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Organization:

Title:

Comments: Attention: Linda Jackson, Payette Forest Supervisor

Date: October 27, 2020

From: Jo Kemper

To All It May Concern:

Thank you for the opportunity to comment on the Draft Environmental Impact Statement (DEIS) for the Proposed Stibnite Gold Project in Valley County, Idaho. As the comments in this letter pertain directly to the project and the project area, and specifically point out oversights and omissions, please consider this a substantive comment letter.

My name is Jo Kemper, I am an outdoor enthusiast, public lands user, kayaker, and taxpayer. I have a degree in environmental engineering, and experience working for public works, specifically in drinking water, and industrial pretreatment for wastewater. The proposed Stibnite Gold Project is in a remote and wild place that is important to me, because of my personal experiences in the public lands surrounding the South Fork Salmon River. My concerns surrounding this project span beyond my background and training in science, water quality, and environmental regulations. I am writing as a concerned citizen and stakeholder who utilizes these public lands in their current state, lands for which I am an owner of and for which the Forest Service is directed to manage in the public interest.

It is incredibly important to me personally that the Forest Service protect the outstanding water quality of this major tributary to the Wild and Scenic Salmon River, as this river system is vitally important for native and endangered fish, outdoor recreation, and the economic vitality of the local communities that surround it. Moving forward with this project would not only adversely impact my personal enjoyment of this public resource through whitewater paddling, camping and fishing, it would negatively impact all of the people of Idaho who rely on the hundreds of thousands of visitors each year to National Forests, and it goes directly against the Valley County Comprehensive Plan goal, "To promote and support a viable recreation and tourism program that is in harmony with the Land Use section of this plan" (Valley County Comprehensive Plan, p. 52).

The DEIS clearly states that all of the alternatives presented, apart from Alternative 5, would adversely affect federally listed endangered fish species, their habitat, and the watershed's water quality and quantity. The DEIS also states: "The analysis area is a popular area for a variety of recreation activities on both private and public lands." (DEIS 3.19 pg. 603). A summary statement acknowledging the importance and abundance of recreation in the analysis area is provided; however, the entirety of the recreation section does not address how recreation will be impacted by the Stibnite project, nor does it provide recent sources in its descriptions of uses, the sources are out of date, especially in the context of Idaho's booming population, noting its value of recreation (census.gov, 2020; Foy, 2020; Raphelson, 2017; Men's Journal, 2019). Please revisit and provide information on impacts to economic and social cultural benefits of recreation to local communities and state, national, and international visitors in a supplemental DEIS that can be reviewed. Please provide an economic analysis of the local tourism economy, using data relevant to the most recent 2-3 years.

Additionally, the federal government is expected to receive most of the total tax revenues resulting from Stibnite's operations. The state of Idaho is expected to get ten million dollars in tax revenue per year while Valley County is expected to get only \$300,000 per year. As a result, operations are expected to result in a relatively limited tax revenue increase for the local area's economy (DEIS 4.21-26). The DEIS offers no mitigation to the substantial costs that will be incurred by Valley County Taxpayers.

Furthermore, the project cites a high percentage of non-local employees (DEIS 4.21-2), most workers would reside in the Boise area and would commute (DEIS 4.21-9), most employees are expected to spend almost all their earnings at their place of residence. As a result, the economic contributions to Valley and Adams counties economies would be limited to income earned by workers that live in the area (DEIS 4.21-7), and as just cited above, most of the workers would not live in the area.

In summary, the proposal is from a Canadian mining company, and includes a plan that proposes to adversely impact water quality, recreation opportunities, and the wellbeing of the economy in Idaho, for all public land users, and especially the communities closest to the project. The communities facing the most risk, the chance of contamination directly upstream of their livelihoods, are the same communities that would be incurring the associated burden on their public services, and the overall economic losses associated with Idaho's environmental degradation, and irreversible loss of fish habitat.

I strongly disagree that the value of gold going into a Canadian mining company's pocket, outweighs the value of this intact natural resource to Idaho, and to the public, to which it belongs. What does Idaho stand to gain by relinquishing one of its coveted outdoor paradises to Canadian mining interests? What happens if Midas goes bankrupt prior to remediation? Who is going to treat the water in perpetuity if Midas cannot afford to? Who will ultimately burden the cost of environmental remediation in the future if Midas does not? History has shown that Canadian mining companies do not necessarily have US waterways' best interest in mind. Please take a moment to learn about the situation with the Tulsequah Chief Mine in British Columbia, while not entirely parallel situations, it demonstrates the potential environmental consequences of bankrupt Canadian mining companies' impact from upstream on one the premier salmon fisheries of the world, the Taku River, in Alaska (riverswithoutborders.org, dnr.alaska.gov).

The South Fork Salmon River is finally healing from the scars of past mining activity, and the impacts of expanded mining activity represents an unacceptable risk to this watershed. The area not only holds a special place in the heart of many outdoor enthusiasts; it represents a dominant part of the economic viability and healthy lifestyle of surrounding communities. These are values that should be preserved in perpetuity and not sacrificed for short-term gain.

Thank you for your consideration.

Jo Kemper