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Organization:

Title:

Comments: To Whom it May Concern,

My name is Betsy Delph. I live and work in McCall now, but I have been lucky enough to live and work along the South Fork of the Salmon River, as well as a lookout high about the East Fork South Fork as a USFS employee. This area of the Stibnite Project in the upper East Fork South fork is important to me personally, but more significantly, is important to our region, and our region's economic, ecologic, and environmental health, as well as the viability of recreation, first nations' connections to the land, and the general integrity of the land. The impact on undisturbed habitat must be scrutinized more carefully. The impacts that the DEIS ought consider more closely are manifest, but I will choose here to focus on impacts to our native fish.

The stated intent is to ensure viable and resilient fish habitat in the East Fork of the South Fork, and the most assured method is to "protect the best and restore the rest." Over half of the mine footprint is in undisturbed habitat. The USFS must analyze an alternative to minimize the mine footprint that is contained only to previously disturbed areas.

SUGGESTIONS:

1. Don't put mining waste - new or old - or build new roads- in undisturbed habitat.
2. Don't conduct activities that are likely to mobilize additional arsenic such as blasting waste rock and grinding rock into tailings.
3. Don't bring millions of gallons of diesel fuel, cyanide and other chemicals to the site.
4. Do reconnect habitat, isolate historic mine waste from streams, and restore degraded riparian areas.

"The DEIS indicates that the Forest Service has preliminarily determined that project will adversely affect bull trout (pg. 4.12-87), Chinook salmon (pg. 4.12-69), steelhead (pg. 4.12-75), and their critical habitats; and may indirectly impact Westslope cutthroat trout (pg. 4.12-93)." DEIS p. 4.12-201, Table 4.12-66 "Comparison of Fish and Aquatic Resource Impacts by Alternative:" this table documents adverse effects to fish and, and yet it does not take into account additional, synergistic impacts that will occur downstream of the mine site.

It should, because Chapter 3 describes the "Fish Analysis Area" to include waters downstream of the mine. Downstream impacts are highly likely and predictable due to the effects of mine site increased temperatures and exceedences of sediment and chemicals such as mercury and arsenic.

This region, this state, and the Northwest are experiencing a collapse of our native fish runs, and we are also purportedly deeply invested in supporting the recovery of these runs. Please take extra special consideration of the undeniable impacts of reopening mining in the East Fork South Fork, and take pains to mitigate every aspect: if it is not possible to mitigate these risks, weigh this properly, make the necessary decision.

Thank you for your consideration,

Elizabeth (Betsy) Delph