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Comments: As a stakeholder who uses and studies our public lands, rivers, and species professionally, I implore you to take public use and recreation into consideration for the proposed Stibnite Gold Project. As everyone is aware 2020 has been a challenging year for many due to civil unrest, diseases, and economic challenges. I was fortunate enough to visit the East Fork of the South Fork of the Salmon River for the first time in June 2020. Me and a good friend I haven,Äôt seen in many years travelled from Missouri, where I am getting my masters degree in fisheries biology, to Yellow Pine, Idaho. While traveling we spent hundreds if not thousands of dollars on fuel, food, housing, and fishing equipment. Most of this money was spent in small, rural communities in Idaho (e.g., Salmon, Riggins, Yellow Pine). Most people would find it bizarre that two young, unemployed people would spend so much time and money to go fishing. However, we were aware of the rare fishing opportunities that the EFSFSR offers to the public. Bull Trout, which have been extirpated from a large portion of their historic range, seem to thrive in the EFSFSR. I have pursued Bull Trout throughout much of their range, but never have I seen such high densities and large fish. The next week was spent enjoying the company of close friends, making new ones, enjoying the town of Yellow Pine, and the public land surrounding it. We were fortunate enough to catch many Bull Trout and see wild Chinook Salmon spawning. That is the first and only place I have seen Chinook Salmon. My friends first fish on a fly rod was a 27,Äù Bull Trout that is a memory neither of us will forget. He said that he wants to make going to the EFSFSR an annual event. The DEIS as written ignores public stakeholders,Äô loss to public lands and the impacts to the vibrant recreational economy in the area. The mine would 2,569 acres of public land that is FOR the people, not for foreign, private companies. 13,466 acres would be inaccessible to public stakeholders for many years, affecting the ability to recreate and pass on knowledge. Indigenous peoples will suffer from the inability to pass on traditions and cultural for many generations. Outdoor recreationists spend billions of dollars a year in Idaho (OIA 2020). Ignoring their rights to access and protect their public land would be an injustice to the United States Citizens as they entrust the Government to manage the land for the benefits of ALL people. The Stibnite Gold Mine as planned has direct negative impacts to 3 species of fish listed on the Endangered Species Act. Bull Trout, Chinook Salmon, and Steelhead all utilize the areas that will be permanently impacted by the Stibnite Gold Mine. These fish were placed on the ESA to be protected by the government, this includes protecting their habitat. ,ÄúSuch an act may include significant habitat modifcation or degradation where it actually kills or injures wildlife by signifcantly impairing essential behavioral patterns, including breeding, feeding, or sheltering (Endangered Species Act),Äù. Spawning habitat is critical for the successful recruitment of a species. Degradation to the access or quality of spawning habitat results in diminished fish stocks. The DEIS clearly states that spawning habitat and access to that habitat will be negatively altered. Chinook Salmon populations have been declining in Idaho for years. Dams and habitat degradation have limited the ability for these economically important fish to reach their spawning grounds. Without access to spawning grounds these fish cannot continue their life cycle. The South Fork Salmon River contains the most important remaining habitat for summer chinook salmon in the Columbia River basin. The fish were once the largest, most valuable segment of the world's largest runs of chinook salmon.,Äù (US Forest Service) ,Äú This statement alone implies that the South Fork Salmon River is irreplaceable and destroying 20.8% of critical habitat could have repercussions felt all the way throughout the Columbia basin. The juveniles born in the SFSR contribute to the entire Chinook Salmon fishery which creates jobs throughout the country and world. The National Marine Fisheries Service has designated critical habitat for chinook salmon. It includes all tributaries of the Salmon River presently or historically accessible to chinook salmon. This includes essentially the entire South Fork system. Within critical habitat, an agency must avoid actions that destroy or adversely modify that critical habitat.,Äù (US Forest Service) Salmon and Steelhead bring nutrients from the ocean to the SFSR where it becomes available to other animals and plants creating a healthy ecosystem. Steelhead are a highly sought after by fishermen and women. Like Chinook, they have declined throughout their range due to anthropogenic causes. The Steelhead fishery in Idaho used to be vibrant brining in millions of dollars every year. However, recent declines in populations have resulted in closures (e.g. Clearwater River, Snake River). This has extremely

negative impacts on the small towns that rely on health runs of fish for an economic boost. There are many Idahoans that either directly or indirectly rely on the health of the fisheries. The Steelhead that use the SFSR and the EFSFSR for reproduction are important to the economic and environmental health of the entire Colombia basin. Bull Trout are top level predators in the SFSR. Because of their predatory nature they help keep other fish populations in a healthy balance. Bull Trout populations have been declining throughout their historic range. Bull Trout require cold, clean, complex, and connected habitat to thrive. The SFSR and EFSFSR have this high-quality habitat for the Bull Trout. Bull Trout from the entire Columbia drainage benefit from having a stable source population such as that found in the EFSFSR. The DEIS states that 27.5% of Bull Trout spawning habitat will be lost. This is unacceptable and inexcusable damage for such an ecologically important species. Bull Trout are also heavily sought after and fly fishermen from all over, such as myself, come to target these fish. The DEIS also fails to mention effects on other aquatic species throughout the watershed. There are more biotic and abiotic interactions that need to be considered. Aquatic macroinvertebrates, other fishes, and allochthonous inputs all play Important roles in the health of the ecosystem. You cannot expect to change one part of an ecosystem without altering all aspects. Further investigation into the prey and forage base for the adult and juvenile fishes should be taken into account. Under the Stibnite Gold Mine plan habitat will be severely impacted. Besides habitat loss there will be effects throughout the SFSR watershed. Excessive traffic, new road construction, and heavy equipment can cause sedimentation in the stream causing low reproduction, loss of aquatic invertebrates and ultimately a decline is fish abundance. This can also cause distress on the terrestrial ecosystem causing habitat fragmentation and increases in edge habitat. Hunting is a culturally and economically important in Idaho. The area affected by the mine will have negative impacts not only on game animals but all fauna. The plan to keep the tailings and waste in the headwaters is extremely concerning. Open pit mines have caused huge economic and public health issues in the past. Keeping toxic materials such as cyanide in the head waters of the Columbia basin is not only concerning but negligent to the considerations of all people inhabiting and utilizing that water. As a West Virginian we still fight the legacy effects of acid mine drainage from hundreds of years ago. If the health and ecosystem damages aren,Äôt dissuasive enough, the economic impacts related to AMD are. AMD mitigation is expensive and perpetual issue. There is not a true fix to the damages caused by AMD only mitigation. If the mine were to fail there would be irreversible and persistent ecological, economical, and public health issues. The South Fork Salmon River (and the East Fork South Fork) represent something special to citizens in Idaho and beyond. Whitewater paddlers and anglers travel from around the world to enjoy this irreplaceable river. 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. I don,Äôt think there is a single person that can justly say that this project will not have any negative ecological impacts. This area is pristine and irreplaceable. Any negative impacts to the fish and biota are direct infringements upon the rights of public land owners and the Endangered Species Act. It is important habitat for 4 species of concern 3 of which are on the ESA. We should be doing everything in our power to ensure that these species and the public land is there for many generations to enjoy. Indigenous peoples use this land to carry out traditions that have been occurring for thousands of years. Public landowners have a right to say how this land should be used. If we cannot trust our government to protect these critical and sensitive places, then how can we trust them to protect the rest of our land. NO MINE.