Data Submitted (UTC 11): 10/29/2020 2:48:35 AM
First name: Margaret
Last name: Lojek
Organization:
Title:
Comments: Comments to the Payette National Forest:

Please register my concerns regarding Midas Gold's proposal for the Stibnite area. I have personally visited the Midas site, toured with leaders of the proposal, attended public presentations and discussions about the proposed mine, and spoken face to face with the people working hard to get a green light to dig new poisonous pits into our wild areas. There are many red flags in the DEIS and although I have not had sufficient time to review the lengthy document, today I would like to comment on the following four points:

1. Scope and Need- to claim that this expanded mine is "needed" for antimony, whether for national security or for any other reason, is at best misleading and probably an outright deceitful lie. Our nation's current demand for antimony can be fully supplied by other existing mines, eliminating the need to start up this new one, even if demand increases drastically. And besides, Midas admits antimony is only worth 5% of their operations. They want gold because--guess what?-- it will earn them more money; they don't really want antimony, and it's inaccurate to hide behind false motives.

2. Fish and Fish Tunnel- when I toured the proposed mine site, I was shocked at the concept of a fish tunnel. I asked the Midas personnel if a fish tunnel of 1.6k has ever been successful. They admitted no. I waded through sections of the DEIS to try to understand, and I'm still not convinced. Appendix J3, p. 6 states there is "reasonable probability" that the fish will be injured or die trying to pass through this manufactured tunnel! There is no similar tunnel with similar species, so the audacity of this part of the proposal is astounding. This is going to be, at best, learning by trial and error--but this is no primary school experiment: the likely consequences would be devastating to the East Fork of the South Fork of the Salmon River. The DEIS shows that the idea is pure conjecture, and I don't buy it. In fact, the folks at Midas who gave me the tour didn't really buy it, either. Not only is the tunnel poorly researched and poorly modeled, the injuries to fish due to other blasting, relocating the stream, transporting the fish, or accidental hazardous spills is not analyzed in the DEIS.

3. Incomplete analysis of several other areas- I am asking you, our regulatory agency, whose job it is to protect our shared natural resources, to require more analysis of Economic Impact, Alternatives 3 and 4, and bird life. The DEIS fails to show how an international mining corporation that moves tons of chemicals, rock and people fits into the long term economic well being of our beautiful area. The DEIS uses phrases like "arsenic unpredictability" that are not fit for a proposal of this magnitude; it is too vague. If the PO is really a PRO, then we should have been presented with an alternative that shows what would happen if the mine were limited only to the current disturbed land. That is not explored in the DEIS, and it should be, thoroughly. Furthermore, the DEIS modeling fails to include climate change, which would directly impact several species. Lastly, where is the analysis of metals like arsenic and mercury on migratory bird species? We all know what happened to the thousands of migrating snow geese that landed on the Berkley Pitt in Butte. Potential killing of migratory birds must be addressed in this proposal in a way that satisfies the Migratory Bird Treaty Act and Executive Order 13186.

4. As you know, the massive amounts of rock processed to create a single ounce of gold mean that enormous heaps of deadly metals will sit abandoned forever. Lead, mercury, arsenic, zinc and cadmium...the EPA itself admits that "all liners leak" and indeed, every mine in our neighboring state of Montana has leaked (Basin Creek, Beal Mountain, Golden Sunlight, Montana Tunnels, TVX Mineral Hill, Zortman-Landusky, and Kendall) (Duncan, 138). The current DEIS does not account for this likely happening and its effects downstream. The same cold temperatures that freeze pipes and the same seismic activity that requires careful construction of homes and schools will also affect the plastic liners of the mine. This does not satisfy the requirement to keep the river safe

in perpetuity.

Thank you for reading all of the many comments, including mine. To reward your reading this far, I will close by recommending we all should beware of this warning from one of our nation's undisputed great writers:

"Definition of a gold mine: hole in the ground, owned by a liar." (Mark Twain)