Data Submitted (UTC 11): 10/28/2020 12:00:00 AM

First name: Kevin Last name: Heiner Organization:

Title:

Comments: While I also submitted letters to you, house and senate officials for Idaho and the Governor of Idaho through Idaho Rivers United, I wanted to write you a more personal letter because the South Fork (SF) Salmon is near and dear to my heart as one of the most special places I have traveled to, repeatedly.

I understand and appreciate the multifaceted mission of the USDA Forest Service. In my professional career, I work with FS employees each and every day to implement stewardship projects on public lands. I've come to really appreciate the men and women of the FS who have dedicated their careers in service of our legacy of public lands. In my opinion, while the NPS manages lands for preservation, education and uses now and in the future for the masses, the FS has a tougher job as resource extraction is a critical element of our economy and the FS must be able to provide for that use, while also providing for public access to a diminishing slate of wild areas due to the population growth and resource extraction.

However, in my personal life, I am a passionate whitewater adventurer. While balancing a family and a career in conservation, I have traveled the world in pursuit of the best expert and unsullied whitewater. Five years ago, I stumbled upon the SF Salmon as part of a trip organized by a close friend from Colorado (where we live in Durango) who knew Idaho better than I. That first trip down at high flows was life changing for me. The quality of the whitewater on that river ranks among the best in the world. I have since been back and on my second trip, we spent two nights camping in the SF Salmon Canyon and aside from the high quality whitewater we were all enamored with the quality of the wilderness, even finding an adolescent grizzly bear skull in one of our camps.

In my opinion, the SF Salmon is a river without parallel in Idaho or the broader USA. My understanding is that it underwent a large scale restoration effort after previous mining operations in the headwaters. I fear that despite the pro-environmental and restoration oriented claims of Midas Gold, the character of the SF Salmon will be irrevocably changed if this project moves forward as is. This would be a shame, because the river and region are becoming increasingly used by whitewater paddlers and anglers, as the high quality resource that it is is becoming more well known. In balancing the economics of this project, what consideration has been given to the fledgling recreation and tourism economy and its potential for growth? What about the unique wilderness characteristics that it offers?

The Stibnite Gold Project, and all Action Alternatives in the DEIS, would cause undue harm to ESA listed fish, the irreplaceable recreational values of the region, and indigenous resources.

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 impacts of the Stibnite Gold Project would extend beyond fish, however. The looming risks of large scale mining include acid mine drainage, tailings dams failures, and cyanide spills. 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 too risky. Additionally, mine access roads would cross 71 different streams, exposing each stream to the risk of hazardous material spills and increased sedimentation.

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 & Downstream; 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.

Please stop the Stibnite Mine Project.