

# **Stibnite Gold Project EIS**

## **Appendix D**

### Mitigation Measures

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**D-1: Preliminary Mitigation Measures Required by the  
Forest Service and Proposed by Midas Gold as  
Design Features**

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## Forest Service Mitigation Measures

This section lists Forest Service designated mitigation measures for the Proposed Action and action alternatives. Mitigations will be followed during and after completion of project activities to avoid or minimize adverse impacts on the human and natural environment.

Standards and guidelines in the Payette and Boise National Forest Land and Resource Management Plans (Forest Plans) (Forest Service 2003, 2010) that are designed to reduce or prevent undesirable impacts resulting from proposed management activities are incorporated into all action alternatives by reference. In addition, best management practices outlined in the Best Management Practices for Mining in Idaho<sup>1</sup> will be implemented where appropriate and applicable for operations to minimize site disturbance from mining and drilling activities and to ensure operations are in compliance with all applicable local, state and federal regulations.

The preliminary mitigations listed in **Table D-1** address site-specific environmental concerns for the Stibnite Gold Project and were evaluated in this Draft Environmental Impact Statement.

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<sup>1</sup> Idaho Department of Lands. Best Management Practices for Mining in Idaho. 1992. Prepared by Idaho Department of Lands in conjunction with Other State and Federal Agencies through the Idaho Mining Advisory Committee. November 16. Available at: <https://www.idl.idaho.gov/mining/bmp/bmp1992ttl.pdf>.

**Table D-1 Preliminary Mitigation Measures Required by Forest Service**

Number	Description	Resources Affected	Alternatives
<b>FS-1</b>	If previously undiscovered cultural resources (historic or prehistoric objects, artifacts, or sites) are exposed on NFS land as a result of project operations, those operations will not proceed until notification is received from the Forest Service that the proponent has complied with provisions for mitigating unforeseen impacts as required by 36 CFR 228.4(e) and 36 CFR 800.	Cultural Resources	All Action Alternatives
<b>FS-2</b>	A programmatic agreement (PA) is being developed and will outline measures to ensure compliance with Section 106 of the NHPA, including but not limited to protocols for completing cultural resources surveys within the analysis area, permitting requirements, treatment of historic properties, monitoring requirements, inadvertent discovery protocols, curation, and treatment of human remains. The PA will identify known adverse effects to historic properties, including the NRHP-listed Stibnite Historic District, and provide mitigation measures.	Cultural Resources	All Action Alternatives
<b>FS-3</b>	A management plan will be developed for each historic property nominated to the National Register of Historic Places. The plan(s) will be drafted during the nomination process.	Cultural Resources	All Action Alternatives
<b>FS-4</b>	Architectural designs would follow principles and concepts outlined in the Built Environment Image Guide (BEIG).	Scenic Resources	All Action Alternatives
<b>FS-5</b>	Opportunities will be considered for protection or enhancement of culturally significant plants that are known to occupy the project area and the Tribes have identified during project scoping or consultation.  Tribes will be consulted regarding opportunities for restoration, enhancement, and maintenance of native plant communities that are of interest to tribes when proposed activities may affect those plant communities.	Cultural Resources, Vegetation	All Action Alternatives
<b>FS-6</b>	In fish-bearing waters, intake hoses shall be screened with the most appropriate mesh size (generally 3/32 of an inch), or as determined through coordination with NOAA Fisheries and/or USFWS.	Fish	All Action Alternatives
<b>FS-7</b>	Fish passage will be provided at all proposed and reconstructed stream crossings of existing and potential fish-bearing streams.	Fish	All Action Alternatives
<b>FS-8</b>	When taking water from TEPC fish-bearing streams for road and facility construction and maintenance activities, intake hoses will be screened with the most appropriate mesh size (generally 3/32 of an inch), or as determined through coordination with NOAA Fisheries and/or USFWS.	Fish	All Action Alternatives
<b>FS-9</b>	Handling of road waste material (e.g., slough, rocks) will avoid or minimize delivery of waste material to streams that would result in degradation of soil, water, riparian and aquatic resources.	Fish, Health and Safety, Soils, Water Resources, Wildlife	All Action Alternatives

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Number	Description	Resources Affected	Alternatives
<b>FS-10</b>	Spill Prevention, Containment, and Control Plan shall be in accordance with 49 CFR 171, including incident reporting and response.	Fish, Health and Safety, Soils, Water Resources, Wildlife	All Action Alternatives
<b>FS-11</b>	Site-specific analysis using calculated risk tools or another method will be documented in the project record for stream crossings designed to accommodate <100-year flood recurrence interval.	Fish, Health and Safety, Access and Transportation, Wildlife	All Action Alternatives
<b>FS-12</b>	Garbage and trash will be removed from National Forest System lands regularly and disposed of in an IDEQ-approved waste disposal facility. Food and garbage will be stored either indoors, in vehicles, or if outside, in wildlife-proof containers. No garbage will be burned.	Fish, Wildlife, Health and Safety	All Action Alternatives
<b>FS-13</b>	Trees or snags that are felled in RCAs will be left unless determined not to be necessary for achieving soil, water, riparian, and aquatic desired conditions. Felled trees or snags left in RCAs will be left intact unless resource protection (e.g., the risk of insect infestation is unacceptable) or public safety requires bucking them into smaller pieces.	Soil, Water Resources, Fish, Vegetation	All Action Alternatives
<b>FS-14</b>	The operator will immediately report any fuel, oil, or chemical discharges or spills greater than 25 gallons on land, or any spill directly in a stream to IDEQ, USFS, USFWS, and NOAA FISHERIES as required by applicable federal and state regulations by phone and/or fax (or as soon as possible after on-site containment efforts are implemented as per the SPCC plan), and initiate emergency consultation.	Fish, Wildlife, Wetlands	All Action Alternatives
<b>FS-15</b>	Employees and staff will receive training and direction to avoid spawning adult Chinook salmon, bull trout and steelhead.	Fish, Wetlands	All Action Alternatives
<b>FS-16</b>	Where settlement ponds, tailing dams, or impoundments are planned, each will be located, designed, constructed and inspected under the supervision of a professional engineer.	Geology and Geotechnical	All Action Alternatives
<b>FS-17</b>	To reduce the potential of slope failure associated with saturated sump pits on steep slopes, a remote sump or portable recirculation tank would be used if stability considerations warrant it. On slopes greater than 35%, the selected locations would be reviewed and approved by Forest Service specialists.	Geology and Geotechnical, Water Resources, Fish	All Action Alternatives
<b>FS-18</b>	Because both tailings and development rock storage facilities would be located within RCAs (Fiddle DRSF, West End DRSF, Yellow Pine DRSF and Meadow Creek TSF), the following conditions apply: <ul style="list-style-type: none"> <li>• Waste material will be analyzed using the best conventional methods and analytic techniques to determine its chemical and physical stability characteristics.</li> <li>• Waste and waste facilities will be monitored to confirm predictions of chemical and physical stability, and make adjustments to operations as needed to avoid degrading effects to beneficial uses and native and desired non-native fish and their habitats.</li> <li>• Waste facilities will be monitored to ensure chemical and physical stability and</li> </ul>	Geology and Geotechnical, Wetlands and Water and Wildlife	All Action Alternatives

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Number	Description	Resources Affected	Alternatives
	<p>revegetation to avoid degrading effects to beneficial uses and native and desired non-native fish and their habitats.</p> <ul style="list-style-type: none"> <li>Degrading effects from locatable mining operations situated in RCAs will be mitigated by identifying reasonable locations for access, processing, and disposal facilities outside of RCAs, wherever possible.</li> </ul>		
<b>FS-19</b>	Commercial transport vehicles also will be inspected at Knox or Landmark by the driver prior to accessing Johnson Creek. Transport companies are required to document DOT annual inspections and Landmark vehicle inspections.	Health and Safety, Access and Transportation	All Action Alternatives
<b>FS-20</b>	Road clearing and maintenance activities for roads under FRTA easement agreements will be coordinated with Valley County as necessary.	Health and Safety, Access and Transportation	All Action Alternatives
<b>FS-21</b>	An emergency fire response plan, including emergency notification contacts will be posted on site and staff will be trained in emergency response procedures.	Health and Safety, Vegetation	All Action Alternatives
<b>FS-22</b>	All activities will be conducted in accordance with State of Idaho fire protection procedures (as outlined in IDAPA 20.04.01), local Valley County Fire District regulations, and Forest Service rules and regulations and 36 CFR 228.11.	Health and Safety, Vegetation	All Action Alternatives
<b>FS-23</b>	Several fire-response kits will be spaced strategically around the project area.	Health and Safety, Vegetation	All Action Alternatives
<b>FS-24</b>	On-site staff will monitor local and onsite fire conditions and maintain contact with local area fire officials to ensure appropriate fire management procedures are followed in the event of implementation of fire restrictions or woodland use restrictions (e.g., “Red Flag Warnings”).	Health and Safety, Vegetation	All Action Alternatives
<b>FS-25</b>	To accommodate floods, including associated bedload and debris, new culverts, replacement culverts, and other stream crossings will be designed to accommodate a 100-year flood recurrence interval unless site-specific analysis using calculated risk tools or another method, determines a more appropriate recurrence interval.	Health and Safety, Water Resources, Wetlands, Fish	All Action Alternatives
<b>FS-26</b>	A site-wide health and safety plan will be developed and provided to the Forest Service. As part of the Health and Safety Plan, medical, fire, and weather emergency response procedures will be developed, and all employees and contractors will be familiar with these procedures.	Health and Safety	All Action Alternatives
<b>FS-27</b>	Facilities will blend with the surrounding landscape character and the ROS setting. ROS descriptions from Forest Plans will be used to help guide facility development within each ROS class.	Recreation	All Action Alternatives
<b>FS-28</b>	Protection measures for National Forest System trails will be followed.	Recreation	All Action Alternatives
<b>FS-29</b>	Any damage to or loss of Forest System trails will be repaired or mitigated.	Recreation	All Action Alternatives
<b>FS-30</b>	Have a buffer between the road and the RNA to minimize effects of roads to the RNA.	RNAs	Action Alternatives 1, 2,

