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Comments:

I am an outdoor recreation guide. I have guided wilderness river, fishing, hunting, and backpacking trips in my career. My livelihood, along with thousands of other Idahoans, relies on the outdoor recreation economy, an economy whose foundation is a healthy environment. People choose to recreate in Idaho because of its large tracts of pristine wild lands and wild rivers. Salmon River and its tributaries are unique. It is one of our last large, free flowing watersheds and is critical habitat to endangered fish. As a stakeholder passionate about our lands, rivers, and the species dependent upon them, I urge you to take a closer look at the proposed Stibnite Gold Project. I urge you to support Alternative 5: the No Action Alternative. Idaho rivers and our outdoor recreation economy are worth far more than gold!

The Stibnite Gold Project, and all Action Alternatives in the DEIS, would cause undue harm to ESA listed fish, the irreplaceable recreational values of the region, and indigenous resources. The East Fork/South Fork of the Salmon River provides critical habitat for 3 Endangered Species Act listed fish species: chinook salmon, steelhead, and bull trout. We have seen declining numbers in steelhead and chinook returns over the past years. Now is not the time to compromise any viable habitat these ESA fish have left. According to the USFS website, the South Fork of the Salmon is designated as critical chinook salmon habitat. "Within critical habitat, an agency must avoid actions that destroy or adversely modify that critical habitat." I hold the USFS accountable to follow their own rules and regulations!

The Stibnite Gold Project would significantly modify this critical habitat for chinook (and steelhead and bull trout). 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 and I urge you to protect them. All Action Alternatives in the DEIS would destroy and adversely modify the critical habitat of chinook salmon, steelhead, and bull trout.

The impacts of the Stibnite Gold Project would extend beyond fish, however. The looming risks of large-scale mining include acid mine drainage, tailings dam failures, and cyanide spills. Possibilities of contamination from mining activities, which will create 446 million tons of potential acid generating and/or metal leaching materials and 161,095 sq. meters of open pit walls is too risky. Additionally, mine access roads would cross 71 different streams, exposing each stream to the risk of hazardous material spills and increased sedimentation. Creeks and streams on or near the site already have high levels of arsenic from legacy mining impacts. Reopening would lead to more arsenic, mercury and other heavy metals being released into Idaho rivers. The potential for a major leak or contamination event would lead to river water quality compromises locally, but also regionally. Stibnite is located near the headwaters of the South Fork of the Salmon River. Therefore, if there were to be a cataclysmic contamination event, the repercussions would extend to Riggins, Lewiston and beyond. The downstream communities are dependent upon the Salmon River for their economies, and any actions that could compromise livelihoods should be considered dangerous.

Take the Summitville Mine disaster for example. This was a Canadian-based company who used gold cyanidation process to extract gold which resulted in 610,000 m<sup>3</sup> of stored toxic water. Following the company's bankruptcy, the US government spent over \$155 million to clean the site. I guided on the Pigeon River in Tennessee for one summer. This is a perfect example, although tragic, of how allowing the industrial contamination of waterways negatively affects recreation. Guiding on this toxic river sent me to the hospital more than once with MRSA infections and debilitating ear infections. Locals no longer fish from the river and thousands of dollars have been needed for ongoing clean up and restoration projects. Clean water and access to it is becoming a thing of the past as more large-scale mining and industrial projects are being approved without

proper evaluation of the possible risks. Please, I urge you to take a closer look at the proposed Stibnite Gold Project.

The South Fork Salmon River (and the East Fork South Fork) represent something special to citizens in Idaho and far beyond. Whitewater paddlers and anglers travel from around the world to enjoy this irreplaceable river. Anyone who has been in the Salmon River watershed knows what a special, unique place this is. Downstream from the mine site, the South Fork is suitable for Wild & Scenic designation. In addition to restricted tribal and recreational access in the 3,423 acre mine footprint and 13,446 acres of public land within the Operations Area Boundary for 20 years, unforeseen circumstances (mine or dam failures, contamination, etc.) could jeopardize even more river miles and recreational opportunities downstream. Idaho relies on outdoor recreation/tourism as a foundation of its economy. Any sort of contamination could end the thriving outdoor recreation economy that relies on the Salmon River and its tributaries. Twenty years of mining jobs and the greed of a Canadian mining company is NOT worth more than the values that everyday Idahoans like me hold dear.

Please do the responsible thing and stop the Stibnite Mine Project. We need your leadership now more than ever!