

Data Submitted (UTC 11): 5/30/2022 1:10:59 PM

First name: Susan

Last name: Marsh

Organization:

Title:

Comments: I was involved in the initial planning phases for this mine in the mid-80s, and it seemed then that the company in charge was very willing to work with the USFS to design the mine to have the least impact on the surrounding environment. Things have changed quite a bit since then, and the tailing/storage footprint is already much larger than I ever imagined it would be.

The hard rock mining industry's record on environmental responsibility is not what I would call sterling, even though technology has made some strides in preventing the kind of mess left around places like Cooke City. Yet many of the necessary construction and operation activities associated with a mine are inherently incompatible with the wild setting surrounding it. I'd like to see the USFS take some strong steps in permitting (such as requiring a bond and best management practices) to prevent, rather than to try to mitigate, any ill effects.

The necessity of preparing an EIS demonstrates that special circumstances exist and that not every impact can be mitigated. There is no doubt that the minerals being extracted from the area are necessary and important, and that the minerals such as those found in the Stillwater complex are relatively rare. Given this situation and the location of the mineral-bearing complex, it's important to meet multiple objectives in compliance with the standard in the forest plan.

The scoping document does not list preliminary issues, but the following are ones that I hope the forest will adequately address in the EIS.

Safety: according to the notice in the Federal Register, "public health and safety could potentially be impacted throughout the life of the mine." We have a pretty good idea of what this could mean, given the propensity of mining activities to create long-term problems both on site and downstream but specifically, what are the potential hazards of most concern and how will they be avoided? Of equal concern is the potential effect on public safety after the life of the mine is over. That seems to be the time period during which things are left to fend for themselves after mine closure.

Use of the area by the public: Will the three-fold increase in surface disturbance for mining-related operations displace other uses or reduce public enjoyment of the surrounding area, and what might be done to minimize the effects on scenic quality, noise, and other intrusions? Is increased traffic during construction and future operations a concern as far as public use of the forest road system, trails, and the East Boulder Campground?

Effects on an inventoried roadless area: It seems that the effect would be, as proposed, to make this roadless area smaller by allowing part of it to be developed. Will the intrusion into the roadless area have any effects on its integrity that cannot be prevented?

Surface and groundwater: Construction of the type and extent being proposed has significant potential to have negative effects on water quality. How does the USFS plan to regulate and bond the activities proposed to minimize the risk of damage to watershed resources?

Wildlife: The Federal Register notice suggests that construction and operations "could affect" wildlife species and habitats including fish such as Yellowstone cutthroat trout. Again, how does the USFS plan to regulate and bond the activities proposed to minimize the risk of damage to wildlife and fish habitat? Is one species of fish the only concern in the area?

Thanks for the opportunity to comment.

