

Data Submitted (UTC 11): 10/25/2020 6:00:00 AM

First name: Judy

Last name: Anderson

Organization:

Title:

Comments: My eyes and fingers do not work so well on the computer so I am using the standard way of communicating with hand writing. I hope you can read it. Thank you.

NEPA requires an unbiased objective analysis of the stibnite gold project but I feel I must question whether that was even possible given the intense political pressure Midas cold asserted on the whole process. From the struggle over the approval of non-federal Representation status given to Midas for writing the BA (something the local F. S. office fought against) to the overwhelming redactions since April 2019 in the FOIA[rsquo]d documents of meetings with Midas gold 2 Laurel Sayers speech to Congress to Midas is lobbying at the state level to change Idaho code Ann allow corporate assurances as a financial guarantee for mining cleanup all of the above show undue influence exerted by Midas gold at every level of this process . I am afraid the DEIS itself is also a reflection of this undue influence.

I am a 40 plus year resident of Lake Fork, Idaho. I raised six kids who have loved the salmon the main the middle the South and East Forks. The South work has been for years are go to destination for those early spring trips to see bare ground and set in the hot springs. The East fork South fork is Iconic Idaho for many of us and the thought of the impending industrial corridor massive destruction of landscape and strong probability of endangerment to our rivers is nauseating. Since the first day I heard of this revival of the stibnite mine I knew in my God it was not worth the risk to our rivers.

The DEA's seems riddled with disconnects missing information data that does not match conclusions and weak analysis there are a lot of adverse impacts listed as such but with no follow up significance context listed leaving you with a big So what?

Looking at social and economic impacts what strikes me is the unrecognizable description of McCall. [ldquo]No population growth[rdquo] What! We are being inundated. Where did they get that conclusion? The numbers are outdated. And the statements on local housing demand 4-2-11 are just confusing there is an has been for years debilitating housing crisis in McCall. Employers, the school district have been stressed to find housing for their employees. This has been exacerbated by people moving here and driving up prices so regular people who work here now are struggling for places to live and then we're going to get 400 30 dash 50 new people moving here and somehow this is going to work out? because some people will be making enough money to buy a house? What houses? On 4-21-12 The DEIS sort of admits [ldquo]that could in turn contribute to greater scarcity of affordable housing and increased housing price appreciation[rdquo] Put down what? No context no significance to the community of this crisis situation no suggestions mitigations offer. Don't NEPA regulations require appropriate mitigation measures to be included? (Section 1502.14 NEPA regs). The conclusion the DEIS needs close review by local housing authorities and real the state specialists.

The DEIS does describe the town as being partially dependent on tourism/recreation (29%) for its economy but then it doesn't analyze or I couldn't find any realistic analysis of what the impact of Midas Gold generated traffic would do to our already congested Hwy 55 almost every day in summer . What is going to happen with all the tourist traffic impacted by Midas traffic? Why wasn't this critical element looked at? All the impact school district sewer and water loss of government services because of wage inflation and competition for workers, employers losing workers, diminishment of Internet services-they are mentioned usually under the banner of potential adverse impacts (4.21-15) but then what? Just another adverse impact- nothing else? Then there is the BUST part of the cycle (4.21-31 to 4-21-35) They did description of all the adverse impacts that will happen to the community and they even say quote in the absence of adequate economic transition mitigation the mine closure related decrease in local employment could have an adverse effect on the local areas residents, this is, an

overall economy? So Buck up Valley County 'cause it's going to get rough and then guess what? Midas will pay no property taxes during the construction phase and only \$300,000 a year during operations. Translation: taxpayers of Valley County will be paying for the adverse impacts one way or the other.

OK, I just have to ask. In that little chart of (4.1.2) incomplete and unavailable information which I am sure was put in that annoying format to obfuscate) When things are listed as not there but definitely relevant then if the information is relevant why isn't it there and how can we make determinations without the relevant information question mark new paragraph i am worried about downstream effects period it seems like the DEIS only Analyzed effects on water quality, temperature, etc. Within the mindsight. I worked for the F. S. doing riparian inventory I am well aware that disturbance on streams can have a huge effect downstream. So what about the downstream effects of sedimentation, stream temperature changes, water chemistry, they need to be described as well as the significant stated in the DEIS.

