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Organization: Earthworks

Title:

Comments: Hello,

I represent Earthworks, an organization dedicated to protecting communities and the environment from the adverse impacts of mineral and energy extraction while promoting sustainable solutions. Attached are comments from some of our over 40,000 supporters on this proposal. Thank you for the opportunity to comment on this project.

I am writing to urge your office to issue a Supplemental Draft Environmental Impact Statement for the Stibnite Gold Project. This project proposed to “[Auml][uacute]restore the site[Auml][ugrave] where prior mining impacts have occurred. Unfortunately, the DEIS itself indicates that there will be significant and permanent fish habitat loss. Vast amounts of land will be permanently destroyed by new mining activities. In addition, the new plan will require permanent water treatment to avoid polluting the East Fork of the South Fork of the Salmon River and its various tributaries, which could last thousands of years and cost billions of dollars. A major component missing from the DEIS was a study of underground mining as an alternative, rather than three open pits and hundreds of millions of tons of associated waste rock. The National Environmental Policy Act states that projects must minimize environmental impacts while also meeting the purpose and need for the project. Yet the current DEIS didn[Auml][ocirc]t even look at, let alone justify why, an underground mining alternative would be infeasible. The Forest Service must offer detailed justification as to why it never considered the one approach to mining that could eliminate most of the adverse impacts yet still allow gold to be mined. In addition, by failing to account for changing conditions due to climate change, the hydrologic analysis makes inaccurate assumptions about baseline conditions and future hydrologic conditions. Finally, the DEIS is incredibly difficult to evaluate, because all of the 1000+ supporting documents are listed in an unsearchable format, many of which lack the titles in the list of documents. This means that the public cannot find key references without scrolling through a list of 1000+ files with file names that often yield no indication of their content. The general structure of the DEIS is also highly counterintuitive and results in reviewers having ambiguities in content, and having to switch between multiple documents with no page numbers and a table of contents that is extremely difficult to navigate. For these reasons, I urge you to develop a Supplemental Draft Environmental Impact statement that corrects modeling flaws, studies an underground mining alternative, and presents the findings in a way that enables the public to evaluate meaningfully.

Attachment: 40,000 Form Letters

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