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Comments: Monday, October 12, 2020

Linda Jackson

Payette National Forest

500 N Mission St. Building 2

McCall, ID 83638

Subject: Please issue a Supplemental Draft Environmental Impact Statement for the Stibnite Gold Project that will safeguard clean water and salmon habitat -- Stibnite Gold Project EIS #50516

To Payette National Forest Supervisor Linda Jackson:

I strongly urge your office to issue a Supplemental Draft Environmental Impact Statement for the Stibnite Gold Project. This project proposed to "restore the site" where prior mining impacts have occurred. Unfortunately, the Draft Environmental Impact Statement (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.

"Our duty to the whole, including to the unborn generations, bids us to restrain an unprincipled present-day minority from wasting the heritage of these unborn generations. The movement for the conservation of wildlife and the larger movement for the conservation of all our natural resources are essentially democratic in spirit, purpose and method."

-- Theodore Roosevelt

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'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.

"As we peer into society's future, we--you and I, and our government--must avoid the impulse to live only for today, plundering for our own ease and convenience the precious resources of tomorrow. We cannot mortgage the material assets of our grandchildren without risking the loss also of their political and spiritual heritage. We want democracy to survive for all generations to come, not to become the insolvent phantom of tomorrow."

-- Dwight D. Eisenhower

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.

"Earth provides enough to satisfy every man's need, but not every man's greed."

-- Mahatma Gandhi

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.

"Every man who appreciates the majesty and beauty of the wilderness and of wild life, should strike hands with the farsighted men who wish to preserve our material resources, in the effort to keep our forests and our game beasts, game-birds, and game-fish--indeed, all the living creatures of prairie and woodland and seashore--from wanton destruction. Above all, we should realize that the effort toward this end is essentially a democratic movement."

-- Theodore Roosevelt

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.

"A thing is right when it tends to preserve the integrity, stability, and beauty of the biotic community. It is wrong when it tends otherwise."

-- Aldo Leopold

Thank you for your consideration of my comments. Please do NOT add my name to your mailing list. I will learn about future developments on this issue from other sources.

Sincerely,