

Data Submitted (UTC 11): 10/29/2020 3:54:14 AM

First name: Lauren

Last name: Druash

Organization:

Title:

Comments: Dear USFS,

As a sportswoman and outdoor enthusiast with a background in Environmental Biology and a career in conservation, I am deeply concerned about the Stibnite Gold Project. The only course of action that would not negatively impact wildlife, ESA listed fish species, indigenous community treaty rights, and Idaho's vital recreation industry is 'no action'.

Part of the justification for this mine project is the production of antimony. The mine (comparatively to gold) would be an extremely small amount. Due to a lack of domestic production and refinement facilities, the antimony would be shipped out of the country, making it no longer an affordable, viable domestic source.

The DEIS failed to adequately evaluate several factors, including, but not limited to, the following: Impacts of water contamination due to geochemical reactions from mine operations of surface water, aquatic life, ground water, and waterfowl; impacts of noise, habitat destruction, light pollution on wolverines within the Operations Boundary, which are a protected species; noise pollution and light pollution impacts on migratory wildlife due to activity within the operation boundary; impacts on the recreation industry (a \$7.8 million dollar industry, that provides countless jobs and supports entire towns) due to water contamination temperature alterations to water, and noise/light pollution; impacts to the recreation, outfitting, and guiding industry that operates within and adjacent to the operations boundary; impacts of the Burnt Log Road development and increased traffic on the environment (water, erosion, etc) and wildlife in terms of movement, habitat fragmentation, and migration; impacts of accidental spills and traffic crossing 71 individual streams to and from the mine site; adequately modeling impacts on water quality due to fractures and faults within the mine area; the impacts of spills of hazardous materials during transit along the Burnt Log Road route that would contaminate water and soil; impacts and mitigation of seismic activity on the mine site, tailings facility, tailings retention efforts, and the Burnt Log Road; Impacts and mitigation of avalanche impacts on the mine site, tailings facility, tailings dam, and Burnt Log Road.

Predictions and results for alt. 3 & 4 are not modeled, which is a failure of disclosure of the comparative effects of the alternatives. This does not provide adequate information for an accurate comparison. This is a violation of NEPA, which requires that substantial treatment be given to each alternative, as well as mitigation measures, which alt 3 and 4 lack.

In regards to ESA listed Chinook salmon, all Action Alternatives in the DEIS would destroy and adversely modify the critical habitat of chinook salmon, steelhead, and bull trout. The DEIS recognizes that although fish passage would be 'theoretically' restored to the area above the mine site (via an unscientifically founded assumption that fish will migrate via a tunneled river), the water temperature will be too warm for Chinook salmon to utilize. These issues are not adequately mitigated within the DEIS, which is not acceptable for ESA listed species. Alternative 2 (Midas Gold's proposal) states that this project would destroy 20.8% of chinook salmon critical habitat and 27.5% of bull trout critical habitat in the analysis area - an unacceptable loss for ESA listed species. Additionally, the Salmon River is a vital river for Idaho's salmon recovery goals. A leak, spill, or tailings dam failure could have tremendous impacts on salmon runs and could decimate Idaho's salmon recovery efforts. Mitigation for this has not been adequately evaluated in the DEIS.

Acid mine drainage, tailings dams failures, and cyanide spills are all realities of large-scale, open-pit gold mines. With the production of 446 million tons of potentially acid generating and/or metal leaching materials and 161,095 sq. meters of open pit walls, the risk of contamination from mining activities is extremely high.

More than anything, I want to see this area restored (as the Nez Perce Tribe was adequately doing before Midas Gold acquired the site). Recently, one of my closest friends hunted for the first time on the public land adjacent to the site, successfully taking his first elk. Unfortunately, the area where he has spent countless nights camping, and where he successfully had his first hunt, will no longer be accessible. He will never be able to take his kids to the spot where he discovered and fell in love with hunting. Personally, I learned to fly fish just a few miles downstream from the site. I have been so excited to think of bringing some of my closest friends to the same spots I learned to cast for the first time while camping near the SF Salmon - only to realize that within a few years, the road may be heavily trafficked, noisy, and suffer the impacts of erosion and runoff. This was also the place that I went to observe the Neowise comet, as it is one of the very few areas left in this world where light pollution doesn't hide the stars and night sky. If the mine site is developed, it will simply be one more place where light pollution is an issue.

The area surrounding and downstream from the Stibnite Mine area is an incredibly special and unique area. It is wild, pristine, quiet. There are so few places like this left in this world. This incredibly special place becoming the operations area for the 7th largest gold mine in the US is unthinkable. Gold can be recycled, reused, and is only truly valuable to humans and for human use. Our wild, pristine places are valuable to everything that lives there - from bull trout to elk, to wolves, bears, wolverines, and deer. Resource extraction is a necessary aspect of human society at this point, but there are places where resource extraction is not appropriate. The Stibnite Mine area is one of them - especially for a Canadian company with a strategically placed PR firm in Idaho.

The damage that Midas Gold will inflict is irreversible - even if they complete their 'supposed' restoration work, there will still be unrepairable damage as shown in the DEIS. In all likelihood, Midas Gold will not complete the restoration work - like so many other companies that attempt to use financial guarantees as a promise of future restoration work, they will probably declare bankruptcy once they have fully used the site, leaving them 'incapable' of restoring the area. Taxpayers will be left with the bill.

I urge you to protect this incredibly special, unique, and valuable place. Our wildlife, forests, lands, and sportsmen are relying on the USFS to protect their irreplaceable natural lands and resources.