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Comments: I grew up in Idaho. My first trip back to Stibnite was in 1978. Since then I have made many trips back to there and surrounding areas with friends and family. We have stood with our kids and stared in wonder at the Indian gum trees along the South Fork and hid in Indian hunting blinds to see what it was like. I cooked at the Sunnyside Mine, on the other side of Monumental Summit from Stibnite. I packed and cooked for an outfitter up Sugar Creek, Tamarack Creek and Bum Creek. I have planted trees near the confluence of the Secesh and the South Fork and did two seasons of timber stand exams in the SFSR watershed. Just from time spent in the area I feel like I have a lot of basic knowledge of the land surrounding Stibnite. I have many concerns about the redevelopment and expansion of the mine at Stibnite.

The land in question has been home to the Nez Perce for thousands of years. They did not willingly give up their ancestral home and hunting and gathering grounds. They are asking for this land to be respected in such a way as to let the salmon return. The indigenous peoples recognize that all things are connected. A large scale mine, with its heavy equipment, blasting, dangerous chemicals, intensive water use, and endless possibilities for human error will have significant negative impacts on water and fish for the twenty-year duration of the mine and probably for hundreds of years after.

Nearly 58% of the new development of the proposed mine will be on previously undisturbed ground as cited in Stibnite Gold Project table ES-3. This does not include an 8-mile swath of new power line that will be cut and visible from far off, or any of the disturbance along the 42 miles of existing powerline that will need to be upgraded. No estimate has been made of the number of old growth trees that will be cut and removed for the power line. It does not include the 17 miles of new road construction that is being considered by joining the Burntlog road with the old road that comes down Meadow Creek into Stibnite. Fourteen of these road miles will cut through an inventoried roadless area. This area, in my opinion, should be off limits to commercial mining interests. The area is directly adjacent to the Frank Church river of No Return Wilderness and would encourage a flow of recreation traffic along with over 30 oversized daily truckloads of explosive gasoline, toxic chemicals and other mining and general supplies. (Star News Oct 8, 2020) Over 700 acres of SGP will be within inventoried roadless areas. This is a lot of new disturbance on public land for the benefit of a few.

#### Vegetation Concerns

Depending on the alternative chosen approximately 600 - 1000 mature (old growth) whitebark pines will be cut (SGP ES 4-1) The Payette Forest Plan,(which was not available on the Payette Forest website at the time of this writing), cites several times the need to protect whitebark pine habitat and encourage conditions that will promote their regeneration. The USFS Intermountain Region classifies whitebark pines as sensitive species which means population viability is a concern. (USFS). 'Sensitive species of native plant and animal species must receive special management emphasis to ensure their viability.' (Interagency Special Status USFS). Whitebark pines are also US Endangered Species Act Candidates. The SGP does not mention any mitigation for the removal of up to 1000 of these old growth trees and the destruction of their habitat. How does the USFS find this consistent with their stated need to protect and encourage the well-being of this species?

Whitebark pines are keystone species in their high elevation, dry and windy habitats. They protect watersheds by regulating snowmelt runoff and their roots stabilize rocky and poorly developed soils, preventing soil erosion. (USF&W) They are essential food sources for high elevation birds and mammals. These whitebark pines are likely 500 years old or more. Their removal will fragment the whitebark pine habitat in the area, disrupting food source and cover for all plants, birds and animals that depend on them. Once removed, they will not return in our lifetimes.

The SGP would impact known occurrences of sensitive and forest watch plant species. (SGP ES 4-1) As one

example, the bent leaf milk vetch occurs in the mining area at high elevations on exposed sites. The plants are not prolific seed producers, one tiny pod containing only one seed, and their numbers are relatively small. No one really knows if plants like these could be re-established if their habitat was destroyed. Fourteen other possible sensitive plant species are mentioned in SGP Appendix H as being potentially located within the project boundaries. No specific plans were stated to protect these plants if found. No surveys have been done to document occurrences of these plants. And again, no one knows how successful seed collection or propagation would be to preserve local populations. SGP Appendix D, FS-6 states that opportunities will be considered for protection or enhancement of culturally significant plants that are known by the Tribes to exist within the mining area. What might some of those protection measures be? This offers no assurance that any protection will happen. If part of the USFS definition of a sensitive species is that the population viability is a concern, how is the destruction of the plants and their habitat consistent with this concern?

