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First name: Aaron
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Organization:
Title:
Comments: Ms. Jackson,

Thanks for the opportunity to comment on the Stibnite Gold Project Supplemental Draft Environmental Impact Statement (SDEIS).

As a kayaker I have enjoyed paddling the South Fork of the Salmon and its tributaries for over 30 years. As someone who has paddled all over the world the quality and clarity of the whitewater is among the best anywhere. My family and I also enjoy the Salmon River downstream of the South Fork and the quality of experience and easy access provides the best family friendly river experience in the country. In addition - growing up in the Northwest - the salmon runs were part of our lives and the South Salmon was once among the most prolific salmon streams in the entire Columbia Basin. To do anything to jeopardize this unreplaceable resource or the opportunity to revitalize the salmon runs would be a disservice to our country and the natural world.

Therefore, I am writing to urge the Forest Service to conduct additional analysis for the Stibnite Gold Project. As detailed more below, the current SDEIS is not sufficient or lawful because it: (1) fails to adequately consider impacts to eligible, suitable, and congressionally designated Wild & Scenic Rivers or opportunities to mitigate impacts; (2) lacks key information and analysis necessary for an informed public review under the National Environmental Policy Act (NEPA); and (3) needs to consider a reasonable range of alternatives. Absent additional analysis, I do not believe that the most basic requirements of the NEPA will have been met.

Impacts to eligible, suitable, and congressionally designated Wild & Scenic Rivers have not been adequately considered. The SDEIS completely fails to address potential adverse impacts to the congressionally designated Main Salmon and Middle Fork Salmon rivers. Impacts to water quality in the South Fork Salmon River and its headwaters may negatively impact the Outstandingly Remarkable Values (ORVs) of the Main Salmon River. The Middle Fork Salmon River will likely be impacted, as the Burntlog access route uses significant portions of the high divide that separates the South Fork Salmon and Middle Fork Salmon River watersheds. Light, visual, water, and dust pollution may impact the scenery ORVs of the Middle Fork Salmon River. Additionally, three rivers within the project analysis area have been deemed to be eligible or suitable for inclusion in the National Wild and Scenic Rivers System: Burntlog Creek (eligible), Johnson Creek (eligible), and the South Fork Salmon River (suitable). While the SDEIS acknowledges that mining activities would adversely impact ORVs for water quality and fish, there is no consideration of mitigation measures to reduce impacts - such as graveling access roads to reduce sedimentation.

The SDEIS lacks key information and analysis necessary for an informed review as required by NEPA, including basic engineering specifications and analysis of the tailing's storage facility, sediment modeling, or detailed reclamation plans.

The SDEIS fails to consider a reasonable range of alternatives. The SDEIS only considers the mine applicant's proposed mine plan and no alternative action. This is not a reasonable range of alternatives. Please evaluate an alternative that utilizes underground mining operations rather than open-pit mining. Underground mining operations would greatly reduce the most adverse environmental impacts and must be considered. At minimum, the Forest Service should consider a third alternative that significantly reduces negative ecological impacts.

Finally, the Stibnite Gold Project will negatively impact the treaty-reserved rights of the Nez Perce Tribe and other indigenous peoples. The SDEIS clearly states that "Adverse impacts to tribal rights and interests under either

alternative, including preventing access to traditional lands, harming traditional fishing and hunting rights, impacting endangered salmon and concerns that it would harm the tribe's salmon restoration efforts".

Furthermore - with efforts underway to remove dams on the Lower Snake River that would reconnect the Columbia to its highest quality tributaries - the Salmon and South Salmon being among them - why should we do anything to undermine these efforts for the sake of one company's profits?

Please incorporate missing information and analysis necessary to make an informed decision among alternatives and allow additional time for public comment prior to issuance of a Final Environmental Impact Statement (FEIS) for the Stibnite Gold Project.

Thank you for reading this and for your attention to these matters.

Sincerely,

Aaron Pruzan
Wilson, WY