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First name: Robert

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Organization:

Title:

Comments: Dear Ms. Jackson,

I believe that Midas Gold has produced the only viable option for restoration of the upper East Fork South Fork Salmon River. Billions of dollars have been spent in Idaho and the Pacific Northwest region to restore salmon, steelhead and bull trout habitat over the past two decades including removal of fish passage barriers, water quality improvements, and stream realignment. The Stibnite Gold Project proposes similar restoration strategies using private funding to address legacy mining impacts and proposed impacts that would otherwise cost many millions of dollars to address using traditional restoration funding mechanisms. Meanwhile, no entity (private, governmental, or tribal) has even attempted to develop a plan to restore passage and habitat for fish in this area because the cost has been too high a hurdle to overcome.

There is no doubt in my mind that the existing passage barrier at Yellow Pine Pit and the existing contamination from spent ore deposits in the watershed would not be addressed in my lifetime without Midas Gold's proposal due to the significant risk and cost of the work required to address these issues. The majority of salmon/steelhead restoration funds in Idaho comes through The Pacific Coast Salmon Recovery Fund (PCSRF) which has distributed approximately \$52.09 million for projects since 2004 (about 64% of which, \$33.3 million, has been for habitat protection and restoration). Restoring fish passage at Yellow Pine Pit will require a stream diversion while the pit is being filled with soil/rock regardless of the underlying purpose (for mining or restoration). A tunnel is the most viable means of a stream diversion as evident by historical tunneling for stream bypass in the 1930's and Midas Gold's current proposal. Such a tunnel would cost tens of millions of dollars, plus the cost to generate, move, and place backfill in sufficient quantity to fill Yellow Pine Pit to a level sufficient to restore natural fish passage to the roughly 35 miles of perennial streams above the barrier (roughly 6 miles of which is conservatively considered suitable for salmon/steelhead spawning and rearing based on intrinsic potential modeling). The cost therefore to restore fish passage at Yellow Pine Pit is on the order of the entire PCSRF funding for the past 17 years combined...not to mention the cost to restore water quality which the US EPA and others have already attempted to address unsuccessfully at the cost of several million dollars -- The area remains listed on EPA's Superfund website and is considered "Functioning at Unacceptable Risk" by the US Forest Service.

The Stibnite Gold Project is a trade-off. As proposed, passage would be improved to the East Fork South Fork Salmon River and lower Meadow Creek where most historical salmon spawning and rearing has occurred. But passage would be blocked farther up the watershed with the placement of tailings and development rock. Existing and proposed contaminated sediment would be reclaimed and placed into a modern tailings facility, but there is potential risk of a spill during or after mining. A comparison of existing versus proposed watershed conditions indicators as reported to the US Forest Service via Midas Gold's Conceptual Mitigation Plan (Tetra Tech 2019) suggests a net improvement to watershed conditions resulting from the project, but this comes at the cost of roughly 15 years of diminished conditions during mining. These trade-offs, both real and hypothetical, have been evaluated and heavily scrutinized through a rigorous permitting and agency consultation process.

The scientific evidence strongly suggests the project will restore fish passage, reduce the level of contaminated soil/water, and improve fish habitat. This is not opinion, it is fact based on the best available scientific data and analysis. There are many emotions and unsupported claims surrounding the proposed Stibnite Gold Project. Without the Project, the East Fork South Fork Salmon River will remain contaminated and large areas of potential habitat and cold water refugia will go unused by salmon and steelhead even as global warming and other threats to these already threatened and endangered species increase. I urge the US Forest Service to consider the available scientific data and analysis as the only unbiased evidence for the project and the best information

available to support the Stibnite Gold Project and ultimately to permit the Project using alternative 2.

Thank you for the opportunity to provide my comment.

Best Regards,