Data Submitted (UTC 11): 10/22/2024 1:06:56 AM
First name: Steven
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Organization:
Title:
Comments: Thank you for this opportunity to comment and to object to the Stibnite Gold Project.
https://www.fs.usda.gov/project/payette/?project=50516

I intend to follow 36 CFR 218 Subparts A: "Issues raised in objections must be based on previously submitted written comments, unless based on new information arising after designated opportunities for comment."

Steven T. Harshfield (Oct. 21, 2024)

My specific 2020 DEIS comments that I am using to object to the ROD:

I am referencing this comment for my first objection: Burnt Log Mine Road

"Midas Gold moved the road further south (in the Riordan Creek drainage), which allows the road to go above the slide draws. Now, I might be reading the map wrong, but Figure 3.2-2 shows high erosion potential exactly where the new alternative is being placed on Meadow Creek ridge. I'm not comfortable with that. Midas Gold needs to address this, especially since they deflected my question on this subject during a webinar in September."

I am referencing this comment for my second objection: Borrow Sources

"I am totally against the borrow pit on top of Pistol Rock ridge between Trapper Creek and Riordan Creek. This ridge is a major vista which people see as a gateway into the Frank Church Wilderness. Considering all the gargantuan earth movements at Stibnite, I am amazed to say that this borrow pit would be the worst impact to the skyline out of all of Midas Gold's actions. As for alternative material sources, mining from the 1980s produced more than enough road base."

I am referencing this comment for my third objection: Johnson Creek Substation Location

"I specifically asked Midas Gold in a webinar where the substation would be located. I was told it would be on a bench east of the Johnson Creek road. That sounded good; out of sight and out of mind. However, I found the location in the DEIS. It was not on the bench but cut into the hillside right next to the Johnson Creek road. I don't appreciate the conflicting information. Whatever the location, I'm inclined to strongly criticize the Forest Service for considering the hillside location. This is the Johnson Creek Scenic Corridor which should be kept clean from eyesores like this. My family built a home on Johnson Creek and the Forest Service demanded that we place the power line under the road for the visual benefit. A substation in the scenic Dead Horse Canyon is going to be a hundred times as intrusive as a small high line. Move the substation to the bench and out of sight!"

My objections to the Record of Decision for the Stibnite Gold Project:

Objection one: I object to the ROD, because I have not seen evidence that the mining road (Burntlog Route) going through the Riordan Creek drainage is viable. I am not aware of new geophysical studies which assure us that the road inside Riordan Creek drainage is without serious risk. The Stibnite mining company's first geophysical study showed some of the mountain below Meadow Creek Ridge to be highly erosive. Moreover, as the proposed road climbs up from Black Lake to Meadow Creek Ridge the mountain has a 30 degree slope with even steeper draws. When we combine erosive soil and the steep slope and the lack of vegetation due to past fires and the disturbance of road building, I cannot believe without proof, that the soil stability will be acceptable. I fear highly erosive events and avalanche are likely.

I admit that the Forest Service must have had assurances based on real studies that the road is viable. However, things fall through the cracks. To that end, please guide me to that information or please follow through with studies to assure us a safe road.

Objection two: I object to the ROD, because I still think the visual impact of the Burntlog Route will be too great. My concern is centered around the borrow pits above Trapper Flat and near Black Lake being too visually disturbing. As far as I know, the borrow pits are still in the Plan. I see the Forest Service has used Special Use Authorizations to allow degradation in the environment. While I agree Special Use Authorizations can be used for small things, I do not agree that SUAs should be used for serious blight. Serious degradation should be studied and changed or specifically mitigated.

Again, I admit that the Forest Service must have looked at the borrow pits in 3D renderings like Google Earth and decided from all vantage points that the borrow pits would be acceptable. However, things fall through the cracks. To that end, please guide me to the models used or please follow through with new models to insure visually blight free Trapper Flat and Black Lake areas.

Objection three: I object to the ROD, because I do not have evidence that the new Johnson Creek electric substation(s) and transmission lines are compatible with the forest plan for a Scenic Corridor. Moreover, as with objection two, I am concerned that the SUA allowing visual degradation might be implemented. However, my objection can be quickly eliminated with evidence of appropriate mitigation, such as placing substations out of view of the road.

I am flummoxed that even though the ROD deals with the Special Use Authorization for Idaho Power upgrades, I could not find specifics in the ROD. Nor did I find a link. Also, I did not find the SUA in the list of SOPA. I admit that the Forest Service must list specific upgrades somewhere and I am just too limited to find them. To make quick work of my objection, please guide me to the Special Use Authorization for Idaho Power upgrades and associated details.

Closing thoughts concerning the ROD and the Plan:

This fall, I saw flagging adjacent to the Johnson Creek road in the Landmark area. Is this in preparation for widening the road? People living along the Johnson Creek road should be made aware of road activity as far in advance as possible. We have not been notified. I will endeavor to search out the plan for the road using information from the ROD and hopefully I will find it. However, if the flagging is happening prior to wide dissemination of notice to the public, this is a bad sign. I want to warn the Forest Service and the Stibnite mine: do not make the public worry. In places like Alaska, the public might be an afterthought, but in Idaho, the public is going to be an important part of the equation.

Finally, please do not overlook practical things. For instance, your greatest concerns might be mineral and chemical poisoning. However, during the mid-century mining, the East Fork River ran like milk and during the

mining in the 1980s, precipitation and runoff often stopped extraction of ore. The West End pit mine released fine particulate matter coming from the dolomite and flushed into the East Fork river. Today, we are expecting many times the extraction rate of both prior mining eras. Hence, I expect sediment release will cause a yearly spring shutdown of 3 months and/or I am expecting a substantial expense will be incurred to cause the sediment to settle out of solution. It's an annoying practical thing that can break the mine's bank. Hence, it is no sin to run the calculations again and make sure this mine can be successful at the current time with the current plan.