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Comments: My name is Gayle Dixon. I have lived in Adams County for 46 years. I worked for the US Forest Service in Idaho, Valley, Washington, and Adams Counties during those years, and worked within the SGP project area. My family and I love Idaho's rivers and public lands and are very concerned that this project will have lasting impacts on the health and bounties of the Salmon River drainage.

Comments on Birds

The Migratory Bird Treaty Act (MBTA) prohibits actions that kill birds on the list of migratory bird species. Executive Order 13186 directs the US Forest Service to protect migrating birds and promote their conservation. In the DEIS, Opinion M-37050 (3.13.2.4) is noted stating that [ldquo]incidental[rdquo] takes of migratory birds are not prohibited. In August 2020 the above opinion was rejected by the court. The court stated that it is unlawful to kill birds [ldquo]by any means whatever or in any manner[rdquo], including incidental takes.

With this in mind, project actions that will kill migratory birds must be readdressed to comply with the court ruling. It must look at the effect on all migratory species, not just focal species, sensitive species, Management Indicator species, endangered species, and species of greatest conservation need.

The discussion of the effects of the SGP proposal on wildlife indicates that there will be effects from mining, the construction and existence of utility lines, and the construction and use of roads. Birds specifically may be affected by vehicles, helicopter flights, emissions exposure, noise and light pollution, reductions in habitat, reductions in prey species, impacts from communication towers and transmission lines, removal of nest and roost trees, etc. How can the Forest Service approve this project, knowing that birds will be killed? Who will enforce the MBTA?

The DEIS specifically notes the following effects on birds:

[bull] Numerous wetland dependent species[hellip] would be displaced from the mine site into other areas that may or may not be available and may provide less suitable habitat. 4.11.2.1

[bull] Loss of riparian areas also would result in changes in vegetative species composition and reductions of available nesting substrate, breeding habitat, forage for migrating birds[hellip] 4.11.2.1.2

[bull] [hellip]displaced birds would face more competition in the areas they are forced into[hellip]

[bull] Insects and insectivorous birds may be exposed to metals and other elements from atmospheric emissions and tailings piles associated with gold and silver mining [hellip] elements may enter the food web[hellip]direct and indirect impacts to insectivorous birds[hellip] 4.13.2.2.2.

How can the Forest Service [ldquo]protect migrating birds and promote their conservation[rdquo] while acknowledging the above effects of the proposal?

Throughout the discussions of impacts to wildlife in the DEIS there is constant hedging on mitigation and the effects of the proposal:

[bull] To the extent practicable, trees found to contain nests would not be disturbed or cut. 4.13.2.2.2.1

[bull] [hellip]habitats will likely be reclaimed in part on closure[hellip] Table 4.13-19

[bull] (The project) will likely improve habitat for wildlife. Table 4.13-19

What if it is not practicable to avoid nesting sites? Will the young birds be killed in direct violation of the MBTA? Will the Forest Service require that habitats be improved or reclaimed? Again, how will the Forest Service [ldquo]protect migrating birds and promote their conservation[rdquo] while allowing habitat to be destroyed.

I was unable to locate a discussion in the DEIS of the effects of arsenic, mercury, etc on water birds that may land on the pit lakes or other water within the project area, potentially causing mortality. Where is this discussion? Why were the known impacts of pit lakes on water birds not discussed? Perhaps the perpetual water treatment in Alternative 2 would affect the pit lake water quality, but what about the water quality in the other alternatives?

Comments on amending the Payette Forest Plan

Are you considering amending the Forest Plan so that this proposal can adversely affect threatened fish and wildlife? Are you amending the Forest Plan to allow the direct loss of threatened species habitat? Is it legal to amend standards tied to the Endangered Species Act?

Comments on the EFSFSR Fish Tunnel

The references cited in support of the fish tunnel are paltry. This piece of the SGP proposal lacks scientific credibility and when the tunnel does not work the habitat restoration for Chinook salmon will be totally inadequate. Did you read the cited references? Can the Forest Service guarantee that the tunnel will function as proposed? There are too many maybes in this proposal.

Comments on treating water in perpetuity 45.3-45 (Alternative 2)

Would a trust be established so there would be funds for the WTP to treat the water in perpetuity? How much would this cost? In my experience when mining is finished the miners disappear and the Forest Service is left with the cleanup costs. How would the Forest Service hold the SGP accountable?

Economics

Midas gold has spent millions and millions of dollars on exploration, and propaganda, and permitting (including the DEIS) without any returns. Is the Forest Service sure this project is economically viable?