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Organization:

Title:

Comments: To whom it may concern:

I write to you today to submit comment on the Stibnite Gold Project DEIS. This letter should be considered as substantive formal comment, defined as "within the scope of the proposal, having a direct relationship to the proposal, and including supporting reasons for the responsible official to consider" (36 CFR 219.62).

I am a stakeholder in this issue in the truest sense of the word. As a member of a multi-generational Idaho family, a river guide, a scientist and an educator, I understand this land and the impacts of this proposed project deeply and gravely. It is an absolute necessity that you support Alternative 5: the No Action Alternative at the end of the review period.

The Stibnite Project would do irreconcilable harm to endangered fish, watersheds, tourism, and indigenous resources in the great state of Idaho, not to mention the creation of possible downstream effects in the South Fork and Main Salmon rivers, the Snake and the Columbia. For the purposes of this letter I will focus on risks to fish and water quality.

The DEIS does an inadequate job of addressing all the aforementioned issues. According to Alternative 2 (Midas Gold's proposal) of the DEIS, this project would destroy 20.8% of Chinook salmon critical habitat and 27.5% of bull trout critical habitat in the analysis area. These are unacceptable losses for these already endangered fish. All Action Alternatives in the DEIS would destroy and adversely modify the critical habitat of Chinook salmon, steelhead, and bull trout. The USFS itself has publicly designated the South Fork of the Salmon as critical Chinook habitat and states that "Within critical habitat, an agency (the USFS) must avoid actions that destroy or adversely modify that critical habitat." The DEIS states that the USFS has determined that Alternative 2 would negatively impact bull trout (p. 4.12-87), Chinook (p. 4.12-69), steelhead (4.12-75) and Westslope cutthroat trout (p.4.12-93). To approve this Alternative would be negligent of the USFS.

The DEIS also does not adequately address the true risk of chemical contamination to land and water. Various studies including Gestring & Hadder (2017) have indicated that close to 100% of operational gold mines in the United States have had "at least one pipeline spill or other accidental release." Other releases might include industrial acids and cyanide. The estimated potential load of toxic waste totals 446 million tons or more with the potential to impact more than 70 sensitive waterways through transport and spills.

The plan's attempts to predict even "best case" water quality outcomes are lacking. Chapter 4.8.8.2.1.3 identifies the omission of critical fault and fracture modeling on groundwater quality with the addition of mining operations. Additionally, the plan would require the treatment of surface water "in perpetuity" to meet quality standards. However, the modeling only extends to 100 years, a time point selected without substantiation to signal the end of presumed contamination. Idaho is the fastest growing state in the nation (census.gov, 2020) and our needs for clean water will only continue to increase as population grows.

As indicated in the DEIS, the Stibnite Project would impact 3,500 acres of federal, state, and private lands in Valley County, my home. I remain deeply concerned for the future of the important fish and hardworking people in Idaho. In the end, the DEIS indicated that the project poses too many risks that go unaddressed by all Alternatives except Alternative 5. Please consider the future of our state and stop the Stibnite Gold Project from going forward with any of the current proposals.

Sincerely,

Hallie Holland