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Organization:

Title:

Comments: To whom it may concern,

I am writing today to urge the Forest Service to conduct a Supplemental Draft Environmental Impact Statement (SDEIS) for the Stibnite Gold Project located in the headwaters of Idaho's South Fork Salmon River.

As an Idaho river guide, I care deeply about the protection of wild places, especially the pristine South Fork Salmon, which I have had the honor of rafting. As a pragmatist, I understand our modern society has come to rely on certain resources that need to be extracted. As a citizen of the United States, I believe we all agreed to a certain set of rules, and should all play by those same rules.

The current DEIS for the Stibnite Gold Project located in the headwaters of Idaho's South Fork Salmon River violates rules about what an environmental impact statement is meant to contain. Without sufficiently analyzing the potential environmental impacts or considering a reasonable range of alternatives for the proposed construction of this project, the current DEIS is unlawful.

(1) 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 (November 2015). However, they do not provide details on what "modern" mining techniques they are using that would produce different outcomes from the past mines in the region, or ways that they would "avoid or minimize harm." This is a very large proposed mine and while Midas is working with guidance from the Presidential Memorandum, the memorandum itself is very vague and leaves room for a great deal of environmental destruction.

(2) The plan completely fails to address mechanisms for specific inclusion of tribal governments, or a measure of impacts specific to Native American people or tribes who utilize this region for fishing and hunting. This proposal would disproportionately impact local tribes, and there is no mechanism to balance out that disproportionality.

(3) The plan describes wildlife habitat restoration, and certain protections for unnamed wildlife, fish, and birds, but neglects to specifically mention small mammal species who are at greatest risk for death/adverse health impacts from antimony runoff. Additionally, noise is predominantly discussed from the perspective of local human residents, the closest of which are ten miles away. However there is not sufficient detail to explain how animal habitat would be protected by increased noise. This would destroy the surrounding habitat for several species.

(4) The number of miles of new road is not stated. While there is some explanation of roads that will be maintained during initial construction and then connected, it is not clear how much roadless area will be permanently changed. This is a pristine wilderness area and any new roads dramatically alter wildlife habitat and the pristine nature of the wilderness.

(5) Deep and critical analysis of the environmental impacts caused by open pit mining is absent or otherwise unavailable to the public. The DEIS as it stands contains a summary chart of more than two full pages of incomplete or unavailable information which, by the Forest Service's own admission, are "deemed essential to a reasoned choice among alternatives" (Table 4.1-2).

(6) A reasonable alternative to open pit mining is underground mining. Underground mining has fewer environmental impacts and should have been considered. This was a massive oversight.

Please conduct a thorough Supplemental DEIS that addresses the following:

- (1) Specifics about "modern" mining techniques
- (2) Impacts to tribal fishing and hunting grounds
- (3) Impacts to and restoration of wildlife habitats, including noise impacts
- (4) Detailed attention to impacts from new roads
- (5) Completion of missing analysis and information necessary to understand potential impacts to water quality and wildlife (as outlined in DEIS table 4.1-2)
- (6) Consideration of underground mining as an alternative to open pit mining

Thank you for reviewing my comments.