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First name: Russ

Last name: Thurow

Organization:

Title:

Comments: Russ Thurow

3 Boots Road

Salmon, Idaho 83467

russtfisher@hotmail.com

October 27, 2020

ATTN: Linda Jackson

Forest Supervisor

Payette National Forest

McCall, Idaho 83638

Subject: Stibnite Project EIS

Dear Ms. Jackson:

For more than 30 years, I have enjoyed recreational opportunities along the South Fork Salmon River and its tributaries, including the East Fork South Fork Salmon River (EFSFK) and all of its major tributaries. Back on June 29, 2017 I attended the Boise "open house" concerning the proposed Stibnite gold project. Based on my knowledge of the history of mining in the area as well as my experience working with the aquatic resources in the South Fork Salmon River, I have very serious concerns about the extensive and severe risks of re-opening the Stibnite mine.

In the 1980s I worked as a Senior Fisheries Research Biologist for the Idaho Department of Fish and Game. In 1984 and 1985, I conducted an extensive fisheries research project to assess the distribution and status of summer steelhead, spring/summer Chinook salmon, bull trout, westslope cutthroat trout, and redband trout within the entire South Fork Salmon River drainage. We conducted fisheries surveys and collected data in all areas of the South Fork Salmon River drainage, including the mainstem South Fork and its tributaries as well as in the Secesh River and EFSFK and their tributaries, and Johnson Creek and its tributaries. Much of that research is cited in the DEIS. The EFSFK supports critical habitat for three salmonid species listed under the federal Endangered Species Act (ESA): Snake River spring/summer Chinook salmon, Snake River summer steelhead, and bull trout as well as two USFS Regions 1, 4 Sensitive Species: westslope cutthroat and redband trout. None of these species can accept additional risks to their persistence. The EFSFK's wild summer steelhead are especially unique and at severe risk. The South Fork Salmon River drainage is one of just three major refuges and strongholds for wild steelhead remaining in Idaho. The Middle Fork Salmon River drainage and the Selway River drainage are the other two strongholds. A few tributaries to the mainstem Salmon River upstream from the South Fork (Bargamin, Chamberlain, Horse, and Sabe creeks) also support much smaller wild steelhead populations. All other summer steelhead populations in Idaho have either been extirpated (i.e., the Boise and Payette river drainages) or the native wild stocks have genetically altered by out-of-basin hatchery-reared stocks (i.e., the Clearwater River). Re-opening mining in the Stibnite area increases the risk of leaching cyanide, mercury, and arsenic from the existing superfund site. Increasing mining activities at Stibnite also increases the risk of fuel and chemical spills and adds the risk of introducing slugs of sediment-laden water. These additional risks represent an unacceptable, severe threat to the persistence of the ESA listed and Sensitive fishes described above.

I have reviewed the Draft EIS prepared by the Payette National Forest and have the following comments:

1.) In my July 2017 comments, I suggested that, to meet NEPA requirements, the DEIS must include a "worst-case scenario" so the potential effects of the proposal may be accurately evaluated and the full suite of risks may be examined in detail. I was unable to find a worst-case scenario analysis and request that you provide one prior to preparation of the final EIS.

2.) The DEIS accurately confirms that the Stibnite project would result in a net loss of critical habitat for Chinook salmon, summer steelhead, bull trout and Westslope cutthroat and redband trout. As described above, loss of critical habitat is unacceptable and would further jeopardize the persistence of these iconic and invaluable Idaho fishes. These species are important ecologically, to native Tribes for cultural and ceremonial uses, recreationally, and economically. Another at-risk native anadromous fish, the Pacific Lamprey, is relatively un-surveyed in the drainage- yet likely present. The Stibnite project would also have severe negative effects on any Pacific lamprey in the basin.

3.) The DEIS identified eight significant issues of concern. According to NEPA requirements, the selected alternative must strive to minimize adverse environmental impacts on National Forest System resources. Each of the four "action" alternatives has so many serious concerns and severe risks that only the No-Action Alternative can meet the goal of minimizing adverse environmental impacts to public resources.

