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Comments: I am writing to support Alternative 5, the No Action Alternative outlined in the Stibnite Gold Project's Draft Environmental Impact Statement. I am writing as a concerned citizen, specifically a recreational user of these public lands who values their current undiminished state, lands for which I am an owner of and for which the Forest Service is directed to manage in the public interest. As a resident of Washington State I make an annual pilgrimage to the area around Yellow Pine to paddle the rivers of the South Fork Salmon watershed which contain world class whitewater.

The DEIS clearly states that all of the alternatives presented, apart from Alternative 5, would adversely affect federally listed endangered fish species, their habitat, and the watershed's water quality and quantity. It is incredibly important to me personally that the Forest Service protects the outstanding water quality of this major tributary to the Wild and Scenic Salmon River, as this river system is vitally important for native and endangered fish, outdoor recreation, and the economic vitality of the local communities that surround it. Moving forward with this project would not only adversely impact my personal enjoyment of this public resource through whitewater paddling, camping and fishing, it would negatively impact all of the people of Idaho who rely on the hundreds of thousands of visitors each year to our National Forests.

The South Fork Salmon River is finally healing from the scars of past mining activity, and the impacts of expanded mining activity represent an unacceptable risk to this watershed. I am concerned that there is not any analysis in the DEIS of the effects of arsenic, mercury and other carcinogenic compounds stored in the pit lake water to migratory birds especially ESA protected species that could come into contact with these surface waters. The Migratory Bird Treaty Act prohibits actions that kill birds on the list of migratory bird species including incidental takes therefore the proposed action would result in unlawful takes of protected species. The plan to treat surface water in perpetuity to meet state water quality standards relies on an assumption that whatever company mines the site will put money into a trust fund to support the operational costs to treat the water forever. The infrastructure to do so (powerline, roads, treatment facilities) will remain forever. However, the contamination is modeled to still require treatment 100 years in the future. The DEIS assumes, without support, that chemical reactions causing contamination will slowly decrease to a point where contaminants will be below state standards. When this time comes is unknowable. Moreover, state water quality standards have equal chances of becoming stricter in the future as remaining the same. How can you plan to treat water to state standards in perpetuity when the state may enact more strict water quality rules at any time? The project also comes with the additional risks of tailings dam failure, acid mine drainage, and cyanide spills, none of which are accounted for in the DEIS. The fact that this project will create a perpetual environmental hazard (and infrastructure to manage that hazard) in the South Fork Salmon watershed proves without a doubt that the project impacts have a severity and duration that warrant special attention by the Federal government. The proposed action should result in an Environmentally Unsatisfactory rating under the EPA EIS rating system.

As a citizen that recreates in the South Fork Salmon watershed I am concerned at the lack of information in the DEIS regarding impacts to recreational users under the proposed action. The recreation section of the DEIS does not adequately address how recreation will be impacted in under the proposed action nor does it provide up to date sources in its description of uses. A more robust analysis of recreational uses in the South Fork Salmon watershed including surveys of year round users and meetings with recreational stakeholders would need to be conducted to adequately quantify impacts to the recreational user group. Alternative 5, the No Action Alternative is the preferred choice for recreational users. Additionally, the DEIS offers no analysis of the impact from commuting workers and trucks hauling supplies on Highway 55 or Highway 95 both of which are crucial corridors for recreational users to access the area.

South Fork Salmon River is not pristine, but it is wild, free-flowing, largely within public lands, undeveloped, and supports native fish. While all fish are of management interest, four special status native salmonids are of particular interest because of their status as federally-listed fish or fish of management concern. These all require cold, clear, clean, running water and varying unobstructed migration pathways to complete their life cycles. To

ensure viable and resilient fish habitat in the East Fork of the South Fork the most assured method is to "protect the best and restore the rest." Do not select an alternative that will put mining waste or build new roads in undisturbed habitat. Do not conduct activities that are likely to mobilize additional arsenic such as blasting waste rock and grinding rock into tailings. Do not bring millions of gallons of diesel fuel, cyanide and other chemicals into the watershed. I am concerned that the DEIS indicates that the Forest Service has preliminarily determined that project will adversely affect bull trout (pg. 4.12-87), Chinook salmon (pg. 4.12-69), steelhead (pg.4.12-75), and their critical habitats; and may indirectly impact Westslope cutthroat trout (pg. 4.12-93). The proposed action clearly has adverse impacts to ESA fish populations therefore I encourage the Forest Service to select Alternative 5, the No Action Alternative to protect the ESA fish populations and to protect the best fish habitat in the watershed by not allowing the proposed action to go forward.

The DEIS lacks specific information on how hazardous wastes from the site will be managed. What is the plan to insure that hazardous materials will be separate from community trash and garbage? Where will the community, industrial trash and garbage be hauled? How often will hazardous waste be shipped through recreational corridors and what are the plans for containment should a spill occur? The DEIS does not sufficiently present a plan under any proposed action that gives me confidence a spill could be contained and that waste will not accumulate on-site in potentially unsafe amounts. What will happen with the hazardous waste when it is removed from the site? Does the county have facilities to deal with it? There is not any discussion in the DEIS of emissions resulting from the hauling of industrial hazardous waste and garbage from the site.

The DEIS does not treat climate change in any comprehensive way. Given the upcoming presidential election and likely change in administration climate change requirements are surely to be a reinstated component in NEPA. NEPA clearly states in the opening paragraph:

"The Congress, recognizing the profound impact of man's activity on the interrelations of all components of the natural environment, particularly the profound influences of population growth, high-density urbanization, industrial expansion, resource exploitation, and new and expanding technological advances and recognizing further the critical importance of restoring and maintaining environmental quality to the overall welfare and development of man, declares that it is the continuing policy of the Federal Government, in cooperation with State and local governments, and other concerned public and private organizations, to use all practicable means and measures, including financial and technical assistance, in a manner calculated to foster and promote the general welfare, to create and maintain conditions under which man and nature can exist in productive harmony, and fulfill the social, economic, and other requirements of present and future generations of Americans."

All of this to say this final thing which is that the South Fork Salmon and the East Fork of the South Fork of the Salmon offer a unique river experience either by raft, cat boat, or kayak. I have traveled many places in the world to kayak and without a doubt the South Fork of the Salmon is my favorite place to kayak. The experience is second to none and the whitewater would not be the same if when the water splashed my face my eyes burned from mine tailings or I was nearly killed or maimed on the road by a truck hauling fuel or waste to or from the site or my view obscured by facilities, powerlines, or other structures put in place. Please keep this wild place and ensure that the watershed continue to recover from past mining operations by choosing Alternative 5, the No Action Alternative.