My understanding of the standards in the forest plan is that they are promises to the public of protection of aquatic, terrestrial resources and watersheds. So (Appendix A) SGP asked for an amendment like the one to be able to degrade the aquatic, terrestrial resources, the watershed for the 15 to 20 years of the mine operation and says it is going to be OK for them to do the degradation because they're going to fix it but it is hard to find anything specific about how they're going to do this or believe that it can be done in the first place. Should not, we, the public feel betrayed by this implementation of the forest plan and the granting of waivers to the SGP?

And then there is climate change do I even have to say the biggest threat to humanity and the earth ecosystems ever. I feel it is dealt with in the DEIS in a cursory manner S&P Global, whose purpose is to analyze complex businesses And give accurate data for decisions said that [ldquo]gold mines emitted on average 0.8 tons of CO2 equivalent for every ounce of gold that was produced in 2019.[rdquo] They go on to say that because of strong price performance leading to a lot of new gold mines opening there is [ldquo]concerns of mining's impact on climate change .[rdquo] also that [ldquo]open pit mines emit an average around twice as much CO2 per ounce of gold produce as underground mines.-A report from Wood Mackenzie found that [ldquo]emissions from metals production will need to halve over the next 20 years in order to achieve the Paris agreement decarbonization goals [ldquo]

The DEIS does not deal with any of these realities. Midas would not allow underground mining to be an option period there is no responsibility taken in The DEIS for carbon emissions and contributions to the climate crisis dash if anything it is dismissed (DEIS 4.4-25).

There should be very explicit climate change analysis in all alternatives. Do you tell carbon footprint calculations for each alternative as well as indirect CO2 emissions for calculations plus water consumption estimates from electrical generation estimates of electrical generation from fossil fuel plants renewable energy generation could be used at certain levels to reduce the carbon footprint. In spite of changes proposed by this administration are there not federal climate change policy's from CEQ, NEPA guidelines, Clean Power Plan act that would apply?

We could also assign [ldquo]embodied energy costs for each major commodity, then we'd have as much a much better understanding of mining economics. And how about the cost of perpetual water treatment?

In addition, the DEIS does not adequately analyze the effects of climate change on their predictions. For example, the risks of tailings facility overflows with rain on snow events in mid-winter or spring. Events that will certainly increase with climate change period or the rise and stream temperature which the DEIS predicts maybe 4 degrees but with climate change rises and air temperature it could be much higher. The same for wildfire dash caused loss of shade which would increase temperatures. In all I feel the cumulative effects of climate change on all the predictions including regeneration of vegetation and the reclamation timetable needs to be carefully addressed before we can have any real assessment of the impacts of this project.

In conclusion, I have read as much of the DES as my old eyes could handle. I have talked to retired F. S. workers who know the mine site, I have listened to experts, fish biologists, geochemists, hydrologists, mining engineers talk about the DEIS and I have to conclude that it is poorly executed, shabbily done and confusing. To repeat what I stated in my intro, I think the reason for that is the intense political pressure put on the process by Midas gold. Did AECOM do independent modeling or did they just use Midas is modeling? Was FACA violated because Midas seems to be acting as an advisory to the F. S. without being appointed and can parties with a vested stake being advisory in the first place? What were all the redactions in the FOIA documents of meetings between the FS regional office, Washington office and model Midas gold hiding? The letter from Mark Belke to Keith Lannon on October 5th 2018 clearly shows to me evidence of Midas gold meddling in what should be an objective process. Many briefing papers from the Forest Service show Midas Gold's pressure on the Forest Service. And how about see EQ granting Governor Little's request (July 2020) to identify SGP as a high priority infrastructure projects? High priority? For stake holders maybe just more evidence of S GPS pressure leading to a compromised process I am exhausted by COVID by the this DEIS by the whole thing an I am sure you are too thank you for reading my comments.