Thanks you for the opportunity to comment on the proposed mining project at Stibnite, Idaho.

I grew up in Idaho. My first trip back to Stibnite was in 1978. I lived in Yellow Pine for 2 years. Since then, I have made many trips back to there and surrounding areas for work and recreation, in all four seasons, with friends and family. We have stood with our kids and stared in wonder at the Indian gum trees along the South Fork and hid in Indian hunting blinds to see what it was like. I cooked at the Sunnyside Mine, on the other side of Monumental Summit from Stibnite. I packed and cooked for an outfitter up Sugar Creek, Tamarack Creek and Bum Creek. I have planted trees near the confluence of the Secesh and the South Fork and did two seasons of timber stand exams in the SFSR watershed. Just from time spent in the area I feel like I have a lot of basic knowledge of the land surrounding Stibnite. I have many concerns about the redevelopment and expansion of the mine at Stibnite.

I and everyone else reviewing the Stibnite Gold Proposal have read pages of projections of the ‘temporary’ and lasting (as in forever) impacts of the proposed mining operation. The cumulative effects of a large scale mine are greatly understated.

Page ES 6 states, “Under the 2021 MMP, approximately 280 million tons of development rock and 112 million tons of ore would be mined. About 3.2 million tons of historical Bradley tailings "ore" would also be removed”. This is a huge amount of disturbance in an ecosystem that needs all of its parts to be functioning to survive.

The need for water to process the mined ore far exceeds the amount of water there is. Page ES 16 briefly describes how ground water levels would drop for long periods and in some areas, ‘forever’. Surface water from the streams would be heated up then used up. ES16 also describes how the disturbed rock from mining “would be capable of leaching aluminum, antimony, arsenic, cadmium, copper, manganese, mercury, zinc, sulfate and TDS into surface water and groundwater in concentrations that exceed water quality criteria.” Additionally, the wastewater from 500 mine workers for 10 – 20 years would contribute to the degradation of the water. This could destroy local and downstream fish populations in the near- and long-term view. These fish species include, but are not limited to,

Snake River Spring/Summer Chinook Salmon (Federally Threatened with Designated Critical Habitat)
Columbia River Bull Trout (Federally Threatened with Designated Critical Habitat)

These fish species have enormous significance to the indigenous tribes whose Treaty Rights need to be respected. If protected, the fish will come back for many hundreds more years. The gold, once it is mined, will make someone wealthy that may never set foot in Valley County.

ES 16 states: “The 2021 MMP would remove an estimated 259 acres of occupied whitebark pine habitat (12.5% of occupied habitat in the analysis area), totaling 1,236 trees.” Whitebark pines are keystone species in their high elevation, dry and windy habitats. Many of the older trees could be 500 years old or more. Action is being taken to list whitebark pine (*Pinus albicaulis*) as a threatened species under the Endangered Species Act (ESA). How is destruction of these trees compatible with its consideration of being a threatened species?

Areas scraped of vegetation during mining cannot simply be replanted and expected to thrive. These harsh landscapes have evolved and grown over thousands of years. ES 11 addresses the projected number of acres that will never be able to support vegetation again. ES 11 also points out the lack of growth media necessary for the establishment of newly planted seedlings. The Burnt Log route will never be able to simply be restored to its pre mining condition. The Stibnite area will never be able to support the lush vegetation envisioned by some, post mining.

My brother worked in an open pit, hard rock mine in northern Alaska for over 20 years. He often talked about the strong unwritten creed among miners to man up and get the job done. The mine operated 24 hours a day with the miners shifts lasting 12 ½ hrs, overlapping some so production wasn’t lost at the shift change. While the geologists and engineers had the best-informed intentions to operate safely with minimal environmental damage, they were not the ones on the ground working through blizzards and long night shifts, hauling hazardous chemicals and huge loads of ore. There is every reason to believe this mining operation will be similar. Mistakes happen, conditions on the ground are often not the same as at the drawing board. As one fish biologist pointed out, one bad spill into the watershed could wipe out the entire fish population, eggs, smolts and all. The grade on the Landmark Road, just one small segment of the long road into Stibnite, which would be travelled using either the Johnson Creek route or the Brunt Log route, has sharp switchbacks and is very steep and hazardous.

The effects of this proposed mining activity are serious and far reaching. It crosses roadless areas, compromises and or destroys fish and water resources and is very close to the wilderness area. The risks and the long-term degradation of the environment are not worth the quest to gain wealth by the mining company. I would encourage the Forest Service to take the long view and support the salmon runs and the ecosystems of the East Fork of the South Fork of the Salmon River which will benefit us all instead of taking the short view and enabling some to extract gold and wealth and irreversibly degrade our vanishing wild areas.