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Number	Description	Resources Affected	Alternatives
			and 3
<b>FS-46</b>	Topsoil and any brush removed will be stockpiled separate from fill material and used in reclamation.	Soils	All Action Alternatives
<b>FS-47</b>	Prior to expected water runoff, water management features will be constructed, installed, and/or maintained. Activities and features include, but are not limited to, waterbars, rolling dips, seeding, grading, slump removal, barriers/berms, distribution of slash, and culvert/ditch cleaning.	Water Resources, Soils	All Action Alternatives
	Water supply points, service areas, and other needs for road and facility construction projects are to be identified before implementation to avoid impacts to, soil, water and riparian resources and occupied TEPC plant habitat.	Water Resources, Soils, Botanical Resources	All Action Alternatives
<b>FS-48</b>	Midas Gold will monitor stormwater runoff and stormwater BMPs as per the SWPPP. Stormwater monitoring, inspections, and reporting will be conducted in accordance with the NPDES Multi-Sector General Permit (MSGP) and the SWPPP.	Water Resources, Soils	All Action Alternatives
<b>FS-49</b>	Midas Gold will implement additional surface water quality baseline turbidity monitoring (daily during break-up, not to exceed a period of 3 weeks), provided the sampling sites are safely accessible. Monitoring will include: (1) one station upstream in Meadow Creek above the SODA; (2) one downstream in Blowout Creek above the confluence with Meadow Creek; and (3) one above and below the confluence of Meadow Creek and EFSFSR.	Water, fisheries	All Action Alternatives
<b>FS-50</b>	Road rutting from traffic will be minimized by construction and maintenance of surface drainage structures, application of surfacing material, and by restricting road use when conditions are unacceptable due to moisture that is leading to the onset of rutting and concentrated turbid flow. Note typical guidance is no use if ruts deeper than 4" are created.	Water, Wetlands, Fish	All Action Alternatives
<b>FS-51</b>	For the borrow sources and all areas of temporary disturbance, standard reclamation practices will be followed, including segregating and stockpiling topsoil, implementing stormwater and sediment BMPs, backfilling and placing topsoil, and revegetating.	Water, Soils, Wetlands	All Action Alternatives
<b>FS-52</b>	To minimize sediment runoff from the temporary roads and roadbeds, water bars, silt fencing, certified weed-free wattles, and/or weed-free straw bales will be installed in strategic downslope areas and in RCAs.	Water, Wetlands	All Action Alternatives
<b>FS-54</b>	Forest Service approved portions of Conservation Strategies and Agreements for Sensitive species (where they exist) will be followed in Sensitive species habitat and populations that may be impacted by Project.	Vegetation	All Action Alternatives
<b>FS-55</b>	Seeds and plants used for seedings and plantings in revegetation projects will originate from genetically local sources of native species.	Vegetation	All Action Alternatives

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Number	Description	Resources Affected	Alternatives
<b>FS-56</b>	Effects to TEPC, Sensitive, and Forest Watch plant species and their habitats will be avoided to the extent possible. Project actions in occupied Sensitive plant habitat will incorporate measures to ensure habitat is maintained where it is within desired conditions, or restored where degraded.	Vegetation	All Action Alternatives
<b>FS-57</b>	Noxious weeds and undesirable non-native plants will be eradicated in the Operations Area boundary, within permitted use areas, and the cut/fill slopes of roads and trails used by mine and mine facility related traffic. Where it is not practical to eradicate existing infestations, infestations will be managed to prevent seed production and spread. In areas of existing extensive infestation, mitigation for noxious weed prevention will be incorporated into road layout, design, and project alternative evaluation. Measures to reduce the potential for spread and establishment of noxious weed infestations will be included in the updated Weed Management Plan.	Vegetation	All Action Alternatives
<b>FS-58</b>	<p>Only certified noxious weed (as designated in the most recent All States Noxious Weeds List)-free hay, straw, or feed will be used on National Forest System lands. In addition to certified noxious weed-free seed, Midas Gold will use certified (where certification is available) noxious weed-free materials such as hay, straw, or mulch for use in reclamation activities.</p> <p>Where certification is not available, these materials will be inspected and determined to be free of weed seed before purchase and use. This inspection will be coordinated with a Forest Service botanist or county weed agents. Any borrow or gravel sites used as source material for the Project will be certified as being weed-free by Forest Service specialists or county weed agents (for off-Forest sources) before use in the Project.</p>	Vegetation	All Action Alternatives
<b>FS-59</b>	Earth-disturbing equipment such as cats, graders, and front-loaders will be cleaned to remove all visible plant parts, dirt, and material that may carry noxious weed seeds prior to entry onto the Project area and again upon leaving the Project area, if the project area has noxious weed infestations. Wash sites will be located: (1) where they are easily accessible and useable, (2) on gravelly or well-drained soils, (3) where wash water runoff will not carry seeds away from site, (4) where wash water runoff will not directly enter streams, and (5) where they may be used repeatedly for several activities within the area.	Vegetation	All Action Alternatives
<b>FS-61</b>	<p>Midas Gold's Weed Management Plan will be updated before Project actions to include specific measures to reduce the potential for spread and establishment of noxious weed infestations via Integrated Weed Management. Noxious weed management will require determining the presence, location, and amount of noxious weed infestations in the Operations area. Management strategies identified in the Weed Management Plan will describe:</p> <ul style="list-style-type: none"> <li>• Methods and frequency for treating infestations,</li> <li>• Treatment procedures and restrictions,</li> <li>• Reporting requirements, and</li> </ul>	Vegetation	All Action Alternatives

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	<ul style="list-style-type: none"> <li>Follow-up or monitoring requirements. Herbicide use will be applied consistent with the Boise and Sawtooth Weeds EIS Biological Opinion on the Boise National Forest.</li> </ul>		
<b>FS-63</b>	If TEPC or sensitive plants are likely to be disturbed by the SGP, digging or physically removing whole plants should be discouraged in favor of collecting seeds or cuttings for propagation of plants in other areas.	Vegetation	All Action Alternatives
<b>FS-64</b>	During any planned activities, should any other TEPC or sensitive plant species be observed in the project area, the Forest botanist will be notified, and the potential impacts will be evaluated.	Vegetation	All Action Alternatives
<b>FS-68</b>	New facilities for storage of fuels and other toxicants will be located outside of occupied TEPC plant habitat.	Vegetation and Wildlife	All Action Alternatives
<b>FS-69</b>	For management actions that include application of insecticides, herbicides, fungicides, or rodenticides, mitigation will avoid or minimize adverse effects on TEPC species or their habitats.	Vegetation and Wildlife	All Action Alternatives
<b>FS-70</b>	Midas Gold will coordinate with Forest resource specialists to consider TEPC habitat needs when designing and implementing management activities that may affect TEPC species and their habitats.	Vegetation and Wildlife	All Action Alternatives
<b>FS-71</b>	Commercial material will be removed using harvest methods that ensure soil productivity and minimal damage to residual trees.	Vegetation, Timber	All Action Alternatives
<b>FS-73</b>	Areas where the soil has been exposed by ground-disturbing activity will be revegetated, and concurrent reclamation will be conducted where possible and practical to offset potential erosion or sediment release. Potential areas will include construction and development sites, underground utility corridors, skid trails, landings, firebreaks, slides, slumps, temporary roads, cut and fill slopes, and traveled ways of specified roads. Other measures developed in coordination with the Forest Service may be used to supplement the influence of re-vegetation in preventing the invasion or expansion of noxious weeds.	Vegetation, Timber	All Action Alternatives
<b>FS-75</b>	All Forest Service, county and state speed limits, road restrictions and load limits will be observed by staff and contractors during travel. Personnel and contractors will be encouraged to drive at speeds appropriate for reducing the possibility of vehicle- wildlife accidents. Vehicles will be requested to slow down to speeds necessary to minimize the fugitive dust generation or the route watered if significant dust generation is produced during vehicle travel. If appropriate, during equipment mobilization and demobilization, pilot cars will be used to ensure appropriate speed and reduce potential for conflicts or incidents along the narrow access roads leading into the project area.	Vegetation, Water Resources, Wildlife, Fish, Health and Safety	All Action Alternatives
<b>FS-77</b>	The use of natural or neutral colors and non-reflective surfaces will be considered for structures. An exception to this would be when the function of the structure is to be seen.	Visual Resources	All Action Alternatives
<b>FS-80</b>	MGI will coordinate with the Forest Service on current and planned air (flight) operations.	Water Resources, Fish	All Action alternatives

