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Comments: Thank you for your careful consideration of public comment in your decision making regarding the Stibnite Draft Environmental Impact Statement (EIS). We write to you on behalf of NOLS - provider of outdoor education teaches boating skills (raft, kayak, canoe), human history, leave no trace, leadership and expedition skills on the Main Salmon River through the Wild and Scenic section. We are opposed to the Stibnite Gold Mine project and recommend Alternative 5- no action. We find that the Draft EIS fails to have a robust public comment due to the Covid-19 pandemic. Likewise, it fails to account for the potential impacts to downstream users in potential economic harm caused by environmental degradation.

NOLS launches over 10 trips per year on the Main Salmon River which has resulted in thousands of student user days and countless life changing student experiences. Since the school's inception in 1965, NOLS has grown to be an international organization that has educated over 350,000 individuals - a list that includes NASA astronauts, members of the U.S. military, and people from all walks of life. We have learned through personal experience that dams, mining projects, and environmental degradation can have tangible negative impacts on the student experience and impact our ability to operate.

Public Process

Nols has a longstanding history of providing public comment in land use planning when decisions may impact the areas in which we operate. However, the Forest Service's decision to move forward with the NEPA mandate for public comment during a worldwide pandemic disregards the integrity of the public comment process in a substantive and capricious way. NOLS is a relatively large and well resourced organization in the outdoor recreation industry, and we are struggling to find sufficient bandwidth to adequately address this issue. It is certain that others in less financially secure situations, or those that have been historically disenfranchised, are heavily impacted in their ability to provide informed public comment.

If the Stibnite Gold Mine project was brought to NOLS attention outside of the context of Covid-19, then NOLS's public policy team would work directly with NOLS Teton Valley staff and engage with students and stakeholders, to craft well researched and informed public comment. However, Covid-19 has dramatically impacted our ability to provide the robust public comment that we are accustomed to.

For context, NOLS no longer has the NOLS Teton Valley Director position and the public policy team is short-staffed and suffering from reduced hours. NOLS's senior field instructor and former Teton Valley Assistant Director - Will Stubblefield - provided comment in this letter outside of any formal NOLS capacity. These types of situations are not unique to the NOLS situation; rather, other entities have expressed similar struggles to find sufficient bandwidth to fully analyze the DEIS and its potential economic and environmental harms.

Economic Harm:

We understand the Mining Law of 1872 requires that public lands are eligible for mineral extraction as a revenue source for the American people; however, we strongly disagree this should come at the expense of in-tact proven industries that are long-term economic drivers of their local communities. This does not mean mining cannot or should not take place in National Forest lands, rather, there are areas much better suited for this type of work outside of cherished and depended upon landscapes. Outdoor recreation fills paychecks, puts food on the table, and is the way of life in central Idaho. The proposed gold mine outlined in the DEIS will only threaten or diminish those long-standing values.

Student Experience:

Please consider the following testimony from one of NOLS senior field instructors.

"I have worked for NOLS as a lead instructor since 2012. In this time I've shared adventures with students from across the United States and around the world. One of the most amazing classrooms that we are privileged to use is the Main Salmon River in Idaho. When taking students down the Main Salmon we always stop at the confluence of the South Fork of the Salmon River and the Main. At the South Salmon River, our students swim, fish, and learn about the natural history of the South Salmon Watershed. The Stibnite Gold Project threatens the clean water, fish species, and natural environment that offers our students life changing experiences.

To our students, the value of the South Fork of the Salmon is clear. They are amazed to see clean and cold water after travelling down the Main Salmon, which can be warm and full of algae in mid summer. They catch Cutthroat Trout and Bull Trout under the cliff at the confluence after miles on the Main Salmon with water too warm for trout. In some years, we find spawned out steelhead or chinook carcasses and teach the life cycle of anadromous fish in the South Salmon. We also spend time swimming and practicing swiftwater rescue skills. These are all examples of the uniqueness of the South Salmon and the value it provides to our students and our educational organization. It is a unique and special river and should be protected as such.

Students come to NOLS to gain experiences in Leadership and Outdoor Skills to carry forward into their lives. We are lucky to offer these skills to our students while operating in conjunction with land managers of public lands and we rely on our land managers to help protect the classrooms that are invaluable to our student experience. As an educator who has seen the positive impacts of a healthy South Salmon River watershed, I'm asking you to select Alternative 5: No Action, in response to the SGP DEIS." - Will Stubblefield - NOLS Senior Field Instructor

As Will described in his testimony, the environmental impacts predicted in the DEIS, such as a net decrease in fish habitat and water flows, will irrevocably alter the NOLS student experience and take away from educational opportunities that are currently enjoyed. As an organization that relies on marketing in-tact, healthy, and viable wilderness areas and experiences, the Stibnite Gold Mine project's best case scenario will negatively impact our operations and diminish our operations. Ultimately, the proposed mine project threatens to diminish NOLS ability to provide the wilderness experience our students expect.

Thank you for your serious consideration for the points raised within this letter. The decision-making process surrounding public lands is founded upon robust public comment to fully analyze a proposed project's potential impact on the environment. Without such public comment, in addition to the negative impact this project could have on the local economy and environmental quality, sound decision-making is not possible and we urge you to take Alternative 5 - no action - at this time.