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Comments: Personal Background and Comment Stature

I live in Riggins, Idaho along the Salmon River, which is about 50 miles downstream of where the South Fork Salmon joins it, and thus a part of my backyard. So. what happens upstream eventually reaches us.

My wife and I run a commercial outfitting service for whitewater and fishing trips that depends on viable populations of salmon and steelhead. The integrity of the spawning grounds in the high country watersheds is a significant factor that impacts these numbers.

Before outfitting I worked as a wildlife biologist on the Wallowa Whitman National Forest in the early 1970s coordinating fish and wildlife needs with other natural resource management concerns such as logging, grazing, and mining. I have lived in Riggins since 1985 and know the area (including the South Fork) well. The proposed Stibnite Project and potential negative impacts it has on the natural flora and fauna are of grave concern to me.

My concerns

1. Before analyzing the impacts for any project that takes place in critical fish and wildlife habitats, is the question of how crucial is the need to proceed and for what purpose? Because the ecological processes have been severely compromised before, such as increased sediment loads in the South Fork drainage from past logging that heavily increased erosion and reduced the anadromous reproduction signature on the landscape, additional geological entry into the same general area will add to the aggregate of accumulated negative impacts. Incrementalism of scale is how such projects often are allowed, due to the almost invisible nature of how small changes escape notice until they run their course and accumulatively reveals the real story. It is like trying to watch the green grass of spring turning brown by fall. The changes are nearly impossible to see through daily observation.

While gold and antimony are not considered a serious need for national security reasons, and can both be found/processed in other areas that are located in less critical habitat types and ecologically challenged environments, why chance a high-risk project in the South Fork to begin with?

2. In light of the continued failure of dam removal on the Snake River, and the last best chance to save our fisheries, the managing agencies have stressed the magnified importance of doing all the other potential remedies to aim for anadromous restoration. Thus, with one of the 4-H's (hatchery, harvest, habitat, and hydro)taken off the table, the remaining three legs gain even more importance. Of these three, habitat is the most important because the other two legs are supported by it as the baseline for the carrying capacity of what the landscape can produce.

More specifically, maintaining the integrity of the upper reach spawning grounds, (officially designated as critical habitat for salmon, steelhead, and bull trout) where the Midas Project is proposed and will significantly impact other natural resources, is a critical component to the fundamental baseline that determines carrying capacity and future outcomes. Every incremental loss in these "CRITICAL" environments has a significant end-run impact on anadromous fish. It lowers the fish recruitment ceiling. Ancillary activities associated with the project, such as road building, is one example of incremental changes to fish and wildlife habitat that should be considered. Downplaying the significance of incremental changes leads to distortion of the big picture and false perception of ground truth.

3. Unfortunately, climate change is an additional burden to our planet now, and the consequential potential for catastrophic fires can have graver impacts to wildlife than yesterday-year. Not only does the threat of increased reduction of hiding/thermal cover for large mammals become greater, so too does the amount of smoke from wildland fires pose significantly more risk for killing small birds and micro-organisms that support it all, (trophic cascade effect). The recent massive die-off of significant numbers of migratory birds, as revealed by research reported by a CBS documentary, is yet more evidence for what we can expect in the near future. Scientists suspect that small lungs and vaster amounts of smoke-filled air contributed to mortality, and can have catastrophic impacts on multiple levels.

4. While substantive comments are requested by governing agencies, the time required for going over such a long and detailed analysis is beyond the scope for the general public to realistically do within such short comment boundaries. Complicated systems and interpretation of data (such as J.3 Environmental Baseline Matrix - Watershed Condition Indicator Tables) make analysis difficult for the professional, let alone Joe Public.

In light of the serious threats and dire jeopardy our salmon and steelhead continue to face, is alone, reason enough to challenge the wisdom of allowing such a mega-mining project to happen in the first place. Any form of environmental compromise to a fishery that is on the brink of extinction is too great a risk to take. Rather than scrutinizing every avenue that can impact fish and wildlife needs, on an incremental basis to determine what can best be compromised is another lesson of not paying attention to learning from history.

There comes a time when we must learn something from history and simply say "no action," to the compound negative interest of mega projects like Midas Gold.

The danger of shifting baseline that continuously changes with each new environmental reality that results from new landscapes created by alterations in resource management policies and strategies is that it degrades sound ecological function incrementally. Over the long-haul incrementalism results in more dead grass. (Diminishes carrying capacity).

5. The best predictor of future behavior is past behavior. Based on a preponderance of evidence for contamination and compromised water quality in many previous mining operations, (legacy impacts) the public trust level for believing claims by yet another mineral extraction proposal has also been compromised. I am highly skeptical of claims that this project will provide a positive conservation outcome for fish and wildlife. Furthermore, what about the impacts on my business that depends on viable habitats for healthy fish runs? How socially responsible is it to provide new mining jobs at the expense of the recreation industry that will feel the economic loss if extractive processes fail?

Furthermore, with the major dismantling of environmental regulations (established by best science) by the Trump administration, erosion of public trust for positive outcomes only adds fuel to the skepticism of the extraction industry. It makes dubious that the Payette National Forest agency can be held accountable as a conservation watchdog for our public natural resources. More specifically, is the question of their analysis of the Humidity Cell Testing (HCT) and the likelihood of ARD and metals mobilization from the Midas test findings. How valid are their tests at being an accurate assessment for the area? Again, large cooperations have one basic goal: profit for their stakeholders. Distortion fields and twisted language of PR campaigns created to justify dubious projects, such as the black cancer veil used by the tobacco industry for years to mask the risks of smoking is one prime example of why public trust has been so diminished.

That Midas claims its project will maximize restoration of habitat, restores fish passage, and re-establishes forest cover is highly questionable. Has independent analysis from forest service biologists been done, filtered, or modified due to direction from top officials in the Trump administration?

Aldo Leopold, the father of wildlife management, claimed that biologists are like doctors who must deliver the bad news, but is essential if the efficacy of proper treatment is to be successful. And, like doctors, who live by the fundamental maxim, "first, do no harm", (Primum non nocere) so too must a biologist follow with the same

bioethical guidelines. Thus, as a biologist, my advice is not to interrupt this precious habitat that Midas Gold wants to enter. In this specific case, "doing nothing" (non-maleficence) is far better than "doing something."

In conclusion: Given that all things are connected, that we are living at a time of the Sixth Great Extinction on planet earth, and that the Columbia and Salmon River is home to one of the richest historic runs of anadromous fish worldwide, allowing the Midas Gold Project to go forward is like adding the last card on top of a house of cards that causes the entire ecological structure to collapse. The magnitude of scale for a potential avalanche is not worth the risk. The health of not only the environment, but my personal business that depends on viable fish populations is also at stake, as are many other guide services and the ancillary businesses piggybacking them.

In today's world, where climate change is altering normal conditions and natural cycles that may be beyond man's control (or to willfully make the necessary changes to curb negative environmental impacts) in addition to many other activities (fracking and drilling) that are occurring, it accentuates the importance of limiting new projects that will only add to incrementalism of environmental corruption, such as the Midas project in my backyard.

In my consideration of the Midas plan for restoration and operations to clean up a heavily impacted legacy of mining, "no entry" is the best strategy for optimizing the needs of fish and wildlife. *Primum non nocere*.