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Comments: As an outdoor industry professional, whitewater kayaker, and neighboring Oregonian who often spends time and dollars in Idaho, I am writing to support Alternative 5, the No Action Alternative outlined in the Stibnite Gold Project's Draft Environmental Impact Statement (DEIS). I am lucky enough to have paddled the East Fork of the South Fork Salmon into the South Fork Salmon, and my personal connection to the river calls me to point out the weaknesses in the Stibnite Gold Project.

I feel that the Midas Gold Stibnite Mine proposal is lacking in due diligence and analysis of all factors. Here are a few points of concern from the DEIS:

\*The United States government does not consider gold a strategic or critical mineral, so the Stibnite Gold Project hinges on the potential production of antimony. But antimony is common in mines all over the US, and a new mine isn't needed to extract this material. Also, due to a lack of domestic refinement capacity in the US, mined antimony would need to be shipped internationally to be processed, rendering claims of antimony as a national security interest baseless.

\*The project will adversely impact groundwater, which will then impact surface water, which will then impact aquatic ecosystems. Modeling in the DEIS shows that arsenic, antimony, mercury, and other metals will contaminate the water even after the mine closes. There are flaws in the modeling that fail to acknowledge the area's faults and fracture zones, as well as the assumption that the company mining the site will continue to support treatment of the surface water in perpetuity via a trust fund to support costs.

\*Over half of the mine footprint is held within a previously undisturbed habitat. This is inconsistent with the claims of restoration.

\*The DEIS indicates that the Forest Service has determined that the project will adversely affect bull trout, Chinook salmon, steelhead, and potentially Westslope cutthroat trout. These special status native salmonoids require cold, clear, clean water to complete their life cycles. The proposal includes significant loss of habitat for the bull trout and Chinook, as well as an increase in stream temperatures - both of these factors will lead to a decrease in quality and quantity of the fish. Elements of the proposal also fail to take into account holistic downstream effects of the mine, despite defining the "Fish Analysis Area" as including waters downstream.

\*The DEIS fails to outline a specific, detailed plan for handling hazardous materials and chemicals. How exactly with the hazardous waste be handled? Who will be responsible for the handling of this waste?

\*The proposal fails to analyze emissions impacts in a comprehensive way. There should be a deeper and more complete analysis of emissions and potential impacts to the climate.

\*How does the Stibnite mine impact the local tourism economy and recreation? The proposal should include more recent and relevant data to inform decision making. Idaho's recreation economy generates \$7.8 billion and supports 78,000 jobs - impacts on this industry are not negligible, and 79% of Idaho residents participate in outdoor recreation.

\*There are inconsistencies in the proposed amendments to the Forest Plan. When an amendment covers more than 15 years, it should be a plan level amendment, not a project specific amendment. Also, because some of the standards are tied into the endangered species act, the USFS does not have the authority to waive them.

\*The DEIS offers no proposed mitigation to the impacts of a population increase on Valley County, including local housing, public utilities, the McCall-Donnelly school system, telecommunications, and congestion to crucial road corridors.

\*The proposal fails to properly analyze spill risk of hazardous materials being transported along rivers including the Payette and Salmon and underestimates accident risk on the 75 miles of backcountry roads these materials must travel.

Taking the above concerns (and many others not mentioned) into consideration, it is clear that the DEIS fails to

account for the full scope of the project and its potential ramifications. The South Fork Salmon watershed and surrounding ecosystem are too precious to gamble with. Please protect our wild spaces and the South Fork Salmon.