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First name: Beth

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Organization:

Title:

Comments: Dear Forest Supervisor Jackson,

This letter is in regard to the Draft EIS for the proposed Stibnite Mine Project.

My name is Beth Kochevar and I am an environmental science educator in McCall, Idaho. I have a B.A. in Geology and an M.S. in Natural Resources. I chose to make the Idaho my home eight years ago because of the immediate connection I felt to the people and the landscape. Idaho hosts millions of acres of wilderness, public land, and wild and scenic rivers; Idahoans have a special, intimate relationship with the Land that is unique and essential for our collective wellbeing. There are many aspects of the proposed Stibnite Gold Project (SGP) and that threaten these shared values and are deeply concerning for the sustainability of our future generations. It is equally concerning that the Draft EIS for the SGP is insufficient in providing enough information about the potential threats to a resilient socio-ecological system in the area of the proposed mine.

While the potential impacts of the SGP are separated out into different categories such as fish, vegetation, geology, recreation and Treaty Rights, the DEIS does not sufficiently discuss the inextricable connections between some of each of the impact area. An impact to one of these areas will inevitably cause cascading impacts to the others. For example, the DEIS lists potential impacts to federally listed fish species, including destruction of up to 70% of critical habitat (DEIS p. 4.12-201), too warm and not enough water for fish to thrive (DEIS p. 12-69), and permanent barriers to fish passage in Meadow Creek from new construction. However, the water quality issues listed (such as increased arsenic in the stream system) will also have negative impacts to the fish populations. Additionally, these listed fish are keystone species in the forest ecosystem, bringing marine derived nutrients from the ocean to the headwater streams. If these fish populations are depleted due to the potential impacts from the SGP, the greater forest ecosystem will also be impacted. These impacts are not listed in the DEIS.

Another example of information that is missing from the DEIS is the impact to the larger social and ecological system from the destruction of white bark pine in each of the Alternatives listed. Since white bark pine is a keystone species in forest ecosystems, certainly there are wider implications for the ecosystem if these trees are destroyed. This is not depicted in the DEIS. Whitebark pine is considered an important or keystone species in the ecosystems where it is found due to its function as habitat and food for wildlife, its ability to colonize areas after fire and other disturbances, its ability to survive on harsh, high-elevation droughty sites, and its function in regulating snowmelt and reducing soil erosion (Keane et al. 2017). Whitebark pine is a long-lived tree, commonly living over 400 years. Whitebark pine populations are declining in North America . Whitebark pine, a candidate species without proposed or designated critical habitat, is found in the analysis area (DEIS p.3.10-23). Construction activities under Alternative 1 would require removal of vegetation, including whitebark pine individuals (DEIS p. 4.4-12). Native trees and shrubs also would be planted, as well as disease-resistant whitebark pine seedlings. Revegetation efforts would likely represent an improvement over areas of existing poor-quality soils; however, revegetation of the disturbed mine site and legacy impacted areas would likely be difficult due to current trends for climate change and encroaching of subalpine fir into the whitebark pine habitat.

Finally, there is insufficient elaboration of the reciprocal relationships between humans and the Land in the DEIS, to the point of allowing the SGP to violate human rights and Treaty Rights. The topics addressed in the DEIS and outlined in the Purpose and Need section are listed as "resources" but there is not sufficient mention of the ways humans and the Land interact that is more than as using "resources." For example, native peoples have lived with the Land in the surrounding SGP area since time immemorial. In addition to the physical damage done to the Land and resources, it will be a threat to many people's identities to destroy any part of the Land in this area because destroying the Land is akin to destroying the mind and spirit. This is a matter of human rights, and this is

not sufficiently addressed and mitigated in the DEIS. This relationship between the native peoples and the Land and their rights to carry out their cultural practices have been federally recognized since the Nez Perce Tribe Treaty of 1855 and to degrade the Land in this area will be in direct violation of these rights, which take superiority to the Mining Act of 1872. We all have an inherent right to wellbeing, and the degradation of the ecosystem in this area violates the intrinsic connection and reliance of humans and the Land.

Comingled impacts to the SGP area need to be filled out completely so the full picture of the socio-ecological system in the EFSFS watershed and the cascading impacts can be weighed.

In summary, according to the purported impacts for Alternatives 1, 2, 3, and 4 (which, concerningly, are not fully modeled), even with Midas's plans for restoration, there will be irreparable loss of native, endemic, and keystone species that will have cascading effects in the socio-ecological system that we all rely on. The permanent damage what would be done to this area is fully inconsistent with the claims of "restoration" made by Midas. It would be shortsighted to allow this amount of environmental degradation to occur when we are also facing unprecedented effects of climate change that will compound the direct human impacts on this landscape. For the livelihoods of the generations of Idahoans that come after us, the focus of work in this area should be on restoration, conservation, and upholding Treaty Rights guaranteed to the native peoples, not short-term extractive industry. I want to tell my students that we did all we could to leave them a healthy, just, and equitable world in which they can thrive.

Sincerely,
Beth Kochevar