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Number	Description	Resources Affected	Alternatives
<b>FS-82</b>	Storage of fuels and other toxicants or refueling will not occur within RCAs unless there are no other alternatives. Storage of fuels and other toxicants or refueling sites within RCAs will be approved by the responsible official and have an approved spill containment plan commensurate with the amount of fuel.	Water Resources, Fish, Wetlands	All Action Alternatives
<b>FS-83</b>	Dust abatement chemicals will be used in accordance with applicable road maintenance BA. Apply dust- abatement additives and stabilization chemicals (typically MgCl <sub>2</sub> , CaCl <sub>2</sub> , or lignin sulphonates) to avoid run-off of applied dust abatement solutions to streams. Spill containment equipment would be available during chemical dust abatement application. Where the road surface is within 25 feet (slope distance) of surface water, dust abatement would only be applied to a 10-foot swath down the centerline of the road. The rate and quantity of application will be regulated to insure all of the chemical is absorbed before leaving the road surface.	Water Resources, Fish, Wetlands, Air Quality	All Action Alternatives
<b>FS-84</b>	All fuel transport drivers will be required to have spill response, safety, and resource awareness training. In this program, drivers will be informed of the Idaho State Emergency Medical Service (EMS), first hazardous materials responder actions, and the importance of anadromous fisheries that must be protected. In addition, each driver will participate in a safe-driver training course that is specific for the Midas Gold fuel convoy. The course will cover the SOP as well as discuss causes of accidents and how to minimize risk.	Water Resources, Fish, Wildlife, Health and Safety, Hazardous Materials	All Action Alternatives
<b>FS-85</b>	Adequate support personnel will be scheduled at all times, including a minimum of three 40-hour hazardous waste operations and emergency response (HAZWOPER)-trained spill responders.	Water Resources, Fish, Wildlife, Health and Safety, Hazardous Materials	All Action Alternatives
<b>FS-86</b>	Drivers will be experienced in fuel truck hauling on NFS roads and will be familiar with the travel routes, including locations of steep slopes that require downshifting (for vehicles with manual transmission)	Water Resources, Fish, Wildlife, Health and Safety, Hazardous Materials	All Action Alternatives
<b>FS-87</b>	Tire chains will be required on NFS roads for snow or ice road conditions.	Water Resources, Fish, Wildlife, Health and Safety, Hazardous Materials	All Action Alternatives
<b>FS-88</b>	Pilot and emergency response vehicles will carry appropriate containment and first aid equipment. Each convoy (between the two vehicles) will carry at least one gallon of dry plug-n-dike; three oil sorbent booms (which will be sufficient length for a worst case scenario); one bundle of sorbent pads; shovels; 96- inch by 96-inch piece of plastic sheeting; a bucket; a 55-gallon drum; and a small trash pump (or equivalent) and generator.	Water Resources, Fish, Wildlife, Health and Safety, Hazardous Materials	All Action Alternatives
<b>FS-89</b>	The spill response team will carry sufficient containment equipment for one full tanker. This may include 4,000 gallons of empty storage capacity on standby at Stibnite Logistics Facility. If necessary, a second vehicle carrying additional spill response equipment will be added.	Water Resources, Fish, Wildlife, Health and Safety, Hazardous Materials	All Action Alternatives

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Number	Description	Resources Affected	Alternatives
<b>FS-90</b>	After completing operations, all empty fuel and lubricant containers will be removed from the operations area and transported and disposed in accordance with local, state, and federal requirements.	Water Resources, Fish, Wildlife, Health and Safety, Hazardous Materials	All Action Alternatives
<b>FS-91</b>	Two or more stored spill containment/response caches will be placed along each of the fuel delivery routes.	Water Resources, Fish, Wildlife, Health and Safety, Hazardous Materials	All Action Alternatives
<b>FS-92</b>	Fuel will be stored in sealed 55-gallon steel drums, approved double-walled fuel tanks, or in approved single-walled tanks within secondary containment. Fuel will be managed, tanks would be inspected, and any oil release would be responded to in accordance with the SPCC plan.	Water Resources, Fish, Wildlife, Health and Safety, Hazardous Materials	All Action Alternatives
	Fuel for exploration drilling will be delivered to the drill rig in a 100- gallon doubled- wall tank mounted to a pick-up truck, tracked vehicle, or by helicopter.	Water Resources, Fish, Wildlife, Health and Safety, Hazardous Materials	All Action Alternatives
<b>FS-94</b>	Should any oil or chemical discharges or spills occur, the release would be reported to IDEQ and other appropriate agencies as required by applicable federal and state regulations immediately (or as soon as possible after on-site containment efforts are implemented as per the SPCC plan). Spill response would be in accordance with the SPCC plan, which includes a trained on-site emergency response team. Spills or discharges would be documented in writing.	Water Resources, Fish, Wildlife, Health and Safety, Hazardous Materials	All Action Alternatives
<b>FS-95</b>	A fuel management plan would be created for the SGP to analyze measures for minimizing the potential for fuel spills along the main routes into the activity area. The fuel management plan also would outline times of year and the routes that would be used to deliver fuel to the SGP facilities. The fuel plan would be followed for all activities associated with fuel delivery.	Water Resources, Fish, Wildlife, Health and Safety, Hazardous Materials	All Action Alternatives
	In the unlikely event of a helicopter crash into water, Midas Gold emergency responders would be notified by radio. One group would respond immediately to the crash site, to render assistance, medical aid, and employ environmental precautions including stabilization of the site, deploying booms, and absorbent pads, and pumping off excess fuel from the helicopter. A second Midas Gold emergency response team also would mobilize and head to the outlet areas of the Yellow Pine pit, or to the junction with Sugar Creek, to deploy secondary absorbent booms across the river. Midas Gold also will maintain a section of “sea curtain” boom on site, which is designed for use in the relatively quiet water of the Yellow Pine pit. The emergency response team leader would notify senior Midas Gold personnel and emergency medical or fire responders, as appropriate.	Water Resources, and Safety, Hazardous Materials	All Action Alternatives
<b>FS-97</b>	Drilling mud and hole plug products, if utilized, would conform to American Petroleum Institute (API) guidelines for ensuring groundwater integrity. Material Safety and Data Sheets (MSDS) for all products would be posted and available on site with the SPCC plan.	Water Resources, Fish, Wildlife, Health and Safety, Hazardous Materials	All Action Alternatives

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Number	Description	Resources Affected	Alternatives
<b>FS-98</b>	Annual spill awareness/response training will be required for on-site personnel and suppliers/providers.	Water Resources, Fish, Wildlife, Health and Safety, Hazardous Materials	All Action Alternatives
<b>FS-99</b>	All fuel containers will be marked with contents, owner’s name and contact information.	Water Resources, Fish, Wildlife, Health and Safety, Hazardous Materials	All Action Alternatives
<b>FS-100</b>	Fuel containment sites, engines and other equipment with fuel or lubricants will be periodically checked for leakage or spillage and in accordance with the SPCC plan.	Water Resources, Fish, Wildlife, Health and Safety, Hazardous Materials	All Action Alternatives
<b>FS-101</b>	A copy of the SPCC plan will be kept at an appropriate onsite facility. Staff handling fuel or petroleum products will be trained to successfully implement the SPCC plan. Inspections of fuel storage and handling areas will be conducted as specified in the SPCC plan. Appropriate warning signs will be placed around fuel storage facilities.	Water Resources, Fish, Wildlife, Health and Safety, Hazardous Materials	All Action Alternatives
<b>FS-102</b>	All contractors and company staff involved in handling oil and other chemicals would be made aware of the site SPCC plan, spill kit locations, and appropriate emergency response procedures, and would be required to abide by all applicable federal, state, and local laws and regulations pertaining to their respective operations.	Water Resources, Wetlands, Fish, Wildlife, Health and Safety, Hazardous Materials	All Action Alternatives
<b>FS-103</b>	<p>To provide protection to the EFSFSR, snow removal for Stibnite Road will be accomplished in accordance with the following standards of performance:</p> <ul style="list-style-type: none"> <li>• Except snow and ice, all debris that is removed from the road surface and ditches will be deposited away from stream channels at approved locations.</li> <li>• During snow removal operations, banks will not be undercut and gravel or other surfacing material will not be bladed off the roadway surface.</li> <li>• Ditches and culverts will be kept functioning during and following plowing. Berms left on the shoulder of the road will be removed and/or drainage openings will be created and maintained. Drainage openings will be spaced to maintain satisfactory surface drainage without discharge on erodible fills.</li> <li>• Dozers will be used on an as-needed basis for plowing snow. The dozer operator will maintain an adequate snow floor over the gravel road surface.</li> <li>• Snow will not be totally removed to the gravel road surface. Appropriate snow floor depth will be maintained to protect the roadway.</li> <li>• Damage of roads from, or as a result of, snow removal will be repaired in a timely manner.</li> <li>• Culverts and stream crossings will be clearly marked before snow removal begins to avoid placing berm openings in locations that will allow runoff to enter drainages directly at the culverts or stream crossings. Excessive snow will not be plowed into locations that will impact operation of the culverts or prevent positive drainage from drainage</li> </ul>	Water Resources, Wetlands, Fish, Access and Transportation	All Action Alternatives

