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Comments: Aside from being born and raised in Idaho, I am a 14-year full-time resident of Valley County and provide professional services to local and state-wide communities as a licensed Idaho veterinarian.

I am asking the Forest Service to exercise its option to choose Alternative 5 (effectively the no action alternative). Details of the proposed Midas Gold project are compellingly inappropriate for the Forest Service to permit new mining at the Stibnite site for many reasons. The three reasons most convincing are the following.

Environmental Contamination

Mining as proposed by the Stibnite Gold DEIS profoundly threatens the quality and inherent safety of surface water and ground water. Contaminated water (containing arsenic, antimony, and mercury) in turn literally endangers all downstream aquatic species and their habitat, including ESA-listed Snake River Chinook Salmon, Snake River Steelhead Trout, and Columbia River Basin Bull Trout. Heavy-metal pollution starting at the headwaters of the East Fork South Fork Salmon River contaminates all downstream waters to the Pacific Ocean.

Pollution of any sort degrades nature. As a veterinarian [ndash] the very definition of a practical biologist, I have unique working knowledge of biological processes across species and have professionally investigated real and potential poisoning of domestic animals. Notably, the level of heavy-metal toxicity associated with historic mining at the Stibnite site is sufficient that the EPA proposed Stibnite as a Superfund site on the National Priorities list in 2001 and a remedial investigation started in 2002.

(<https://cumulis.epa.gov/supercpad/Site/index.cfm?fuseaction=second.schedule&id=1000236>).

In 2019, the US Department of the Interior and US Geological Survey completed the scientific investigations report titled [ldquo]Arsenic, Antimony, Mercury, and Water Streams near Stibnite Mining Area, Central Idaho, 2011-17.[rdquo] In short, this study documents altered stream configuration and habitat in the study area. Dangerous toxin levels for aquatic and human life are directly associated with previously documented levels of arsenic, free cyanide, lead, mercury, silver, zinc, and antimony. Even this most recent USGS study, many years after the most recent active mining activity in the Stibnite area, identified harmful levels of arsenic, antimony, and mercury contamination in those local waterways. As a veterinarian, I find this profoundly troubling and indicative of the on-going damage associated with large-scale gold mining, whether historical or contemporary.

I am also disturbed that the Forest Service allowed the British Columbia-based Midas Gold authority to author the 2019 Biological Assessment (BA) report referenced above. As US Rep. Betty McCollum, Chair of the House Appropriations Subcommittee stated: [ldquo]Allowing a mining company to author its own BA on its project's potential impacts to ESA-listed species creates potential conflicts of interest and undermines public confidence in the permitting process." In short, as the beneficiaries of the proposed mining were allowed to write the official Biological Assessment there is reason to wonder if the report was written to [ldquo]whitewash[rdquo] or obscure even more damning conclusions.

I have serious concerns that any new commercial mining in the Stibnite area will inevitably result in heavy-metal contamination in the East Fork South Fork Salmon River and all downstream flows. Detrimental impact on our future recreation in and around any associated rivers, streams, lakes, and reservoirs is truly secondary to the ongoing profound harm to those associated ecological systems. Ongoing heavy-metal poisoning of rivers simply threatens the diversity and robustness of aquatic life (in particular protected fish) and, if eaten frequently enough, other life forms such as ospreys, water fowl, and even humans.

Restoration and Cost

At the heart of Midas Gold's public campaign is a promise to heal the historic mining blight of the Stibnite area that occurred over decades and decades ago. That damage is adjacent to and intrudes on the largest Primitive Area in the lower 48 states [ndash] the joined Gospel-Hump Wilderness and Frank Church River of No Return Wilderness.

However, Midas Gold's concept of restoration is to redisturb the current Stibnite mine site and excavate at the minimum an additional 800 acres of undisturbed wildlife and fish habitat. Two of three enormous mining pits are projected to be left on the landscape in perpetuity with liners that will eventually leak. All liners leak eventually. It is sobering that a 6.5 magnitude earthquake rolled through Idaho's Sawtooth mountain range on March 31 of this year. With an epicenter area 45 miles west of Challis, the center of this major earthquake was only a few dozen miles east of Stibnite. This was the second largest earthquake in Idaho history, and even 3 months later the area is experiencing a string of aftershocks, some registering as high as magnitude 4.8 (Idaho Statesman, June 25, 2020). Earthworks' 2013 U.S. Gold Mines Spills and Failures Report study that all 27 active U.S. gold mines had experienced at least one pipeline spill or other accidental release.

