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Organization:

Title:

Comments: My name is Ryan Holmes and I am an Idaho native and resident who has spent an immense amount of time in the Payette National Forest, specifically in the Salmon River Drainages. I am a Carpenter, Fisherman, Hunter, Whitewater Kayaker, and Professional Raft Guide in the great state of Idaho and a Ski Patrolman in Alta, UT and I am writing to express my extreme concern in regards to the potential environmental impacts of the proposed Stibnite Gold Project.

I would like to express my opposition to the project laid out by Midas Gold in their operational plans, as well as the USFS Draft EIS that was published in August of this year. Based on the extreme potential environmental impact posed by this project and a DEIS that does not give justice to a [ldquo]hard look doctrine[rdquo] when it comes to options 3&4, due process has not been performed and if this mine is permitted, it is likely that one of the treasures of this state will be irreversibly harmed.

The only acceptable option outlined in the DEIS is Alternative 5, the No Action Alternative.

The proposal from Midas Gold cites somewhat impressive numbers at first glance for the State of Idaho. However the creation of 500 jobs for 12 years is massively outweighed by the tens of thousands of professional outdoorsmen and women and outfitters who depend on the recreation economy to survive and share the beauty of our public land with so many people each year. The extraction industry consistently shows that there is one group of people who are considered in these endeavors. That is - the investors. With this in mind, the following evidence leads me to conclude that the No Action Alternative is the only option as these proposals are written.

Loss of Fish Habitat

The DEIS p. 3.12.1 describes 4 special status native salmonids that are threatened by this project, 3 of which are protected under the Endangered Species Act. While we have continued to make survival for these species difficult, the EFSF and South Fork Salmon are critical habitat for these fish. The proposed project does not carry the tune of restoration when over half of the mine footprint is in undisturbed habitat. In addition, the fish passage at Yellow Pine pit lake would initially be provided in the EFSFSR tunnel, then ultimately by backfilling the Yellow 5 Pine pit and building a new stream channel over the top of the backfill, thereby providing permanent fish passage through the area. The success of [ldquo]fish passage[rdquo] depends on the success of the tunnel, which is tentative, unproven, and lacking rationale.

It is the role of the USFS to protect these species and their habitat, instead of allowing them to be put at further risk. The potential for poisoned water, higher water temperatures and loss of habitat show that alternative 5 is the best option for the health of these native fish.

Water Quality

The South Fork Salmon and EFSF are free-flowing, wild rivers that provide habitat to Native Fish, resources to ranches and inhabitants of the Salmon River Corridor, and a clean beautiful water way for recreationalists in the State. The proposed plan to treat surface water in perpetuity to meet state water quality standards, relies on the assumption that the company mining the site will put money into a trust fund to support the operational costs to treat the water forever. This is not realistic and the impact from building new roads, increased heavy machinery traffic, and power supplies will be lasting. Now this expectation of care seems flawed in the ideal scenario, we just need to look to the recent spill of toxic mine waste near Silverton, CO and the devastating impacts to the Animas and San Juan Rivers. There is no place for a large scale mining operation at the headwaters of such a

critical river system. Alternative 5 is the only way to ensure that a similar large ecological disaster does not occur in our public land.

Hazardous Materials

The DEIS states that HAZMAT would be transported to and from the mine site. It should also acknowledge that would be accomplished by traveling through miles of public land and sensitive habitat. Given that these materials would be used and stored at the headwaters of such an impactful river system, who will be on site to ensure that no waste is allowed to contaminate the water ways? Who will be responsible to ensure that these hazardous wastes will be separate from community waste? What will you do with the hazardous waste and does the county have the ability to deal with it appropriately? And lastly, is the potential environmental clean up cost factored into the economic package that has been proposed.

Recreational Impacts

The South Salmon is a world-class whitewater experience and fishing stream, bringing paddlers and anglers from all over the world to this corner of Idaho, who actively support the local economy. As well, residents of Idaho scub as myself have always valued outdoor recreation as part of the reason they live here.

In Section 3.4.3.3.17 SOCIAL AND ECONOMIC CONDITIONS, the DEIS notes that [ldquo]Communities near the analysis area are rural and rely heavily on tourism and the trade industry to support their economies[rddquo] This project threatens the recreational opportunities and the tourism they generate for generations of Idahoans and visitors alike. Alternative 5 provides the best option for the future of outdoor recreation in Valley County. 500 jobs is not nearly enough to offset the growth and benefit recreation brings to Valley County.

Other Concerns

The socio-economic impact of this proposal is unlikely to bring as much positive influence to Valley County as Midas has stated. The DEIS prediction is a population increase of 438 new residents. There is already a current housing crisis. (4.21-11) 59% of Valley county households pay more than 30% of their income on housing. With population increase local housing demand will increase. There will be a greater scarcity of affordable housing and higher prices for real estate. The DEIS offers no mitigation for the exacerbation of this local crisis.

Additionally, No property taxes will be paid by Midas until after the SGP facilities are completed and the mining operations begin. As a result construction activities are expected to result in negligible tax revenue benefits for the local area[rddquo]s economy. (4.21-8) The federal government is expected to receive most of the total tax revenues resulting from operations. The state of Idaho is expected to get ten million dollars in tax revenue per year. Valley County is expected to get \$300,000 per year. The DEIS offers no strategy to offset the substantial costs that will be incurred by Valley County Tax Payers.

As you well know, the expansive mountainous region that surrounds the proposed mine site, all access roads, and proposed routes can receive substantial amounts of winter snow. With this, the concern for Avalanche Safety has not been properly addressed. I am a professional ski patroller and I have been actively performing avalanche mitigation and forecasting for many seasons. I have also been involved in avalanche rescue and recovery operations which strengthen my concern for the lack of attention that Midas has given this issue. The safety of construction teams, residents, and Midas employees has not been adequately considered in the google earth analysis.

In Conclusion:

I strongly oppose the Stibnite Gold Project and advocate for Alternative 5 of the DEIS, the No Action Alternative.

The potential cost and harm to another of Idaho's major free flowing ecosystems, and the lack of necessity for this project make it a clear misuse of public land.

Thank you for your work in protecting our National Forests and promoting healthy recreation, conservation, and employment.