 5% discount rate as well as a conservative estimate of revenue) so they have plenty of money to pursue challenging goals. This project should aim to achieve the highest of standards and set an example for restorative mining in the West.

(2) Fish Passage Diversion, in PNF: Standard SWST09, is to be amended to "suspend the requirement of new surface diversions to provide upstream and downstream fish passage within the footprint of mining operations."

Removing that standard is basically an abdication of the duties of the Forest Service to sustain the health, diversity, and productivity of the Nation's forests. The Midas Gold Plan of Restoration and Operations describes

the purpose of the project as, among other things, "restoring the salmon fishery." Removal of this standard would eliminate the duty of Midas Gold to accomplish that purpose. The singular focus of this project should be on improving habitat for the fish species of concern, instead, this allows the project to prevent access to fish habitat in perpetuity.

The proposed plan amendment is neither sufficiently justified nor appropriate. All Alternatives under consideration allow for some level of permanent blockage of fish habitat, and thus, all should be tossed and revisited. The Forest Service should demand that the RCP involve consideration of Alternatives that meet the current Forest Plan Standards. The approaches described in the current Alternatives are likely limited by a desire to reduce expenses. That is a faulty approach. We should not allow the desire of a company to make billions of dollars to permanently eliminate habitat for threatened species of fish.

In summary, I do not believe the right approach was taken in developing the RCP or the DEIS. We need to restore this area and make it productive again. Yes, work needs to be done and there are opportunities for mineral extraction, but we need to stop making profit the sole driver of this project and let a focus on restoration lead the way.

Sincerely,  
Eric Winford