

Data Submitted (UTC 11): 10/27/2020 6:00:00 AM

First name: Nik

Last name: Haase

Organization:

Title:

Comments: Hello my name is Nik Haase,

I am from Asheville, North Carolina. I had the pleasure of camping, kayaking and fly fishing along the South Fork of the Salmon, the East Fork of the South Fork and the Main Salmon Rivers in June of 2018. What a spectacular part of our country, a truly wild place to adventure. The drive into the South Fork is a wonderfully remote stretch of gravel road with unobstructed views into endless forests. During my time in the South Fork watershed I experienced the best whitewater kayaking I have ever done. The clear clean water provided some of the best fly fishing I have ever had the privilege of experiencing.

I am genuinely concerned that the Stibnite Gold mine will disrupt all these activities for many reasons.

1. Mining in the area will directly adversely affect the water quality. Chemical reactions between rock and water have the potential to release acid and toxic metal ions into groundwater and surface water which in turn will affect all aquatic organisms. In addition, the predictive modeling of the impact on water quality seems to have error in its method. For example, the faults and fracture zones present in the area are acknowledged as having potentially significant influence on groundwater movement and quality. However, they are not taken into account in the modeling. This omission is identified at ?Chapter 4.8.8.2.1.3?.
2. As previously mentioned, the leaching of acid and other toxic chemicals into the ground and surface water would damage the very pristine watershed that exists disrupting the world class fly fishing I enjoyed. The activity and process of creating and removing of mining waste will inevitably create more opportunity for environmental and water quality degradation.
3. The river corridor is home to four federally-listed special status native salmonids that require cold, clear, clean, running water and unobstructed pathways to complete their life cycles. The DEIS indicates that the Forest Service has preliminarily determined that ?project will adversely affect ?bull trout (pg. 4.12-87), Chinook salmon (pg. 4.12-69), steelhead (pg.4.12-75), and their critical habitats; and may indirectly impact West slope cutthroat trout (pg.4.12-93). Any damage to the habitat of these fish could prove fatal to the species in the area, which I know to be a major influence in bringing recreation to the area.
4. It is noted in the DEIS that the local communities rely heavily on tourism to support their economies[rdquo] and that [ldquo]the analysis area is a popular area for a variety of recreation activities on both private and public lands,[rdquo] yet there is no report, information, or analysis on how the Stibnite proposal will affect tourism, recreation, or the related economic benefits to local communities. The recreational opportunities are what brought me to the area. Water quality degradation, the installation of roads, and utilities will serve as detriment to the appeal of this watershed for recreation.

The South Fork, East Fork of the South Fork and the Main Salmon rivers are priceless. There is no amount of Gold or antimony that can make up for what would be lost.

[ldquo]While a supporting report by the USGS mentions the Stibnite Gold Project as a potential source of antimony in the United States, the report notes that the [ldquo]enhanced recovery of antimony from precious-metal deposits may represent the most readily available source of antimony if demand were to increase rapidly.[rdquo]

In other words, antimony is common in many precious metals mines in the United States and the numerous gold and silver mines in operation today in the United States, in places like Nevada, could easily fulfill any need for domestic antimony production. Antimony has not been recovered domestically to date, however, because it has not been economical to do so. Also, mined antimony would currently need to be shipped outside of the United

States due to a lack of refinement capacity in the United States. This seems to undermine any argument by Midas Gold or anyone else that antimony needs to be mined domestically for strategic or national security reasons and that it needs to be mined at Stibnite. In short, the Stibnite Gold Project is not a strategically important mine and it is disingenuous for Midas Gold to pretend otherwise. It appears, rather, that Midas Gold is attempting to exploit a commodity that is, at best, a minor component of its Stibnite Gold Project and that the Stibnite Gold Project may not even produce.

Please do not allow this mining operation to move forward. This would allow another massive unnecessary environmental tragedy to occur.

With Respect,

The geochemistry and water quality from mining runoff: Modeling in the DEIS shows that arsenic, antimony, mercury, and other metals will contaminate water for many years after mine closure. The effects analysis in the DEIS focuses on predictive numerical modeling. In attempting to quantify changes to water quality and quantity at different times during the mining operation and up to one hundred years in the future, the DEIS relies on certain assumptions that contain significant error. This error is primarily based on the methodology employed to analyze uncertainty in the model outputs.

For example, the faults and fracture zones present in the area are acknowledged as having potentially significant influence on groundwater movement and quality. However, they are not taken into account in the modeling. This omission is identified at Chapter 4.8.8.2.1.3. Further, the plan to treat surface water in perpetuity to meet state water quality standards relies on an assumption that whatever company mines the site will put money into a trust fund to support the operational costs to treat the water forever. The infrastructure to do so (powerline, roads, treatment facilities) will remain forever. However, the contamination is modeled to still require treatment 100 years in the future. The DEIS assumes, without support that chemical reactions causing contamination will slowly decrease to a point where contaminants will be

below state standards. When this time comes is unknowable. Moreover, state water quality standards have equal chances of becoming more strict in the future as remaining the same.

The roads, utilities, and maintenance needed to have such an extensive operation would be devastating to the area and never go away.

Fish Facts from the DEIS which may be inconsistent with a "restoration" theme. REMIND THE USFS that to ensure viable and resilient fish habitat in the East Fork of the South Fork the most assured method is to "protect the best and restore the rest." Over half of the mine footprint is in undisturbed habitat. The USFS must analyze an alternative to minimize the mine footprint that is contained only to previously disturbed areas. OTHER SUGGESTIONS: 1. Don't put mining waste - new or old - or build new roads - in undisturbed habitat. 2. Don't conduct activities that are likely to mobilize additional arsenic such as blasting waste rock and grinding rock into tailings. 3. Don't bring millions of gallons of diesel fuel, cyanide and other chemicals to the site. 4. Do reconnect habitat, isolate historic mine waste from streams, and restore degraded riparian areas

HAZARDOUS MATERIALS THE DEIS SAYS: Hazardous materials and chemicals would be transported to the mine site in U.S. Department of Transportation-certified containers by trained personnel and would be stored in

designated areas employing secondary containment measures. A Hazardous Materials Handling and Emergency Response Plan would address procedures for responding to accidental spills or releases of hazardous materials to minimize environmental effects. Used products would be stored on site in approved containers that would be separate from other trash and garbage products. Therefore, there is little chance of wildlife being exposed to hazardous materials. Alternatives 2, 3, & 4 would have similar effects on general wildlife species as Alternative 1. In the project area how will community and industrial trash and garbage be managed and who will oversee its management? COMMENTS AND QUESTIONS TO ASK: On site who will be responsible for and insure that hazardous materials will be separate from community trash and garbage? Where will the community and industrial trash and garbage be hauled? What will you do with the hazardous waste? Does the county have facilities to deal with it? Have you discussed hazardous waste and garbage disposal with Valley Co.? In your emissions estimates did you include the emissions from the hauling community and industrial hazardous waste and garbage? Do you have a plan for recycling your community and industrial

CONSISTENCY WITH FOREST PLAN Forest Plans are promises between the USFS and the public. Both the Boise and Payette NF Forest Plans that are proposed to be amended (meaning to be [ldquo]de-promised[rdquo]) for the SGP include:-duration of fish and wildlife degradation (adverse effects),-total soil resource commitment (ie soil disturbance),-visual quality, and-water diversions