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Organization: Immersion Research

Title:

Comments: My name is Max Blackburn and I am an avid outdoor recreation enthusiast and lover of the natural world. Whitewater kayaking is my preferred manner of recreation but I thoroughly enjoy fishing, mountain biking, mushroom hunting and hiking. I am also the sales manager of a paddlesports gear manufacturer that sells products all over the world and has physical locations in both Pennsylvania and Washington states. Our customers use the products we make to enhance their experience while paddling rivers and to make their experiences safer. One of the highest concentrations of whitewater enthusiasts and our customers happens to be in the state of Idaho. The South Fork of the Salmon River is famous amongst the whitewater community for its untouched wilderness, exciting rapids, pristine environment, and epic camping. It is also known for its pristine habitat that harbors a unique ecosystem for extraordinary plants and wildlife, in particular fish and aquatic species.

I have visited this canyon on a couple of occasions and each trip has been one of the more memorable experiences of my life. One particular trip where we started with 20 miles on the Secesh River which flows into the South Fork, then paddled 35 miles on the South Fork, then finished with 20 miles on the Main Salmon was one of the best 3 days I have ever spent on this planet. It is a trip that every human should have a chance to experience if they develop the skills and knowledge to do so.

The South Fork of the Salmon watershed and it's surrounding area is a fantastic example of public lands providing a balance between ecological preservation and low impact use from humans that drives a significant but sustainable tourism economy. I am concerned that the proposed Midas mine will jeopardize this fragile ecosystem and public health at the same time.

I am asking that the Forest Service create a Supplemental Draft Environmental Impact Statement for the relative agencies and public to review and have the opportunity to comment on in order to address all of the missing and incomplete information of the current DEIS.

It seems that there is a large amount of missing information, and the best way to capture that is with a supplemental DEIS. As a responsible agency that is involved with managing public resources, such as water quality and quantity, I ask that you please provide additional and relevant information that I will request in more detail below.

While I am also writing to support Alternative 5, the No Action Alternative outlined in the existing Stibnite Gold Project's Draft Environmental Impact Statement, the requested Supplemental Draft EIS is critical for an accurate review and assessment.

My concerns with this project are numerous but here a few that I feel are most significant:

According to the U.S.Forest Service, the South Fork Salmon River contains the most important remaining habitat for summer Chinook Salmon in the Columbia River basin. Bull Trout are a threatened species whose population

numbers are dwindling. Steelhead and Cut Throat Trout also call this watershed home and rely heavily on a functioning ecosystem.

The DEIS states that "the overall net effect will be a loss of both quality and quantity of salmon habitat compared to existing conditions and that the total habitat for bull trout decreases throughout the timeline of the project. Post closure there will be a net decrease in quality and quantity of bull trout habitat, despite removal of barriers."

With fishing season either being shortened or canceled in recent years because runs were already not sufficient, even without a mine in place, I am requesting more information on what will be done to ensure the protection and future populations of these precious species. The proposed Fish Tunnel is a poor excuse for a reclamation effort as the DEIS states "after close collaboration with other agencies, meeting passage criteria, and executing all adaptive management measures, there exists reasonable probability that the project won't be able to pass fish safely, timely, or effectively."

I also have concerns about the lack of an emergency plan should there be a cyanide spill while transporting it by truck through the South Fork valley and Burntlog Creek. The DEIS is severely lacking in contingency plans for this event, which anyone who has paid attention to past mining projects similar to this one, knows is an event likely to occur.

Lastly, I am concerned about the impact on long term environmental and economic health of the immediate region where this mine is proposed. While there may be short term benefits in terms of new employment opportunities, those will quickly disappear after the mine is done producing in a few years and the region will be left with a steep decline in water and air quality, a disrupted job market and a decimated wilderness area which was once a beacon for ecological and economic prosperity. The DEIS is severely lacking in measures of accountability to maintain environmental and public health measures after the project is complete.

Thank you for the consideration and for taking the time to read my comments.