

Data Submitted (UTC 11): 7/20/2017 6:00:00 AM

First name: Zack

Last name: Waterman

Organization: Idaho Chapter Sierra Club

Title: Director

Comments: Thank you for the opportunity to provide the attached scoping comments.

Sierra Club appreciates the opportunity to submit the following comments regarding the Stibnite Gold Project Plan of Restoration and Operations submitted by Midas Gold Idaho, Inc. in September 2016 and related amendments to the Payette and Boise National Forest Land and Resource Management Plans.

The Sierra Club is the oldest, largest, and most effective grassroots environmental organization in the United States. The Sierra Club represents more than 3 million members and supporters nationwide and more than 3200 members in Idaho. Our mission is to "explore, enjoy, and protect the planet". For more than 125 years we have been working to promote the conservation and restoration of our natural and human environment.

Sierra Club has serious concerns regarding Midas Gold's proposal to undertake open pit mining operations at the headwaters of the East Fork of the South Fork Salmon River, located approximately 3 miles west of the Frank Church-River of No Return Wilderness.

The proposed project is located in the headwaters of one of the last relatively intact ecosystems in the Lower 48 states and home to the longest and highest elevation salmon and steelhead runs in the world. The relatively intact high elevation habitat provides refugia for many species facing significant and increasing negative impacts resulting from our changing climate. The long-term health and viability of this ecosystem are dependent upon healthy headwaters and the conservation of habitat outside of areas that are currently protected as Wilderness. As climate change and other human impacts continue to degrade and fragment ecosystems, Sierra Club is concerned that Midas Gold's proposed mining activities will significantly and negatively impact water quality and quantity, wildlife and vegetation, migration corridors, and degrade or destroy habitat needed by sensitive, threatened and endangered species. We request that the USFS thoroughly analyze the aforementioned potential negative consequences including direct, indirect, and cumulative impacts.

In particular we are concerned about impacts to fisheries. The proposed mine site is located in an area that provides or could provide spawning and rearing habitat for Chinook, steelhead, bull trout, and westslope cutthroat trout. Please thoroughly analyze potential impacts to these fisheries, including downstream impacts to locations outside of the proposed mine site. Please also conduct thorough surveys and identify which stream locations are being utilized by threatened and endangered fish. We are also concerned with proposals to reroute the East Fork of the South Fork Salmon River through a fish passage tunnel and request that the USFS provide examples where this type of passage has been successful.

Please work with Midas Gold to identify opportunities to reduce potential overall impacts and increase watershed restoration efforts. In order to understand potential negative impacts and resulting needs and opportunities for additional mitigation and restoration efforts, it is important for Midas Gold and the USFS to complete comprehensive surveys for sensitive, threatened and endangered species and establish surface and ground water quality baselines.

Sierra Club appreciates this opportunity to provide public comment.