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Organization:

Title:

Comments: OVERVIEW

First, I am sorry if my comments lack appropriate structure. I am struggling to organize a large amount of project information in a short time.

Second, I will comment on information presented in the DEIS. However, I find many of my areas of concern fall through the cracks of the DEIS. My general impression is that Midas Gold and the Forest Service are myopic. They focus on the Yellow Pine pit so much that they miss the cultural, recreational and environmental damage inherent in other actions. For example, the Tailings Storage Facility of Alternative 3 would be completely antithetical to the history of Stibnite and to recreation. Next, the new road in Alternative 2 would cause callous destruction to the area I have always known as The Black Lake Special Research Area. No mine can justify damaging one of the most beautiful and pristine areas in the Boise Forest.

Third, I have problems with the mine itself. Nobody I know asked for the Hanger Flats pit lake. Midas Gold made an issue of restoring the valley contour. I was under the impression this mine would fill in its big holes. The DEIS talked about the possibility of filling in the pit but indicated that it may not be economically unfeasible. Really? I don't see a big cost difference in lifting waste rock 500 feet into Fiddle Creek or carting the rock over to Hanger Flats. If Midas Gold insists it is not feasible, I must ask Midas Gold and the Forest Service if the margins are enough to risk this mining project, since we all know there will be cost overruns and uneven returns.

MAIN COMMENTS:

Topic: Alternative 3 Tailings Storage Facility

The East Fork storage facility is a non-starter. It would cover up the historic Stibnite recreation area and prime land for camping and hunting. I thought the TSF would be in a higher side drainage but that would pose problems, too. I see less impact to the public with the Meadow Creek alternative.

Topic: Burnt Log Mine Road and Borrow Sources

I envisioned the new section of road would somewhat parallel the Thunder Mountain road, which would minimize the human footprint. I understood it could not follow the same grade, but I am disappointed the chosen grade takes so much space. I also envisioned the road going from Riordan Creek to Meadow Creek Ridge close to the Thunder Mountain road or a little to the north. I was surprised when Midas Gold chose to build the road south and cut across steep slide draws. Hence, I was not totally surprised with the road change in Alternative 2. In Alternative 2, Midas Gold moved the road further south, which allows the road to go above the slide draws. Now, I might be reading the map wrong, but Figure 3.2-2 shows high erosion potential exactly where the new alternative is being placed on Meadow Creek ridge. I'm not comfortable with that. Midas Gold needs to address this, especially since they deflected my question on this subject during a webinar in September. Finally, I understand most of Midas Gold's road decisions, but two decisions are completely out of line.

First, I am totally against the borrow pit on top of Pistol Rock ridge between Trapper Creek and Riordan Creek. This ridge is a major vista which people see as a gateway into the Frank Church Wilderness. Considering all the

gargantuan earth movements at Stibnite, I am amazed to say that this borrow pit would be the worst impact to the skyline out of all of Midas Gold's actions. As for alternative material sources, mining from the 1980s produced more than enough road base.

Second, I am totally against the road in Alternative 2. The road should stay clear of Black Lake. The road should hide in the low spots, not climb the ridge and punch through the pristine Black Lake Basin, AKA Black Lake Special Research Area. I know this allows for a shorter road but it is not compatible with the wilderness setting and with our love of the area. A simpler solution is to slightly modify the original plan. Stay in the Riordan Creek drainage but move north or south until it reaches a better location to climb Meadow Creek ridge.

Topic: Road safety and closures

Increased road danger is downplayed in Alternative 4. I take offense when the tables on road safety misleadingly display only miles of roads. People living and recreating in the Yellow Pine area would suffer greatly from the increase in dust, noise and danger of Alternative 4. We have seen mine traffic before, but this traffic would be several times greater. We would lose our sense of well-being. It would totally negate festivals and holidays. Another problem with the DEIS is it does not have an estimate of accidents and lost lives on the dirt roads for alternative 4. I find this particularly important because the lives are mine, my family and my friends.

