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Comments: I am a natural resource professional with a Bachelors degree in Geospatial Analysis with a minor in Environmental Policy. I have scientific field experience in the Salmon River watershed. Though I am a Florida native, I have family in McCall and Salmon, Idaho, and have been visiting Idaho regularly my entire life. The Salmon River and its tributaries represent an important sense of place to my family and me.

In 2016 I worked for Idaho Fish and Game as well as a local nonprofit, Salmon Valley Stewardship. I surveyed sage grouse habitat and identified sensitive species of plants throughout public and private lands. I have hiked in the South Fork Salmon River's forest and mountains, and observed Chinook salmon spawning there. I have lived with my aunt and uncle on the banks of the Salmon River, and in Salmon, Idaho. I have created artwork depicting the Salmon River, its life force, and the Frank Church River of No Return Wilderness. I have rafted and trained as a raft guide on the Salmon River.

The Salmon River and its watersheds have played an important role in my personal and professional development. This is an area of immense economic and cultural significance to all people of Idaho. After reading I am concerned about the following impacts of the Stibnite Gold Mine to the South Fork of the Salmon River and surrounding areas:

The Stibnite Gold Mine violates the 1855 treaty with the Nez Perce Tribe

One of the major issues with this proposal is that it will reduce the Nez Perce tribe's access to their ancestral lands and hunting grounds, (DEIS Table ES4-1 page ES-36). Currently the tribe spends over 2.5 million dollars per year on hatchery programs and restorative efforts within their ancestral hunting grounds. The construction of the Stibnite Gold Mine directly undermines the tribe's environmental restoration work. This economic loss to the tribe is not sufficiently addressed in the DEIS. Shannon F. Wheeler, the Nez Perce Tribal Executive Committee Chairman, said, "For the Nez Perce Tribe, the value of the land, wildlife, and resources will always be worth more than any amount of gold. History has proven that mining scars the landscape and damages natural resources. Damage to our natural resources will have long-term impacts on everyone, and the impacts will still be felt by people here long after the company, and gold, have left the country..." (Nez Perce Stibnite Press Release Final 2018). The Nez Perce people are the ancestral stewards of the land their opposition to the Stibnite Gold Mine must be taken into account.

Populations of Bull trout, Salmon, Steelhead will be negatively impacted

The location of the proposed SGP mine is problematic because it is located at the headwaters of the South Fork of the Salmon River. This area currently provides critical habitat for three endangered species of fish: chinook salmon, bull trout and steelhead. According to table ES4-1 page ES-33, fish populations may be affected through hazardous spills from mining activities. The Stibnite Gold Mine has the potential to leach arsenic, antimony, aluminum, manganese, sulfate, total dissolved solids, copper, cadmium and zinc, resulting in levels that exceed water quality criteria. Additionally, the document states that construction of the mine will permanently alter the physical structure of the river and its tributaries, resulting in the loss of known fish runs, including fiddle creek and meadow creek. This will alter the flow and water levels dramatically. One of the proposed mitigation strategies for this project is a "fish tunnel," which has no evidence to be effective and has never been tested. Allowing Midas gold to use this tunnel to transport fish could result in the deaths of thousands of fish. The DEIS estimates that over 7,000 fish will need to be collected and transported in this tunnel in order to get them to their spawning grounds. Canadian based Midas gold portrays the Stibnite Gold Mine as an opportunity to restore fish habitat, however the DEIS document states that the project will reduce the quality and quantity of water flow, reduce habitat, potentially leach toxins into the South Fork of the Salmon River watershed.

Public access for recreation will be vastly reduced

The Salmon River and its tributaries serve as a cornerstone for the Idaho lifestyle. The American public currently uses the land outlined in the DEIS for activities such as fishing, rafting, hiking, camping, and birding. Pages ES-35 and Es-36 within table ES4-1 outlines how Idaho's roadless character will be fragmented. The EPA and forest service have invested millions of dollars into restoring this area from the last time it was mined. Allowing a Canadian mining company to take charge of restoration efforts while also extracting natural resources is a huge risk for the Idahoans and wildlife that enjoy these beautiful waters.

Conclusion and missing analysis

As a natural resource professional and supporter of the Idaho wilderness, I oppose the Stibnite Gold Mine as proposed by Canadian-based Midas Gold. There are also several components of this project that have not been analyzed in the DEIS: How will the mine construction affect traffic patterns in McCall? How does Midas Gold plan to financially compensate the tribe for undermining their 2.5 million yearly restorative efforts? How does Midas Gold plan to compensate the public for reducing water quality and fish populations? Allowing this project to move forward as outlined in the Draft Environmental Impact Statement will directly result in the loss of fish, the loss of public lands and access to public lands, and it will violate the 1855 treaty with the Nez Perce tribe.

Thank you for reading my comment,  
Amanda Matthews