

Data Submitted (UTC 11): 10/29/2020 5:18:46 AM

First name: Becca

Last name: Aceto

Organization:

Title:

Comments: Thank you for the opportunity to provide comments on the Stibnite Gold Project, an open pit mining proposal that falls within one of the most spectacular, wild regions of Idaho. With years of experience conducting habitat surveys on landscapes across Idaho, my main concerns with this proposal are the likely negative impacts to wildlife and habitat. These concerns are outlined below.

-Midas Gold has proposed the construction of miles of new road through a current Inventoried Roadless Area that also happens to be habitat for sensitive Idaho species such as wolverines and mountain goats. Numerous studies have shown that wolverines, a top-tier species on Idaho's Species of Greatest Conservation Need list, are sensitive to road density and motorized use. This includes a study published in 2019 by Round River Conservation Studies, the Forest Service's Rocky Mountain Research Station, the University of Montana, and the University of Wyoming. Allowing the Burnt Log Road to be expanded without spending time conducting proper studies on how this would affect sensitive wildlife species in the area is short-sighted and a risk to the well being of some of Idaho's most impressive megafauna.

-There is no readily apparent study outlined in the DEIS that looks at potential impacts to migratory birds such as waterfowl in relation to the multiple tailings ponds that will be left behind on the landscape post-operations. Per the Migratory Bird Treaty Act, actions that kill birds on the list of migratory birds are prohibited. With the potential heightened levels of arsenic and other contaminants in the water of these tailings ponds, I believe an analysis of the potential impacts are warranted. How can Midas Gold assure that it will not harm migratory birds throughout the duration of, and after mining operations?

-The negative impacts to the East Fork's sensitive fish species - chinook salmon, steelhead, bull trout, and westslope cutthroat - are immense throughout the duration of, and after Midas Gold's proposed mining operations.

oThe direct loss of chinook salmon habitat over all alternatives is 3.3 - 4.2 miles. This is a significant loss of habitat for a threatened species listed under the Endangered Species Act. Furthermore, this loss is not specifically mitigated in the DEIS, only generally mentioned in Mitigation Appendix D.

oThe Meadow Creek diversions, the construction and operation of the Tailings Storage Facility and Development Rock Storage Facility, and the construction/operation of the Development Rock Storage Facility in Fiddle Creek, would create new barriers to natural fish movement that would be permanent.

-Over half of the mine footprint is in currently undisturbed wildlife habitat. The Payette National Forest must analyze an alternative to minimize the mine footprint that is contained only to previously disturbed areas.

With potential impacts to the Payette National Forest's fish and wildlife incredibly high, I support Alternative 5, the No Action Alternative. Thank you for your time.