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Title:
Comments: Comment on the Midas Gold and South Fork Salmon

Dear Linda Jackson, Vicki Christainsen, and NEPA review committee,

My name is Cole Moore, I am a High School Teacher, and whitewater kayaker out of Banks, Idaho. I have spent the last 5 years returning to the South Fork of Salmon and the greater Salmon watershed to experience the whitewater and pristine wilderness that these rivers are apart of.

I am writing to submit my concerns and state/ request that a supplemental DEIS is needed because the current one is incomplete with a lot of missing information. Further, with its current content I am advocating strongly for Alternative 5, no action. I am also writing to request that the comment period be extended to the full 120 days because I did not have enough time to review the extensive DEIS document due to its truly extensive length, personal circumstances of limited time, and some links of the DEIS that did not work for me to open and were therefore unavailable.

The current DEIS presents alternatives that are narrow in scope and rely on incomplete analysis. There are no modeled predictions or results for alternatives 3&4, and the DEIS has not fully disclosed the effects of 3 and 4 for comparisons. Please provide this information in a supplemental DEIS for public comment.

In brief (due to my time constraints), here are the concerns I have come up with so far:

1. Non-unique mining alternatives: Alternatives 1-4 are similar and present the same type of mining- cyanide leach mining- which is banned in Montana and certain areas throughout the United States due to negative environmental and human health effects. Please provide alternatives that consider actual alternatives, such as dry stack mining, which was never considered or modeled. This could / should be considered when dealing with an environment sensitive to water quality and quantity. There is also the potential for underground mining, which would have less rock removal and therefore less rock waste. All 4 of the alternatives contain 3 open pits & a giant tailings storage facility. Mining as an open pit eventually turns into a pit lake which will 100% have a negative impact on water quality.

2. Water Quality: Chemical reactions between rock and water have the potential to release acid and toxic metal ions into groundwater and surface water. Groundwater quality and quantity will be adversely impacted by the project. These impacts will then affect surface water which in turn affects aquatic organisms. Groundwater and surface water have many interactions and should be thought of as two parts of a single integrated system, the primary distinction between the two being the time scales of their respective processes. Modeling in the DEIS shows that arsenic, antimony, mercury, and other metals will contaminate water for many years after mine closure. Keep in mind this detrimental prediction likely represents a best case scenario.

The effects analysis in the DEIS focuses on predictive numerical modeling. In attempting to quantify changes to water quality and quantity at different times during the mining operation and up to one hundred years in the future, the DEIS relies on certain assumptions that contain significant error. This error is primarily based on the methodology employed to analyze uncertainty in the model outputs.

For example, the faults and fracture zones present in the area are acknowledged as having potentially significant influence on groundwater movement and quality. However, they are not taken into account in the modeling. This omission is identified at Chapter 4.8.8.2.1.3. Further, the plan to treat surface water in perpetuity to meet state

water quality standards relies on an assumption that whatever company mines the site will put money into a trust fund to support the operational costs to treat the water forever. The infrastructure to do so (powerline, roads, treatment facilities) will remain forever. However, the contamination is modeled to still require treatment 100 years in the future. The DEIS assumes, without support that chemical reactions causing contamination will slowly decrease to a point where contaminants will be below state standards. When this time comes is unknowable, and yet, Midas could manage to hold no accountability after mine closure if bankruptcy, or other circumstances of non-accountability are wrangled, which would leave this economic, social, and environmental burden upon the citizens of Idaho and the United States. Further, what is the consumption and water use management Plan?

3. The DEIS indicates that the Forest Service has preliminarily determined that project will adversely affect bull trout (pg. 4.12-87), Chinook salmon (pg. 4.12-69), steelhead (pg. 4.12-75), and their critical habitats; and may indirectly impact Westslope cutthroat trout (pg. 4.12-93). Chinook and bull trout are listed as threatened species. What are the implications of the Endangered Species Act in these circumstances? What considerations does the best available science recommend in order to maintain and protect these species? Please incorporate these considerations into the DEIS and into your considerations of the project. From my research, the adverse effects of Alternatives 1-4 are too great to even consider them.

Fish: The "DEIS p. 3.12.1 describes the 4 special status fish: South Fork Salmon River is not pristine, but it is wild, free-flowing, largely within public lands, undeveloped, and supports native fish. While all fish are of management interest, four special status native salmonids(i.e., fish in the family which includes salmon and trout) are of particular interest because of their status as 4 federally-listed fish or fish of management concern. These all require cold, clear, clean, running water and varying unobstructed migration pathways to complete their life cycles."

4. Recreation: It is noted in the DEIS that the local communities rely heavily on tourism to support their economies" and that "[t]he analysis area is a popular area for a variety of recreation activities on both private and public lands," yet there is no report, information, or analysis on how the Stibnite proposal will affect tourism, recreation, or the related economic benefits to local communities. A supplemental report and information are needed accordingly. Further, the sources are out of date (many are 2003 and 2010) in the context of Idaho experiencing a population boom, and its residents holding high value in recreation opportunities.

Idaho's Recreation and tourism generates $7.8 billion in consumer spending and support 78,000 jobs; 79% of Idaho's residents participate in outdoor recreation; and recreation opportunities is a recruitment tool for businesses used to attract and retain workers (Source: Bureau of Economic Analysis, 2018; Idaho Business for the Outdoors, 2020). Recreation and tourism are a big deal locally, state-wide, and nationally and thus, please provide the missing information on impacts to recreation and recreation and tourism economies as related to the Stibnite Alternatives and a management plan and contingencies for the recreation in the area per each alternative.

Please also include a report on model impacts Alternatives will have on recreation in the South Salmon and Salmon Rivers related to water quality scenarios, as immense local economies depend upon the health and water quality of these watersheds.

5. Native American Rights: What considerations have been taken into account of Nez Perce rights and positions on this proposal? Social-cultural and economic impacts intertwined with environmental impacts must be provided in the supplemental DEIS.

I am very invested in this area and the well-being of its clean water, endangered species, natural environment, and local communities' health and economies, which is why I have great concerns about this project and am requesting a Supplemental DEIS and a longer review period in order to be able to comment adequately.

Thank you in advance for extending the comment period to the full120 days and for ultimately, insisting on a supplemental DEIS for public comment in order to account for the missing information, outdated sources, and lack of use of best scientific knowledge.