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Organization:

Title:

Comments: To whom it may concern,

I am a property owner downstream of the proposed mine, with domestic water rights to the South Fork Salmon. I am also a scientist who specializes in quantifying the value people derive from nature. In looking through this DEIS, I don't see any evidence that the economic pros and cons of the Stibnite Gold Project have been adequately weighed. There is no analysis of the economic impacts to recreation, water use, or the salmon and trout fishery, and no cost-benefit analysis for the state or nation. By the government's own numbers, recreation is a much larger contributor to U.S. GDP than mining, and central Idaho is a mecca for recreationists of all kinds. I am a prime example - after decades of driving across the country to raft and fish Idaho rivers, I bought property there, registered a car, hired people to help me build, paid taxes and utilities, etc. I am there for river and wilderness recreation. I have floated the South Fork many times, watched as more and more people float past my cabin each year, and fully expect that soon their numbers will warrant a permit lottery to regulate use - the secret is out. These folks are but one segment of a rapidly growing recreation economy that supports vastly more local jobs, in perpetuity, than a 20-year mining project that imperils them.

In addition to the costs and benefits of this project if everything goes as planned, Idahoans and Americans need an honest assessment of the risks involved and their substantially larger costs. As someone who has spent a lot of time in the South Fork Salmon River Basin, I know that rain-on-snow events, particularly after a fire, commonly cause massive flooding and associated scouring of stream channels. The USFS has rebuilt many roads and bridges after such events. A liner sounds like a permanent feature, but I have seen floods in tributary watersheds scour 15 feet of channel bed in a day, carrying enormous boulders like pebbles. A liner doesn't stand a chance against such events, and a 400' tailings pile is subject to failure just like our hillsides. Such an event may have a low probability of occurrence, but it is by no means zero, and given the potentially catastrophic ecological and economic impacts, a risk analysis is more than warranted. No U.S. gold mine has ever completely avoided accidental releases, and with permanent tailing storage and water treatment facilities on site there will be a great deal of time for low-probability events to occur. These risks must be analyzed and weighed.

I am writing to urge the Forest Service to conduct a Supplemental Draft Environmental Impact Statement (SDEIS) for the Stibnite Gold Project. The current environmental review fails to adequately analyze environmental impacts resulting from construction of the proposed Stibnite Gold project or consider a reasonable range of alternatives, including their costs, benefits, and associated risks to the public domain.

Among its most serious flaws, the DEIS fails to consider underground mining operations as an alternative to massive open pit development or explain why such an alternative is infeasible. Underground mining operations would greatly reduce the most adverse environmental impacts and must be considered.

Critical analysis of the environmental impacts resulting from open pit mining operations is either missing entirely or inaccessible to the public. The DEIS itself 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).

Please conduct a thorough Supplemental DEIS that addresses the following:

- (1) The efficacy and longevity of the liner under the tailings impoundment
- (2) Completion of missing analysis and information necessary to understand potential impacts to water quality and wildlife (as outlined in DEIS table 4.1-2).

(3)An analysis of the economic and ecological risk of containment failures

Thank you for considering my comments.

Sincerely,

Darius Semmens