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	<p>areas. Some snow is necessary around culvert openings and in the bar ditches as this will insulate the ditch and culvert and will prevent the water in the ditch and culvert from freezing.</p> <ul style="list-style-type: none"> <li>• No ice and snow removal chemicals will be used on roads.</li> <li>• Traction material will be 3/8-inch diameter gravel or greater.</li> </ul>		
<b>FS-104</b>	If additional water rights are applied for, the Forest Service would be informed to determine if additional analysis or consultation is necessary prior to use.	Water Rights	All Action Alternatives
<b>FS-105</b>	Water management features will be constructed, installed, and/or maintained on authorized temporary roads on completion of use, before expected water runoff, or before seasonal shutdown. Activities and features could include water bars, rolling dips, seeding, grading, slump removal, barriers/berms, distribution of slash, and culvert/ditch cleaning.	Wetlands	All Action Alternatives
<b>FS-107</b>	Section 6 of IDL's Best Management Practices for Mining in Idaho (IDL 1992) would be observed, including if water is encountered in exploration holes, water zones would be sealed off during abandonment to prevent crossflow.	Wetlands	All Action Alternatives
<b>FS-108</b>	Surface water withdrawal intake hoses will be situated so as to prevent generation of turbidity in bottom sediments during pumping.	Wetlands, Water Resources, Fish	All Action Alternatives
<b>FS-109</b>	Pumps will be turned off when not in use and water conservation practices will be implemented.	Wetlands, Water Resources, Fish	All Action Alternatives
<b>FS-110</b>	Intake pumps will not be situated within the active stream/ditch channel and will be placed within containment vessels capable of holding 120 percent of the pump engine's fuel, engine oil and hydraulic fluid. The smallest practical pump and intake hose will be used.	Wetlands, Water Resources, Fish	All Action Alternatives
<b>FS-111</b>	Following large storm events, the intake pumps will be inspected to determine if stream flow has encroached into the pump area and if the pump needs to be moved so it remains above flowing water.	Wetlands, Water Resources, Fish	All Action Alternatives
<b>FS-112</b>	A spill prevention and clean-up kit will be placed at the intake pump site and would consist of absorbent pads and/or boom (which would be sufficient length for a worst-case discharge), drip pan, a shovel, and a fire extinguisher	Wetlands, Water Resources, Fish	All Action Alternatives
<b>FS-113</b>	Spare fuel for the water intake pump will be stored in approved [29 CFR 1926.152(a)(1)] fuel storage containers placed into a secondary containment vessel capable of holding at least 120 percent of the volume of the fuel in the fuel container.	Wetlands, Water Resources, Wildlife, Fish	All Action Alternatives
<b>FS-114</b>	Intake pumps, fuel storage, and containments will be inspected at each refueling and periodically between refueling.	Wetlands, Water Resources, Wildlife, Fish	All Action Alternatives
<b>FS-115</b>	All activities will be conducted in accordance with Idaho environmental anti-degradation policies, including IDEQ water quality regulations at IDAPA 58.01.02 and applicable federal regulations.	Wetlands, Water Resources, Wildlife, Fish	All Action Alternatives

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Number	Description	Resources Affected	Alternatives
<b>FS-117</b>	A standard marine-type fuel containment boom (which would be of sufficient length for a worst-case discharge), spill prevention kit, and fire kit will be stored at the re-fueling site and would be readily available during off- loading of fuel from the fuel truck or during re-fueling operations.	Wetlands, Health and Safety, Hazardous Materials	All Action Alternatives
<b>FS-118</b>	Public education and interpretation programs will be used along Burntlog Route to foster wilderness values, and to maintain environmental qualities and primitive recreation experiences.	Wilderness	All Action Alternatives
	Road reconstruction and/or upgrades to NFSR 51290 (Meadow Creek Lookout Road) on the ridgeline dividing Meadow Creek from the Indian Creek drainage will be restricted to 30 feet either side of the centerline of the existing alignment to prevent potential for direct impacts to the Frank Church River of No Return Wilderness area.	Wilderness	All Action Alternatives
<b>FS-119</b>	Calving and fawning areas will be protected from project-related disturbance during big game calving or fawning season. FS will coordinate with IDFG for site-specific locations and timing restrictions.	Wildlife	All Action Alternatives
<b>FS-120</b>	Impacts to known nests, denning sites, winter roosting sites, and hibernacula (bats) of TEPC and Sensitive wildlife species will be avoided during the nesting or denning period whenever possible. If impacts cannot be avoided, specific mitigation measures would be developed to minimize impacts, maintain key features of habitat, or to avoid disruption on a case-by-case basis through coordination with Forest Service wildlife biologists.	Wildlife	All Action Alternatives
<b>FS-121</b>	<p>Buildings, equipment and drill rigs will have limited external lighting and will employ noise-minimizing practices.</p> <ul style="list-style-type: none"> <li>• Construction equipment engines will be equipped with adequate mufflers, intake silencers, and engine enclosures when feasible.</li> <li>• When practicable, pumps, generators, and engines will be turned off when not in use.</li> <li>• A temporary wooden structure will be erected around portions of the drill, pumps and heaters, but so as not to create worker safety issues related to exhaust vapor build-up. The drill engine will be inside the structure, and acoustic absorbent panels will be placed on the inside walls of the structure to absorb noise.</li> <li>• Drill contractor will install mufflers or similarly effective sound control devices on all engines at the drill rig.</li> <li>• Whenever feasible, different noisy activities will be scheduled at the same time (e.g., drill site installations using helicopter and alternate site drilling), since additional sources of noise generally do not add a significant amount of noise.</li> <li>• When practicable, pumps, generators, and engines will be turned off when not in use.</li> <li>• Noise reduction effectiveness of typical control measures will be monitored by Midas Gold at the beginning of each drilling year after installation of the system. This monitoring will be done to document the efficiency of control measures employed at the</li> </ul>	Wildlife, Visual, Noise	All Action Alternatives

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Number	Description	Resources Affected	Alternatives
	<p>site.</p> <ul style="list-style-type: none"> <li>• Whisper Quiet light plants will be used to mitigate visual impacts from night exploration operations.</li> <li>• Light shields will be placed over outside lights,</li> <li>• confining light to the immediate area in order to further limit visual impacts.</li> </ul>		
<b>FS-122</b>	Sightings of TEPC or Sensitive wildlife species would be reported to the Forest Service.	Wildlife	All Action Alternatives
<b>FS-123</b>	Mud sumps used for drilling operations will have perimeter fencing to keep wildlife from accidentally falling into the excavation.	Wildlife	All Action Alternatives
<b>FS-124</b>	To prevent inadvertent entrapment of common and special-status wildlife during construction, all excavated, steep-walled holes or trenches more than two feet deep will be covered with tarp, plywood, or similar materials at the close of each working day to prevent animals from being trapped. Ramps may be constructed of earth fill or wooden planks within deep walled trenches to allow for animals to escape, if necessary. Before such holes or trenches are backfilled, they would be thoroughly inspected for trapped animals. If trapped wildlife are observed, escape ramps or structures will be installed immediately to allow escape.	Wildlife	All Action Alternatives
<b>FS-125</b>	If fawning/calving activity is encountered during drilling activities, activity will cease and/or be modified in coordination with the Forest Service.	Wildlife	All Action Alternatives
<b>FS-126</b>	If necessary to maintain key features of nesting/denning habitat or to avoid disruption of nesting/denning activities, prescribed activities will be modified in coordination with the Forest Service.	Wildlife	All Action Alternatives
<b>FS-127</b>	<p><b>Boreal Owl:</b> Restrict activities between March 1 and July 15 occurring up to 1,500 ft from active boreal owl nest sites. Exact distance for which restrictions apply would be determined by wildlife biologist based upon topography and vegetation screening on a site- specific basis. A 350-foot ground disturbance buffer will be maintained around identified active nests to maintain site-level microhabitat conditions. Timing restrictions would not restrict planned road use patterns, public access, or hauling operations.</p> <p>Exceptions:</p> <ul style="list-style-type: none"> <li>• Mine Site and New Road Construction: Land clearing activities in areas where complete vegetation removal (greater than 0.5 acres) is necessary, these activities will not occur until after the owl breeding season (March 1 through August 1) outside of modeled BOOW habitat. Activities in modeled BOOW habitat will not occur before August 1st unless area is surveyed and species are found to be absent.</li> <li>• Power line construction and upgrades: Land clearing activities in areas where complete vegetation removal is necessary will not occur until after the owl breeding season (March 1 through August 1).</li> <li>• Power line construction and upgrades: Land clearing activities in areas where complete</li> </ul>	Wildlife	All Action Alternatives

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Number	Description	Resources Affected	Alternatives
	vegetation removal is necessary will not occur until after the bird breeding season (April 1 through July 30th).		
<b>FS-128</b>	Potential drill pad sites adjacent to any open mine workings or natural caves will be observed for the presence of bats. If necessary to maintain key features of habitat or to avoid disruption, activities will be modified in coordination with the Forest Service.	Wildlife	All Action Alternatives
<b>FS-130</b>	To the extent possible, trees and snags found to contain nesting cavities would not be disturbed or cut. No trees with active nests would be cut. Exceptions: <ul style="list-style-type: none"> <li>• Mine Site and New Road Construction: Land clearing activities in areas where complete vegetation removal (greater than 0.5 acres) is necessary, these activities will not occur until after the bird breeding season (April 1 through July 30th) for migratory and resident birds.</li> <li>• Power line construction and upgrades: Land clearing activities in areas where complete vegetation removal is necessary will not occur until after the bird breeding season (April 1 through July 30th) for migratory and resident birds.</li> </ul>	Wildlife	All Action Alternatives
<b>FS-131</b>	Potential water sources will be surveyed by Midas Gold in coordination with the Forest Service for Columbia spotted frog egg masses and other amphibians after ice melt and avoid disturbing any water sources with identified egg masses or other species. Exceptions: If egg masses are found at a water source essential for project activities, the egg masses would be relocated in coordination with the Forest Service wildlife biologist	Wildlife	All Action Alternatives
<b>FS-132</b>	<b>Great Gray Owl:</b> Activities will be restricted between March 1 and August 1 in an area up to 1,500 feet from active great gray owl nest sites. Exact distance for which restrictions apply would be determined by wildlife biologist based upon topography and vegetation screening on a site-specific basis. A 150- foot ground disturbance buffer will be maintained around identified active nests to maintain site-level microhabitat conditions. Exceptions: <ul style="list-style-type: none"> <li>• Mine Site and New Road Construction: Land clearing activities in areas where complete vegetation removal (greater than 0.5 acres) is necessary, these activities will not occur until after the owl breeding season (March 1 through August 1) outside of modeled GGOW habitat. Activities in modeled GGOW habitat will not occur before August 1st unless area is surveyed and species are found to be absent.</li> <li>• Power line construction and upgrades: Land clearing activities in areas where complete vegetation removal is necessary will not occur until after the owl breeding season (March 1 through August 1).</li> </ul>	Wildlife	All Action Alternatives
<b>FS-134</b>	<b>Northern Goshawk:</b> Activities will be restricted within a 30-acre (average 650-foot radius) area surrounding an active goshawk nest tree to avoid disturbance and retain vegetative structure around the nest site. In addition, no drill pad construction, drilling operations,	Wildlife	All Action Alternatives

