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First name: Scott

Last name: Keithley

Organization:

Title:

Comments: My name is Scott Keithley and I would like to comment on the DEIS for the Stibnite Gold Project(SGP)

I have lived here in Idaho for for 35 years and do not plan on ever leaving. This state offers so much opportunity to experience nature as untouched as it can be, that I am so fortunate to be able to live here. This SGP has threatened some area that I consider some of the most pristine, and important to humankind and our fish and wildlife. I have a deep connection to the land in the South Fork of the Salmon River(SFSR) drainage. I have recreated here with my family for over half my life(35 Yrs). I feel part of this landscape, and it means everything to me. My family built a cabin on the SFSR at trails end subdivision in 1990, and we still use it regularly today as an escape from our troubled world. I am not Native American, but feel their connection to the land that has given them life for many, many generations. I am not necessarily against any mining, but feel if it is done right that we can accept it as a necessary part of the human condition. I am concerned though that any mine site I've visited looks more like a moonscape than the way the ground looked before the mineral extraction happened.

One of my favorite areas to recreate is the area where the new haul/ access road is proposed. This area has near wilderness character, and is adjacent to the Frank Church River of No Return Wilderness. I've personally seen wolverines here as well as most other wildlife you could observe in our area. This area is also in an area that is in inventoried roadless area according to the states designation. I believe that putting a new road (might as well be a freeway) here is the most irresponsible part of this whole project. This land is unlike anything else I've come across in this whole area. It has rough access, which keeps a lot of people from using it, but gets you close enough to wonderful resources such as high mountain lakes, that you can take young kids there without an epic hike.

The only alternative that addresses the use of Johnson Creek Road as a option is Alt. #4. Rebuilding this road to a wider, safer access to the mine seems like something that should be in every alternative as an option. This road has been used to access the mine for the last two mining operations there that span 70+ years. Somehow it has been adequate for this many years.

The area where the proposed new access road is located has seen a huge increase in tourism as far as I have witnessed, over the years I have recreated there. I have witnessed 4wd's, UTV's, ATV's, motorcycles, hikers, hunter's, fisherman, campers, wildlife viewer's, and others. The DEIS has got outdated info from 2010 about the recreation that occurs in this area. This area needs to be protected to ensure it's there for future generations. The short term use by the SGP does not justify destroying the pristine character of this piece of land, for a limited timespan that will change the character of this land for many generations. This is a priceless piece of the forest that needs protected. I believe it is against everything in the USFS policy to allow the degradation of this resource when an existing roadway is already in place.

The other aspect of these two road alternatives is that the existing Johnson creek road is low elevation and much more snow free than the Burnt Log route. The high elevation route will require avalanche control and much more plowing, which will increase the greenhouse gas emissions exponentially for the project.

When looking at the alternatives it seems that there are no modeled predictions for Alt.s 3&4. Section 1502.14 of NEPA says the agency must rigorously explore and objectively evaluate all reasonable alternatives and devote substantial treatment to each alternative. There are some adverse impacts in the DEIS on these alternatives and no mitigations offered.

My next major concern has to do with the Mine site that SGP proposes. I believe that the USFS has the responsibility to not degrade public land that is currently undisturbed. Upper Meadow Creek should be left as is and not used as a tailings storage area. Wherever there is stream bed that has not been previously destroyed, we should try and protect the best and then restore the rest. The waterways are very important to the fish and to the future water quality and we need to protect these wherever possible. Over half of the proposed mine footprint is on undisturbed ground. This is unacceptable in the scope of what the USFS needs to do to protect the land for the greater good of the public. The East fork of the South Fork of the Salmon River (EFSFR) is an important

