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Organization:

Title:

Comments: Dear Supervisor Jackson,

I am writing to comment on the Draft Environmental Impact Statement (DEIS) for the proposed Stibnite Gold Project (SGP) on the Payette and Boise National Forests. I have significant concerns with the proposed SGP. Hardrock mining has a long history in the United States of significant environmental impacts, followed by abandonment of mines and failure to remediate impacts once profitable ore has been extracted. Given its proposed location in the headwaters of the South Fork Salmon River watershed and its massive footprint, the SGP would likely result in substantial adverse impacts to imperiled salmonid populations, other aquatic fish and wildlife resources, recreation opportunities, and tribal subsistence and cultural practices. I encourage the Forest Service to adopt the No Action Alternative (my preference) or Alternative 4 in their Final EIS and Record of Decision. Below are my specific concerns regarding the SGP and DEIS.

* The DEIS demonstrates that the project will adversely impact Chinook Salmon, Steelhead Trout, and Bull Trout that are listed under the Endangered Species Act. Given the imperiled status of Snake River Spring/Summer Chinook, Snake River Steelhead, and Bull Trout, along with the critical habitat that the South Fork Salmon River watershed provides to these populations, the project represents an unacceptable risk to the viability of these populations.

* Because of its proposed location near the headwater of the South Fork Salmon River, any release of mine tailings or other toxic chemicals due to the SGP could spread downstream throughout the South Fork Salmon River and eventually into the mainstem Salmon River. Changes to water temperature and water chemistry due to the SGP will also propagate downstream. While the DEIS acknowledges the risk of downstream impacts, I think it underestimates the danger from low-probability but high impacts events that could result from a large release of toxic mine tailings, diesel fuel, or other chemicals associated with mining. This risk is particularly concerning given the large physical footprint of the proposed mining activities.

* Alternatives 1, 2, and 3 include construction of new roads within inventoried roadless areas. This road construction would be contrary to the National Forest Roadless rule and would likely result in adverse environmental impacts given the large and diverse environmental effects that road construction and use is documented to have. Additionally, once a road is constructed and an area of land is no longer considered a contiguous roadless area, additional road building would become easier. The final EIS should consider these types of secondary effects where initial development would make further development more likely.

* While it is not a Wild and Scenic River or entirely encompassed by designated wilderness, the South Fork Salmon River has many wilderness characteristics and is an exceptional recreation resource. In particular, the South Fork Salmon River provides world-class whitewater kayaking and rafting in a wild, remote setting. Releases of mine tailings or other toxic materials due to the SGP would impair the recreation value of this outstanding resource.

* Midas presents the SGP as an opportunity for "environmental restoration," despite acknowledging that the need for restoration is due to the previous history of mining. Mining is not the solution to mining.

* The DEIS specifies insufficient mechanisms for inclusion of tribal governments, or a measure of impacts specific to Native American people or tribes who use this region for fishing and hunting. This proposal would disproportionately impact local tribes with no mechanism described for mitigating for these disproportionate impacts.

* While Midas claims to incorporate a mitigation plan in accordance with the Presidential Memorandum Mitigating Impacts on Natural Resources from Development and Encouraging Related Private Investment, they do not provide details on what mitigation would entail or what "modern" mining techniques they would use to produce different outcomes from the past mines in the region, or ways that they would "avoid or minimize harm."

Thank for considering my comments and for incorporating my concerns into the Final Environmental Impact Statement and ultimate decision.

Sincerely,

Aaron David