Data Submitted (UTC 11): 10/27/2020 2:45:43 AM First name: Claire Last name: Cripps Organization: Title:

Comments: I am an Idaho resident, a transplant from Tennessee, and I made the leap with the unique rivers of Idaho being a huge reason why.

I understand that historically mining has been a huge part of Idaho economy, profiting communities in a boomand-bust fashion. I acknowledge that river access has been possible many times because of mining projects and subsequently, access roads from the past.

Sometimes mining proposals require meeting in the middle with all stakeholders involved. Each project of course should be assessed on an individual basis, sometimes the benefits outweigh the risks, but Stibnite Mine is NOT one of those situations I am very concerned that the effects of reopening (and making larger) this open pit mine will be dramatic. Here are some of the key issues that concern me:

1. Fish habitat. The draft EIS states on page 2 of the executive summary that "As a result of the Project, Midas Gold will restore sensitive fisheries" but I don't see how that can be done with their current proposal. The draft EIS indicates that the Stibnite Mine project WILL without a doubt adversely affect bull trout, west slope cutthroat, chinook salmon, and steelhead populations. More clarification is needed, with the following being addressed: All of these fish require cold, clean, flowing water for their survival. Bull trout migrate in late summer to small streams before returning to larger bodies of water, and according to the timeline of the Stibnite project, the draft EIS states that the total habitat for bull trout will absolutely decrease. There is a proposed increase in water temperature of up to 4 degree C, and that's without consideration of climate change effects. Steelhead are the only species listed that would see fewer negative effects, mainly due to the timing of their inland migration and spawning. If, due to climate change, the water temp increase goes above 4 degree Celsius, that will change and increase negative effects to steelhead as well, which are a staple to the Idaho recreational economy. A proposed tunnel reroute would exist for nearly a mile, rerouting the East Fork of the SF of the Salmon for the entire 20+ year life of the project. Appendix J-3 in the DEIS states that the tunnel's ability to pass fish is

questionable:

"Even after collaboration with other agencies, there exists a reasonable probability that the tunnel will not be able to pass fish safely, timely, or effectively. "

2. Water issues: Midas Gold proposes a PERMANENT water treatment facility on Payette National Forest land, i.e. public lands. This facility would operate "as long as needed" post closure--WHAT DOES THIS MEAN? I understand that to mean it could...and likely WILL operate with no actual end date. The public deserves more clarification on this...

The Draft EIS also states "The West End pit is expected to take 41 years to fill and is expected to overflow and discharge intermittently based on spring runoff conditions" And while "Temporary water treatment plants" would be used if needed, there is still so much uncertainty for the health of the river and communities downstream. Impacts downstream of the Yellow Pine Pit Lake, maybe the most impacted waters, are not evaluated. Failure to incorporate these impacts in the DEIS is a blatant neglect of communities who depend on this watershed. We all live downstream. Again, this needs more clarification.

What about the liners? The DEIS states "the liner system proposed does not currently meet regulatory requirements" "At the request of the Idaho Mining Assn, the ID Dept of Environmental Quality has entered into rulemaking on existing regulations to change the regulatory requirements"

Again, before this project continues any further, the public needs and deserves, more clarification...