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First name: Erica

Last name: Laidlaw

Organization:

Title:

Comments: To whom it may concern,

I am a McCall resident, born and raised. I care about my home and its future. I am writing to express concerns about the proposed Stibnite mining project by Midas Gold and the findings in the DEIS.

Firstly, I'd like to question why the DEIS is not open for a longer public comment period? It seems- particularly during a pandemic- more time and consideration should be allotted for the public to make a comment. In a challenging time, I believe most of us are finding it hard to prioritize anything beyond the basic needs of our families.

Also, to my understanding, the public's main means of accessing the DEIS is through the internet, with few printed copies publically available. According to Broad Band Services, 26.9% of Idahoans are without internet services. So, it seems plausible that nearly a quarter of our population has little to no accessibility to the document. Additionally, navigating the DEIS online has been challenging, as many of the links are dead ends or having issues. Even the technologically capable are having issues retrieving DEIS information online, let alone those who may lack the necessary skills to navigate your website. As unintentional as all this may be, I fear many people may be alienated from accessing and understanding the implications of the Stibnite project due to this. We all deserve to be apart of our home's future. So I request you to please extend the comment period and make more printed copies available to our potentially overlooked populations.

Secondly, while I believe there are many concerning points made in DEIS, I will only briefly touch upon the Burnt Log Road and the intended transportation route created and maintained by Midas. In my best ability to read the document, I see very little in the way of avalanche management and winter maintenance. It is noted in Appendix C that Midas foresees little avalanche danger due to mature vegetation growth patterns along the route. It seems they have gathered this information through satellite imagery and conclude there are no historic slide paths along their indented route and therefore no risk. However, the DEIS also includes a point from (Mears 1992 Snow Avalanche Analysis for Land-Use Planning and Engineering) that undermines Midas's analysis, stating, "Many slopes with potential avalanche terrain lack a long history and show no sign of previous avalanche activity through study of vegetative indicators or aerial photos" (Mears, 23).

I believe most avalanche management professionals would state that the terrain's slope angle is more telling of potential avalanche risk than historic slide paths. There are many types of slides that can burry roadways and threaten trucks that don't necessarily take out swatches of mature growth trees. Midas's transit route will most certainly travel through 30+ degree terrain, and therefore avalanche terrain. Additionally, with the shift in climate change, we are experiencing far more rain on snow events in our high alpine, weakening our snowpack, and increasing the risk of avalanche activity.

Yet, even if the avalanche risk was minimal, the Dalton Highway in Alaska spends nearly \$7 million a year primarily managing snowdrifts and slick spots. While I recognize these are very different roads, dictating very different management approaches, it must be said that winter maintenance goes beyond the risk of a massive slide. Interstate 80, running through the plains of Wyoming, has innumerable trucking accidents every winter, without the risk of avalanches. Midas is proposing moving toxic waste along a route that will be one of our highest roads in the state. Invariably, these trucks will face extreme weather conditions. The Midas workers and our precious wilderness area deserve to be ensured some amount of safety with a well-considered avalanche and winter maintenance plan. I believe this goes beyond just analyzing aerial imagery of vegetation-- don't you think?

Thank you for reading and considering my concerns.