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First name: Kaz
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Organization:
Title:
Comments: Payette National Forest Supervisor
Linda Jackson
500 Mission St., Building 2
McCall, ID 83638

Dear Linda,

My name is Kaz Thea and I have been a professional Wildlife Biologist for more than 30 years. I have lived in Hailey, Idaho for 24 years. I graduated from the University of Idaho with a masters in natural science (MNS) and worked for the US Fish and Wildlife Service for 10 years, worked for an environmental advocacy organization for several years and was an environmental consultant for 8 years. As a resident of Hailey, the Salmon River headwaters is in my backyard. I hike along it, paddle the river and go on our own private family river trips every year. It is one of the few remaining undammed rivers in the lower 48 states and we are lucky enough to have salmon swim the gauntlet through the Columbia and Snake river dams through the entire length of the undammed Salmon River to spawn in its headwaters in the Sawtooth valley over 900 miles from the Ocean. The entire 400+ miles of Salmon River corridor including all its tributaries are healthy with some of the best recreational opportunities and fishing experiences in this country. I choose to live in more natural wild places and recreate in nature because it enriches my soul and rejuvenates me. I am passionate about clean water, healthy fish and wildlife resources, and the protection of land and water. Mining a major tributary, the South Fork of the Salmon River will destroy the health of this river, will impact the opportunity to kayak and fish the river. It must be protected and the Stibnite mine should not be allowed to move forward.

I urge you to take a closer look at the proposed Stibnite Gold Project. The DEIS is
lacking critical analysis and sufficient alternatives for the public to weigh in, the Forest Service must submit a supplemental EIS to address these issues. I urge you to support Alternative 5, the No Action Alternative! Idaho rivers and our outdoor recreation economy are worth far more than any gold that is recovered from the Stibnite mine the risk and permanent damage to the surrounding area is just too great! In my 25 years as a resident of Idaho I have advocated for the protection of natural resources as a biologist, a river recreationist, and a mother of a passionate river runner. I have a few more detailed comments in opposition to the Stibnite Gold Project and the impact area of the project as follows:

Problems with the Process
The DEIS is a very large intimidating document even for a person like myself who has experience reading and making sense of these types of documents. This DEIS is definitely not in a form that is easily interpreted by the genera public. How can you possibly expect anyone who doesn't have expertise understand this lengthy, complex document and attempt to submit an informed comment? We have not been provided with enough time to understand and analyze the details let alone provide substantial comments. Please extend the deadline, allow people who do not have the expertise adequate time gain the knowledge and understand the process to respond to this important DEIS about the future of our public lands. The Stibnite Mine Project, and all the Action Alternatives of this DEIS, would cause irreparable harm to ESA listed salmonid fish species, would cause huge impacts to the irreplaceable recreational values of the region, and to indigenous resources. The Forest Service should be very concerned about the impacts on natural resources impacted by this project and its impacts to Fish and Wildlife species. I have in-depth experience with mining impacts and have written extensive biological opinions when I worked for FWS. This document has in no way proved that resources will not be impacted.