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Number	Description	Resources Affected	Alternatives
	<p>helicopter flights or roadwork activities would occur within a 1,500-foot buffer around active goshawk nest tree(s) from April 1 to August 15 to avoid disrupting nesting activities. Exact distance for which restrictions apply would be determined by a wildlife biologist based upon topography and vegetative screening on a site-specific basis. Timing restrictions would only be required for active nest sites. Timing restrictions would not restrict planned road use patterns, public access or fuel hauling. Because goshawks commonly move to alternate nest sites within a territory, the nest site location will be re-identified annually.</p> <p>Exceptions:</p> <ul style="list-style-type: none"> <li>• Mine Site and New Road Construction: Land clearing activities in areas where complete vegetation removal (greater than 0.5 acres) is necessary, these activities will not occur until after the bird breeding season (April 1 through July 30th) outside of modeled NOGO habitat. Activities in modeled NOGO habitat will not occur before August 30th unless area is surveyed, and species are found to be absent.</li> <li>• Power line construction and upgrades: Land clearing activities in areas where complete vegetation removal is necessary will not occur until after the bird breeding season (April 1 through July 30th).</li> </ul>		
<b>FS-135</b>	<p>The Forest Service wildlife biologist will be notified of any occupied sensitive species nests or dens encountered during implementation that may be associated with listed or sensitive species. If necessary to maintain key features of nesting/denning habitat or to avoid disruption of nesting/denning activities, prescribed activities will be modified in accordance with the Forest Service wildlife biologist.</p>	Wildlife	All Action Alternatives
<b>FS-136</b>	<p>Winter recreation use in high-elevation habitats characteristic of wolverine denning habitat will be monitored periodically. Relationships between winter recreation activities and wolverine use of the landscape will be evaluated periodically. Where practicable, monitoring will be done in cooperation with State fish and game agencies.</p>	Wildlife	All Action Alternatives
<b>FS-137</b>	<p>Any adverse wildlife encounters will be reported to the Forest Service and/or appropriate State and federal wildlife managers.</p>	Wildlife	All Action Alternatives
<b>FS-138</b>	<p>Reclamation cover material (e.g. growth media) used in places including but not limited to the TSF and DRSF's will be evaluated for contaminants prior to use during reclamation. Acceptable metal/contaminant concentrations and sampling and testing methodology would be documented in a sampling and analysis plan developed prior to reclamation</p>	Soil, Water, Public Safety	All Action Alternatives
<b>FS-139</b>	<p>The project proponent will prepare a Spill Response Plan for Concentrate Trucks. The plan will address response and cleanup for concentrate trucks on all transport routes. The plan will include a sampling plan to assure that all contrite is cleaned up and will include potential impacts to soil, riparian and water resources.</p>	Soil, Water, Public Safety.	All Action Alternatives
<b>FS-141</b>	<p>To minimize the risk of collisions:</p> <ul style="list-style-type: none"> <li>• Install wildlife friendly culverts for rodents and small mammals.</li> </ul>	Wildlife	All Action Alternatives

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Number	Description	Resources Affected	Alternatives
	<ul style="list-style-type: none"> <li>Remove road-kill carcasses regularly to prevent scavenging and bird congregations along roadways. Eliminate use of steady burning lights on tall structures (e.g., &gt;200 ft).</li> </ul>		
<b>FS-142</b>	<p>To minimize the effects of project-related lighting on wildlife:</p> <ul style="list-style-type: none"> <li>To the maximum extent practicable, limit construction activities to the time between dawn and dusk to avoid the illumination of adjacent habitat areas.</li> <li>If construction activity time restrictions are not possible, use down shielding or directional lighting to avoid light trespass into bird habitat (i.e., use a 'Cobra' style light rather than an omnidirectional light system to direct light down to the roadbed). To the maximum extent practicable, while allowing for public safety, low intensity energy saving lighting (e.g. low pressure sodium lamps) will be used.</li> <li>Minimize illumination of lighting on associated construction or operation structures by using motion sensors or heat sensors.</li> <li>Bright white light, such as metal halide, halogen, fluorescent, mercury vapor and incandescent lamps should not be used.</li> <li>Light shields will be placed over outside lights, confining light to the immediate area in order to further limit visual impacts.</li> </ul>	Wildlife	All Action Alternatives
<b>FS-143</b>	<p>Communication towers should not be sited in or near wetlands, or other known bird concentration or high use areas (e.g., riparian corridors), in known migratory or daily movement flyways. Towers should not be sited in areas with a high incidence of fog, mist, and low ceilings.</p>	Wildlife	All Action Alternatives
<b>FS-144</b>	<p>For new communications towers no more than 199 feet above ground level (AGL), use construction techniques which do not require guy wires (e.g., use a lattice structure, monopole, etc.). Such towers should be unlighted if Federal Aviation Administration regulations permit. If taller (&gt;199 feet AGL) towers requiring lights for aviation safety must be constructed, the minimum amount of pilot warning and obstruction avoidance lighting required by the FAA should be used. Unless otherwise required by the FAA, only white (preferable) or red strobe lights should be used at night, and these should be the minimum number, minimum intensity, and minimum number of flashes per minute (longest duration between flashes) allowable by the FAA. The use of solid red or pulsating red warning lights at night should be avoided.</p>	Wildlife	All Action Alternatives
<b>FS-145</b>	<p>Deploy a satellite or network connected visibility web camera as part of the FS visibility network aimed from the boundary of FCRNRW south of mine across to FCRNRW boundary north of mine and/or from north to south on the FCRNRW boundary looking to the opposite boundary to document frequency of plume blight and visibility impacts to the wilderness area.</p> <p>Work with Midas Gold to employ additional controls (likely dust mitigation) if Forest Supervisor deems visibility impact magnitude or frequency unacceptable.</p>	Air Quality	All Action Alternatives

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Number	Description	Resources Affected	Alternatives
<p><b>FS-146</b></p>	<p>Prepare a dust mitigation plan with appropriate schedule or triggers for control deemed adequate by IDEQ, FS, and EPA to achieve the level of control 93% (as submitted in their draft application for PTC from IDEQ) of dust.</p> <p>Alternatively, the company could employ particulate matter or opacity monitors deemed adequate by IDEQ and the FS and immediately apply water or chemical dust control when PM or opacity monitors reach levels within 10% of the threshold determined by IDEQ and FS.</p> <p>To further ensure the intended high level of control, the FS requires an adaptive management plan as dust is a major component of emissions and air quality impacts affecting the near-field area. See also IDEQ dust control plan outline and EPA AP42 pp. 13.2.2-12 – 13.2.2-17.</p>	<p>Air Quality, Wildlife, Vegetation, Wilderness Character</p>	<p>All Action Alternatives</p>
<p><b>FS-149</b></p>	<p>Detrimental Soil Resource Protection: Vegetation Clearing, Skidding and Yarding Trees, and other Incidental Detrimental Soil Impacts within the Project Area</p> <p>The following measures are included to minimize detrimental impacts to soil productivity and soil- hydrologic condition and meet Forest Plan standards for soil productivity. These measures would primarily be applied to land areas that would not be considered a total soil resource commitment (TSRC) to minimize detrimental soil disturbance (DD) impacts.</p> <p>Soil moisture operability requirements</p> <p>Heavy equipment, ground-based mechanized harvesting and skidding equipment (skidders, feller- bunchers, jammer-yarders; and other heavy machinery, e.g. dozers, trucks, masticators, excavators) will be allowed when soil moisture is sufficiently low, or when adequate winter logging conditions exist with enough depth of packed snow and/or frozen ground. The Forest Service will ultimately determine when and where appropriate operating conditions exist. The intent is to minimize detrimental soil rutting, displacement, and compaction.</p> <ul style="list-style-type: none"> <li>• To determine appropriate soil moistures for operations, use the “Field Guide to Soil Moisture Conditions Relative to Operability of Logging Equipment”, available in this document’s appendix</li> <li>• Typically, soils are too moist for ground- based mechanized harvesting and skidding operations if a 1 to 2-inch diameter ball of mineral soil collected from a 4 to 6 in. depth can be molded with hand pressure by 6 directional squeezes into a ball that will not break upon repeated tosses to 1 to 2 feet in the air.</li> <li>• Exceptions may be made to allow limited operations on moist soils only excavated skid trails and landings.</li> <li>• Adequate winter logging conditions must include a sufficient depth of frozen ground and/or packed, dense snow to support machine traffic and prevent detrimental soil rutting, displacement, and compaction from harvesting and skidding. Typically, these conditions are as follows:</li> </ul>	<p>Soil, Water Resource</p>	<p>All Action Alternatives</p>

