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Comments: For more than 30 years, I have recreated along the South Fork Salmon River and its tributaries, including the East Fork South Fork Salmon River (EFSFK) and all of its major tributaries. On June 29, 2017 I attended the "open house" concerning the proposed Stibnite gold project. Based on my knowledge of the history of mining in the area as well as my experience working with the local aquatic resources, I have very serious concerns about the severe risks of re-opening the Stibnite mine. I understand that the Payette National Forest must prepare an EIS to evaluate potential environmental effects of the proposed project. I am confident that if the EIS fully discloses the legacy of past mining impacts and thoroughly addresses all aspects of the proposal, the documented risks will prove too great to proceed with the proposed project.

In the 1980s I worked as a Senior Fisheries Research Biologist for the Idaho Department of Fish and Game. In 1984 and 1985, I conducted an extensive fisheries research project to assess the distribution and status of summer steelhead, spring/summer Chinook salmon, bull trout, westslope cutthroat trout, and redband trout within the entire South Fork Salmon River drainage. We conducted fisheries surveys and collected data in all areas of the South Fork Salmon River drainage, including the mainstem South Fork and its tributaries as well as in the Secesh River and EFSFK and their tributaries, and Johnson Creek and its tributaries.

The EFSFK supports critical habitat for three salmonid species listed under the federal Endangered Species Act (ESA): Snake River spring/summer Chinook salmon, Snake River summer steelhead, and bull trout as well as two USFS Regions 1, 4 sensitive species: westslope cutthroat and redband trout. None of these species can accept additional risks to their persistence. The EFSFK's wild summer steelhead are especially unique and at severe risk. The South Fork Salmon River drainage is one of just three major strongholds for wild steelhead remaining in Idaho. The Middle Fork Salmon River drainage and the Selway River drainage are the other two strongholds. A few tributaries to the mainstem Salmon River upstream from the South Fork (Bargamin, Chamberlain, Horse, and Sabe creeks) also support much smaller wild steelhead populations. All other summer steelhead populations in Idaho have either been extirpated (i.e., the Boise and Payette river drainages) or the native wild stocks have genetically introgressed with hatchery-reared stocks (i.e., the Clearwater River). Re-opening mining in the Stibnite area would increase the risk of leaching cyanide, mercury, and arsenic from the existing superfund site. Increasing mining activities at Stibnite would also increase the risk of fuel and chemical spills and also add the risk of introducing slugs of sediment-laden water. These additional risks represent an unacceptable, severe threat to the persistence of the ESA listed and Sensitive fishes described above. It is essential that the EIS is based on a scientific analysis that includes past monitoring of ESA listed and sensitive fishes and other resources. If the data to assess actual effects is not adequate to assess all potential effects, additional data will need to be collected. In order to meet NEPA requirements for the EIS, I also suggest you to include a "worst case scenario" so the potential effects of the proposal may be accurately assessed and the full suite of risks may be examined in detail.

At the open house, proposals were presented for constructing additional roads at the headwaters of Burntlog Creek and near Horse Heaven. The implication seemed to be that these new transport routes somehow reduced the potential effects of the proposal. That is not true. Burntlog Creek supports the same three salmonid species listed under the federal Endangered Species Act (ESA): Snake River spring/summer Chinook salmon, Snake

River summer steelhead, and bull trout as well as the two USFS Regions 1, 4 sensitive species: westslope cutthroat and redband trout. A spill along the proposed road could be disastrous for fish populations from Burntlog Creek through Johnson Creek, through the EFSFK, along the lower mainstem South Fork, and downstream into the mainstem Salmon River through the Wild and Scenic River corridor. As you are also aware, the South Fork lies primarily within the Idaho Batholith, a granitic lithology. As a result, the new roads also add the risk of fine sediments being released into surface waters in addition to risks of fuel and chemical spills.

The EIS must also contain full disclosure and an extensive description of the long, relevant history of past mining and the legacy of severe impacts left by earlier mining. Antimony mining subsidized by the public began in the 1940s. Taxpayers also funded infrastructure such as the road from Yellowpine to Zena Creek and today Valley County taxpayers are asked to pay for that road maintenance. After WWII millions of public dollars were spent to try and clean up the mess left by earlier mining. In the 1970s, a pilot cyanide heap leaching project at Stibnite ultimately became a full mining operation until bankruptcy closed it in the mid-late 1990s. Just as in the post WWII era, taxpayers were again asked to spend vast amounts of money to clean up the mess left by a private mining company. The EIS must address how this new proposal will avoid the same pattern of public funds being spent to clean up the mess left by a private company. At the open house, bonds were mentioned. As you are aware, the antiquated 1872 Mining Act provides minimal opportunity to secure adequate bonds. To my knowledge there has never been a mine cleanup that was fully funded by a prior bond. The economic analysis must be based on true, actual costs of operations, including full cleanup costs. The economic analysis must also be based on accurate estimates of gold produced rather than inflated estimates designed to lure investors.

Finally, I lived in McCall in the 1980s and have several very close friends who still reside there. As noted above, I visit the area regularly and often recreate in the South Fork drainage. I want to point out what I consider to be a lack of integrity by Midas Gold. I understand that it is their prerogative to flood the local newspaper with ads that are focused on the positive aspects of their proposal, while ignoring or glossing over the actual risks. However, Midas has also hired locals to be mouthpieces for their very biased messages. I consider that unethical behavior and it suggests to me that perhaps Midas cannot be trusted to tell the truth about their proposal.

Thank You for the opportunity to provide these comments.

I look forward to reviewing a thorough and comprehensive EIS.