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Comments: My name is Tyler Stright. I am a native Idahoan, an avid outdoorsman, and a lover of nature. In the mountains of Idaho allows one to develop a deep appreciation for all seasons and the life that is supported from snow-capped peaks to the rivers that flow through this beautiful state. I have traveled to many beautiful places, but none so beautiful as my home town of McCall. I left in search of education and adventure only to return to McCall to begin meaningful work as a fisheries biologist for the Nez Perce Tribe (NPT).

The South Fork Salmon River (SFSR), Big Creek (tributary to the Middle Fork Salmon River), East Fork South Fork Salmon River, Johnson Creek, and the Secesh River are the primary research location for both the NPT as well as the Idaho Fish and Game (IDFG). I have had the privilege of walking many miles of these waterways and my appreciation for them has continued to grow over time. Not only do these streams play a keystone role in the functionality of the aquatic, riparian, and surrounding mountain ecosystems, but they are the home to many native fish species that are also essential to this functionality. Chinook salmon stand out as the species that is most important to protect and save in these ecosystems. They represent a unique connection from the ocean into our beautiful state, transferring nutrients as smolts migrate to the ocean and bringing nutrients back from the ocean when adults return to their native streams to spawn and give their body back to the earth. Chinook salmon already face many perils: habitat degradation, the hydropower system, agriculture runoff, poor ocean conditions, and climate change to name a few. The reason there are Chinook salmon supplementation efforts in the SFSR and in Johnson Creek is due to anthropogenic impacts of the past, one of which is the Stibnite Mine.

I am in opposition to this expansion of the Stibnite mine.

The existing pit mine is already violating water quality standards. The Stibnite project will contaminate water with arsenic, antimony, and mercury for years after the mining closure. This will have negative effects on the aquatic ecosystem, organisms, and could pass these negative effects far downstream of the site. It will be nearly impossible for the site to not contaminate water when you consider the massive increase of size compared to the existing footprint. Section 4.8.8.2.3 states it is [unrealistic] to bring water quality up to a standard that is better than what exists currently at the mine site. Despite activities that would improve water quality for fish from the removal and reclamation of legacy mine wastes, exceedances of the NMFS and USFWS and other applicable criteria for antimony, arsenic, copper, and mercury are anticipated to extend indefinitely post-closure (Pg. 4.12-39, Chapter 4.12.2.3.3.1). This is strong evidence this will not be a good decision from an environmental standpoint.

This project will end after many years of reshaping the earth, but the access roads will remain forever. Sedimentation is a well known problem for Chinook salmon, and decreases the viability of eggs in the spawning gravel. Unmaintained roads over time will contribute to this problem long after the mine has been abandoned. Additionally, the road traffic to the mine is estimated at 5 trucks per hour, 5AM-7PM, year round, for twelve years. That is 235,000 trips on the roads back and forth to the mine site (5 trucks/hr * 14 hrs/day * 5 days/wk * 56 wks/yr * 12 yrs). This is a massive volume of large trucks, and the risk of this is evident in 4.16.2.1.1. Yellowpine will be

used until the new road is complete, which places either the Johnson Creek or SFSR Chinook populations at higher risk, both from sedimentation, road destruction, and accidents (e.g. chemical spills). Further, the traffic analysis of the plan is inadequate and does not consider weight of trucks nor does it discuss seasonal road conditions. Anyone who has traveled those roads in the winter can confirm the high risk situation.

The plan shows a long list of undesirable changes regarding fish: Up to 31.8km of stream directly impacted by removal, direct loss of up to 4.2 miles of Chinook salmon (listed as threatened under the Endangered Species Act) and up to 7.14 miles of pristine Bull Trout habitat, changes in water temperature, and change in water chemistry (Table 4.12-66). Chinook are already experiencing temperature problems on their migration routes due to climate change, changing snow pack (e.g. water storage) and changing springtime melt patterns. Further contribution to increasing water temperatures could have drastic effects on the health of fish and their ability to spawn, not to mention the viability and survival of the eggs they deposit in the spawning gravel. The plan clearly shows modelled stream temperatures increasing by up to 5 degrees celsius, which is unacceptable (p. 4.12-69; 4.12-83; 4.12-87). Habitat availability for other fish is shown to be reduced in perpetuity.

This is a very small portion of the negative affects expanding the Stibnite mine will have. There may be a strong argument for having a gold mine, but expanding a mine at the headwaters of a river that feeds and sustains a huge ecosystem is not the correct decision. This is not the correct location to place a mine, and there are surely other locations where environmental impacts could be more easily mitigated. This mine expansion has the potential to have negative impacts that flow down hundreds of miles of river through Idaho, Oregon, Washington, and into the Pacific Ocean.

Section 1502.14 of NEPA Regulations it requires that the agency must [ldquo]rigorously explore and objectively evaluate all reasonable alternatives[rdquo] and [ldquo]devote substantial treatment to each alternative.[rdquo] In addition regulations require [ldquo]appropriate mitigation measures[rdquo] be included. As it stands, this plan does not sufficiently address the potential impacts of the mine nor does it show any evaluation of reasonable alternatives (different location?).

We are still experiencing the negative effects of the first Stibnite mine. The Stibnite expansion is not the correct choice. If that path is chosen, we will be suffering the consequences of that choice for many generations. I strongly oppose the Stibnite Gold project.