

Data Submitted (UTC 11): 10/21/2020 6:00:00 AM

First name: Diana

Last name: Bryant

Organization: Wapiti Meadow Ranch

Title: Owner

Comments: In response to the Draft EIS of the Midas Gold Stibnite Mining project, I am going to advance my general observations regarding access and scope first, then detail other problems I can see and foresee with specifics of the Midas Gold's plan. I am going to leave the environmental concerns to the experts: The Nez Perce Tribe, Idaho Conservation League, Idaho Rivers United, your own FS data and others with the scientific knowledge specific to this project and its impact area: the EFSFSR, roadless area, eastern Valley County wildlife habitat. I am vitally concerned with those destructive aspects of the plan, but will concentrate on my area of expertise: disruption of the recreational, business, and personal lives of the many generational human inhabitants and the myriad of recreational users of the impact area proposed for cataclysmic disruption by Midas Gold.

To begin at the beginning of development of the Midas Gold Stibnite project, the company needs access to one of the most remote and rugged areas in the Lower 48 states. Remote and rugged enough, some would claim, that it would preclude such a large scale incursion. The existing access is via the Johnson Creek/EFSFSR roads: narrow, extremely winding, elevation changing, one lane in many places, gravel. (I am sending, as well, my letter to the editor, Star News, McCall, to explain my objections to the use of this route for mine access.) Having traveled it again (the latest trip of 33 years) just yesterday and paying close attention to every mile, knowing I would be writing this letter, I can tell you that any widening/improving of this road would create havoc in Johnson Creek below.....just the improvements, not even the eventual use of the road for any heavy mining traffic, including the first years of planned heavy access before the Burnt Log route was completed.

In full disclosure, it was I who suggested to Midas representatives at an initial Yellow Pine town 'forum' over 5 years ago that there might be another route (Burnt Log) to their mine instead of the JCR. At that time, they had no idea that the Burnt Log Road even existed. While that route is anathema to me, based on the disruption to roadless area wilderness and vital wild life habitat, it is an improvement over the Johnson Creek/EFSFSR route with its absolute negative impacts to the salmon spawning streams, West Slope Cutthroat and Bull Trout habitat, indigenous wildlife and human homes and businesses there.

Have you considered this resolution to the problem: insist that Midas complete its haul road from Landmark/Burnt Log Road/new construction road from the Landmark end BEFORE they begin the mining process, or trying to construct the road 'from both ends', thereby eliminating any need to use the Johnson Creek/EFSFSR route for any but its current traffic usage for those years before the Burnt Log Route is finished. This would eliminate the risks mentioned above.....those construction years when Midas would plan to use the Johnson Creek/EFSFSR road for construction materials and workers.

The second great concern is the hugely increased footprint of the original mining activity at Stibnite. All Midas' claims of restoration aside (an advertising gimmick of the most disingenuous order), their proposed plan would spread the permanently disrupted site over 3 times larger and the tentacles leading to and within it would change the character of Valley County and its prized recreational backcountry forever. My hope would be that the final

permits would sizeably shrink the planned footprint of the project to keep it more within the boundaries of the previous mining claims and disrupted area.

If heavy haulage could be eliminated from the plan (more onsite reduction of extracted materials so air transport....as previously done, perhaps.... could be utilized) the traffic on and off the site could more happily coexist with current usage.

In section ES.17 Project Schedule and Duration: Midas estimates a total of 20 years, but then goes on to say they will return areas to pre mining conditions except those facilities that might be useful in future times for more mining activities in the general area and ES.18 will and would continue 'scout projects' in the greater area. ("Removing surface facilities and infrastructure (except where selected facilities will benefit future activities")) I have already been made aware that claims have been made/being held in the whole of the Horse Heaven area, upper Meadow Creek, around Meadow Creek lookout and down toward Riordan Lake and Creek, i.e. over the summit and down toward the Johnson Creek drainage.....a company acquiring the claims adjacent to Stibnite to be ready and able to sell to the Stibnite group whenever they wish to expand their operations even further. This current project is just the center of the amoeba that would spread out over the wilderness area that we call home and that is a recreation center for much of central Idaho. A specification to any current permits that might be issued to the effect that ALL mining effects/activities be deactivated at the end of 20 years and no further expansion be authorized/permitted in the future would alleviate concerns that this would be an ongoing project.

There are dozens of questionable projects within the whole that experts can better answer than I, however, I would like to activate common sense to list a few that seem to have problematic outcomes if included in the permits:

1. The Tunnel to facilitate fish movement in the upper EFSFSR during the project

2. Maintaining the Burnt Log Route from Landmark to Stibnite during the winter

3. Providing for recreational access via Cabin Creek/Trout Creek route from Warm

Lake to the Johnson Creek Road. This route was abandoned long ago (late 1940's)

When the avalanche problem there tossed plows over the side during the

War years. Who would dare groom that route.....an impossible winter rec

Trail without constant grooming!

4. Promises to 'clean up' the EFSFSR, when we already have healthy populations

Of Bull Trout, West Slope Cutthroat and even spawning Chinook Salmon there.

No new huge mining project at its headwaters is going to improve that stream!

5. Closed access to public from Landmark along existing Burnt Log road.....a well

Used public access for ATV/UTV and motorcycle riders in the no snow months

And a vastly popular snowmobile route in winter.

6. Limiting access to public to Thunder Mountain Area and Wilderness trailheads

7. Dangers to public and to mining traffic on the Warm Lake Road

7a. Damage to the Valley County roads infrastructure and need to totally finance

Repair/replacement of same.

8. A large enough Bond to cover all eventualities.....make it huge, please!!

9. And, most important of all, the dangers of destruction to fisheries, wildlife and human habitat. Reparations to impacted individuals and organizations? Fish and Game? Forest Service? Organizations that have already put millions into 'reclamation action".? Please attend to them.

10. Outside the preview of this permitting process?? how soon will Midas Gold, an exploration company with no previous extraction experience, sell its claims/permits to an extraction company that has made none of the promises to Idaho, Valley County and the local communities and has none to keep. Or is it really outside the FS process to consider the background and history of the applicant company??

I understand the exigencies of the Mining Laws and the obligations they put on the permitting process, but the FS does have the ability to limit the growth and tentacles of mining projects, based on many of the comments of the concerned public and experts in scientific fields. Midas Gold would like us all to believe 'they can't exist without the whole plan' and that they can 'fix the problem' at Stibnite. The 'whole plan' will disrupt over half of Valley County backcountry recreational opportunities and "The problem" is well on its way to being fixed: As an Orvis Endorsed Fly Fishing Lodge, some of our best guest days were on Meadow Creek, the Glory Hole and the upper EFSFSR.....Bull Trout and spawning Salmon wouldn't exist on the latter if the water weren't pure enough, and the Nez Perce Tribe and others have been working tirelessly to improve it and its tributaries even more. Hopefully, they'll be given a chance before the mining at Stibnite begins its pollution cycle, yet again.

Please consider my suggestions to help mitigate the damage Midas Gold is poised to launch! My preference, of course, is to wish Midas Gold away!

PS. Letter to Editor re: Johnson Creek Road option for access to Stibnite to follow.