Data Submitted (UTC 11): 10/28/2020 5:25:43 AM
First name: Mariah
Last name: Radue
Organization:
Title:
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 Alternative 5, no action should be chosen.

Firstly, 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. The project should not be approved unless the treaty rights are upheld in the eyes of the US Government and Tribal Governments.

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. The majority of the disturbance of the project that is on-Forest, outside of the private property owned by Midas Gold, lies on previously undisturbed ground according to the PRO. 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 the additional 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 healthy 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. The long-term impacts to groundwater and surface water will be drastic and irreparable.

My concerns about the analysis of the project relate to the treaty rights, fish and wildlife habitat, reclaimed and restored stream channel design, and groundwater and surface water quality. I believe that the impacts to surface and ground water are the most demanding of additional analysis by the agencies before this project can be considered fully analyzed. In the analysis' current form, I urge you to choose No Action. There is not adequate proof that surface resources will left in a way that will meet the needs of future forest users. This project strives to restore an area in dire need of restoration. Yet, the negative impacts to streams outside of the historic mining is

not to the benefit to the American public as wild places become scarcer. I thank you for your time and look forward to reading the agencies' response.

Sincerely,
Mariah Radue