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Comments: I am writing to submit just the beginning of many concerns regarding the Stibnite GOLD Project. With its current content I am advocating strongly for Alternative 5, no action. I have outlined just a few of the most concerning topics below.

Native American Rights: What considerations have been taken into account of Nez Perce rights and positions on this proposal? Social-cultural and economic impacts intertwined with environmental impacts should be addressed in the DEIS. The executive summary does not specifically name any tribes (in particular land stolen in the land grab treaty of 1863) and the need to maintain the hunting and fishing lands of the Nez Perce tribe. Further, the 216 page plan document has ZERO 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. (The prefix trib as in tribe or tribal is used twice in the document, with no specific tribes named).

Fish: The DEIS p. 3.12.1 describes four special status fish and 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). 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 (i.e., fish in the family which includes salmon and trout) are of particular interest because of their status as 4 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. Chinook and bull trout are listed as threatened species. What are the implications of the Endangered Species Act in these circumstances? What considerations does the best available science recommend in order to maintain and protect these species?

Wildlife: 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, the plan includes a "wildlife mortality reporting tool" - thus acknowledging that this will kill wildlife...The goal would be NOT to kill wildlife, rather than have a tool to report the death of the wildlife.

Access: "The Payette National Forest did not offer printed copies of the DEIS to the general public; the Forest made the DEIS available in electronic form only. The failure to provide printed copies arbitrarily excludes a significant portion of the public from participation in the DEIS process. If a person doesn't have a good computer, reliable Internet service, and enough computer skill to negotiate the document - the DEIS is essentially unavailable. Additionally, it is well-documented that Internet access is much more limited for families that are low-income, rural, American Indian/Alaska Native, Black, or Latino, compared to more affluent white families. The Payette National Forest's failure to provide printed copies hinders public participation and is an abuse of discretion, discriminatory, and unethical. As someone with the privilege to voice my concerns here, I am doing so for those who have not been extended the opportunity. Additionally, the Stibnite Gold Project EIS #50516 Comment Page has been unresponsive most of the day today, and each of the other days that I have attempted to submit comments, further inhibiting public participation in the DEIS process.

These are just a few of the substantial implications that must be addressed before proceeding. Thank you for taking the time to understand these impacts and consider alternatives moving forward. Please incorporate these considerations into your considerations of the project. From my research, the adverse effects of Alternatives 1-4

are too great to even consider them.

Sincerely,  
Megan Degelsmith