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Comments: Ms. Linda Jackson

Payette Forest Supervisor

McCall, Idaho

via email

Re: Stibnite Gold Project

I am writing to express my concern with the Stibnite Gold Draft Environmental Impact Statement (August 2020). The proposed mining project is a HUGE undertaking that will have irreversible impact on the environment, including wildlife habitat, water quality and scenic beauty. The project envisions the building of three massive open pit mines to extract gold and antimony for commercial gain by a Canadian company, Midas Gold. For an estimated 20 years, part of the Salmon river will be diverted to a tunnel with unknown impact on migratory fish such as chinook salmon. This project not only directly threatens the South Fork of the Salmon River but also downstream communities and will do irreversible damage to the surrounding forests and water quality. I appreciate the amount of work that has gone into the preparation of the Draft Statement but the Draft itself indicates a significant amount of information is missing (e.g., Table 4.1).

I found a recent Forest Service publication noteworthy:

Every August, since 1965, Payette National Forest fisheries personnel have sampled areas of the South Fork of the Salmon River to evaluate fine sediments within Chinook salmon spawning areas. Biologists are particularly interested in fine sediments (less than 6mm) because too much fine sediment can be detrimental to salmon and steelhead egg-to-fry survival. In the winter of 1964 - 1965, a rain-on-snow event took place in the upper South Fork of the Salmon River watershed. This event, in conjunction with the hundreds of miles of logging roads and the unstable granitic soils of the region, caused several very large landslides that delivered thousands of cubic feet of fine sediment into the south fork and very nearly wiped-out the river's Chinook salmon population.

As a result, a ban on logging within the south fork watershed was enacted and annual core sampling efforts were initiated. Fifty-five years later, the data set created by this sampling effort is one of the largest of any kind within the U.S. Forest Service and continues to guide management decisions on the Payette National Forest. Today, the levels of fine sediment in the South Fork of the Salmon River are very close to what they were prior to the 1960s and are in line with reference sites in the Frank Church-River of No Return Wilderness. This shows fisheries personnel that the methods being used in the area are working, providing a safe habitat for Chinook salmon.

It took fifty five years to recover from this event? And now we're going to stir it up again? To what extent has there been an evaluation of the potential effects of the Stibnite Gold project on water quality (and air and noise pollution) resulting from the increased dust generated from construction and expanding access roads, and the increased traffic? The instability of the region has been noticeable since the March 2020 6.5 earthquake and subsequent seismic activity. To what extent has this been factored into the stability of the tailings storage pond and the potential for leakage or spillage of the cyanide, arsenic and antimony expected to be present in the tailings from this mine?

So many unanswered questions. This planet is a finite resource. These lands and its inhabitants are sacred to tribal communities and these wild lands provide refuge and enrichment to many. Now more than ever it is imperative that a project of this magnitude and consequence should include a supplemental environmental

impact statement. Full and transparent information is needed for the public, and the Forest Service, to effectively evaluate the impact of this project and minimize any adverse environmental impacts. The mining community does not have a good track record and failure is costly. Can we afford that?

Please give due consideration to possible alternatives and full evaluation of the consequences, before its too late.

Thank you for your consideration.

Sincerely,