stream to many migratory and protected fish. What happens in the mining process and the years thereafter mean everything to these fish. The USFS has an obligation to make sure that there is no loss of habitat for these protected species. This seems to be not be the case in the DEIS as both loss of habitat, increased stream temps, sediment, dewatering, change in water chemistry and toxic metal contamination seem to be the accepted part of the result of mineral extraction. I believe that in this day and age we can do better than this and I think the USFS has to make sure that the mining is done without compromising the fish, as they have no voice in this matter. The Payette and Boise forests do not allow new surface stream diversions unless they provide upstream and downstream fish passage (DEIS appendix A). SGP has proposed to suspend this requirement. This is not good for the future of these protected fish (Salmon, Steelhead, Bulltrout). There should be no exceptions to the current forest plan unless the whole forest plan is changed. The plan is in place to protect the resources that the USFS is obligated to oversee and not micromanage to make it fit what a mining company wants or needs to make their operation more profitable. The stream temps that are projected in the DEIS show increased temps in all alternatives around the mine site. These temps are detrimental to the fish especially the ones going through or living in the area during summer and early fall when the temps are the highest, and these are not taking into account climate change which will undoubtedly make them higher. The change in water chemistry predicted will most likely hurt the fish also. The fish tunnel proposed is also not proven and is not assured to be a good solution for fish passage (DEIS apx J3P.6). I think the project needs to be looked at with a vision of not affecting the fish, instead of what loss can we tolerate of these protected fish.

I have a cabin downstream on the South Fork of the Salmon river. I have a domestic water right on the river, and filter water from the river all winter when I stay there. I have a concern with metals arsenic, antimony, mercury, and others that will be in the discharge water from the mine site. Chapter 4.8.8.2.3 has an opinion that it is "unrealistic" to bring the water quality up to a standard that is better than what currently exists at the mine site. This means to me that it will be worse. How much worse? I'm concerned with the need to have to treat the outflow water from the site for many years, maybe for 100 years? This seems unacceptable to me, what if gold prices go down and Midas is forced to close the project down, what then? Who will take care of the water treatment? So there is a bond, how long will that last? Who is next in line to take care of the water? How much will it cost? What if no one can, will the water go through untreated?. What will the contamination levels be? Will they kill fish? How about humans? How far downstream will it be deadly? I think with this many unanswered questions that the need to contain toxic water has to happen at the mine site and do not allow it to enter the waterways. Maybe the size and scope of the extraction of ore needs to be modified to ensure that the water is not polluted. Midas will not be there to fix the problem when the gold is gone, so it needs to be addressed throughout the mining process at whatever cost. I have to believe there is a way to get the gold out of the ground and not pollute the pristine waters of the Salmon River Drainage.

The next concern I have is air pollution. Studies show dust from the site during extraction could drift into the Middle Fork drainage, or various sub-drainages. This could be toxic and what levels could be expected? This doesn't seem to be answered in the DEIS, only that it will exist and not to what degree. With climate change upon us another concern is the CO2 emissions. S&P Global put out a report saying that in 2019 for every ounce of gold produced that .8 tonnes of CO2 were released into the atmosphere. This level of output would increase Valley county's emissions by 800%. This is a slap in the face to those of us that are trying to reduce our carbon footprint and breathe the clean air we moved here for. The DEIS does not mention anyway to mitigate these huge increases in our area. Midas says they will use some solar power and grid power to help, but to what degree will this achieve?

My last concern is the effect on our community. How much will Midas contribute to fix the problems the increased population and traffic will cause? Roadways will need improvements in many areas to be safe for the increased traffic volume. Housing for working class is already in an extreme shortage for something affordable. Local businesses cannot find enough help to satisfy their current needs. The schools will be pushed to their limits to accomadate the short term (15 Years) influx of mine workers kids. How much will Idaho power increase our electric rate in order to provide power to Midas Gold in the quantity they require. How will this large scale operation effect our whole way of life in Valley County? I moved here because of the quality of life , not to get rich quick and move on to the next big moneymaker. I plan to spend the rest of my life here and want to see slow steady growth, not the boom and bust that is usually associated with gold mining.

In closing, I myself or any other individual do not have the authority to grant Midas Gold permission to mine or not mine. The mining act of the 1800's is powerful and needs revision to bring it into the current world we live in, with the environmental challenges that exist today. We have to depend on the USFS to do the right thing and protect the land, the fish, the wildlife, the water, and us humans that call this place home. Please make sure that Midas does what ever is needed to extract minerals on the Stibnite site in a safe way that doesn't degrade the precious part of this planet we call home. The governing agencies need to leave politics out of the decision making process and let the best practices available dictate what is done on this sensitive piece of real estate. Thank you for allowing me to comment on this most significant project.