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Number	Description	Resources Affected	Alternatives
	<ul style="list-style-type: none"> <li>• Minimum 4 in. depth of frozen soil and no snow, or</li> <li>• Minimum 2 in. depth of frozen soil and 6 in. machine packed snow, or</li> <li>• 0 in. depth of frozen soil and minimum 10 in. machine packed snow</li> <li>• Feller-buncher (or other mechanical ground-based harvesting systems)</li> <li>• Harvesting equipment is allowed to traffic portions of units up to 35% slope</li> </ul> <p>Jammer, Off-Road Jammer, Skyline, Helicopter</p> <p>On slopes greater than 35% where ground-based harvesting and skidding equipment is restricted, utilize directional felling and cable yarding, cable (jammer, off-road jammer), skyline/excaline, or helicopter harvest systems and limit equipment operations to designated skid trails, roads and landings.</p>		
<b>FS-154</b>	<p>Incorporate total amounts of coarse woody debris (&gt;3 inches diameter) onto reclaimed lands as evenly distributed as possible in the tonnages and diameters described in the Forest Plan, Appendix A, page A-9, Table A-9; USDA Forest Service 2003a. Preference should be given to retain the percentages of the large-sized CWD (greater than 15-inch diameter) identified in the Forest Plan. If tonnages and/or sizes are unavailable, then assure that trends toward desired conditions are achieved. Total desired tonnage is measured following the completion of reclamation activities; thus the objective should be to meet the upper range of tons per acre by PVG (table A-9; USDA Forest Service 2003a) or greater with larger-diameter material. Preference should be given to larger-diameter material to meet these requirements (prioritize &gt;15 in. diameter in 6-foot or greater lengths).</p>	Soil, Water Resource, Wildlife	All Action Alternatives
<b>FS-155</b>	<p>Identify any high- and moderate-risk landslide prone areas or other susceptible unstable landforms (utilize PAF SINMAP Landslide Prone model outputs, field-indicators of instability, consult soil scientist).</p> <p>Management activities located on high- and moderate-risk areas will maintain stability in the following ways:</p> <ul style="list-style-type: none"> <li>• Avoid road construction on moderate- and high-risk LSP areas and avoid concentrating water onto LSP areas from road drainage.</li> <li>• On the most unstable high-risk areas, road and trail construction may be prohibited.</li> </ul>	Geology, Soil, Water Resource	All Action Alternatives
<b>FS-156</b>	<p>Applicable road obliteration PDFs for all project roads proposed for obliteration that includes; temporary roads, constructed Burnt Log route, abandoned sections of the Burnt Log route will be fully recontoured, including full bench constructed road segments.</p> <p>Road obliteration through recontouring is the reclamation of a road template through 1) deep decompaction (36") of the inside half of the road surface 2) excavation of road fill down to the natural ground level and place on top of the decompacted inside half of the road surface on the cut slope side of road 3) reestablish the natural slope profile 4) vegetation clump planting.</p>	Soil	Alternatives 1, 2, and 3

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Number	Description	Resources Affected	Alternatives
	<p><u>Decompaction</u>: All compacted road surfaces that will be covered with excavated material, for example the inside half of the road surface, shall be decompacted to a depth of 36 inches or to a restrictive layer (bedrock). This is to promote water infiltration, breakup any potential landslide slip surface between the road surface and excavated and placed fill material and allow deep root vegetation establishment.</p> <p><u>Excavation</u>: After decompaction of the roadway, the outside road fill material shall be excavated and placed on roadbed between the top of cut and natural ground, forming a slope approximating natural contours. No ditches, water traps, or berms shall remain. Finished product should blend in with the surrounding terrain.</p> <p><u>Soil-Vegetation Plug Transplanting</u>: Excavate soil- vegetation plugs from adjacent natural and undisturbed ground having a minimum surface area of 9 sq. ft. to a depth beyond the vegetation rooting zone (plug size is dictated by excavator bucket size). The plug transplant shall be of sufficient depth that would maintain the root system and contain adequate soil to enhance favorable growth. Soil-vegetation plug transplanting will be done at a minimum rate of 15 plantings per 100 lineal feet evenly distributed along the width and length of the recontoured surface. The plugs will be transplanted to a depth even with the surrounding recontoured ground level. This work would be accomplished with an excavator.</p> <p><u>Surface Ground Cover</u>: ground cover across the entire recontoured or disturbed surface (this would include all scarified ground, de-compacted roads and skid trails), by order of priority, shall be achieved using a combination of clump planting, native mulch, coarse woody debris and certified weed free agriculture straw to reach a minimum of 50% to the maximum 80% coverage of the recontoured surface or disturbed area. Apply native seed mix, hydromulch or organic fertilizer.</p> <p>This Order or priority shall be given to vegetation plug planting, native mulch, coarse woody debris, straw.</p> <p>When applying coarse woody debris, use various size classes at levels similar to surrounding undisturbed ground and placed at various orientations.</p> <p>The desired result of road obliteration through recontouring is to restore slope contours the natural slope profile, improve soil productivity, improve soil- water infiltration, reestablish ground water flow paths and hydrologic function. Recontouring roads increase the rate of vegetative recovery and restores shallow ground water flow paths.</p>		
	<p>Conduct a suitability study for the Johnson Creek eligible river corridor to its assigned Recreational classification standards prior to project implementation.</p>	<p>Wild and Scenic Rivers</p>	<p>All Action Alternatives</p>

## Mitigation Measures Proposed by Midas Gold as Project Design Features

**Table D-2** contains a summary of project design features proposed by Midas Gold Idaho, Inc. (Midas Gold) that will be mitigation measures. Mitigation measures are included in the Stibnite Gold Project Plan of Restoration and Operations (Midas Gold 2016). The following documents describe additional mitigation measures for the Stibnite Gold Project (SGP).

- Stibnite Gold Mitigation Plan (Midas Gold 2019)
- Fisheries and Aquatic Resources Mitigation Plan (Brown and Caldwell, Rio Applied Science, and Engineering, and Midas Gold 2019);
- Fishway Operations and Management Plan (Brown and Caldwell, McMillen Jacobs Associates, and BioAnalysts 2019);
- Conceptual Stream and Wetland Mitigation Plan (CMP) (Tetra Tech 2019a); and
- Wildlife Habitat Mitigation Plan (Tetra Tech 2019b).

The mitigation measures described in the above documents are applicable to all action alternatives, except as noted, but were specifically designed for Alternative 1. Following the Record of Decision, Midas Gold will integrate all required mitigation commitments into the Environmental Monitoring and Management Plan (EMMP) (Brown and Caldwell 2019). The EMMP consists of a program framework and appendices containing component monitoring and management plans. Midas Gold will use the EMMP to guide monitoring, document permit compliance, implement impact reduction procedures, and address adaptive management thresholds and responses where impacts and mitigation effectiveness carry substantial uncertainty.

**Table D-2 Mitigation Measures Proposed by Midas Gold as SGP Design Features**

Description	Resources Affected	Alternatives
Busing and/or vanpooling will be provided for Midas Gold and contractor employees.	Air Quality	All Action Alternatives
Proper dust control will be employed along transportation corridors and active mining areas using aquatic safe dust suppression chemicals and methods.	Air Quality, Water Resources, Fish, Wildlife	All Action alternatives
<p>To protect fish residing in, using, or potentially using the Yellow Pine Pit lake (Chinook salmon, steelhead trout, bull trout, Westslope cutthroat trout, mountain whitefish), Midas Gold has developed a Fish Salvage and Release Plan to isolate the lake from upstream movement into the lake and salvage and release fish. The Fish Salvage and Release Plan will be refined in coordination with federal, state, and tribal agencies.</p> <ol style="list-style-type: none"> <li>1. Midas Gold will, In consultation with the U.S. Fish and Wildlife Service (USFWS) and the National Marine Fisheries Service (NMFS) (the Services), design, install, and operate a fish trap and one or two weirs designed to allow fish to leave the Yellow Pine pit lake but not allow fish to migrate upstream past the trap to ensure that the fewest number of individual Endangered Species Act (ESA)-listed fish species are present in the pit lake when the draining process begins. The timing for providing the upstream barrier to fish movement will be designed to minimize the number of fish in the Yellow Pine pit lake, particularly larger bull trout that dominate the fish assemblage in the lake.</li> <li>2. Fish captured in the Yellow Pine pit lake will be immediately released downstream of the upstream fish movement barrier or in another location determined by the appropriate regulatory agencies.</li> <li>3. The Yellow Pine pit lake will be partially drained to recover the remaining fish, and relocate them prior to final draining of the pit lake.</li> </ol>	Fish	All Action Alternatives
A fishway has been designed and will be operated within the East Fork South Fork Salmon River (EFSFSR) tunnel to provide upstream and downstream volitional fish passage throughout mine operations.	Fish	Alternatives 1, 2, and 3
As an alternative to the fishway in the EFSFSR tunnel Midas Gold will provide adult passage by trap and haul if needed. Criteria may be put in place so that if any unusual or unexpected events occur that result in adverse impacts to fish during operations, fish passage through the fishway will be switched to trap and haul operations.	Fish	All Action Alternatives
Lighting will be provided in the fishway to determine if it aids in fish passage and to provide light for tunnel and fishway inspections. The system will be configured so that it mimics the photoperiod of the region, run manually on a dimming system, or be completely turned off at the option of the operator	Fish	All Action Alternatives
Fish salvage operations will be conducted any time the facility needs repair within the fishway, potentially during sediment removal, and potentially when streamflows recede from the accessway.	Fish	All Action Alternatives
Post mining, the EFSFSR stream channel will be reestablished across the backfilled Yellow Pine pit with a channel design that will provide for upstream and downstream fish passage.	Fish	All Action Alternatives
Midas Gold will reestablish fish passage through the existing box culvert on the EFSFSR just downstream of the confluence with Meadow Creek at the McCall-Stibnite Road (County Road [CR] CR 50-412) crossing.	Fish	All Action Alternatives

