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Comments: To whom it may concern,

I do not think that the Draft Environmental Impact Statement (DEIS) for the Stibnite Gold Project reflects the mission of the Forest Service, "to meet the needs of present and future generations." The DEIS does not adequately investigate the impacts of the Stibnite Gold Project in the long term and the effects that this disturbance will have on future Forest users. I am an avid forest user for recreation and spiritual renewal as well as a resident of Idaho. I recognize that the Forest Service is mandated as a multiple-use agency and that many people use Forest lands for their livelihood. But if you think of the original mission of the Forest Service, to provide quality water to the people of the United States, this analysis does not adequately show that surface and groundwater will be protected after this project is complete. For this reason, and the reasons addressed below, I ask for additional analysis of the Stibnite Gold Project or for it to not be approved.

First, I believe that this analysis does not fully address the economic impacts to the local community. On page 3-4, it says that Midas Gold will commit to hiring local employees, yet they do not commit to a percentage of employees. Therefore, how can the Forest Service ensure that the mine will have the benefit suggested by the company to the rural community? Next, on page 3-4, the document states that the average construction wage is \$70,000. Yet in Table 3-1, it says that the average construction wage is \$33,247. Why do these figures not agree? There is not adequate consistency or citation in this section, therefore I believe that this analysis is unreliable and incomplete. Last, the analysis does not address the negative impacts that the project will have on tourism. How much money do tourism and recreation bring to the area? How many river miles will no longer be open to the same types of recreation? How will mining infrastructure impact visitation based on similar project areas within the National Forest System? These questions should be addressed before the economic impact can be assessed.

In addition, the Stibnite Gold Project does not protect the treaty rights of the Nez Perce Nation and other nations with rights to fish at usual and accustomed fishing stations, and to hunt, gather and graze livestock on open and unclaimed lands, all outside of the reservation boundary. I did not note a location in the DEIS where treaty rights or tribal consultation was discussed. The analysis should be considered incomplete until tribal consultation is documented within the statement and the treaty rights are upheld.

The project would improve some aspects of fish habitat. However, the overall project in the long term will damage the health of the river and landscape and therefore the treaty rights to fish and hunt. One way that the project will damage fish and game habitat is by drastically increasing disturbance to native, undisturbed Forest land. Seventy-two percent of the disturbance of the project that is on-Forest, outside of the private property owned by Midas Gold, lies on previously undisturbed ground (see page 14-39). This disturbance will drastically change the vegetation and the nature of the stream channels, adversely affecting fish and wildlife. The vegetation on reclaimed mines rarely matches the surrounding vegetation, changing how wildlife and game will use the lands. If there are differing views about post-reclamation vegetation growth, please include in analysis suitable examples of successful mining reclamation vegetation that matches native vegetation. Second, the altered stream channels as a part of the reclamation do not ensure that the water temperature will be appropriate for anadromous fish. The analysis needs to address what the likely temperatures will be for the reclaimed streams and if there are additional measures that can be taken besides increased vegetation cover if the streams are too warm for fish.

My next concern with the analysis is with the cover system that is proposed for the reclaimed and restored stream channels. First, what is the long-term life (i.e. 50-year, 100-year, 500-year) life of the system? The analysis needs to address the erosion rates of the streams and how the cover will respond to high-volume flood

events. In addition, it should be assessed if there are historic landslides upstream of the cover systems to judge whether debris flows are likely in the valleys. The vegetation growing on the liner, requisite for a health stream channel will reduce the integrity of the liner. There needs to be additional analysis of the proposed vegetation type on a geosynthetic cover and how it will perform in 50-years, 100-years, and 500-years.

My last major item of concern about the DEIS is the groundwater. Page 15-8 addresses groundwater contamination through monitoring yet monitoring once the project has begun will not predict the magnitude, during, or location of possible groundwater contamination to the area. It is therefore necessary to include a groundwater model in the analysis to deem inadequate. In the DEIS, there are no references to a groundwater model. Additionally, how can the groundwater contamination potential be fully addressed if the characteristics of the liner are not outlined in the analysis? Therefore, the required limits of infiltration of a liner should be stated, the degradation of the liner in a vegetated stream habitat should be predicted, and a groundwater model should be generated to predict what types of impacts the project could have.

My concerns about the analysis of the project relate to the economic impacts, treaty rights, fish and wildlife habitat, reclaimed and restored stream channel design, and groundwater modeling. I believe that the impacts to groundwater are the most demanding of additional analysis by the agencies before this project can be considered fully analyzed. In the analysis' current form, I do not think there is adequate proof that surface resources are left in a way that will meet the needs of future forest users. I thank you for your time and look forward to reading the agencies' response.

Sincerely,  
Mariah Radue