

Data Submitted (UTC 11): 10/29/2020 2:14:48 AM  
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Organization: Idaho Rivers United  
Title: Membership & Outreach Coordinator  
Comments: Dear Ms. Jackson,

As stakeholders passionate about our lands, rivers, and the species dependent upon them, we urge you to take a closer look at the proposed Stibnite Gold Project. The DEIS is lacking critical analysis and sufficient alternatives for the public to weigh in, and the Forest Service must submit a supplemental EIS to address these issues. We also urge you to support Alternative 5: the No Action Alternative. Idaho rivers and our outdoor recreation economy are worth far more than gold!

The Stibnite Gold Project, and all Action Alternatives in the DEIS, would cause undue harm to ESA listed fish, the irreplaceable recreational values of the region, and indigenous resources.

The East Fork/South Fork of the Salmon River provides critical habitat for 3 Endangered Species Act listed fish species: chinook salmon, steelhead, and bull trout.

According to the USFS website, the South Fork of the Salmon is designated as critical chinook salmon habitat. "Within critical habitat, an agency must avoid actions that destroy or adversely modify that critical habitat."

The Stibnite Gold Project would significantly modify this critical habitat for chinook (and steelhead and bull trout). According to Alternative 2 (Midas Gold's proposal) of the DEIS, this project would destroy 20.8% of chinook salmon critical habitat and 27.5% of bull trout critical habitat in the analysis area. These are unacceptable losses for these already endangered fish and I urge you to protect them. All Action Alternatives in the DEIS would destroy and adversely modify the critical habitat of chinook salmon, steelhead, and bull trout.

The impacts of the Stibnite Gold Project would extend beyond fish, however. The looming risks of large scale mining include acid mine drainage, tailings dams failures, and cyanide spills. Possibilities of contamination from mining activities, which will create 446 million tons of potential acid generating and/or metal leaching materials and 161,095 sq. meters of open pit walls is too risky. Additionally, mine access roads would cross 71 different streams, exposing each stream to the risk of hazardous material spills and increased sedimentation.

The South Fork Salmon River (and the East Fork South Fork) represent something special to citizens in Idaho and beyond. Whitewater paddlers and anglers travel from around the world to enjoy this irreplaceable river. Downstream from the mine site, the South Fork is suitable for Wild & Scenic designation. In addition to restricted tribal and recreational access in the 3,423 acre mine footprint and 13,446 acres of public land within the Operations Area Boundary for 20 years, unforeseen circumstances (mine or dam failures, contamination, etc.) could jeopardize even more river miles and recreational opportunities downstream.

Twenty years of jobs and the greed of a Canadian mining company is NOT worth more than the values that everyday Idahoans hold dear.

Please stop the Stibnite Mine Project.