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Organization:

Title:

Comments: Request for a Supplemental Draft Environmental Impact Statement on the Stibnite Gold Project EIS #50516

To who it may concern,

My name is Anna Bruno. As much as I hate the term, I am a professional whitewater kayaker, river lover, and outdoor educator. Much of my professional life has been spent on rivers around the world, using them to share the importance of protecting our environment and fostering personal growth in the next generation. In addition to my role as the Editor for Kayak Session Magazine, I have taught for World Class Academy, where I currently work as the Dean of Students and spent ten years running a youth development and whitewater kayaking summer camp for youth aged 11-18. I've seen first hand the environmental and societal value rivers have; in particular, the rivers of Idaho.

My first time on the South Fork Salmon was on a high water spring trip. My second was a low water summer. Both times, I was blown away by the beauty of the river canyon, and just "how good it was." Floating through the majestic canyons felt like a return to prehistoric times, and I would not have been surprised to see a slumbering dragon or rogue pterodactyl. Visiting the pictographs, I was struck by the river's long history and importance across populations. In the summer, when some of the best surf waves in the United States come in just downstream, I was shocked to see the community that forms along the river side. From rafters and families to high-level professional athletes, the Salmon River watershed is part of the lifeblood of Idaho.

I am writing to ask the Forest Service to create a Supplemental Draft Environmental Impact Statement for the relative agencies and public to review and have the opportunity to comment on in order to address all on the missing and incomplete information of the current DEIS, some of which I have highlighted below.

Incomplete and unavailable information impedes the public's ability, and the Services' ability to evaluate significant adverse impacts, whether environmental, social, or cultural.

Midas's current plan for mining practice could affect up to 3500 acres, only 880 of which are owned mining claims, the rest is on public land. The current DEIS does not adequately address either Reclamation or Mitigation. For example, the DEIS states that "information on the adequacy of the leak detection layer for Alternative 2 has not yet been provided" (Section 4.1-3). However, "the functionality of the MicroDrain liner/leak configuration proposed under Alternative 2 is a relatively new technology, thus adequacy of performance over long time frames has not been fully described" (Section 4.1-3).

This liner is critical in containing the millions of tons of toxic mining waste. If information is not publicly available about how well the liner will function or how long it will last, no reasonable determination can be made about the impacts to the affected environment and environmental consequences under Alternative 2. The Forest Service admits that this information is essential to a reasoned choice among alternatives. A Supplemental Draft Environmental Impact Statement should be developed disclosing the adequacy of the liner so that the public can review and comment on the relevant information.

Additionally, What is the mitigation plan for trucking cyanide in along South Fork Salmon, Burntlog Creek, and Johnson? The current DEIS lacks this significant information, which is necessary for review and consideration.

While the DEIS he 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 fails to address the associated economic and social impacts. Many in this region of Idaho depend and rely on economic vitality related to tourism and recreation and depend upon the integrated watershed of Salmon River systems and the hundreds of thousands of visitors each year to our National Forests. This number and economic benefits are growing immensely annually, with a recorded record number of visitors and related economic benefits in summer 2020.

It's not just the South Salmon. It's the Warm Lake Highway, Trail Creek, Johnson Creek, Burnt Log Creek, The East Fork South Fork, The Upper South Salmon, the Main Salmon, the Snake, and the Columbia.

As a responsible agency who is involved with managing public resources, such as water quality and quantity, I ask that you please extend your comment period. Please care for our public lands properly, by fully examining and sharing the potential consequences of this project with a supplemental draft environmental impact statement, and allowing the relative agencies and the public the opportunity to both review and comment.

Thank you,

Best,

Anna Bruno

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Anna P. Bruno

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