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Payette National Forest Supervisor

Linda Jackson

500 Mission St., Building 2

McCall, ID 83638

Dear Linda,

My name is Elizabeth (Lisa) Ostermiller. I've lived in McCall, Idaho for the last 34 years. I graduated from the University of Idaho with a degree in Wildlife Sciences and worked on the Payette National Forest for 20 years.

As a resident of McCall, close to the project, I am passionate about our lands, rivers, and the species dependent upon them. I 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.

I also urge you to support Alternative 5: the No Action Alternative. Idaho rivers and our outdoor recreation economy are worth far more than gold! In my 30 plus years as a resident of Idaho I have experience with these resources as a river guide, for work and as a fisher-person and river recreationalist.

I have a few more detailed comments in opposition to the Stibnite Gold Project and the impact area of the project as follows:

#### Problems with the Process

The DEIS is a very intimidating document. I have experience with documents of this type. This DEIS is NOT in a form that is easily interpreted. How can you possibly expect anyone that doesn't have expertise with these kind of documents to even attempt a comment that will actually be accepted? Also, we have not been given enough time. You are encouraged to extend the deadline - again - to let people who do not have expertise be able to gain the knowledge and process to rightfully respond to this DEIS.

And finally, 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.

#### Purpose and Need

I am NOT convinced there is a need for more gold and I certainly am NOT convinced this DEIS proves there is a need to mine for gold at the Stibnite Project given the possible consequences to the environment in perpetuity.

The chances of failure are there, they last forever, making all of the reasons to mine....

Many modern mining projects have accidental spills due from tailing dam failures or operational issues, placing everything downstream at risk

Midas Gold intends to nearly triple the footprint of the historic mine area, using three open-pit mines and cyanide leaching to extract gold and antimony in the headwaters of one of Idaho's most iconic waterways: The Salmon River. This unacceptably changes access to valuable critical habitat, recreational resources and possibly changing it forever for the worse.

There are varying treatments to the alternatives giving us a fragmented basis on which to make judgements for comparisons. The DEIS does not take a HARD LOOK at Alternatives 3 & 4. There is the hard look doctrine that should have guided this.

In section 1502.14 of NEPA Regulations it requires that the agency must "rigorously explore and objectively evaluate all reasonable alternatives" and "devote substantial treatment to each alternative." In addition regulations require "appropriate mitigation measures" be included. From what I can see, alternatives 3 & 4 were not looked at with the rigor nor evaluated to the standards required and in many sections of the DEIS there are "adverse impacts" mentioned and NO mitigations at all offered.

The possible risks of large scale mining include acid mine drainage, tailings dams failures, and cyanide spills are unacceptable. 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.

#### Impacts on Fish

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 idea of tunnels just make me laugh. I'm sorry but this just can't be a serious consideration.

#### Impacts on Recreation

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. In my experience as a river guide and living close to these waters in McCall, I am steeped in the culture of this river system.

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.

#### Impacts on Community

I work in health care in McCall. I am NOT just a part time resident. When the impacts of this project on the community are so great and so devastatingly ignored, it makes me wonder if anyone really thought about this at all?

Schools - where are the numbers? Where are the calculations on class sizes and needs for more resources? I've been working at the hospital and clinics here for 15 years. I know for a fact if there were a mine disaster or leak of hazardous wastes it would quickly overwhelm our small community and resources here.

In conclusion - Please stop the Stibnite Mine Project.

Sincerely,

Elizabeth Ostermiller

10/25/2020

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