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Organization:

Title:

Comments: Please see attached letter voicing my opposition to the Stibnite Gold Project.

My name is Robert Griffith and I am an Idaho resident and property owner. I am a river runner, fisherman, hiker, and wilderness advocate who has spent extensive time in the Salmon River country, including the South Salmon. I am a member of the Board of Directors of the Snake River Fund, a Wyoming-based non-profit which looks out for the health of the Snake River drainage. And finally, I am a concerned citizen and public land owner who is deeply troubled by the potential environmental impacts of the proposed Midas Gold project at Stibnite.

I am writing to voice my opposition to this project as explained by Midas in their published plans, and the USFS's own Draft EIS published in August 2020. This location, at the headwaters of a major river system, and adjacent to the largest Wilderness area in the lower 48, makes it unsuitable for large-scale mining as described in the plans from Midas Gold. The only good option, as outlined in the DEIS, is Alternative 5, the No Action Alternative.

There are many impacts of this project which are unacceptable, but I will focus my comment on those issues I consider most significant:

Water Quality

The EFSF and South Salmon rivers are wild, free-flowing, and largely clean. The potential impacts of the Meadow Creek Tailings Pond on this system cannot be downplayed. Toxic water, containing arsenic, mercury, and other heavy metals, does not belong at the headwaters of this large river system. The downstream impacts of a leak, or a major blowout, would be catastrophic. We need only to look at the recent release of toxic mine water near Silverton, Colorado, and the devastating impacts to the Animas and San Juan Rivers, to see the dangers this project holds. Alternative 5 is the only way to ensure we avoid a similar natural disaster.

Fish Habitat

The EFSF and South Salmon rivers are critical habitat for many fish species. The DEIS p. 3.12.1 describes the 4 special status native salmonids that are particularly threatened by this project, 3 of which are federally-protected under the Endangered Species Act. Many of these fish are currently barely hanging on, and the current upstream migration of the Chinook Salmon is a fraction of the historical run. It is the job of the USFS to protect these species, not put them at undue risk. The reduction of water quality and temperature, and loss of critical habitat involved in this project are unacceptable. Alternative 5 is the best alternative for the health and continued survival of these native fish species.

Air Quality and Carbon Emissions

The Stibnite Gold Project will produce significant amounts of dust and hazardous air pollutants. The Payette National Forest's DEIS and Idaho Division of Environmental Quality regulators improperly ignored emissions caused by blasting, loading, and transport of ore and waste rock in their analysis, even though those activities are integral to mine operation. This reduction of air quality would furthermore undoubtedly spill over into the adjacent Frank Church Wilderness. Air quality is a wilderness characteristic the USFS is mandated to protect, making this is unacceptable.

Furthermore, the potential carbon footprint of this project is massive and would increase the carbon emissions of

Valley County by 800%. Gold mines emitted on average 0.8 tonnes of CO2 equivalent for every ounce of gold that was produced in 2019, according to a report from S&P Global. [ldquo]Open pit mines emit on average around twice as much CO2e per ounce of gold produced as underground mines[rdquo], says S&P. This is unacceptable. In the year 2020 we should be looking at ways to reduce our carbon footprint, not massively increase it. Alternative 5 provides the best option for air quality and CO2 emissions.

Hazardous Materials

HAZMAT, including chemicals and fossil fuels, would be transported to the mine site through miles of public lands and sensitive wildlife habitat. These materials are to be stored onsite, at the headwaters of a large river system, in the heart of your National Forest. The impacts of an accident regarding the transportation or storage of these chemicals would be huge. The only alternative which addresses this issue is Alternative 5.

Recreational Impacts

The South Salmon is a world-class whitewater experience and fishing stream, bringing paddlers and anglers from all over the world to this corner of Idaho, and supporting the local economy. As well, residents of Idaho have always valued outdoor recreation as part of the reason they live here.

In Section 3.4.3.3.17 SOCIAL AND ECONOMIC CONDITIONS, the DEIS notes that [ldquo]Communities near the analysis area are rural and rely heavily on tourism and the trade industry to support their economies[rdquo] This project threatens the recreational opportunities and the tourism they generate for generations of Idahoans and visitors alike. Alternative 5 provides the best option for the future of outdoor recreation in Valley County.

Consistency with Existing Forest Plans

I understand the great care and effort that goes in to Forest-level planning. I also understand that the public input involved in these plans should not be overlooked. That is why I am deeply concerned by the amendments to those plans that go with the Midas Gold proposal. These amendments include: duration of fish and wildlife degradation; total soil resource commitment; visual quality; water diversions. Changes of this size and scope, and lasting for this kind of time-scale, should be done at the plan level, not as a project-specific amendment. This threatens the legitimacy of all forest plans, the trust of the public and should not be allowed. Alternative 5 is the best way to respect the existing Forest plans.

Other Concerns

The EFSF and South Salmon are the ancestral home of the Nez Pearce Tribe. These indigenous peoples have voiced strong opposition to this plan. Their voice should hold great weight, yet it is my understanding that it instead has been largely ignored. Furthermore, this tribe has been pushing for more advanced protections for this river system for decades. Their wishes should be honored, and we should be talking about how to better protect this river in the future. The South Salmon has been recognized as being eligible for protection under the Wild & Scenic Rivers Act, and I look forward to being part of the movement to make that happen.

This project sits at the heart of an expansive mountain range that receives ample winter snows. This means the mine is surrounded by avalanche terrain. I am a professional ski patroller who has performed avalanche mitigation and forecasting for many years, and has taken part in multiple avalanche rescue operations. I am deeply concerned by the lack of thought Midas has put into this issue, and I am worried for the safety of the employees of this project. Proper analysis must be performed regarding the potential for avalanche accidents both at the mine site and along the extensive travel routes to get there.

Finally, I wish to address the material which is being extracted: Gold is a mostly useless product, not essential to

the operation and future of our country. It is purely used for vanity, to increase wealth and avarice by the greedy and covetous members of our society. I acknowledge the necessity of mining and extraction when it comes to the day-to-day needs of our modern lives, but mining gold is only about money. The health of our National Forests and wild rivers is far more important than money, then wealth, then gold.

In Summary:

I see this as a deeply flawed project. The current DEIS identifies many environmental impacts which should disqualify this project from taking place on our sensitive public lands, while not adequately analyzing others. There is only one good option identified by the DEIS, and that is Alternative 5, the No Action Alternative.

Thank you for your consideration, and for continuing to protect our National Forests.