

Data Submitted (UTC 11): 10/29/2020 5:14:23 AM

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Last name: Lake

Organization:

Title:

Comments: Thank you for the opportunity to submit comments on the Stibnite Gold Project EIS #50516. I have spent the majority of my life kayaking and rafting around the western United States. I enjoy our wild and scenic waterways and having been down the SF salmon three times it is one of my favorites! I have strong concerns over the details of the EIS with regard to water quality, impacts to wildlife, and impacts to culturally important land in the South Fork watershed.

1. Please extend the comment period to allow for greater public participation as many people are just learning about the proposed mine project and have a stake in the land and water quality of the South Fork.
 2. Process: The DEIS does not take a thorough look at all the applicable alternatives, and apply the needed environmental analysis to make a comprehensive decision. In particular, alternatives 3 & 4 do not have sufficient discussion of mitigation options to the environmental impacts listed. A project of such size and scope should include all possible alternatives in full detail.
 3. Fish: Cutthroat trout, bull trout, chinook salmon, and steelhead are all either listed or candidates for Endangered Species Act protection, and require cold, clear, free-flowing water to not only survive but to thrive. The Stibnite Gold mine will degrade the water quality and remove critical habitat for all of these fish, and will likely increase the water temperature considerably. In 2015 there was one of the largest mortality rates of freshwater fish due to extreme temperature increases, and those fish populations have still not recovered. Additionally, construction of the proposed tunnel would destroy habitat and as quoted by the DEIS "Even after close collaboration with NMFS, meeting passage criteria, and executing all adaptive management measures, there exists a reasonable probability that the project will not be able to volitionally pass fish safely, timely, or effectively." This is a failure for fish populations at a time when science continues to clearly state that fish will be hit harder through loss of snowpack and increasing water temperature.
 4. Wildlife: I am deeply concerned over the known chemicals in mining processes that will be ingested by water fowl, migrating birds, and local wildlife.
 5. Water Quality: History is laden with examples of pit mines that have breached their barriers and overflowed, and the DEIS itself notes that the West End pit is expected to overflow depending on spring rain conditions. This project is admittedly set up to fail. The construction of the pits and the construction materials (ie pit liners) need to be reevaluated before being considered by the Department of Environmental Quality.
 6. Recreation: As an avid rafter and member of the outdoor recreation community it is disheartening and concerning to have a project with such known water quality and wildlife impacts to be moving forward. The South Fork Salmon is part of a gorgeous and culturally significant landscape and watershed, and should be protected. The state must consider the financial cost to the local economy, the cultural land and resources that will be damaged by this project, and the legacy of degradation that will remain on the landscape after the mining is complete.
- The state has a clear opportunity to utilize the available science and require additional analysis and require Stibnite Gold to improve their plans to be consistent with the needs of endangered fish species, wildlife protection, and water quality standards year round through the life of the project.
- Thank you for your consideration.