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Comments: Thank you for the opportunity to comment on the Stibnite Mine Draft Environmental Impact Statement, prepared by Midas Gold, AECOM, and the Forest Service.

1. CONFLICT OF INTEREST

NEPA requires the agency to ensure accurate scientific analysis. It requires the "professional integrity, including scientific integrity, of the discussions and analyses in environmental impact statements" (40 CFR 1502.24). Avoiding conflicts of interest with the proponent is a clear agency requirement (40 CFR 1506.5). These are not accomplished by allowing the mining proponent Midas Gold to prepare an important Biological Assessment, or to insert Midas Gold documents and analyses verbatim in the DEIS. The Midas Gold "RESTORE THE SITE" logo at the top left of every page of the DEIS Appendices is a dead giveaway of who is the real author of the documents. And it is not the Federal government. The FOREST SERVICE needs to clearly identify and delineate the sections of the DEIS and supporting documents prepared by Midas Gold to distinguish from those prepared independently by the Forest Service.

2. UNFOUNDED MIDAS OPINION

Midas writes things in the DEIS that do not belong there. For example in Appendix G: "It is highly unlikely that the restoration of the site on a standalone basis would be funded by taxpayers, the State of Idaho or any federal agency, such as the Forest Service, the Environmental Protection Agency (EPA), or the NOAA National Marine Fisheries Service. Nor should it be, given that the mining and ore processing facility planned by Midas Gold will incorporate this work into the activities of the proposed Project, at no cost to taxpayers." (Appendix G, p. G-9)

This is an editorial opinion of someone at Midas a Gold wholly unsupported by fact. First: The history of Stibnite is full of restoration of the site funded by taxpayers. Millions of dollars of federal and state taxpayer money has been spent trying to reclaim the site from primitive past damaging mining. There is little reason that will not or cannot continue. For example, the whole CERCLA program and the AML program. Stibnite has been a black hole for taxpayer funds, and there is no evidence that has stopped or will end. Second, it is ridiculous to claim the mining and ore processing facilities will do the restoration work at no cost to taxpayers. Federal and state taxpayers have already paid for their regulatory agencies to participate in planning those facilities for decades. They will be on the hook for years if not decades of more oversight and monitoring if this massive project happens. Most of it taxpayer-paid. And the non-financial costs they will pay for decades to come in the form of environmental damages and lost opportunity costs, will be massive and incalculable. The FOREST SERVICE needs to remove the above statement of Midas opinion and others like it from the SEIS and FEIS.

3. DEIS DOCUMENTS WRITTEN BY MIDAS

On March 14, 2020, the Forest Service approved Midas Gold to serve as a Non Federal Representative (NFR) on the Stibnite Gold Mining EIS project. It also authorized Midas Gold to prepare the Biological Assessment (BA) for threatened and endangered fish resources. Curiously, Chinook salmon, steelhead trout, bull trout, and west slope cutthroat trout are the natural resources most likely to be adversely affected by the project that Midas Gold is proposing. Consequently, Midas Gold would be the one party with the greatest vested interest in the conclusions and content of the BA. They should be the last people to prepare them. Authoring its own document is a blatant conflict of interest, and undermines public confidence in the integrity of the NEPA and permitting processes. NEPA and the NEPA Regulations direct the opposite (40 CFR 1506.56). The FOREST SERVICE needs to disclose and correct in the FEIS this violation of the letter and spirit of NEPA in the DEIS, and coreect

all self-serving analyses, sections, and elements of the BA from the FEIS record.

4. UNREALISTIC SUCCESS OF FUTURE MITIGATION

DEIS Appendix F, Mitigation Strategies etc., reflects optimistic assumptions and high success rates from mitigations that have repeatedly failed over almost a century of mining. THE DEIS analysis needs to be realistic based on past success-failure rates. What is the success likelihood of each of the mitigations listed and proposed? And what are the consequences of failure of each mitigation? And of the mitigations collectively? Stibnite is a poster child for failed mitigations in mining and reclamation. The same laws of physics apply today, the same law of unintended consequences, the same Murphy's law. And the same human nature to shortcut and take the easy way out. The ecosystem elements and systems are fragile, the site is harsh, the environmental obstacles are severe, and the best intentions of numerous mining companies and government agencies have individually and collectively failed over time. Stibnite was and remains a mining disaster area. Superimposing a massive new mining event with three massive open-pit mines will make the whole system much worse. Water quality will degrade, fish populations will decline, wildlife habitat will be destroyed, and recreation displaced. Species extinction will be accelerated. The farther into the future the mitigation, the more likely they will not be funded or implemented or monitored. Reclamation as designed will become increasingly unlikely. The cheery write-up of environmental consequences will more likely become obsolete. It is Stibnite's past, and Stibnite's likely future. The FOREST SERVICE needs to relace unfounded over-optimistic analyses of mitigations and their net effects with realistic risk analyses of adverse effects.

As you are, I am a public land owner. You and I co-own the National Forest Lands upon which this new Stibnite Mine project is proposed. Unlike the King Midas myth, everything Midas touches will not magically turn to gold.

Be assured the old 1900's mining operation was as state-of-the-art as this one Midas has drafted up on paper. And yet, approaching a century later, the area is an environmental disaster area. It is logical to predict that decades from now, the new Stibnite Mining Area that Midas leaves behind will be a new environmental disaster area, its full nature only realized at that time. It happens with every large mine. It is bound to happen with this one. Midas will be gone, and the co-owners of the land will be left holding the bag. Our descendants.

Is this your bequest to our future generations?