Obviously, mining companies are commercial enterprises which must generate monetary profits for their owners and stock holders or cease to exist. Restoring the Idaho landscape back to its pre-mining pristine habitat does not directly make money for mine owners or its stock owners, but rather is simply a cost of doing business. All successful businesses regulate and minimize the cost of doing business. While the Midas Gold website states [ldquo]Midas Gold is committed to following all of the modern regulation practices and financial assurance calculations so we can restore the site,[rdquo] details specifying the actual particulars of bonding are missing.

What is the monetary amount of the bond?

What are the terms of the bond that the government is requiring for actual mining to begin?

Historically, western United States is littered with abandoned mines [ndash] literally mined out with now-forgotten owners having declared bankruptcy to avoid additional costs. As an example, Montana's Zortman and Landusky gold and silver mines, originally owned by the Canadian company Pegasus Gold Corp, went bankrupt and folded 20 years ago. As of March 2019, those abandoned mines continue to leave a legacy of water pollution and a cleanup bill nearing 100 million dollars that is expected to continue in perpetuity.

Given the past history of polluting exhausted gold mines that have been regularly abandoned in western United States, Midas Gold must provide evidence of adequate, tangible bonding before commercial mining should be allowed to commence.

What assurances does the American Public have that Midas Gold will not simply declare bankruptcy or sell its mining interests to another company such as Barrick Gold Corporation?

What assures that any mining company successors to Midas Gold will be bound by any previous restoration agreements?

What iron-clad incentives or agreements prevent Midas Gold from simply abandoning its stated restoration plans after having gutted more pristine Idaho wilderness and profited from whatever gold could be mined?

Indigenous American Rights

Commercial gold mining at Stibnite violates the 1855 treaty rights of the Nez Perce Tribe which is legally recognized as a sovereign nation within the United States. In the early eighteen-hundreds, the Nez Perce Tribe

occupied over 13 million acres of western America now identified as parts of western Montana, southeastern Washington, northeast Oregon, and, most relevant to this discussion, north-central Idaho. The 1855 treaty explicitly reserves a permanent homeland as well as [ldquo]the right to fish at all usual and accustomed places in common with citizens of the Territory; and of erecting temporary buildings for curing, together with the privilege of hunting, gathering roots and berries, and pasturing their horses and cattle upon open and unclaimed land.[rdquo]

Midas Gold[rsquo]s footprint is entirely within the Tribe[rsquo]s aboriginal territory as well as within the area determined by the Indian Claims Commission to have been exclusively used and occupied by the Tribe. The Project is also located on the Krassel Ranger District of the Payette National Forest. The lands comprising the Payette National Forest are open and unclaimed and subject to the Tribe[rsquo]s treaty-reserved rights.

The 1855 treaty with the Nez Perce Tribe trumps the 1872 Mining Act which federal land managers argue, in the eyes of the Mining law, that mining is the highest and best use of public lands.

Consistent with the Nez Perce Tribe[rsquo]s notion of hereditary stewardship of the land, the Tribe[rsquo]s Department of Fisheries Resources Management currently spends \$2.5 million annually on hatchery supplementation, fishery research, and watershed restoration near, and downstream of, Midas Gold[rsquo]s proposed mine. The Tribe[rsquo]s work to restore Chinook salmon runs in the South Fork Salmon River watershed sustainably contributes to the area[rsquo]s economy and quality of life.

I adamantly support the following words of the Chairman of the Nez Perce Tribe, Shannon Wheeler:
[ldquo]Allowing Midas Gold to move forward with their proposed mine will undo the hard work of so many. We have yet to see a mine that does more good than harm and it is our responsibility to look out for our future generations. This mine, if approved, will surely be to the detriment of those future generations.[rdquo]