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Description	Resources Affected	Alternatives
Midas Gold will improve fish passage conditions in the steep and woody debris-clogged portion of the EFSFSR stream channel just upstream from the confluence with Meadow Creek.	Fish	All Action Alternatives
Midas Gold will improve fish passage along the Burntlog Route within the SGP area by identifying and replacing existing collapsed, undersized, or otherwise degraded or poorly designed culverts at road crossings and committing appropriate resources to fix and improve these structures.	Fish	Alternative 1, 2, and 3
Midas Gold will employ blasting setback distances and other controlled blasting techniques following industry best management practices (modifying blasting variables including charge size, and vibration and overpressure monitoring) to minimize impacts to fish from blasting. Midas Gold will follow up with monitoring in early stages of operation to evaluate effectiveness and refine blasting protocols in coordination with federal, state, and tribal agencies, if needed.	Fish	All Action Alternatives
Dewatering will generally be conducted during low-flow periods to facilitate stream segment isolation and fish salvage. When practicable, dewatering also will be timed to avoid or minimize impacts during known spawning periods for Chinook salmon, steelhead, and bull trout.	Fish	All Action Alternatives
To protect fish, Midas Gold will develop a standard procedure for channel segment isolation, dewatering, fish salvage, and fish relocation to appropriate receiving streams during dewatering or maintenance of natural stream and diversion channels, based on the USFWS Recommended Fish Exclusion, Capture, Handling, and Electroshocking Protocols and Standards (USFWS 2012) and refined in coordination with federal, state, and tribal agencies.	Fish	All Action Alternatives
Midas Gold will implement measures to limit stream baseflow effects during active operations, including a combination of lining key reaches of streams potentially impacted by pit dewatering, and infiltrating groundwater that is extracted for pit dewatering into infiltration basins. Maintain instream flows for fish species and other aquatic resources: flows within natural stream channels affected by SGP operations will be maintained to meet seasonally appropriate and stream-specific low-flow needs to the maximum extent practicable. Midas Gold will continue to evaluate options and measures to further avoid and minimize the magnitude and duration of effects of the SGP through other measures in consultation with federal, state, and tribal agencies.	Fish, Water Resources	All Action Alternatives
<p>Midas Gold will stabilize and restore Blowout Creek. Blowout Creek wetland restoration will consist of restoring and enhancing palustrine aquatic bed (PAB), palustrine emergent (PEM), Palustrine scrub-scrub (PSS) wetlands that were impacted when a historical dam failed on Blowout Creek. Headcutting and shallow aquifer dewatering have impaired and reduced functions of the wetland vegetation classes. A grade control and groundwater cutoff structure is proposed to raise the water level in Blowout Creek as well as recharge the shallow groundwater system and reduce stream headcutting.</p> <p>Midas Gold will stabilize the steep, confined, erosive middle reach to address the significant fine sediment load currently produced from this reach and restore the downstream, relatively low-gradient reach.</p>	Fish, Wetlands, Water Resources	All Action Alternatives

APPENDIX D – MITIGATION MEASURES

Description	Resources Affected	Alternatives
Midas Gold will lead annual site visits for U.S. Army Corps of Engineers (USACE), U.S. Environmental Protection Agency (EPA), Idaho Department of Fish and Game (IDFG), and other interested agency personnel as needed to facilitate agency review of mitigation areas if desired. Final reporting and data archival requirements will be subject to permit conditions; however, at a minimum, it is anticipated that monitoring reports will be prepared by Midas Gold annually and submitted to USACE Walla Walla District, EPA, IDFG, Idaho Department of Lands (IDL), National Oceanic and Atmospheric Administration (NOAA) Fisheries, USFWS, the Forest Service, and other interested agencies, SGP partners, and stakeholders.	Fish, Wetlands, Water Resources	All Action Alternatives
Crushed rock will be placed on SGP access roads as needed to provide a durable surface and limit sediment transport.	Water Resources, Fish	All Action Alternatives
Road surfaces throughout the SGP will be stabilized and managed to minimize transport of sediment, dust, and other materials, especially near watercourses through appropriate road engineering, surface drainage, watering and application of dust control binding agents (magnesium chloride, lignin sulfonate, etc.), roadside ditching, road-cut stabilization, road surface maintenance, appropriate speed limits, and by limiting traffic.	Water Resources, Fish	All Action Alternatives
Following permanent cessation of mining activities at the Yellow Pine pit, Midas Gold will backfill the pit and route the EFSFSR over the backfilled pit with a longer, lower-gradient channel with higher intrinsic potential for Chinook salmon and steelhead spawning and rearing than the channel that exists presently. The floodplain area along the constructed channel will include side-channels and other off-channel features and will be revegetated to restore wetland and riparian habitat providing long-term shade/cover favorable to fish.	Fish, Wetlands	All Action Alternatives
The Meadow Creek channel will be routed over the final tailings storage facility (TSF) and Hangar Flats Development Rock Storage Facility (DRSF), resulting in a long, relatively flat surface and a short, steep face. On top of the TSF/DRSF surface, Meadow Creek will be contained within a broad floodplain corridor bound laterally by erosion-resistant terraces and vertically by a subsurface armor layer over an impermeable stream liner.	Fish, Wetlands	Alternatives 1, 2, and 4
Repair and rehabilitate habitats adversely affected by historical mining impacts in the SGP area	Fish, Wetlands, Water Resources	All Action Alternatives
Personnel transporting, handling, or using any hazardous chemicals (including sodium cyanide) will be trained to ensure the safe use of such materials. Midas Gold will design, construct, and manage facilities to conform to International Cyanide Management Institute code.	Health and Safety, Fish, Wildlife	All Action Alternatives
Fuel and other petroleum products at the site will be stored in above ground containment structures, with appropriate secondary containment measures.	Health and Safety, Fish, Wildlife	All Action Alternatives
Midas Gold employees and contractors will be informed about relevant governmental regulations intended to protect cultural and historic resources.	Cultural	All Action Alternatives
Midas Gold will utilize “smart grid” technology to reduce energy consumption, such as auto dimming lights in offices.	Climate Change	All Action Alternatives

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The ore processing facility building will be enclosed.	Noise, Wildlife, Health and Safety	All Action Alternatives
Appropriate sound dampening and muffling equipment will be utilized to minimize noise excursion from equipment and facilities. When possible, schedule high noise activities at the same time. Monitor and maintain equipment to reduce noise related impacts.	Noise, Wildlife, Health and Safety	All Action Alternatives
When practicable, pumps, generators, and engines will be turned off when not in use to avoid unnecessary noise generation and reduce energy consumption.	Noise, Wildlife, Health and Safety	All Action Alternatives
Electric line power will be utilized during operations to eliminate diesel generator noise, except in emergency situations when grid power is down or temporary use in remote areas where it is not practical to run power lines.	Noise, Wildlife, Health and Safety	All Action Alternatives
For safety and security reasons, no alcohol, firearms, or illegal drugs will be permitted on site.	Health and Safety	All Action Alternatives
For safety and security reasons, public access into the mine area will be prevented by using fencing, gate locking, security personnel, and/or notice postings that prohibit unauthorized entry; no unauthorized vehicles or personnel will be permitted on the mine site.	Health and Safety	All Action Alternatives
During Burntlog Route and mine site haul road construction and use, Midas Gold will install and maintain sediment control measures and devices, such as culverts, culvert inlet protection devices, ditching, silt fencing, straw wattles, straw bales, and sediment catch basins.	Wetlands, Fish, Wildlife	All Action Alternatives – note that Burntlog Route will not be constructed under Alternative 4
Cut and fill slopes along roads will be mulched, hydro-seeded or have durable rock inlay material to minimize the potential for sediment generation.	Wetlands, Fish, Wildlife	All Action Alternatives
During winter road maintenance, Midas Gold will remove snow from the Burntlog Route and haul roads at the mine site and the temporary construction access Yellow Pine Route. Midas Gold will avoid disposal of snow in riparian areas, wetlands, or areas where snowmelt might cause road damage or erosion during spring melt. Care will also be taken to dispose of collected snow, which may contain sand or gravel, in a manner that avoids impacts to nearby streams and rivers.	Wetlands, Fish, Wildlife	All Action Alternatives - note that Burntlog Route will not be constructed under Alternative 4
Midas Gold will use coarse sand (with less than 20% fines) for winter sanding of the main access road and mine site haul roads in combination with a fine to medium gravel as needed, (approximately 1/4 - 5/8-inch sizing).	Wetlands, Fish, Wildlife	All Action Alternatives
Access and mine site haul road crossings of fish bearing streams will be designed such that structures installed or constructed allow fish passage.	Fish and Wildlife	All Action Alternatives
Midas Gold will maintain a recycling program at the mine site.	Wildlife	All Action Alternatives
Runoff generated from direct precipitation on the TSF will be retained in the TSF water pool for reclaim to the ore processing circuit.	Water Resources, Fish, Wildlife, Wetlands	All Action Alternatives

