

August 21, 2020

To Whom it May Concern,

I am writing to express my opposition to the proposed Stibnite Gold Project in the headwaters of the South Fork Salmon River in Idaho's Payette National Forest.

The United States Forest Service (USFS) is processing a plan of operations for open pit mining, processing, new road construction, utility upgrades, reclamation, and restoration at the Stibnite mine site. The draft EIS fails to fully consider the negative impacts of mining on the South Fork Salmon River watershed in relation to "fisheries and wildlife, including threatened, endangered, proposed, and sensitive species."

For the last decade, I have enjoyed the privilege of fly fishing and camping in the South Fork Salmon drainage. As an Idaho native, I value clear cold water, native fish species, and the recreational opportunities our public lands provide. I have spent considerable time fishing the waters around Yellow Pine, Idaho and upstream toward the proposed Stibnite Gold Project, not to mention adjacent Johnson Creek and the mainstem South Fork Salmon River. It is a thrill to catch and release native westslope cutthroat trout and bull trout. What I value even more is standing on the streambank and respectfully watching chinook salmon as they complete their life cycle. These anadromous fish migrate hundreds of miles from the Pacific Ocean navigating countless obstacles along the way. The last thing they need is to be threatened by mining activities.

According to published USFS literature, "The South Fork Salmon River contains the most important remaining habitat for summer Chinook salmon in the Columbia River Basin." The river and its tributaries are also home to runs of wild steelhead, bull trout, and westslope cutthroat trout. For the privilege of carving into the headwaters of this watershed, Midas Gold will post a financial bond that is a pittance in relation to the cost of post-mining site remediation. When prices fall (precious metal prices are volatile and cyclical), that bond allows Midas Gold (a Canadian corporation) to disappear and leave a mess that will ultimately be paid for by American taxpayers. But the real victims in this scenario are native fish species, particularly chinook salmon and steelhead. These species, which are already stressed by a variety of human impacts, should not be subjected to another threat. The USFS has an obligation to act in the best interests of these fish species, which are federally designated as threatened.

The history of the Stibnite site is one of environmental abuse. A century of previous mining activity has taken its toll. Various companies have mined and left considerable damage. An estimated \$13,000,000 has been spent for partial site restoration and to clean up hazardous spills. Thousands of tons of mining waste have washed into streams and salmon spawning habitat remains blocked. Tailings cover acres of headwater meadows. In 1989, a fuel truck spilled 1,700 gallons of diesel into Johnson Creek, a major USFS Salmon River tributary. A 1990 cyanide release prompted EPA involvement.

To be clear, mining companies are in the business of extracting precious metals for profit. They are not chiefly concerned with environmental restoration. Yet for decades, mining companies have used proposals for post-mining site remediation in their sales pitches to local communities and governing agencies. History has demonstrated that these plans rarely come to fruition.

While profits are high, companies mine for profit and promise post-mining site remediation. When precious metal prices drop or profit margins shrink for other reasons, mining activity screeches to a halt, jobs evaporate, and companies disappear. What happens if Midas Gold decides to stop operations while they still have nearly a mile of headwaters stream forced through a pipe instead of the natural streambed? What about three new massive open pits where there is currently one legacy pit? Who foots the cost for restoration and how long will the watershed's salmon, steelhead, and trout suffer? What about the thousands of heavy vehicle trips in and out of the area and the potential for chemical and fuel spills?

Native fish species and the Stibnite site will best benefit from environmental restoration and reconnected streams. Therefore, an environmental restoration plan should be pursued, not a for-profit mining project. There are no guarantees with mining and the risks to this precious watershed and its native fish species are far too high.

Respectfully,

Micah Lauer
Boise, Idaho