Table ES4-1 Summary and Comparison of the Potential Environmental Impacts Associated with the Significant Issues by Alternative, clearly illustrates the adverse effects of Alternatives 1-4.

4.) The so called "Burntlog route" in Alternatives 1-3 would be an environmental disaster.

At the June 2017 open house, the Burntlog route was promoted as a new transport route that might somehow magically reduce the potential effects of the proposal. That is absolutely NOT true. Burntlog Creek supports the same three salmonid species listed under the federal Endangered Species Act (ESA): Snake River spring/summer Chinook salmon, Snake River summer steelhead, and bull trout as well as the two USFS Regions 1, 4 sensitive species: westslope cutthroat and redband trout. A spill along the proposed road could be disastrous for fish populations from Burntlog Creek through Johnson Creek, through the EFSFK, along the lower mainstem South Fork, and downstream into the mainstem Salmon River through the Wild and Scenic River corridor. As you are also aware, the South Fork lies primarily within the Idaho Batholith, a granitic lithology. As a result, the new roads also add substantial risk of fine sediments being released into surface waters in addition to risks of fuel and chemical spills.

5.) The DEIS does adequately describe and disclose the long and painful legacy of past mining impacts. In order for the public to understand the actual risks and true costs of the proposed actions, the DEIS must contain full disclosure and an extensive description of the long, relevant history of past mining and the legacy of severe impacts left by earlier mining. Antimony mining subsidized by the public began in the 1940s. Taxpayers also funded infrastructure such as the road from Yellowpine to Zena Creek and today Valley County taxpayers are asked to pay for maintenance of that road. After WWII millions of public dollars were spent to try and clean up the toxic mess left by earlier mining. In the 1970s, a pilot cyanide heap leaching project at Stibnite ultimately became a full mining operation until bankruptcy closed it in the mid-late 1990s. Just as in the earlier post-WWII era, taxpayers were again asked to spend vast amounts of money to clean up the mess left by a private mining company. The DEIS must address how this new Stibnite project would avoid the same egregious pattern of public funds being spent to clean up toxic messes left by private companies. At the open house, bonds were mentioned. As you are aware, the antiquated 1872 Mining Act provides minimal opportunity to secure adequate bonds. To my knowledge there has never been a mine cleanup that was fully funded by a prior bond. The DEIS economic analysis must be expanded so it is based on true, actual costs of operations, including full cleanup costs. The economic analysis must also be based on accurate estimates of gold produced rather than inflated estimates designed to lure investors.

6.) Last, Midas Gold has developed a reputation for unethical behavior and most of its assurances are unsubstantiated or have proven to be suspect.

I lived in McCall in the 1980s and have several very close friends who still reside there. As noted above, I visit the area regularly and often recreate in the South Fork drainage. I want to point out what I consider to be a clear lack of integrity by Midas Gold. I understand that it is their prerogative to flood the local newspaper with ads that are focused on the positive aspects of their proposal, while ignoring or glossing over the actual risks. However, Midas has also hired locals and lobbyists to be mouthpieces for their very biased messages. I consider that unethical behavior and it suggests to me that perhaps Midas cannot be trusted to tell the truth about their proposal. To illustrate further, a few months after submitting my July 18, 2017 comments to then-Forest Supervisor Keith Lannom, I received a telephone call from a former federal employee now employed by Midas. This person had apparently read my July letter as part of the public record and reached out to me since I had previously interacted with them professionally in the 1980s. This person wanted to meet with me to try and "change my mind" about the concerns I had expressed in my July 2017. I found that offensive because my concerns were based on my intimate knowledge of the aquatic resources in the South Fork Salmon River and supported by the data my crews and I collected. By these actions, Midas has demonstrated that, instead of seeking an objective and rigorous assessment of their proposals, they are instead focused on attempting to control public opinion.

Thank You for the opportunity to provide these comments.

Sincerely,

/s/ Russ Thurow

3 Boots Road
Salmon, Idaho 83467
russtfisher@hotmail.com