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Organization:

Title:

Comments: My name is Abraham Role. I grew up in Idaho and was raised on the wild rivers and mountains of Central and N. Central Idaho where I also have worked as a commercial whitewater river guide and now continue to enjoy recreation and the solitude afforded by Idaho's amazing rivers and mountains. The beauty of Idaho's intact wilderness and the healthy ecosystems managed by the US Forest Service are what make Idaho special. Unparalleled scenery and wild, free-flowing, largely pristine rivers are also the foundation of Idaho's most sustainable economy: recreational tourism. The South Fork of the Salmon (SFS) is not explicitly a popular recreational destination and is of lesser economic importance to the recreational tourism economy of Idaho. However, the SFS is a large and important tributary to the (Main) Salmon River and the health of the Salmon River, its fisheries, and its pristine and scenic qualities that drive an enormous recreational tourism economy is dependent on the continued protection and conservation management of the SFS. Furthermore, the SFS, while not particularly well-known or popular is one the most scenic, unique, and challenging stretches of whitewater in Idaho.

I am a citizen concerned about the continued health of the river and forest ecosystems in the headwaters of the South Fork of the Salmon River and therefore I am writing: 1) to ask the Forest Service to create a Supplemental Draft Environmental Impact Statement for the relative agencies and public to review and have the opportunity to comment on in order to address all of the missing and incomplete information of the current DEIS a small sample of which is discussed below, and 2) to support Alternative 5, the No Action Alternative, outlined in the existing Stibnite Gold Project's Draft Environmental Impact Statement.

First of all, in its current state, the DEIS is incomplete and a lack of important information impedes the public's ability, and the USFS's ability, to properly evaluate the significant adverse impacts of the Stibnite Gold Project. Extremely important information that MUST be included in the DEIS includes:

A mitigation plan for transporting cyanide into and along the SF Salmon River, and Burntlog and Johnson Creeks

Adequate information on the adequacy of the leak detection layer (for Alt. 2) / the functionality of the MicroDrain liner/leak configuration

Accurate information / and or a separate EIS for the impact of the construction of the tunnel Midas proposes. (While there may be the potential for long term benefits to threatened and endangered fish species, the short term impacts of the construction of this tunnel have not been adequately addressed)

Information on whether or not the public have access to this area and regional recreation / hunting access during mining operations ?

Information regarding funding agency staff etc. involved in monitoring and oversight of Midas's activities with regard to following legal codes and procedures (this project would require many highly trained individuals and an up-staffing at the USFS - where is funding for this required workforce?)

Information regarding future monitoring reports (which are already public documents). Will these be delivered honestly, and reliably and posted on a website for real time public access? ?

Information on accountability for Midas's mining practices

Information on accountability and future funding for restoration / mitigation projects when the mine becomes inactive ?

Secondly, after reviewing the DEIS I fully support Alternative No. 5[mdash]the No Action Alternative[mdash]because I strongly believe that the negative environmental and social impacts (largely omitted in the DEIS) strongly outweigh any positive economic or job-bolstering effects of Midas's proposed Stibnite Mine Project. The following is a brief list highlighting some of the most important reasons that I support the No Action Alternative:

- * Cyanide leach mining is a practice banned completely in the state of Montana (1998), Wisconsin (2001), 5 Colorado Counties (2004), and many other countries around the world related to a high affinity for failure and environmental destruction
- * Midas's claims that this is a reclamation project but the re-mining is a very small portion of the project; ultimately this is a proposal for a cyanide leach dam double the current size or more ?
- * All 4 of the alternatives contain 3 open pits & a giant tailings storage facility
- * There is no proposal for different configurations, smaller scale, or underground mining. ?
- * Mining underground contains less rock removal = less rock waste. ?
- * Mining as an open pit eventually turns into a pit lake which will 100% have a ?negative impact on water quality. ?
- * Dry mining - this could / should be considered when dealing with an environment ?sensitive to water quality and quantity. ?
- * There is no reclamation or mitigation plan: "no definitive plan in place" and this needs clarification in a supplemental DEIS ?
- * Midas continues to claim safe environmental practices but I cannot find an example / proof. Therefore the DEIS must include requirements for accountability for Midas in the form of binding legal documents
- * The DEIS predicts that 4 fish species (of concern) will be adversely affected by both water quality and/or quantity ?
- * Midas cites references to support the proposed tunnel but these references don't represent the fish species or the habitat present at the Stibnite Mine site
- * Even in the DEIS, there is not compelling evidence to refute concern that this mine will have a negative and permanent impact on the health of the downstream ecosystems (fishing, hunting etc.) and recreational landscape of the river corridors ?
- * There is a long history of mining companies going bankrupt and/or leaving sites in environmental distress / destruction requiring the use of federal funds (ie: Superfund Sites). ?This proposal must include binding legal documents that hold Midas[mdash]and any future entity charged with mining operations[mdash]accountable for future environmental cleanup.

In summary, based on the long history of mining practices, specifically regarding open-pit mining and cyanide leach mining, there is ample evidence to support the conclusions that: 1) there is a high probability that despite Midas's best intentions and promises there will be enduring and unalterable negative and permanent environmental impacts associated with the proposed project, 2) If an accident or incident occurs that causes environmental destruction or degradation, especially if Midas or future mine operators are not directly negligent (i.e. earthquake / storm or flood of unprecedented intensity), no person, corporation or entity will be held financially accountable for remediation or cleanup; explicitly, it is an irrefutable fact that the potential and magnitude of environmental destruction or degradation of the SF Salmon and the downstream resources is much, much greater if the 4 proposed alternatives are endorsed by the USFS versus the No Action Alternative,

and 3) in light of the aforementioned conclusions 1 and 2 above, the potential economic benefits touted by Midas to bolster support for their preferred alternative(s) would not be long term or sustainable economic benefits for Valley County or Idaho, and do not outweigh the risks associated with the proposed project moving forward within the scope of any of the 4 proposed alternatives.