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Organization:

Title:

Comments: To: Linda Jackson, Forest Supervisor

SUBJ: Project 50516 (Stibnite)

Please select the No Action Alternative to this project. The SDEIS documents the numerous negative impacts of this project that greatly outweigh the benefits.

The Purpose and Need does not indicate why this mining project is needed beyond the company's greed.

Everyone familiar with the area knows that the previous Stibnite project was an environmental disaster. The SDEIS acknowledges the past ongoing impacts and the scope of this new proposal is bigger than the previous mine.

The SDEIS identifies 3 species listed as threatened under the ESA. By your own admission, the water quality impacts being modeled "are associated with a degree of uncertainty." SDEIS at 4-175. The SDEIS indicates there "could be" or "may be" negative impacts to water quality or fish. The SDEIS admits there will be an increase in sediment. Of course there will; this is the Idaho Batholith. The soil is inherently unstable and highly erodeable. And you are going to divert a section of the East Fork of the South Fork Salmon River! And a fish tunnel!?!? We all know how successful fish passage has been on the Columbia and Snake Rivers. "Chinook salmon, steelhead, bull trout, and Westside cutthroat trout will be negatively impacted. You go so far as to say that bull trout may be excerpted in some stream reaches. This violates the law.

The DSEIS project states that the spill risk for hazardous materials would be long-term. You have an unfounded claim that a fuel or chemical spill "would likely be readily and cleaned up without any release to the environment." Then you admit that that a larger spill impact could be minor or major. Your over reliance on the contractors experts does not constitute the "hard look" that NEPA requires..

The SDEIS states that all action alternatives would (not just could) potentially leach major ions and other chemicals, including heavy metals that will negatively impact water quality. You just need to look at the past mining in the Silver Valley to see the long-term impact of heavy metals on the Coeur d'Alene River and Lake Corur d'Alene to see that these impacts can never be mitigated or cleaned up. These impacts will last for decades.

The impacts to other resources like recreation, Wilderness, Inventoried Roadless Areas, and the impacts from noise and traffic are unacceptable.

You have not met your obligation under NEPA to accurately disclose all impacts. Do I need to remind you that the CWA and ESA are substantive laws that must be complied with?

I urge you to reject this proposal. I also urge the USFWS and NOAA /NMFS to reject the proposal, issue an honest biological opinion, and deny any further approval of this project.

Thank you,

Rudy Verschoor