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Description	Resources Affected	Alternatives
Midas Gold will be responsible for noxious weed control within areas disturbed by SGP activities.	Vegetation and Wildlife	All Action Alternatives
Lighting will be managed within active mining areas to avoid unintended lighting of natural, wildlife usage areas. External lighting will be kept to the minimum required for safety and security purposes. Lights will be directed down toward the interior of the mine site and shielded, where appropriate.	Scenic Resources, Wildlife	All Action Alternatives
Suitable surface coatings or exterior design features will be used on mine site buildings and other structures to reduce visual impacts.	Scenic Resources	All Action Alternatives
In order to reduce attractants, during construction and operations, trash and other miscellaneous inert (non-hazardous) garbage will be placed in the onsite landfill, or contained in onsite wildlife-resistant containers and hauled to the Valley County waste transfer station for disposal. Used oils, solvents, grease, and antifreeze will be handled separately from normal trash and garbage. Good housekeeping practices will include minimizing loose trash, odors and access for wildlife to trash storage or disposal areas and prompt removal of trash.	Wildlife	All Action Alternatives
Midas Gold will establish and post speed limits for the Burntlog Route, mine site haul roads, and light vehicle access roads on the SGP site. Slower speed limits will be posted at known wildlife crossings and along defined migratory corridors during migration season.	Wildlife, Health and Safety	All Action Alternatives
There will be no hunting or discharge of firearms during construction and operations within the SGP area. The SGP site will be posted to prohibit hunting, and employees will be prohibited from carrying firearms on the SGP mine site.	Wildlife, Health and Safety	All Action Alternatives
Electric power structures to serve the SGP facilities will be designed and constructed to avoid raptor perching on structures for predation purposes and minimize the risk of their being electrocuted.	Wildlife	All Action Alternatives
Midas Gold will install a wildlife exclusion fence around the TSF, process facility areas, and related process ponds in order to reduce the potential for mortalities.	Wildlife	All Action Alternatives
Midas Gold will plan routine inspections of TSF facilities for wildlife use. If needed, Midas Gold will implement measures to remove wildlife and install additional BMPs to reduce wildlife exposure to these areas.	Wildlife	All Action Alternatives
Midas Gold will employ vegetation maintenance for safety along roads, removal of hazard trees, and riparian conservation areas, etc. – coordinate such that wildlife protection and restoration are incorporated during maintenance.	Wildlife, Health and Safety	All Action Alternatives
If critical wildlife zones or corridors are identified, require restricted or seasonal access prior to construction or expansion activities - install physical barriers and/or signage identifying these areas and develop site-specific measures to minimize impacts.	Wildlife	All Action Alternatives
Implement seasonal and spatial restrictions during breeding seasons for raptors and other migratory birds. Based on the species known to be present in the SGP area combined with the types of activities, the following measures will be completed prior to a construction or expansion phase –	Wildlife	All Action Alternatives

APPENDIX D – MITIGATION MEASURES

Description	Resources Affected	Alternatives
<ol style="list-style-type: none"> <li>1. Conduct pre-construction surveys for the species of concern.</li> <li>2. Inspect snags and logs before removal for maintenance, construction, and operations.</li> <li>3. Identify active nests in areas to be disturbed by construction or expansion and either maintain a minimum 500-foot distance or work during non-breeding season.</li> <li>4. These measures do not pertain to the active mining zones.</li> </ol>		
<p>Midas Gold will implement an animal trapping and relocation plan, as necessary, for nuisance species for safety of staff, visitors, and animals.</p>	Wildlife	All Action Alternatives
<p>Midas Gold will install fences along and around the ore processing facilities, TSF, explosive storage areas, and composting/landfill, excluding pit perimeters and high walls.</p>	Wildlife	All Action Alternatives
<p>Midas Gold will install signs of known wildlife crossing and usage areas along access and mine site haul road corridors and all active facility areas. Locations to be determined but will be installed to state the road name and mile markers where these corridors are known to exist. Will also be referenced in the training materials along with visible signage in these locations.</p>	Wildlife	All Action Alternatives
<p>Midas Gold will provide tiered training for awareness, sighting, operations and maintenance, and restoration. Cross training to include noxious weeds, maintenance needs, unsafe conditions, etc. Reporting mechanisms. All mine personnel and visitors will receive some level of training tiered appropriately based on where working, type of work activities, and reason for mine visit. Forms will be developed to document training and identify how often training needs to be refreshed. Fact sheets will be developed on known wildlife in the area including pictures, warnings, and what to do if encountered.</p>	Wildlife	All Action Alternatives
<p>Midas Gold will design and manage the TSF and associated facilities to reduce bird attraction. These include the following –</p> <ol style="list-style-type: none"> <li>1. Surface area of the supernatant pond will be minimized to the extent practicable.</li> <li>2. Install an 8-foot fence around the TSF facility to exclude wildlife from the facility.</li> <li>3. Implement an avian mortality reporting system for the TSF and contact water ponds.</li> <li>4. Use skirting to enclose open spaces as necessary beneath raised structures as practical.</li> <li>5. Follow the International Cyanide Management Code to avoid features possibly attractive to wildlife, as feasible.</li> </ol>	Wildlife	All Action Alternatives
<p>Erosion control techniques at the SGP will include mulching, wetland sodding; planting of vegetation to stabilize slopes; and use of silt fences, biofilters, brush mats, erosion control fabric, and/or fiber rolls along temporary swales, perimeter dikes, and stream banks. In addition, to minimize human disturbance, permanent signage will be posted around the perimeter of individual project sites to prohibit unauthorized foot traffic and the use of all-terrain vehicles and motorbikes, dumping, draining, and cutting and/or removal of plant materials.</p>	Wildlife	

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Description	Resources Affected	Alternatives
Upon cessation of mining activities, most roads within the SGP area, including portions of the Burntlog route, will be reclaimed and restored to natural habitat. In addition to elimination of roads, proposed stream reclamation and enhancement projects throughout the site will reclaim riparian vegetation, improving composition, structure, and function over existing conditions	Vegetation	All Action Alternatives Note that the Burntlog Route will not be constructed under Alternative 4
Midas Gold will inspect and remove vegetation material (including noxious weeds) from mechanical equipment and properly dispose to minimize the spread of unwanted vegetation.	Vegetation	All Action Alternatives
Midas Gold will salvage and preserve the growth media and seedbank materials of wetlands and riparian areas that will be impacted by the SGP. These salvaged soils, containing native seed banks, will be used to aid in establishment of wetland and riparian vegetation in the stream and wetland reclamation areas.	Wetlands, Vegetation	All Action Alternatives
Soil will be amended with additional compost and other sources of organic matter necessary to successfully reclaim wetlands at the SGP.	Wetlands, Vegetation	All Action Alternatives
Midas Gold proposes that it or its designated contractor(s) will perform long-term maintenance as necessary, including maintaining and monitoring the Mitigation Area (including stream and wetlands) in perpetuity once the final performance standards are met or until such responsibility is relinquished to an appropriate third party (Forest Service, etc.) as approved by the USACE.	Vegetation, Wetlands	All Action Alternatives
Wood wastes and wood mulch are the two primary sources of compost. Food waste produced from on-site meal preparation and wastes may provide another source. Combined and properly managed during composting, these materials will provide a source of organic matter to be blended into substrate materials suitable for mitigation.	Vegetation	All Action Alternatives
Midas Gold will plant stream reclamation reaches and wetland reclamation areas with native plant species that are present in PAB, PEM, PSS, and palustrine forested wetlands and riparian areas along streams throughout the Mitigation Area.	Vegetation, Wetlands	All Action Alternatives
Midas Gold will complete revegetation with a variety of native herbaceous and woody species.	Vegetation	All Action Alternatives
Midas Gold will use aquatic safe herbicides during vegetation management activities and noxious weed control. Adhere to chemical label restrictions, federal/state rules on usage. Use proper equipment for chemical application by trained personnel.	Vegetation, Fish	All Action Alternatives
Stormwater drains, ditches, and stream channels will be protected against erosion through a combination of adequate dimension, appropriate gradient, riprap, fabric- encapsulated soil lifts, or other stabilization materials. Diversions will be sized for a peak flow recurrence interval appropriate to the risk level of the facility, in recognition of other water management measures and fail-safes in place (excess flood storage and freeboard in the TSF, etc.), and in accordance with regulatory standards.	Water Resources	All Action Alternatives
The diffuse groundwater discharge on the DRSF face and extending out from the toe will be used to establish wetlands.	Wetlands	All Action Alternatives

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Description	Resources Affected	Alternatives
Riparian fringe and floodplain wetlands will be established on the broad, gently sloping floodplains on both sides of the reclaimed stream channels.	Wetlands	All Action Alternatives
Valley margin wetlands will only be established where there is an upgradient water source sufficient to produce enough saturation and near surface water tables for wetland conditions.	Wetlands	All Action Alternatives
Wetland reclamation will begin after the end of mine construction, with the first reclaimed wetlands occurring in the Blowout Creek drainage. Additional reclamation will occur in and after operational year 7 and continue through operational year 18	Wetlands	All Action Alternatives
Salvaged O and A horizon soils from wetland or hydric soils (seed bank materials over or in combination with mineral soils uplands and wetland subsoils (growth media) will be used to create wetland soil conditions).	Wetlands	All Action Alternatives
Midas Gold will provide mine personnel with mobile deterrents to avoid conflicts with wildlife – sprays, air horns, etc.	Wildlife	All Action Alternatives
All off-highway diesel engines will be EPA Tier IV or better.	Air Quality, Climate	All Action Alternatives