Road closures/restrictions are a related topic to road safety, especially for Alternative 4. Under Alternatives 1, 2 and 3 the road from Yellow Pine to Stibnite would be closed a large part of the day for at least three years. This would kill Yellow Pine because recreation depends on this road every day of the week. For Alternative 4 the road would be restricted for maybe 15 years. The DEIS even boldly says people wishing to go to Big Creek/Edwardsberg will have to use another route some of the time. Why? The road from Yellow Pine to Big Creek is a public road. The East Fork section is every bit as good as Johnson Creek road. There is one bad corner which a couple mobile traffic lights would fix. Restricting the East Fork is untenable for the residents and for the recreating public. It is hard enough to get in and out of Big Creek without long delays. It would put lives at risk because the public will slip by and surprise drivers who expect to have the road to themselves. People will come in from multiple directions with ATVs and motorcycles. Midas Gold has no justification for limiting public access on the East Fork road when the comparable Johnson Creek road is open. It is an unreasonable sacrifice for the public. If Midas Gold feels a need to take extra measures (outside of closing the road) between Profile Creek and Stibnite, I would listen, but systematically restricting travel on the East Fork road between Yellow Pine and Profile Creek is as unacceptable as systematically restricting travel on Johnson Creek road.

Topic: The Mining Plan

The Stibnite Gold Project is trying to juggle multiple tasks at once. It's not easy to produce optimal results. In my professional career, I had a similar responsibility but my results were not to come at the expense of the end user experience. Unfortunately, the SGP end user experience, or public use of this land, suffers under this plan. Let's talk reality. There are not enough salmon returning to the East Fork for the Forest Service or the Nez Pierce to have justified using their money to fill the Yellow Pine pit, especially since it was not overly impacting the resident flora and fauna. That is why the YP pit reclamation is not the shining star that eclipses the warts on this project. The first wart is the Fiddle Creek DRSF. I am happy to see a pseudo vertical map of this DRSFs in the DEIS. It shows the DRSF to be every bit as intrusive as I thought it would be. The reconstructed East Fork road will run close to the Fiddle Creek DRSF and this dam like monstrosity will be an in-our-face reminder of the permanent damage done for gold but not for glory. The second wart is the Hanger Flats pit lake. From my perspective, if I dug a hole to make a lot of money, I would feel obligated to fill in that hole, especially if it was in front of God and everybody and if it was easy to truck or to conveyor material into it. Now, I see two warts and they are the inverse of each other. I think you know where I'm headed. Cut down the Fiddle Creek DRSF and fill in the

Hanger Flats pit. Much better. Thank you. To round out this topic, I know there are benefits to lakes but I also heard that the increase in water temperature due to this lake will not help the salmon. That really does not fit with a salmon recovery project.

Topic: Johnson Creek Substation Location

I am disappointed in both the Forest Service and Midas Gold with respect to the Johnson Creek substation. I specifically asked Midas Gold in a webinar where the substation would be located. I was told it would be on a bench east of the Johnson Creek road. That sounded good; out of sight and out of mind. However, I found the location in the DEIS. It was not on the bench but cut into the hillside right next to the Johnson Creek road. I don't appreciate the conflicting information. Whatever the location, I'm inclined to strongly criticize the Forest Service for considering the hillside location. This is the Johnson Creek Scenic Corridor which should be kept clean from eyesores like this. My family built a home on Johnson Creek and the Forest Service demanded that we place the power line under the road for the visual benefit. A substation in the scenic Dead Horse Canyon is going to be a hundred times as intrusive as a small high line. Move the substation to the bench and out of sight!

Topic: Rebuilding the East Fork Public Road

I am still unclear where the East Fork road will be reconstructed through Stibnite. I don't want it right above or below a hanging wall. I don't want there to be wet land issues. Decide this now.

QUESTIONS AND MORE COMMENTS:

Will soil from under the DRSFs be placed on top of the DRSFs?

Will the whole surface of the TSF and the DRSFs be able to grow local vegetation? I want that type of reclamation.

What is the likelihood of the TSF becoming a dust source?

What is the likelihood of sporadic large discharges of SO₂ from tools like the autoclave? What would be the momentary bulk discharge?

Will the Forest Service guarantee the public use of Burnt Log mining road when travel through the mine site is restricted? It must.

Will the Forest Service, Valley County and Midas Gold guarantee the public unfettered access to the upper East Fork road and to Big Creek? Systematic closing would cause irreparable harm to the Yellow Pine community. Keep the road open.