Fragmentation and destruction of wetland areas will occur on the mine site. Wetlands take years to establish and are critical to the health of the water systems they surround. There could be over 100 road crossing of wetlands and up to 170 acres of wetlands lost.

SGP wants to prevent the establishment and spread of noxious weeds. Reviewing the maps, there are miles and miles of at least ten species of already established noxious weeds along the access roads to the mine site. If the spread of weeds has not been stopped so far, how will more of the same prevention measures make a significant difference in the future? What will prevent the drift of weeds and weed seeds over into the Frank Church River of No Return Wilderness if the Burntlog route is established? Seeds of these weeds can remain viable in the soil for over 10 years. Drift from trying to spray these established weeds would go directly into the waterways. It is exceedingly difficult to get rid of noxious weeds once they have taken root and they will readily spread to any newly disturbed sites. Annual spraying of noxious weeds for the duration of the mining project will not eliminate of any of these non-native invasive species. No specifics are given as to the effectiveness of washing equipment to spread the weeds to new areas. No long-term plan for weed control is mentioned. The Valley County website sums up the effects of noxious weeds by saying that they degrade wildlife habitat, choke streams and waterways, crowd out beneficial native plants, are more susceptible to wildfire and may signal the decline of entire ecological sites. Quoting from the Payette Forest resource management page on their website, "Noxious weed infestations pose a serious threat to the diversity, integrity, and health of the plant communities in the Payette National Forest, which in turn can have negative impacts on recreational experiences, timberlands, wildlife/fisheries habitat, and watershed stability." SGP's plan to address noxious weeds is not aggressive enough or long term enough to adequately address the problem.

#### Water Concerns

The amount of water needed for mining operations far exceeds the amount for which Midas currently hold permits. Stibnite is in a seasonally very dry region. Looking over the figures in Table ES 4.1, one can easily see that the groundwater needed to support ore processing will be more than 4 times more than Midas is currently permitted for and potable water demands from groundwater will be one and a half times more than currently permitted. Table ES 4.1 also states that during drought conditions, (which is usually the prevalent condition during summer and early fall), the groundwater need will increase to over 8 times the amount currently permitted by Midas. This is a significant discrepancy in amount needed compared to amount currently permitted. How will this be addressed? Is there even enough water at all? Water flow in Meadow Creek is expected to be reduced by 45% during mining and up to 100% in the early post closure period. To restate the obvious, mining operations will likely cause Meadow Creek to go dry, at least for a period of time. Surface water temperatures will rise because the water is shallow. Mining water use will also greatly deplete the aquifers. Table ES 4.1 states that there is a good chance that the groundwater in the alluvial aquifers may recover in 10 years after mining is finished, but there is less confidence about the overall recovery of the bedrock aquifer. All this is to say that the intensive use of water for mining is going to have a negative impact on water availability in this already very dry area. This loss of water over a twenty to thirty-year period will limit plant growth, cause some plants to die out altogether and harm and kill fish and their aquatic ecosystems.

I have concerns about piling the spent tailings and development rock on top of any drainage. Liners could leak, dams could fail. A 400 ft tall dam is enormous. This is not good use of public land. Earthquakes do occur in central Idaho. Have any dry site storage areas been considered?

Midas may have good intentions to make an effort to clean up past mining chemicals seeping into the water, but the vast amount of toxic chemicals that will be hauled in, used, and left on the site far exceeds the amount of chemicals left behind from past mining operations. . The impact of 500 people living year-round at the mine site will be enormous. Discharging the human waste into the EFSFSR from that many people over a 20-year period, even treated waste, will change the nature of the clear pools along the river as it is now. The exponential increase in traffic from the mining operation will have myriads of opportunities to degrade the water quality and cause harm to the fish in the rivers the access roads follow, both backcountry roads and major highways. The land of a high elevation, dry site does not quickly recover. The waters of the EFSFSR may never recover fully. The value of an intact, clean environment in the long run, will be greater than any short-term benefits to the local economy. The risks to the fish, the clean water are too great. This is not a good place for a large-scale open pit mine.