Purpose and Need

The Stibnite gold project is not a strategically important mine and I find it disingenuous and unconvincing for Midas Gold to suggest this is an important project over the great risk of significant adverse impacts. At what level of risk should people of the United States who own these federally managed Forest Service lands accept a gold mine project when it is likely to forever impact the area. Mining is a boom and bust type of economy and business, which does not provide stable work for people in the long term. I am NOT convinced there is a need for more gold and I certainly am NOT convinced this DEIS proves there is a need to mine for gold at the Stibnite Project. The chances of failure are real, the adverse impacts would last forever. Many modern mining projects have accidental spills due from tailing dam failures or operational issues, placing everything downstream at risk. Midas Gold intends to nearly triple the footprint of the historic mine area, using three open-pit mines and cyanide leaching to extract gold and antimony in the headwaters of one of Idaho's most iconic waterways, the Salmon River. The footprint changes the entire makeup of the associated uplands that today are mostly intact and healthy and will impact access to valuable critical habitat, recreational resources and forever change the character of the place. The various treatments associated with each of the alternatives only changes some of the impacts by degrees but all the alternatives will adversely impact the area other than the No Action Alternative. The DEIS does not give enough weight to Alternatives 3 & 4, therefore it seems as though your mind is already made up. In section 1502.14 of NEPA Regulations it requires that the agency must "rigorously explore and objectively evaluate all reasonable alternatives" and "devote substantial treatment to each alternative." In addition, regulations require "appropriate mitigation measures" be included. From what I can tell, alternatives 3 & 4 were not looked at with the same level of rigor nor evaluated to the standards required by NEPA. In many sections of the DEIS, there are "adverse impacts" mentioned and NO mitigation measures to reduce those impacts. The possible risks of large-scale mining include acid mine drainage, tailings dam failures, and cyanide spills and all are unacceptable in this otherwise pristine river drainage. Bonding for inevitable leaks, accidents, spills, won't mitigate for the poison that will likely pollute our water and land nearby and cause untold fish kills downstream. Possibilities of contamination from mining activities, which will create 446 million tons of potential acid generating and/or metal leaching materials and 161,095 sq. meters of open pit walls is way too risky. Mine access roads would cross 71 different streams, exposing each stream to the risk of hazardous material spills accidents, and increased sedimentation. The risk is just too great for this healthy river ecosystem to warrant this high intensity, highly risky project.

Impacts on Fish

The East Fork/South Fork of the Salmon River provides critical habitat for 3 Endangered Species Act listed fish species: chinook salmon, steelhead, and bull trout. According to the USFS website, the South Fork of the Salmon is designated as critical chinook salmon habitat. "Within critical habitat, an agency must avoid actions that destroy or adversely modify that critical habitat." The Stibnite Gold Project would significantly modify this critical habitat for chinook (and steelhead and bull trout). According to Alternative 2 (Midas Gold's proposal) of the DEIS, this project would destroy 20.8% of chinook salmon critical habitat and 27.5% of bull trout critical habitat in the analysis area. These are unacceptable losses for these already endangered fish and I urge you to protect them. All Action Alternatives in the DEIS would destroy and adversely modify the critical habitat of chinook salmon, steelhead, and bull trout. The idea of tunnels is completely ludicrous. This is not a viable option and definitely should not be seriously considered. You are talking about a natural healthy river corridor that meets the definition of wild and scenic designation and should be classified as such. The river contains pools, riffles, and runs in the proper functioning condition as well as healthy riparian habitat all of which makes this river corridor so important in providing high quality habitat for these listed fish species. Placing tunnels is irrational, unacceptable and counter to everything the forest service is responsible for in managing our public lands.

Impacts on Recreation

The South Fork Salmon River (and the East Fork South Fork) represent something incredibly special and unique to citizens in Idaho and throughout the country as well as internationally. This is a classic white water stretch of river that challenges the best of white water kayakers out there. Its is a true wilderness experience to lose this would be devastating. Whitewater paddlers and anglers travel from around the world to enjoy this irreplaceable unique river. In my experience as a biologist working on the restoration of habitat for listed fish and wildlife

species and living close to these waters in Hailey, ID, I am steeped in the culture of this river system. 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.

Impacts on Community

History shows that most mines have had accidents from small spills and contamination to large devastating tailings dam failures, I know I conducted the lengthy research for mine impacts in the upper Salmon River drainage and headwaters when I worked for US fish and Wildlife Service and wrote large biological opinions. Nothing has changed, we still continuously see accidents, leaks, dams that fail, which permanently damage natural areas. I am NOT just a part time resident, i live in Hailey full time and when the impacts of this project on the local communities are so great and so devastatingly ignored, it makes me wonder if anyone really thought about this at all. The general mining act of 1872 is completely outdated and most people in this country would not accept mining over protecting the important river and natural resources associated with these drainages.

In conclusion

Please choose the No Action Alternative and put the idea of mining in the South Fork of the Salmon river to bed permanently. It will never be acceptable to mine in this location, it is not worth the risk now or anytime in the future, the Salmon River drainage and all its tributaries are too great to destroy in any way. Please halt any work to move the Stibnite Mine Project forward.